

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0001	Site Allocations	BC8: Old Street roundabout area	B & C: City Fringe Opportunity Area			Resident	Respondent objects to plans to remove the gyratory at Old Street and to provide more public space, referring to these plans as 'high foolishness'. Respondent believes that the works will increase traffic congestion and pollution in the local area. Questions the desirability of additional open space near roads. Does not think the plans for Old Street will improve conditions for cyclists.	Object	The Old Street roundabout project is a separate project to the Islington Local Plan. It is being led by TfL in partnership with Islington Council. The scheme is subject to a separate planning application, which has been granted and for which construction works are underway. The Council believes that the scheme will reduce local pollution and significantly improve conditions for walking and cycling in the area. Over the longer term the changes are unlikely to significantly worsen traffic congestion in the area due to the principle of induced demand. The proposal offers an opportunity to secure open space in a borough where such space is currently poorly provided per head of population.
R19.0002	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.	Object	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
R19.0003	Bunhill and Clerkenwell Area Action Plan			N/A - general comment		Resident	Believes that developers are destroying communities in a search for profit. Believes that there is no consideration for development on a human scale. Concedes that people need homes and jobs but not the homes and jobs provided by the plan. Believes that the plan will result in 'could be anywhere' architecture.	Object	The Local Plan (particularly the Bunhill and Clerkenwell AAP and Strategic and Development Management Policies) has a strong emphasis on development contributing positively to the character, scale and massing of the setting as well as protecting the historic environment and views. The plan also takes a proactive approach to planning for tall buildings ensuring that they are only built in identified locations where they are acceptable in design terms.
R19.0004	Bunhill and Clerkenwell Area Action Plan			N/A - general comment		Resident	Concern about rubbish in the street and lack of waste storage in many properties. Concern about the impact of new development on traffic and parking. Need to prioritise the ongoing maintenance of public open spaces. Concern about the redevelopment of Telfer House damaging nearby street trees. Concern about light pollution, in particular caused by the development at King's Square.	Not stated	Policy T3 of the Development Management Policies requires that all new development will be car free. Policy ST2 on waste requires that all new development must provide waste and recycling facilities. Maintenance of existing public open spaces is not a Local Plan issue, however the Council will continue to maintain open spaces. Policy G4 requires that all developments minimise impacts on existing trees.
R19.0005	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.	Object	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
R19.0005	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury		Resident	Policy BC7 F is not consistent with NPPF policies 96 and 97 as they allocated housing on the Finsbury Leisure Centre site, reducing open space, space for sport, and recreation facilities. There is a deficiency of open space according to the Open Space, Sport and Recreation Study 2009.	Object	BC7 reflects the site allocation which requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
R19.0006	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0007	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0008	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0009	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0010	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0011	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Cllr Sue Lukes	Councillor	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0012	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Business	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0013	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Business	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0014	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Cllr Carolie Russell	Councillor	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0015	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0016	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.

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R19.0017	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0018	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.	Object	A response to the suggested boundary change is provided in the retail topic paper. The Council does not consider that the boundary change is justified.
R19.0019	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Strongly support allocation. The prison is a constant source of anti-social behaviour and is no longer fit for purpose due to its poor state of repair and overcrowding. There is a real need for more housing in the area, particularly larger flats (2 bedroom +) and small houses. Limiting car parking at the site will reduce pollution. Any new development should include large green areas and trees; retain the important heritage of the site and its buildings; have a commitment to education, youth inclusion and artistic endeavour - it could be a major educational/cultural space for Islington. The drainage in the area will need improvements.	Support	Support noted. The respondents aspirations for housing, reduced car parking and preservation of the heritage importance of the site accord with the Council's own. The allocation requires some community use at the site, the exact nature of this will be assessed as part of the planning application process.
R19.0020	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support allocation. Prisons like Pentonville are no longer suitable in cities like London; it is a source of anti-social and criminal behaviour. Housing is urgently required.	Support	Support noted.
R19.0021	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Fully support allocation to replace the prison with housing. The prison building does not seem fit for purpose and holding long-term inmates in central London seems ridiculous. There is a desperate need for schemes which add more social and affordable housing to London.	Support	Support noted.
R19.0022	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. Believe the proposed uses would be ideal for the area although adding additional council housing could exacerbate the problems on Caledonian Road. The area needs investment from small businesses, who will only come if they feel safe and secure. The area needs a holistic approach to attract a diverse range of people to the Cally.	Support	Support noted.
R19.0023	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. The prison is noisy and a source of constant disturbance.	Support	Support noted.
R19.0024	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. Redevelopment will improve the inclusivity of Caledonian Road, and open up the site with a residential and community focused structure that can hopefully be enjoyed by all. The prison itself has very poor facilities, so it could benefit the prison infrastructure to have a modern, purpose built site that can more easily accommodate and rehabilitate the inmates.	Support	Support noted.
R19.0025	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. Islington Council should put pressure on the Ministry of Justice to bring forward a timetable for the development of the site, which should be planned and built in parallel with the Holloway Prison site. The development should include affordable housing and through routes and green space for Islington residents. The site should connect with Caledonian Estate considering the history of the estate with the prison.	Support	Support noted.
R19.0026	Site Allocations	ARCH3: Archway Central Methodist Hall, Archway Close	Archway		Flowervale UK Ltd	Landowner	The site should be allocated for B1 office use and/or general town centre uses as there is no evidence of need for its use as a cultural hub and very significant doubt that it would be deliverable for such a use. The structural condition of the site is such that it is unlikely to be economically viable to refurbish and restore it for cultural or community use. The restrictive covenants on the site also mean it is unlikely to be used for leisure/cultural uses. In addition there is no evidence of need for further cultural facilities in Archway. The council's evidence base identifies the priority need for office floorspace which would be appropriate in this location. Amendment to ownership details requested.	Object	The Site Allocations topic paper discusses this site, the landowner's representations and the Council's response. Ownership details will be amended as a minor modification to the Local Plan.
R19.0026	Strategic and Development Management Policies			Policy R10: Culture and the Night Time Economy	Flowervale UK Ltd	Landowner	Flowervale objects to the designation of Archway as a Cultural Quarter in Policy R10 and the support given in Policy SP7 to Archway's designation as a Cultural Quarter. There is no justification or evidence base to support cultural provision in Archway being expanded or for there being a broader level of cultural activity in Archway which should be enhanced. Delete all references to the designation of Archway as a Cultural Quarter and/or to the use of the Methodist Hall [the Main Hall] as a cultural hub.	Object	The retail topic paper sets out the justification for the cultural quarter.
R19.0026	Strategic and Development Management Policies			Policy SP7: Archway	Flowervale UK Ltd	Landowner	Flowervale objects to the designation of Archway as a Cultural Quarter in Policy R10 and the support given in Policy SP7 to Archway's designation as a Cultural Quarter. There is no justification or evidence base to support cultural provision in Archway being expanded or for there being a broader level of cultural activity in Archway which should be enhanced. Delete all references to the designation of Archway as a Cultural Quarter and/or to the use of the Methodist Hall [the Main Hall] as a cultural hub.	Object	The retail topic paper sets out the justification for the cultural quarter.
R19.0027	Site Allocations	FP13: Tesco, 103-115 Stroud Green Road	Finsbury Park			Resident	Response to Reg. 18 consultation still relevant. Sceptical that the allocation details the full extent of the council's knowledge about Tesco's plans for the site. It is likely the site will be commercial at ground floor with flats above. As the Plan indicates there should be a minimum 18m distance between habitable rooms, new homes should be dual aspect and have private outdoor space, it seems likely that any development of the site will lead to an undisclosed number of flats, some with balconies, overlooking the respondent's home and garden and reducing their light. Home should be a place of retreat for existing residents, not just new ones.	Not stated	Site Allocations identify potential sites for development and assign appropriate uses for that site based on evidenced need. Proposals which do come forward would need to be consistent with an allocation and various policies in the Local Plan. Residents and stakeholders will be able to comment on planning applications as they come forward for each site. The housing need in Islington is acute and therefore all suitable opportunities for new housing should be prioritised. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing infrastructure would also be considered, as would impact on heritage assets, levels of daylight and sunlight and any other relevant consideration. Proposals will need to be of a high quality in line with specific design criteria and standards
R19.0028	Site Allocations	FP13: Tesco, 103-115 Stroud Green Road	Finsbury Park			Resident	Response to Reg. 18 consultation still relevant (concerned that allocation is inappropriately frontloading community consultation to the benefit of the landowner; development of the site will affect respondent's privacy and light). Dissatisfied with the way recent development around Finsbury Park Station has disregarded and inconvenienced residents and commuters. This does not inspire confidence in future plans and the council's ability to consider the views of residents.	Object	Site Allocations identify potential sites for development and assign appropriate uses for that site based on evidenced need. Proposals which do come forward would need to be consistent with an allocation and various policies in the Local Plan. Residents and stakeholders will be able to comment on planning applications as they come forward for each site. The housing need in Islington is acute and therefore all suitable opportunities for new housing should be prioritised. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing infrastructure would also be considered, as would impact on heritage assets, levels of daylight and sunlight and any other relevant consideration. Proposals will need to be of a high quality in line with specific design criteria and standards.
