

From: [REDACTED]
To: [planningpolicy](#)
Subject: Representation regarding the Islington Local Plan Submission (Regulation 19) dated 5th September 2019
Date: 03 October 2019 15:45:40

**Representation regarding the Islington Local Plan Submission (Regulation 19)
dated 5th September 2019**

My representation concerns the inclusion of the former Highbury Vale Police station at 211 Blackstock Road in the Finsbury Park Town Centre and the negative impact this may have on the area and the local community. I believe taking the former police station out of the Finsbury Park Centre, by moving the boundary slightly, would safeguard against this.

The prime purpose of the Islington Town Centres is to safeguard Primary Shopping Centres by:

Local Plan policy R2:

- (i) Safeguarding against the loss of A1 space.
- (ii) Avoiding adverse impact on the vitality of the A1 use.
- (iii) Protection and stimulation of primary frontages.
- (iv) Avoiding harmful breaks in the continuity of the retail units.

The Finsbury Park Town Centre boundary map (figure 4.5 page 142) shows that the Town Centre area, which stretches out along Blackstock Road, ends just south of the former police station. The former police station is the most Southern building within the boundary of the Town Centre boundary.

The former police station has recently been converted to 6 dwellings at upper floors, and a number of commercial spaces at ground and basement level with designated planning uses A1, A2, B1, D1 and D2 (planning P2014/1294/FUL consented 9 April 2015).

From a cursory observation one might conclude that it is logical that the converted police station sits within the Finsbury Park Town Centre. However, point (iii) and (iv) highlight the fact that the former Highbury Vale police station is of a different nature than its neighbours, and that there are good reasons why the boundary should be moved to the other side of the building.

Firstly, the building clearly does not (and cannot because it is a listed building) have an active frontage. Secondly through its distinctive style and scale the building is very different from the rest of the buildings along this road. It seems to me that the boundary has been arbitrarily drawn south of the police station.

From an architectural and urban design point of view, moving the boundary to the other side of the building would be equally logical and justifiable.

The building is located (and forms a natural break) between the primary shopping area of the Finsbury Park Town Centre and the area of thriving small independent shops south of the site. Sadly by locating the former police station inside the Town Centre it jeopardizes the very existence of these small shops.

In 2016 the developer of the site sought planning permission to change the use of the large D1 unit into A1 (411 sqm). The plan was to have a Sainsbury Local convenient store at this location. Islington's reasons for refusing the application (P2016/1249/S73) and the appeal decision are instructive in explaining why the former police station should be taken out of the Finsbury Park Town Centre.

Islington planners refused the application arguing that:

"The proposal would introduce a retail unit (Use Class A1) of inappropriate scale that will adversely impact upon the character and function, and will not contribute positively to the vitality, viability and vibrancy of Finsbury Park Town Centre; and is therefore contrary to policy DM4.4 Part C of the Development Management Policies (2013)."

The Planning Inspector disagreed with this view stating in her appeal decision

that:

"Although the proposed unit would be more than twice the size of the average units within the Town Centre boundary, there are examples of other larger existing retail units within the Town Centre boundary, and as Finsbury Park Town Centre is a District Centre, a larger convenience store format would be appropriate to the scale of the centre. "

Luckily the application and a similar application submitted in 2018 were refused on traffic safety grounds. So the designated use class of the larger commercial unit is still D1.

In 2017 the All-Party Parliamentary Small Shops Group was set up to raise awareness of the positive economic and social contribution of small shops and the areas of public policy that affect them. In 2015 the Group published a report called High Street Britain concerning the long term prospects of the United Kingdom's small retail sector. The report confirms that high streets are losing small independent shops because of larger competitors such as Tesco and Sainsbury. The report summarizes:

"This report provides the analysis of the evidence, both written and oral, submitted to the Inquiry held by the All-Party Parliamentary Small Shops Group, entitled 'High Street Britain: 2015', concerning the long term prospects of the United Kingdom's small retail sector.

Concern for the future of traditional shopping areas arose amidst recognition from many in, and associated with, the retail industry: 'traditional' local small shops or independent convenience stores are disappearing rapidly.

Once a 'tipping point' is reached many small shops could be lost instantly as wholesalers no longer find it profitable to supply them, resulting in the urgent need for a review of the market.

The vast majority of contributors agreed that all small shops are important to, and influenced by, economic, social and political trends. The small retail sector is a key driver of: entrepreneurship, employment, skills, local economies, innovation, and sophisticated business networks, as well as accessibility to vital goods and services, diversity, social inclusion and community activities.

However, contributors are concerned by the intense pressure small shops face, from both market-led forces and external (macro-environmental) forces. Witnesses cite the aggression of larger competitors, distortion of the supply chain, the cost of property, crime, poor planning decisions, a lack of appropriate business support and disproportional regulatory burdens as problematic.

Their loss, largely the result of a heavily unbalanced trading environment, will damage the UK socially, economically and environmentally.

People (as consumers and members of communities) stand to be disadvantaged the most with restricted choice, entrenched social exclusion and a vulnerable supply chain caused by consolidation."

R1 clause E of the Local Plan seems to be designed to protect small shops against the mechanisms described in this report. It says:

"There are a number of other retail and leisure uses that provide a valuable service to local communities but are not within specifically designated areas. These dispersed uses, particularly within A1 and A3 use classes, must be protected. "

The planning application did not consider the impact on the small independent traders immediately south of the site. Unfortunately neither the planning officer nor the planning inspector picked up on this, although real danger exist that the viability of these shops would be adversely affected if a larger convenience store owned by a large supermarket company such as Sainsbury would locate in the former police station. Traditional' local small shops or independent

convenience stores could disappear because they won't be able to compete. This must be avoided because, as the retail report rightly points out: *"the small retail sector is a key driver of entrepreneurship, employment, skills, local economies, innovation, and sophisticated business networks, as well as accessibility to vital goods and services, diversity, social inclusion and community activities."*

Conclusion

1. Currently the former Highbury Vale Police Station is in the Finsbury Park Town Centre. Because of this it has been successfully argued on planning policy grounds that a larger convenience store is an appropriate use at this location.
2. However, there is a real threat that a larger convenience store at this location would adversely affect the viability of the small independent shops south of the site through the mechanisms set out in the summary of the High Street Britain Report.
3. Protecting traditional' local small shops and independent convenience stores and helping them to survive and thrive is very important because they play a vital role in the community.
4. Policy R2 concerns the protection of A1 retail in Primary Shopping Areas. This policy seems to carry more weight, at least in practice, then Policy R1 clause E, which is designed to protect vital A1 and A3 uses outside these areas.
5. It is therefore necessary, in order to be able to effectively protect the small independent shops along Blackstock Road located south of the former police station, to take the former Highbury Vale police station out of the Town Centre.
6. This would be achieved by altering the boundary map (fig 4.5 page 142) by moving the boundary to the north side of the building. Moving the boundary will not change anything else because the police station is the most southern building within the Town Centre boundary.

I believe that this small but important change to the Finsbury Park Town Centre boundary will have a long lasting and positive impact on the success of the area.

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