

Planning and Development  
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[www.islington.gov.uk](http://www.islington.gov.uk)

Planning Inspectors:  
Jonathan Manning and Christa Masters  
c/o Programme Officer, Ms Edwards

Your ref: INS05/INS06  
Our ref: LBI04

7 October 2020

Dear Inspectors,

**Re: LB Islington update on response to fifth (INS05) and sixth (INS06) letters from Inspectors**

**INS05: Housing supply and IIA**

Thank you for your fifth letter (document reference INS05) where you set out your outstanding concerns in relation to housing supply and the IIA. We are writing to provide an update on progress on the issues raised and indication of future timetable.

The council would like to thank the Inspectors for suggesting options for the way forward on addressing housing supply concerns. Having considered these the council is minded to put forward additional allocations alongside increased housing numbers from a small number of existing allocations are likely to give greater comfort in relation to the principle of development and the deliverability of housing sites both in terms of the 5 year supply and beyond. Potential additional sites include housing estates owned by the council as well as other Registered Providers (RPs) of social housing, and over the summer months we had positive and proactive discussions with the landowners in respect of potential additional sites. In order to allocate housing estates which may be suitable for significant additional housing development, and to bring projects forward earlier than anticipated, there will need to be a period of meaningful engagement with residents to ensure they are empowered and participate positively in the process, in line with the relevant guidance by MHCLG. It is important that the Local Plan consultation is appropriately aligned with this residents' engagement in order to support rather than potentially jeopardise future housing delivery. The restrictions put in place by Covid-19 have had an impact on this residents' engagement process.

During July and August we undertook the annual starts and completions survey of planning permissions. This will provide an updated picture of delivery on sites with planning permission within the context of the Covid-19 pandemic. This information will be used to provide an update to the council's housing trajectory.

The council's initial view of the implications of the Covid-19 pandemic on housing delivery locally in Islington is that there is no discernible effect at this stage. The initial evidence from the starts and completions survey is that progress on sites which have implemented permissions has continued at a rate we would expect. In addition, whilst the total number of planning applications received in April 2020 fell by 36% compared to the same month in 2019, over the six month period from March to end of August 2020 the overall fall in applications was only 16%. The most recent figures for August are encouraging and showing a return to levels of activity seen in the same month in 2019. The council will continue to monitor to ensure that this level of activity continues. The Council is of the view that additional five-year supply is not necessary at this point in time but will keep the situation under review.

### **Sustainability Appraisal/Strategic Environmental Assessment**

Thank you for your comments on the IIA. Following careful reflection the council will undertake further work to address the points you have raised.

The council propose to consult on updates to the IIA alongside modifications to Site Allocations mentioned above.

The Council is also exploring the option of seeking consultancy support to undertake a 'critical friend' review of the IIA.

### **INS06: – Implications of recent Use Class regulatory changes**

In the letter dated 4 August you asked for the council's view on the potential implications of recent regulatory changes, in particular the impact of changes to the Town and Country Planning (Use Classes) Order 1987. Following an initial review of the plan within the context of these changes, the council are of the view that some changes are likely to be necessary to the plan including to, Chapter 4 of the Strategic and Development Management Policies.

Given that main modifications are expected to the plan in respect of housing supply matters, additional changes to effected policies can be consulted on in the same exercise.

In addition to the IIA work required in response to the Inspectors' questions, the implications arising from the introduction of Class E will also need to be carefully considered, and the IIA will look to explore and assess a range of potential policy options holistically.

### **Next steps.**

The council estimates the additional work required to address the issues raised in INS05 and INS06 holistically would take 2-3 months. Given the extent of the changes we are also of the view that the proposed modifications should be approved by Full Council before they can be consulted on. The earliest date this could happen would be February 2021. Based on Full

Council approval we would then undertake public consultation on the changes to the Draft Local Plan for a 6 week period and would expect to submit the main modifications together with consultation responses and any other relevant documents in Spring 2021.

We would like to reiterate that we are keen to progress with the Examination as soon as possible but given the context we consider that the timescales proposed are realistic. We are also keen to understand if the Inspectors consider the above approach appropriate in light of the issues they have raised.

Please let me know if you have any questions regarding the above.

Yours sincerely

*J Gibb*

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Islington Council