R19.0029	Site Allocations	AUS3: Electricity substation, 84-89 White Lion Street	Angel and Upper Street			Landowner	Given the site's prime location and proximity to Angel Station, there are more potentially more valuable uses, such as residential, hotel, student accommodation etc. that are not included in the allocation. Believe the value of the site would be maximised with retail on the ground floor, and either residential, hotel or student accommodation above. The allocation does not refer to the height of a prospective development, there would be added value in increasing the number of storeys on the site as it is currently low for the local area.	Not stated	Site Allocations identify potential sites for development and assign appropriate uses for that site based on evidenced need. This site is both within the Central Activities Zone and Angel Town Centre. To meet Islington's need for 400,000sqm business floorspace, business use has to be prioritised in appropriate locations such as this one. The height of a prospective development, and other detailed design matters, should be assessed as part of the planning application process and not addressed in a site allocation.

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R19.0030	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	Building on sports pitches is counter to Sport England's interests, and they will be lobbied by users of the pitches and leisure centre facilities. Reducing facilities does not promote wider health and wellbeing initiatives. Public space on the site is minimised in the proposals, which show defensive spaces and dense development which will be conducive to anti-social behaviour. Universities are funded through significant prescribed fee income and University estates departments are financially incentivised to create their own estate, Finsbury leisure Centre Facilities and public open space should not be sacrificed on this basis.	Object	All four football pitches will be re-provided as part of the new leisure centre. Although the football pitches will reduce in size, they will remain 5-a-side pitches, and will meet Sport England standards. The draft design allows potential for two pitches to be joined together for multi-pitch use for larger events or youth coaching sessions. The design proposals have not yet been completed and the exact area of public space has not been determined. The project aims to deliver more high quality public spaces around the new leisure centre, including a new square on Paton Street and a new open space between the leisure and residential buildings. The layout of the public spaces will also realign Norman Street and Paton Street, creating a more direct pedestrian route between Central Street and St Luke's Gardens. There will be improved green space, new tree planting and a selection of play facilities and new seating. The relevance of the respondent's reference to universities is unclear as the site is owned by LB Islington.
R19.0031	Site Allocations	FP14: Andover Estate	Finsbury Park			Resident	Suggests that the existing green space bounded by Roth Walk has value and the potential to be an attractive space to rest/play with some upkeep. Plans to build on the space have safety implications. Permeability would be affected by the provision of a building in front of the walkway which provides the only access to Roth Walk, or if the plan is for residents of the new building to share the walkway with Roth Walk residents it could create grave danger in the event of fire or other emergency.	Not stated	The Local Plan has policies to protect and promote open space, and protect residential amenity. The allocation is based on the uses permitted by the planning application, which will require further reserved matters permission for future phase(s); this will involve further consultation with residents. The process is being managed by the council's housing department.
R19.0032	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway			Resident	Decking over the railway and building above it would be destructive to residents in the vicinity of the site who have already had to endure significant disruption due to the Overground extension works at the Station and more recently the Highbury Corner works. Building over the railway lines to the west of the station would result in overlooking and the loss of light to people's homes and gardens.	Object	The allocation is suitable in principle. The Local Plan contains policies to protect residential amenity.
R19.0033	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway			Resident	The concept of decking above the platforms is totally unacceptable, and potentially an impossible task without demolishing properties on Court Gardens. Residents have already endured years of disruptive works related to Highbury and Islington Station. Development would put local streets into shadow and block historic uninterrupted views towards Union Chapel. The Station building itself does need upgrading, and the provision of a low level development above the concourse could be advantageous.	Object	The allocation is suitable in principle. The Local Plan contains policies to protect residential amenity.
R19.0034	Site Allocations	KC5: Belle Isle Frontage, land on the east side of York Way	King's Cross and Pentonville Road		HS1 Ltd	Landowner	Welcomes the site's allocation as a site suitable for a development of up to 15 storeys. However feel that the site lends itself primarily to residential use with potentially a small proportion of business floorspace on lower levels, rather than office-led development. Question whether it is correct to refer to the northern part of the Kings Cross development as an office cluster. This area is predominantly in residential/ student accommodation use. Modern noise abatement technology means it is possible to build residential accommodation adjacent to railway lines. Request the allocation is amended to include residential use with business use at lower levels.	Both	Office floor space is an evidenced need and LBI consider the site's location near King's Cross station and the Central Activities Zone provides a strong basis for business use. The site could act to denote the end of the King's Cross cluster and start of the industrial uses to the north.
R19.0035	Site Allocations	KC6: 8 All Saints Street	King's Cross and Pentonville Road		BMO Real Partners	Developer	Suggest the allocation boundary is extended to include the adjacent building - Bacta House, 6 All Saints Street - or that Bacta House is referred to in the development considerations as having potential for limited intensification. It is not considered that Bacta House's locally listed status should necessarily prevent small scale/limited intensification to create additional employment floorspace.	Support	It is not considered that the site boundary should be amended as, given its locally listed status, development potential at Bacta House would be extremely limited.
R19.0036	Site Allocations	AUS9: 10-14 White Lion Street	Angel and Upper Street		National Grid	Statutory consultee	The site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.	Not stated	The allocation specifically refers to the presence of National Grid infrastructure in the development considerations and states that National Grid should be consulted on any development which may affect the cables.
R19.0036	Site Allocations	AUS10: 1-9 White Lion Street	Angel and Upper Street		National Grid	Statutory consultee	The site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.	Not stated	The allocation specifically refers to the presence of National Grid infrastructure in the development considerations and states that National Grid should be consulted on any development which may affect the cables.
R19.0036	Site Allocations	AUS13: N1 Centre, Parkfield Street	Angel and Upper Street		National Grid	Statutory consultee	The site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.	Not stated	The allocation specifically refers to the presence of National Grid infrastructure in the development considerations and states that National Grid should be consulted on any development which may affect the cables.
R19.0036	Site Allocations	AUS1: Royal Bank of Scotland, Regents House, 40-42 Islington High Street	Angel and Upper Street		National Grid	Statutory consultee	The site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.	Not stated	The allocation specifically refers to the presence of National Grid infrastructure in the development considerations and states that National Grid should be consulted on any development which may affect the cables.
R19.0036	Site Allocations	NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road	Nag's Head and Holloway		National Grid	Statutory consultee	The site is crossed by, or in close proximity to, a National Grid high voltage electricity transmission underground cable. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.	Not stated	The allocation specifically refers to the presence of National Grid infrastructure in the development considerations and states that National Grid should be consulted on any development which may affect the cable.
R19.0037	Site Allocations	NH12: 379-391 Camden Road and 341-345 Holloway Road	Nag's Head and Holloway			Resident	Makes claim that an influx of migrants has changed the landscape of Holloway Road/Seven Sisters Road, the area where the respondent grew up. Concerned about the impact of development on: privacy, the environment, light, noise, dust, vibration, vehicle movements, sleep disturbance, health, quality of life and devaluation of property. Suggestion that quality of life in the area is poor and the proposed allocations will bring thousands of people to the area which will create more problems.	Object	Islington have significant development needs for new housing and employment. Nag's Head is a Town Centre location and is suitable for new development. The evidence base underpinning the Local Plan includes consideration of the cumulative impact of new development on infrastructure. The comment about the influx of migrants is a view that is unevidenced and contrary to the Council's values.
R19.0038	Site Allocations	OIS4: 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green	Other Important Sites			Landowner	The owner has no intention of bringing the site forward for development during the Plan period and therefore the continuing allocation of the site in its current form is contrary to guidance set out in the NPPF (para.120). The allocation is not deliverable, illustrated by the fact it was not developed during the earlier Plan period. Suggest 1 Kingsland Road should be removed from the wider site allocation, as other uses would be more appropriate there.	Object	The land ownership details will be updated through modifications.  The council considers that its decision to carry the existing allocation forward into the new Local Plan is reasonable. NPPF paragraph 120 is only applicable when there is no reasonable prospect of an application coming forward. The landowner's declaration does not preclude the development of the site during the Plan period, nor does the fact that the site has not yet come forward for development. A landowner has a vested interest in a site not being allocated as it restricts what can be developed on the site. If the landowner has bought the site solely for investment opportunity as claimed, the existence of the allocation places no additional burden on the operation of the site as it would not restrict, in any way, the existing use.
R19.0039	Site Allocations	AUS7: 1-7 Torrens Street	Angel and Upper Street			Resident	The building (7 Torrens Street) was at one time a multi-story stable block with specially designed stairs so that the horses could be walked up to various floors. I would be disappointed to think that it would be pulled down and consider it to be probably the only one of its type left [even in the UK]. It should be carefully re-purposed – it would make a great artisan centre and fit in very well with the Angel image.	Not stated	The allocation envisages the refurbishment rather than redevelopment of the site with retention of the existing arts spaces.
R19.0040	Site Allocations	BC10: 254-262 Old Street (east of roundabout)	B & C: City Fringe Opportunity Area		Chandler Bars Group Limited and Hornbee Limited	Landowner	Landowner considers the public house at 262-264 Old Street has architectural and historical value that is important to the local street scene. The site offers leisure facilities and licensed premises that add to the vibrancy of the area, and specifically the late-night economy. It also adds to the commercial viability and vitality of the area. There is no need for development of the premises, any development of adjacent properties should incorporate the public house.	Not stated	The site is located within the Central Activities Zone and the City Fringe Opportunity Area and is an appropriate location for office development. The allocation also includes potential for ground floor leisure, retail or other active commercial uses. The Local Plan contains policies to protect Public Houses that have social value, contribute to the cultural fabric of the borough and/or contribute to the economy of the borough, particularly the night-time economy.
R19.0041	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway		London & New York Ltd	Business	Support the allocation but consider it substantially underplays the site's redevelopment potential. Suggest the site has potential for buildings taller than 12 storeys (as identified in the Tall Buildings Study) as it has a high PTAL; is a major transport interchange; has no strategic or local viewing corridors crossing the site; is close to an existing 15-storey tower; and is not in a Conservation Area or close to listed buildings. The site should be considered for a tall tower subject to design considerations, which would enable a greater mix of uses including residential, which the NPPF states plays an important role in ensuring the vitality of town centres.	Object	The council's approach to tall buildings is informed by detailed evidence and is in line with the draft London Plan. The tall buildings topic paper provides further information.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0042	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road			Resident	The allocation should clearly state that 10 All Saints Street is three buildings - 10a, b and c - all of which are locally listed. Historic England should be consulted about any proposed development as the site is partially in, and adjacent to, a Conservation Area and is larger than 1,000sqm. It is requested that the council develop an Urban Design Framework/Supplementary Planning Document for the site given its sensitivity and difficult planning history. Would like to reiterate the importance of the restrictions in the allocation regarding limited intensification, small-scale commercial uses, and the need to respect neighbouring residential amenity.	Not stated	It is not necessary to include reference to Historic England in individual allocations as they count among a number of statutory consultees that the council is required to consult. An urban design framework is not considered necessary as the Local Plan and its supplementary guidance already has detailed design requirements. The allocation wording should ensure adverse impacts on residents are mitigated/prevented.
R19.0042	Site Allocations	KC7: All Saints Triangle, Caledonian Road	King's Cross and Pentonville Road			Resident	Reference to protecting residential amenity should be made in the development considerations. The current building on the site is low, so any taller building will have a negative impact on local residents. The allocation should state that any development should respect the amenity of neighbouring residential properties, including 1-3 All Saints Street/Killick Street, Caledonian Road and Ice Wharf.	Not stated	The Plan has robust policies seeking to protect residential amenity, which will be assessed as part of the planning application process for any development proposals. It is not considered necessary to amend the allocation.
R19.0043	Site Allocations	NH6: 11-13 Benwell Road	Nag's Head and Holloway		Clearwell Creek Properties Ltd	Landowner	Suggest the allocation wording is deleted and replaced with the wording from the 2013 Site Allocation (reference HC4). Removal of support for residential conversion and infill development fails to optimise development potential in the area, in conflict with the NPPF. As the borough does not have a healthy housing supply or up-to-date housing position, it should not delete existing sites allocated for housing. No justification is provided for the change to the allocation.	Object	The representations assert that the amended allocation removes the potential of the site to achieve residential infill development. As the allocation states that an element of residential development is acceptable at the site, it is unclear how they have reached this conclusion. Similarly, the representations suggest that Islington does not have an up-to-date housing position or healthy housing supply, which is incorrect; this is discussed further in the housing topic paper. Regardless of this, the council's evidence base also shows a need to significantly increase the amount of business floorspace in the borough by 2036 and this site was formerly in business use, which the allocation expects to be reprovided.
R19.0044	Site Allocations	OIS15: Athenaeum Court, 94 Highbury New Park	Other Important Sites			Resident	Concerned about the impact development of the site may have on: residential properties to the south; trees; the living conditions of residents of Orwell Court; listed buildings and the Conservation Area; security; landscaping and amenity space.	Object	The objections raised in the representations relate to a specific planning application, which has since been withdrawn. The representations do not object to the principle of development at the site. Amenity and design matters, should be assessed as part of the planning application process and not addressed in a site allocation.
R19.0045	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway			Resident	In favour of bringing the existing building back into use but feel the proposals seek to overuse the space available, resulting in cramped, poorly proportioned development. The overall density should be reduced. Concerned that building directly adjacent to Whitehall Mansions poses a serious fire risk, and may undermine the structural integrity of the old Whitehall Mansions buildings. Construction and occupation of the site likely to create significant noise pollution. The current cycle path should be preserved and consideration given to cycling throughout.	Both	The allocation is acceptable in principle. The detailed concerns of the respondent relate to proposals for the site which will be assessed as part of the planning application process. The Local Plan contains policies that protect residential amenity and support cycling in the borough.
R19.0046	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway			Resident	In favour of bringing the existing building back into use but feel the proposals seek to overuse the space available, resulting in cramped, poorly proportioned development. The overall density should be reduced. Concerned that building directly adjacent to Whitehall Mansions poses a serious fire risk, and may undermine the structural integrity of the old Whitehall Mansions buildings. Construction and occupation of the site likely to create significant noise pollution. The current cycle path should be preserved and consideration given to cycling throughout.	Both	The allocation is acceptable in principle. The detailed concerns of the respondent relate to proposals for the site which will be assessed as part of the planning application process. The Local Plan contains policies that protect residential amenity and support cycling in the borough.
R19.0047	Site Allocations	ARCH11: Dwell House, 619-639 Holloway Road	Archway			Resident	Respondent's home overhangs the site and they are affected by its use on a daily basis. Any redevelopment of the site should be sensitive to this fact.	Not stated	Comments noted. The Local Plan contains policies aimed at protecting residential amenity.
R19.0048	Site Allocations	AUS1: Royal Bank of Scotland, Regents House, 40-42 Islington High Street	Angel and Upper Street		Prudential Retirement Income Limited	Landowner	Acknowledge the requirement for offices on the site but feel the allocation should be amended to allow for a wider range of uses, including residential and hotel development. This would accord with the Local Plan's aim to ensure that each development makes the most of every site and development opportunity.	Not stated	This site is both within the Central Activities Zone and Angel Town Centre. To meet Islington's need for 400,000sqm of business floorspace, business use has to be prioritised in appropriate locations such as this one.
R19.0049	Site Allocations	AUS7: 1-7 Torrens Street	Angel and Upper Street		Chartered Institute of Architectural Technologists	Business	Welcome the review of the site, particularly the potential to develop the unsightly Angel Underground Station entrance. However, a number of things should be taken into consideration: the tube line runs directly underneath the site; the architectural integrity of the warehouse to the rear of Torrens Street; the structural impacts on nearby Georgian terrace properties which are built with no or limited foundations; all Party Wall Act requirements above and below ground; access both in construction and in use; light, noise and pollution both during and after construction; no overdevelopment; health, safety and fire prevention guidelines; the need to carry out an archaeological assessment prior to any construction.	Support	The allocation is acceptable in principle. Any proposals for the site will be assessed through the formal planning process using the policies of the Local Plan which include protecting heritage assets, high quality design and protecting residential amenity.
R19.0050	Site Allocations	BC7: 198-208 Old Street (petrol station)	B & C: City Fringe Opportunity Area		Shell U.K. Limited	Business	Regarding – Shell Old Street Service Station, 198-208 Old Street, EC1V 9FR, Shell UK seeks reassurance that the Local Plan will allow the retention of the petrol filling station use, potentially supplemented by emerging technologies including EV charging.	Not stated	There is no provision in the site allocation or other local plan policies to retain petrol filling stations. The allocation states: "Redevelopment of the petrol station to provide a new building comprising retail/leisure uses at ground floor level with office uses above." The Council would be in principle supportive of a redevelopment of this site where the filling station is removed and redeveloped with retail or leisure uses at ground floor, providing additional floorspace for these uses and an improved urban environment. The Local Plan also aims to support a move away from use of private motor vehicles and toward walking, cycling, and public transport. While electric vehicle charging points may be useful these may also be provided on the street where vehicles may be left to charge overnight.
R19.0051	Site Allocations	BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	B & C: City Fringe Opportunity Area		UBS c/o Reef Group	Landowner	The allocation acknowledges the extant planning permission but states that if the site is subject to revised or new proposals the council will seek office development with affordable workspace and small-scale business uses. The allocation should not ignore the consented position in terms of alternative uses for the site. The council's position on over-concentration of hotel uses has not been evidenced and is contrary to London Plan policy. Also, presenting the site as one entity and not taking into account the differing land ownerships could represent delivery issues and result in no office development coming forward. The public benefits associated with a mixed-use development are greater than just a single office use, including public access to the listed vaults and public realm improvements.	Object	Restriction of visitor accommodation is necessary in order to meet other priority development needs - further discussion is provided in the retail leisure and services culture and visitor accommodation topic paper. The council's policy requirements have evolved in response to changes to its evidence base, and its approach to visitor accommodation has been supported by the GLA. Hotel development can be delivered on the site as per the terms of the extant permission. However, it is appropriate that any revised or new proposals submitted should be subject to updated policy requirements which reflect updated evidence. The site is located within the Central Activities Zone where the Local Plan expresses a clear priority for office space.
R19.0052	Site Allocations	BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street	B & C: Historic Clerkenwell		Omenport Developments Limited	Landowner	Please can the allocation record that planning permission P112478 has not lapsed, it has been implemented and is currently under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. The timescale should be amended to read 2021/22.	Not stated	Permission status will be updated through modifications. Hotel development can be delivered on the site as per the terms of the extant permission. However, it is appropriate that any revised or new proposals submitted should be subject to updated policy requirements which reflect updated evidence. The site is located within the CAZ where the Local Plan expresses a clear priority for office space. The timescales given in the DPD reflect the council's expectation that the site will be developed in the first five years of the 15 year plan period, which is supported by the representations.
R19.0053	Site Allocations	BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street	B & C: Central Finsbury			Resident	Residents consented to the scheme on the basis that it involved improvement works, not flat out development. The site designations/constraints section should state that the execution of improvement works should minimise negative impacts on existing residents. The development considerations should include the preservation of the architectural expression of existing buildings, security improvements and intensification of green space. Proceeds from the sale of new private dwellings should be used for the refurbishment of all communal areas of the estate and any remaining balance used for future refurbishment/maintenance.	Not stated	The site allocation reflects the extant planning permission for the site. The council has policies in place to protect residential amenity during construction works. The use of funds generated by the development of the site is not relevant to the site allocation.
R19.0054	Site Allocations	BC47: Braithwaite House and Quaker Court, Bunhill Row	B & C: Central Finsbury			Resident	Not opposed to development in principle to provide much needed housing and welcomes the fact that Islington's Housing Service will carry out the development instead of a private developer. Concerned that the allocation commits to nothing more in landscaping terms than 'possible landscaping improvements to Quaker Gardens'. The proposed development will result in the reduction of much of the podium space that is a vital recreation space for local people, especially children. It is imperative that meaningful improvements are made to the space that remains. The allocation should require a landscaping strategy to be developed in consultation with residents.	Both	The Plan has robust policies seeking to protect the borough's open space and residential amenity, which will be assessed as part of the planning application process for any development proposals. It is not considered necessary to amend the allocation.
R19.0055	Site Allocations	FP5: 1 Prah Road	Finsbury Park			Resident	The site has been falling into disrepair over the past 15 years or so. More recently the garden has become the focus of anti-social behaviour, day and night, with people openly dealing and taking drugs and soliciting. The high wall at the front of the site is cracked and potentially dangerous. The site is close to the recent council housing development at Vaudeville Court and it would be great if something similar could be done at Prah Road.	Not stated	The allocation supports the council's intention that the site is brought back into use within the Plan period. It is located within Finsbury Park Town Centre and considered appropriate for commercial development.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0056	Site Allocations	FP9: 221-233 Seven Sisters Road	Finsbury Park		Alan Nagle	Landowner	Generally supportive of the allocated uses and the potential highlighted in the Tall Buildings Study for a local landmark building on the site. Feel that the allocation is positively prepared and consistent with national policy in line with NPPF para. 35, however unless the allocation indicates the approximate scale of town centre uses and business floorspace and quantum of residential units envisaged for the site it is unlikely to be 'effective'.	Support	Indicative capacities are not included within individual allocations as the quantum of development suitable would depend on a number of variables, including assessment against criteria in policy DH3. This is also consistent with the design-led approach set out in Policy PLAN1. The Site Allocations topic paper provides further detail on the quantum of development. The council does not consider that this is inconsistent with the requirements of NPPF paragraph 35.
R19.0057	Site Allocations	FP15: 216-220 Seven Sisters Road	Finsbury Park		Universal Church of the Kingdom of God	Landowner	Asks for the allocation to be removed from the DPD as there are plans for the site, which is in private ownership.	Object	The representations indicate that the site is likely to come forward soon, which provides evidence that it is deliverable. Many of the sites allocated in the DPD are in private ownership, this does not make them unsuitable for allocation.
R19.0058	Site Allocations	KC2: 176-178 York Way & 57-65 Randell's Road	King's Cross and Pentonville Road		Transeuropean Carriage Company	Landowner	Consider the site boundary should be amended to exclude 57-65 Randell's Road as it has an extant, implemented planning permission and is unlikely to come forward as part of the 176-178 York Way site. Recognise that any future applications must take the implemented Randell's Road permission into account. Any development must deliver a satisfactory engineering solution to the issue of the railway tunnels directly beneath the site. This is costly, which is partially relieved by the identification of the site as potentially suitable for a tall building. However the current 'business-led' allocation could lead to a cumbersome design in the attempt to reconcile the need for height and slender form with the larger floorplates required by offices. Seek a more flexible mix of uses to enable the delivery of a viable and attractive scheme.	Not stated	Randell's Road is considered appropriate for inclusion within the boundary given the opportunity it offers for more holistic development; inclusion would not preclude sites coming forward in piecemeal way however. An element of residential may be suitable at the site, as set out in the allocation, but the council's need for additional business floor space warrants a business-led development in this location. Business floorspace is viable in this location. The potential design issues discussed in the representations are not relevant to the principle of the site allocation and should be explored as part of any proposals for the site.
R19.0059	Site Allocations	HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner	Highbury Corner and Lower Holloway			Resident	The derelict 1904 station should be preserved and reused as a new ticket hall if at all possible. Concerned that the Garage could be lost - easy to see retention being subject to a viability assessment. It is a rare live music venue in Islington. New exits from Highbury & Islington Station to the north side of Holloway Road and to Highbury Crescent would be welcome.	Not stated	Comments noted. The Local Plan contains policies aimed at protecting cultural uses.
R19.0059	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway			Resident	Welcomes the allocation as parts of the site are very delapidated, and the station building provides an embarrassing gateway to a historic and lively area. Suggests the Marie Curie building could be demolished; the site boundary expanded to include the Victorian terrace up to the corner of St. Paul's Road and Corsica Street which could do with revamping, better retail space and the provision of access to the new space above the railway line if achieved. A pocket park between Highbury Place and Corsica Street would be interesting.	Support	Support noted. The allocation is focused on vacant land adjacent to and over the railway. The suggested extension to the site boundary to include the Victorian terrace on St. Paul's Road is not considered necessary or in keeping with the rest of the allocation. The allocation requires public realm improvements, which will be consulted on as part of any planning application process.
R19.0059	Site Allocations	HC4: Dixon Clark Court, Canonbury Road	Highbury Corner and Lower Holloway			Resident	There is no justification for car parking spaces in such proximity to a tube station and goes against other borough policies in encouraging public transport use.	Not stated	The existing use of the site includes car parking but the extant planning permission for the site, which is reflected in the allocation, involves the removal of car parking spaces in order to provide additional housing as well as community space and public realm improvements.
R19.0060	Site Allocations	N/A - general comment	Nag's Head and Holloway			Resident	Site allocations NH1 to NH13 go directly against the council's Transport Strategy which claims to support a greener Islington. The proposed works would create an environmentally disastrous new area as a result of the disruption, noise and influx of vehicles and people. The proposed tall buildings will destroy views, create bad drafts and wind tunnels, and set a precedent that could destroy the conservation area. There is no mention of environmental mitigation and no assessment of the overall environmental impact of the allocations. The plans are misguided and directed at dismantling historic views.	Object	The council approach to tall buildings is supported by detailed evidence. Identified sites are suitable in principle but any application must meet criteria in policy DH3, which includes a number of considerations including assessment of amenity and environmental impacts. Impacts on protected strategic and local views were considered as part of the Tall Buildings Study. The council takes climate change seriously and is committed to ensuring that Islington's contribution to climate change is reduced as far as possible and the Plan contains comprehensive policies relating to sustainable design.
R19.0061	Site Allocations	NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road	Nag's Head and Holloway		Kawal and Nancy International Limited	Landowner	Support the principle of the allocation but consider that the evidence base has not provided a robust justification for the capped height within the allocation (15 storeys). Suggest that the allocation is amended to remove the somewhat arbitrary height limit. Believe the existing and draft allocations have affected the deliverability of the site and should be revised to allow for piecemeal development to take place across the site.	Both	Islington considers that its approach to tall buildings is informed by detailed evidence, as set out in the Tall Buildings Study, and is consistent with the London Plan. The tall buildings topic paper provides further information. The site allocation highlights the potential for the site to deliver a significant mixed-use development but acknowledges that it is in multiple ownership. The council does not consider that the allocation precludes individual sites within the wider site boundary from coming forward for development.
R19.0062	Site Allocations	NH4: Territorial Army Centre, 65-69 Parkhurst Road	Nag's Head and Holloway		Fairview New Homes Ltd	Landowner	Strongly support the site allocation. Residential development of the site will contribute towards the significant need for new housing identified in the draft Local Plan, including the particular need for affordable housing. The landowner is committed to delivering the comprehensive redevelopment of the site and their emerging proposals directly accord with the site allocation. Expecting to submit proposals in the first quarter of 2020.	Support	Development update and support noted.
R19.0063	Site Allocations	OIS5: Bush Industrial Estate, Station Road	Nag's Head and Holloway		Royal Mail Group Limited	Business	Support the protection of industrial uses (B1c, B2 and B8) and the proposed intensification of the site for non-office based, traditional employment uses. The continued availability of suitable accommodation is essential in allowing Royal Mail to fulfil its statutory duty to collect and deliver letters six days a week. Their operation at Bush Industrial Estate involves long working days, seven days a week and requires a fleet of 53 delivery vehicles. They need to be accommodated within an industrial setting due to the potential for disturbance associated with this level of activity. The development considerations should be explicit that the estate should meet the parking needs of its occupiers and that encroachment of residential uses could reduce the ability of the site to provide accommodation to those who operate outside of standard working hours.	Support	Support noted. The council considers that the existing wording of the allocation is sufficient to protect against residential encroachment onto the site, and supports the delivery and servicing needs of the site's occupiers. Other Local Plan policies such as PLAN1 would also apply to any future planning application.
R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	FFI is community group comprised of people who live, work and study in Islington and are committed to taking positive action to mitigate climate change at a local level. We have previously successfully lobbied Islington Council to agree to divest its pension fund from fossil fuels and to declare a Climate Emergency. FFI note IPCC report; consider that Islington Council, as a relatively affluent and technologically advanced government body, must be ambitious in implementing radical cuts to carbon emissions. Islington Council must set an example for other government bodies, both within the UK and internationally, to emulate as to how to rapidly decarbonise a community. Planning policy is a crucial way of achieving this. FFI highlight the climate emergency motion passed by Islington Council on 27 June 2019 and note that every decision made by Islington Council that has any relevance to carbon emissions (which should include the making of the Local Plan and all planning decisions) must be consistent with the 2030 net zero emissions target	Not stated	The sustainability topic paper provides further detail on the interaction between the Local Plan and climate emergency motion. Importantly, the motion itself is not binding on planning policy, and it makes no formal commitment to a 2030 target.
R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	FFI's primary concern is that the Local Plan refers to making all buildings in Islington net zero carbon by 2050. The Local Plan must reflect the motion passed by the Council on 27 June 2019 for the Council "to work towards making Islington net zero carbon by 2030". The Local Plan as currently drafted, in referring to a 2050 rather than a 2030 net zero target, is clearly inconsistent with the Council's own motion and therefore the Local Plan must be amended. Further, the net zero carbon target is only referred to in Chapter 6 "Sustainable Design" and only in relation to buildings. However, the net zero by 2030 motion passed on 27 June 2019 did not just relate to buildings, but referred to making Islington net zero carbon by 2030. Therefore, the 2030 target must be embedded in the entirety of the Local Plan, such as in the provisions relating to an inclusive economy, transport and sustainable design. The fact that the sustainability sections are towards the end of the Local Plan also suggests these issues have less importance, thus the order of the policies should be entirely reshuffled. As the Council has acknowledged we are in a climate emergency, it must put sustainability, fostering and protecting ecology, green economy issues and energy efficient housing at the forefront of the Local Plan.	Object	The sustainability topic paper provides further detail on the interaction between the Local Plan and climate emergency motion. Importantly, the motion itself is not binding on planning policy, and it makes no formal commitment to a 2030 target.  The Local Plan should be read as a whole; there is no need to repeat the zero carbon target in every relevant section. Paragraph 1.57 notes the importance of tackling climate change, with the Local Plan objectives identifying the significant role that planning has to play in minimising the borough's contribution to climate change. The Local Plan objectives underpin all policies.  The order of the document has no implication on the weight of policy or its importance.
R19.0064	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process	Fossil Free Islington	Other	FFI questions whether the carbon impact of a development could be part of the site appraisal. It seems to not appear prominently enough. In relation to the key design principles, 'Sustainability' comes last and is not well developed. For example it does not state that projects should all be aligned with or contribute to achieving the net zero target.	Object	Presuming that carbon impact relates to emissions of a proposal, this is covered by policies in section 6. The fact that the 'sustainable' principle is last has no bearing on its role as a development principle. PLAN1 is sufficiently detailed to guide applicants; it is noted that other policies will require achievement of the net zero target and various sustainable design measures.

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R19.0064	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Fossil Free Islington	Other	The Plan states “Refurbishment, conversion and extension of existing older buildings is preferred to demolition and redevelopment.” This should apply generally, and not only for preserving the character of this particular area (the Vale Royal/Brewery Road LSIS). As the operational energy of buildings falls, the embodied energy becomes dominant; fair comparisons are difficult, but a study for RICS cited in Whole life carbon assessment for the built environment states that embodied energy typically amounts to between 35% and 51% of the energy over a 60 year life cycle.	Not stated	This does apply generally, see policy S10.
R19.0064	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	Fossil Free Islington	Other	Policy should mandate secure covered bike storage for every new development. The Plan should state that the Community Infrastructure Levy should be used to fund investments to meet the zero carbon target. If we are truly in a climate emergency then this kind of infrastructure must be top priority.	Object	Cycle storage is covered by policy T2. Policy ST1 relates to Community Infrastructure Levy (CIL), and refers to the Regulation 122 list which informs CIL spend.
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part C	Fossil Free Islington	Other	Only major developments and minor new-build residential developments are required to be net zero-carbon. We do not see a reason for making an exemption for minor non-residential new-build developments and would suggest they are subjected to the same requirement.	Object	Specific carbon reduction targets for minor non-residential new-build developments have not been applied because research indicates that the viability of achieving such standards varies significantly between these types of schemes and could undermine the viability of the development. The Building Regulations help to ensure that increases in carbon emissions from minor developments are minimised by setting minimum energy efficiency requirements for new-build and existing developments. Minor non-residential new-build developments are required to demonstrate how carbon emissions will be reduced in accordance with the energy hierarchy as part of the Sustainable Design and Construction Statement in accordance with Policy S4 Part A.
R19.0064	Strategic and Development Management Policies			N/A – general comment	Fossil Free Islington	Other	Some businesses (e.g. petrol stations, car dealerships) directly lead to higher fossil fuel consumption and associated carbon emissions and air quality impacts, as well as increasing motorized traffic in the borough. This contradicts the car-free policy outlined in the Local Plan and it is our view that no new developments or extensions of existing developments of this type should be permitted in Islington. While this may be implicitly achieved through the car-free policy, we would welcome language making it explicit that new emissions-heavy developments will not be accepted in Islington. More should also be done to specifically encourage environmentally friendly operations such as repair shops and tool or toy libraries.	Object	It is not possible to ban specific businesses such as petrol stations outright. However, any planning application would be assessed against relevant policy, including policies related to optimising development and minimising the impact of non-sustainable modes. Where parking was deemed non-essential, the car-free policy would not allow any parking on site. There is little policy can do to promote specific uses such as repair shops and toy libraries; planning is focused on use classes rather than occupiers, although we would expect such uses would benefit circular economy policies which may heighten the weight given to them as part of a planning determination.
R19.0064	Strategic and Development Management Policies			N/A – general comment	Fossil Free Islington	Other	We cannot see any provision for businesses to be monitored to see whether they pollute unnecessarily (i.e. commercial food businesses cooking with coal, pouring oil into drains, increasing traffic through delivery services). The Council should investigate introducing obligatory carbon accounting in Islington with businesses to be made to pay a carbon tax or similar charge to create an incentive to become more sustainable.	Not stated	The plan includes several policies which would cover these issues, e.g. policy T5 which concerns delivery and servicing. However, it would not be appropriate to have a single policy which monitors whether businesses pollute unnecessarily. Such a policy is unlikely to be effective.
R19.0064	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Fossil Free Islington	Other	The Plan does not provide any real obligation or incentive to increase the green spaces we have in the borough or protect existing green spaces. We note Policy G1 but the language is weak. There have been missed opportunities in recent developments to develop green space e.g. outside Highbury and Islington station and Navigator Square which include large expanses of paving. The Local Plan must therefore go further to increase and protect the amount of green space in the borough. We would be in favour of more ambitious requirements for Urban Greening Factor (0.5 for residential developments). We note the recently published Imperial College London research showing that Islington Parks exceed Air Quality legal limits for NO <sub>2</sub> and green space design should have as a priority mitigation – air quality, biodiversity, cooling (see <a href="https://bit.ly/315YdNI">https://bit.ly/315YdNI</a> ).	Object	The plan needs to be realistic, reflecting the densely-built up context of the borough and other development needs. Policy G1 sets out a strategic approach to GI, placing significant importance on preserving and enhancing GI. Green space is prioritised by policy G3 but recognises that there are instances where green space is not achievable.  The UGF policy reflects the London Plan, but paragraph 5.5 notes the potential for revisions through supplementary guidance.  Policy S7 provides strong requirements with regard to tackling poor air quality.
R19.0064	Strategic and Development Management Policies			N/A – general comment	Fossil Free Islington	Other	The conservation guidelines are old and in need of major updates. The Plan is vague around the need to change the conservation guidelines to adapt to climate change. It states that they need to change but does not specify how they would adapt to the public's desire to reach carbon targets. Islington is 50% conservation area so retrofitting for low carbon is difficult if the business as usual conservation status is maintained.	Object	Updates to CADGs are planned; further information is set out in the LDS. It is noted that policy DH1 and DH2 specifically highlight the balance between preserving heritage and maximising opportunities to mitigate the impacts of climate change.
R19.0064	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design; Policy S5: Energy Infrastructure	Fossil Free Islington	Other	Paragraphs 6.4, 6.5, 6.12, 6.50 and Policy S1B and S5K must be amended to reflect the 2030 net zero target rather than a 2050 target.  FFI questions how the Council will drive the transition from natural gas CHP to waste heat. The plan does not set out in any detail how this will occur.  There should be clearer priority for refurbishment of existing properties over building new premises. There should also be a strategy for ensuring that existing unused buildings (including homes) be used as a priority over new builds.  Further, the Local Plan should set out the Council's strategy to promote retrofitting. While we understand there are financial limitations on the Council, FFI would like to see a commitment to seek funding through whatever mechanism the Council can to drive forward action on retrofitting, setting out what action they will take (a) with current funds (b) when new funds available, along with ideas on finding this funding. The Local Plan must recognise the importance of retrofitting and show a strategy for promoting it. To tackle the climate emergency, there must be a proactive rather than reactive planning system. For example, there should be street by street approved window replacement rather than individual properties applying which the system can't afford. There are many opportunities for replacement windows even in conservation areas but citizens are not encouraged to renovate under the current system.	Object	See LBI response to FFI comment on climate emergency motion, in terms of amending net zero carbon target to 2030.  There are not currently specific targets regarding the transition although ultimately this will be driven by the evolution of carbon reduction targets through updates to the Local Plan policies and the Building Regulations. For example, the recent announcement regarding the phase out of domestic fossil fuel heating systems in new houses from 2025 will have an impact on this transition.  The Local Plan promotes a circular economy approach which prioritises re-use of buildings, see policy S10. Policy S1 notes a commitment to partnership working to improve the energy efficiency of existing building stock. Schemes such as the window replacement scheme mooted fall outside the Local Plan. Where such schemes required planning permission, the sustainability benefits would be a material consideration. With regard to conservation areas, it is noted that policy DH1 and DH2 specifically highlight the balance between preserving heritage and maximising opportunities to mitigate the impacts of climate change.
R19.0064	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	Fossil Free Islington	Other	Policy S3C – As it stands this seems to ignore developments that combine refurbishments of 500 sq m with extensions of 500 sq m. Also, it says nothing about larger minor developments. Here and elsewhere (in 7.46, for example) it would be simpler, clearer and more in keeping with the needs of the 2030 deadline, to draw no distinction anywhere between major developments and larger minor developments: all relevant clauses would say “a major development or a larger minor development” or “a smaller minor development”. A larger minor development would be a minor development of 100 sq m or more, whether it involved new building, refurbishment, extension or change of use. A smaller minor development would be any other minor development.	Object	The policy threshold is necessary as there are practical and viability issues for schemes less than 500sqm in terms of adhering to BREEAM standards. The energy hierarchy in policy S1 applies to all development.
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part B	Fossil Free Islington	Other	Bearing in mind the 2030 deadline full FEES would be appropriate for applications submitted from 2020 onwards. The Zero Carbon Hub does not seem to mention having interim FEES before full FEES.	Object	The energy study provides further explanation in FEES and the sustainability topic paper includes discussion on this. The ZCH has clear information on the interim stage, easily obtainable via internet search. The interim stage is necessary to allow the requirement to bed in.
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part D	Fossil Free Islington	Other	While we generally welcome the emphasis placed on reduction of energy demand and energy efficiency measures, we consider on-site renewable energy generation equally important and this should be required for new developments (provided there are no genuine feasibility issues), not just encouraged. London has an excellent solar resource compared to other areas of the UK where there is a much higher concentration of solar PV infrastructure, and the Local Plan should ensure that Islington meets a significant proportion of its energy demand through on-site generation (in line with the London wide Solar Action Plan ). As the Local Plan states, solar PV can be combined with green roofs and could also help tackle fuel poverty by reducing electricity bills for residents.	Object	Reduction of energy demand is the key priority, which reflects evidence from international, national and regional levels. Paragraph 6.6 clearly sets out the council's position.
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, paragraph 6.52	Fossil Free Islington	Other	Residual carbon emissions offset payments need to be high enough to act as a genuine penalty for developments failing to achieve zero-carbon targets on-site. We consider the proposed flat fee of £1000/flat and £1500/house for minor new-build residential developments highly inadequate. An average house emits around 4 tCO <sub>2</sub> /year from heating and electricity. At the nationally recognized carbon price of £95/tonne quoted in the Local Plan, this fee would only compensate for emissions over approximately 4 years of the house or flat's operational period.	Object	The flat fee only applies to minor housing schemes, reflecting viability evidence and the need for a more simplistic approach - it is noted that many minor schemes will not be subject to planning obligations which are necessary to secure case-by-case offsetting. The sustainability topic paper provides further information.  It is also important to note that the Local Plan has a range of policies to reduce emissions on site, meaning that average emissions will likely go down and offsetting becomes less and less necessary.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0064	Strategic and Development Management Policies			Policy S6: Managing heat risk, Part E	Fossil Free Islington	Other	This should apply generally, not only to smaller minor extensions, the use of active cooling measures should not be accepted in any development except in very limited circumstances.	Object	There are practical difficulties for smaller minor extensions in meeting the cooling hierarchy, but the policy does encourage the higher elements of the hierarchy.
R19.0064	Strategic and Development Management Policies			Policy T3: Car-free development	Fossil Free Islington	Other	The Local Plan does not address removing parking spaces to make key roads better for cycling, for example on Hornsey Road; worryingly para 7.26 describes parklets and cycle storage as 'temporary use of existing under-utilised parking spaces'. Why are they temporary and what is the long term plan for these parking spaces?	Object	It is beyond the remit of the Local Plan to enforce removal of existing spaces. Parklets are inherently temporary structures and the policy supports them as a mechanism to achieve other policy benefits were parking is underutilised. Policies T1 and T3 provide strong support for reduction of parking.
R19.0064	Strategic and Development Management Policies			Policy T4: Public realm	Fossil Free Islington	Other	Policy T4B is too weak. In pursuit of the objectives of reducing car transport and hard surfaces there should be a policy expressly intended to apply the highways and parking budget to making carriageways narrower and verges wider and more tree-lined. In particular, an appendix to the Streetbook SPD could identify streets where this policy would offer benefits most easily and economically.	Object	The highways works suggested are not within the remit of the Local Plan, although it is noted that the plan policies would support works which prioritise sustainable travel. The Council are likely to review the Streetbook SPD in the future to provide further guidance on various topics.
R19.0064	Strategic and Development Management Policies			Policy T5: Delivery, servicing and construction	Fossil Free Islington	Other	There is significant scope to reduce emissions and improve air quality in Islington through the use of cargo bikes rather than motorised vehicles or delivery and servicing, and government support is available for the uptake of e-cargo bikes. The draft Local Plan requires that the potential for using cargo bikes or similar clean modes of transport is investigated, in our view this does not go far enough. There should be a clear requirement for businesses to use clean transport for all servicing and delivery that is feasible in terms of distance travelled and weight/size of goods and materials.	Object	Modal shift is a priority but identifying cargo cycles as a specific way of achieving this modal shift is beyond the scope of the Local Plan; such delivery models will clearly not be suitable for all businesses. Policy T5 does encourage last mile delivery through sustainable transport modes.
R19.0064	Strategic and Development Management Policies			Policy DH2: Heritage assets	Fossil Free Islington	Other	The sections in the on conservation areas and heritage assets are very weak in relation to sustainability. Policy DH2 B/C says 'Proposals that harm the significance of a conservation area must provide clear or convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted'. Surely if there is a climate emergency, proposals aimed at increasing energy efficiency of homes, installing renewable energy generation or increasing the greening factor of the plot ought to be given priority concerns about the buildings' appearance. Yet there is no mention of initiative to reduce carbon as a priority. Paragraphs 8.18 – 8.28 makes some changes in order to achieve 'sustainability standards' but it sounds very restrictive and seems designed to discourage rather than encourage such action. This section does not mention climate change related adaptations to buildings at all. This ought to be prioritised. FFI supports protecting heritage assets but the Local Plan must reflect the fact that we are in a climate emergency. There should be a recognition that minor detriments to visible heritage (such as the installation of double glazing where draught proofing will not serve) may be justified by major improvements in energy consumption.	Object	Heritage considerations are governed by other regulations and duties, and require specific consideration of harm. It is noted that heritage is not exclusively concerned with appearance as suggested. The Local Plan recognises possible conflict between heritage and sustainability considerations and paragraph 8.18 is explicit that meeting other policy requirements including those relating to sustainability could justify substantial harm.
R19.0064	Strategic and Development Management Policies			Policy DH4: Basement development	Fossil Free Islington	Other	There should be requirements that such developments provide bedrooms or otherwise meet widespread needs (and do not just add private cinemas, party rooms and so on). Developments for rather flippant purposes should not be acceptable, given the carbon costs. Even a basement of only 4mx4mx3m can generate eight lorry loads of landfill. A report for RBKC concludes that the embodied carbon in a subterranean development is three times that in a surface development and is high relative to the operational carbon over a 30 year life cycle.	Object	The waste generation of basement development is not in itself relevant, unless the management/transportation of this waste would cause amenity impacts. The Local Plan cannot insist on a basement being used for a specific type of room. Policy H4 would apply in terms of the quality of the extended floorspace.
R19.0064	Strategic and Development Management Policies			Appendix 5: Social Value self-assessment	Fossil Free Islington	Other	The self-assessment of social value should be developed to give more priority to low carbon – e.g. no single use plastic, renewable generation.	Object	Paragraph 1 of appendix 5 notes that the list is non exhaustive, hence social value benefits relating to low carbon could be considered. However, the Council will amend via minor modification.
R19.0065	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	Islington Labour Environmental Forum	Other	The respondent states that policy B5 is vague and doesn't address targets to achieve net zero energy building in accordance to declaration of climate change emergency, or provide opportunities for BAME group or women.. The respondent proposes amendments to the policy.	Object	It is not appropriate to specify such detail on what the contribution will be spent. The aim of the policy is to secure the contribution. The Council's skills team will prioritise spending of the contribution.
R19.0065	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated	See response to Islington Society (R19.0072)
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part A	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Object	See response to Islington Society (R19.0072)
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated	See response to Islington Society (R19.0072)
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated	See response to Islington Society (R19.0072)
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part G	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated	See response to Islington Society (R19.0072)
R19.0065	Strategic and Development Management Policies			Policy T3: Car-free development, Part H	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated	See response to Islington Society (R19.0072)
R19.0066	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road		Resident	Respondent claims there is no mention of 'our' area in the plan. Request that some improvements in the area can be included to address community safety and other problems.	Object	The King's Cross Baptist Church is just outside the King's Cross and Pentonville Road Spatial Strategy Area as the council are expecting the majority of growth to happen outside this boundary. It is not considered appropriate to include within the boundary; however we note that a number of policies would apply to any planning applications in this area outside the SS area, including policies related to protecting amenity.
R19.0067	Strategic and Development Management Policies			Policy DH3: Building heights; Policy SP6: Finsbury Park		Resident	Representation objects to the scale and height of development in the Finsbury Park Spatial Strategy Area, citing numerous impacts associated with tall buildings. The representation states that the 2018 tall buildings evidence base (page 21) found that none of the areas of Archway, Finsbury Park, Lower Holloway and the Angel were suitable for tall buildings.	Not stated	The 2018 Tall Buildings Study, undertaken by Urban Initiatives, provides a detailed and comprehensive evidence base. The respondent misquotes from the study, citing the part which summarises the Council's previous evidence from 2010. The tall buildings topic paper provides further information.
R19.0067	Strategic and Development Management Policies			Policy G3: New public open space		Resident	Representation states that there is a lack of concerted effort to improve, protect, and provide green open space and the health of children.	Object	The Council disagrees with this statement. The Local Plan has strong policies relating to Green Infrastructure and open space, including introducing the Urban Greening Factor, and requiring on site provision of open space on large developments. Policy G2 states: Development is not permitted on any public open space and significant private open spaces.
R19.0067	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees		Resident	Support for the policy on biodiversity, landscape design and trees.	Not stated	Support noted.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0067	Strategic and Development Management Policies			Vision and objectives	Highbury Community Association	Other	Respondent supports majority of objectives relating to green, open and play space but object to the support of BBQs in Islington's parks as this increases pollution in a very densely populated borough.	Both	The issue of BBQs in parks is not a matter for the Local Plan.
R19.0068	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Sir Antony Gormley	Landowner	Support for policy SP3 on the restriction of land uses to business/industrial, building height parameters and protected vistas to avoid further encroachment of high-rise office and residential uses coming from York Way.	Support	Support noted for policies to retain the character and business environment of the LSIS; proposed building height parameters; and for restricting land uses to business / industrial.
R19.0068	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Sir Antony Gormley	Landowner	Respondent recommends caution on welcoming individual development proposals of high quality that move away from the industrial character of the area. Requirement for buildings to not to have blank frontages can bring different type of non-industrial building design.	Both	Para 2.39 of policy SP3 outlines that the term active frontages does not refer to the introduction of non-industrial uses; rather, development is expected to explore the potential of introducing active frontages whilst maintaining an industrial use, for example windows which allow views in and out of the building. It is recognised that industrial uses do not traditionally create active frontages so the policy should not be considered a barrier to development – the creation of industrial uses takes precedence over the creation of active frontages.
R19.0068	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Sir Antony Gormley	Landowner	Respondent supports the recognition to transport access and loading requirements in the area, but mentions that roads in the Vale Royal/Brewery Road area are under pressure for delivery of raw materials/HGV. It is suggested that width of roads is protected and increased where possible.	Both	Policy SP3 considers the narrow streets profile of the Vale Royal/Brewery Road LSIS in relation to vehicular movement/access. Part F, states that all development proposals in the LSIS must (individually and cumulatively) consider the layout, orientation, access, servicing and delivery arrangements in order to minimise conflict and to avoid potential negative impacts on highways safety and amenity. In addition, para 2.40 indicates that development in the LSIS is required to demonstrate how delivery and servicing can be adequately provided and potential impacts on highways safety and amenity can be prevented. On-street delivery and servicing will generally not be acceptable for uses which require more frequent and significant vehicle movements, such as B8 uses.  Increasing road widths would be a matter for Highways to consider.
R19.0069	Strategic and Development Management Policies			Policy B4: Affordable workspace	Bayshore Estates Ltd	Landowner	Support the council's aspiration to create a thriving inclusive economy and job opportunities through additional office space.	Support	Support noted.
R19.0069	Strategic and Development Management Policies			Policy B4: Affordable workspace	Bayshore Estates Ltd	Landowner	Proposed policy approach discourages increase in office development and affordable workspace. It disincentivises developers if they want to redevelop office buildings by demolishing worn-out offices and creating new ones. The respondent proposed changes to policy B4, part A, to include that for development to qualify for affordable workspace provision, 1000sqm net additional gross B1a/B1b from development should be considered instead of overall proposed B1a/B1b.	Object	An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the Viability Topic Paper.  It is the intention of the policy to require 10% of overall gross B-use floorspace. Where development comprises an extension to provide additional business floorspace, and the development includes refurbishment / improvement to the existing business floorspace, it considered that requiring 10% affordable workspace from the overall gross business floorspace is appropriate as the whole floorspace will attract an increased rental rate. Where development comprises of an extension only, 10% affordable workspace from the additional workspace would be required, where the total additional floorspace exceeds 1,000sqm - see paragraph 4.47.
R19.0069	Strategic and Development Management Policies			Policy B4: Affordable workspace	Bayshore Estates Ltd	Landowner	Draft Local Plan Viability Study (2018) indicates that site 17 becomes unviable if the affordable workspace requirement is extended to 15 years and 20 years. Respondent suggests amended wording to policy B4, part A, which introduces that where development specific circumstances show that affordable workspace is not achievable, the proposals should be subject to an independent viability assessment. This approach will allow assessment on a case by case basis.	Object	Discussion of viability testing of AW is set out in the viability topic paper.
R19.0070	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport; Policy T3: Car-free development	Highways England	Statutory consultee	We are pleased to see that the Strategic and Development management policies document now makes reference to Highways England as the infrastructure provider for the SRN based on our previous comments to the Islington Local Plan Regulation 18 draft documents consultation (November 2018).  Having examined the re-designation of the Islington Local Plan Proposed Submission (Regulation 19) documents, we are encouraged to see Policy T3 included in the draft Plan: Car-free development which states "All new development will be car free." We note this policy complements other measures taken to promote sustainable transport methods.  Based on the above, we are satisfied that the Islington Local Plan Proposed Submission (Regulation 19) policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109).	Support	Support noted.
R19.0071	Strategic and Development Management Policies			N/A - general comment	Environment Agency	Statutory consultee	We welcome the opportunity to comment on the Strategic and Development Management Policies, Site Allocations and the Bunhill and Clerkenwell Area Action Plan (AAP). In general we support these plans however we have recommended some minor amendments to clarify or strengthen the policies or supporting text to policies.	Support	General support noted. Response to individual amendments provided below.
R19.0071	Strategic and Development Management Policies			Policy S8: Flood Risk Management	Environment Agency	Statutory consultee	We welcome part D of the Flood Risk Policy S8 with the inclusion of the sequential approach to site layout for new development along with the reference to the Sequential Test. We are also pleased to see that the sequential test has been applied as part of the Sustainability Appraisal (SA) for the sites which have been allocated in the Local Plan as indicated in paragraph 6.119. However, some additional clarification may be required to supporting text 6.118 on the Exceptions Test. Also for clarity we suggest you add the following addition: A site specific flood risk assessment can help determine whether part (b) of the Exceptions Test can be met. EA note that Council's internal surface water flood risk team may also have comments on this chapter of the plan.	Object	Support welcome. The Council agree with the proposed amendments and will propose changes through minor modifications. The policy team has engaged with other departments, including Highways, through the preparation of the Local Plan.
R19.0071	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Environment Agency	Statutory consultee	We are pleased to see the inclusion of a requirement for an appropriate SUDS maintenance plan. We welcome the addition of a contaminated land policy S9 point O and P. We have some concerns with wording of the final sentence of point O because it is very strongly worded and in some instances developers will not be able to treat contamination fully prior to commencement of development as they tend to combine remediation with the groundworks for development. Amended wording suggested.	Object	Support welcome. The Council agree with the proposed amendments and will propose changes through minor modifications.
R19.0071	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Environment Agency	Statutory consultee	In addition supporting text 6.147 may be very difficult for developers to implement as it is unlikely that a developer will commit to procuring a full remedial design until they have certainty that they can get planning permission for a scheme. Amended wording suggested.	Object	Support welcome. The Council agree with the proposed amendments and will propose changes through minor modifications.
R19.0071	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Environment Agency	Statutory consultee	We welcome the inclusion of point Q which required development adjacent to the New River or Regent's Canal to ensure that these waterways can reach and maintain good ecological status, in accordance with the recommendations of the Thames River Basin Management Plan (TRBMP).	Support	Support noted.
R19.0071	Strategic and Development Management Policies			Policy ST4: Water and wastewater infrastructure	Environment Agency	Statutory consultee	We are pleased to see the added policy however additional wording recommended for clarity. As it is the responsibility of the water companies to provide connection to mains for both water provision and waste water collection and if developers approach the water companies at the earliest opportunity they will be better equipped to plan out how to provide such services, especially in areas where there may be limited capacity.	Not stated	Support welcome. Proposed amendment is not considered necessary as para 9.15 notes usefulness of engagement in identifying potential capacity issues.



Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0071	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees	Environment Agency	Statutory consultee	It is positive to see that this policy requires development proposals to aim to secure a net gain in biodiversity value.	Support	Support noted.
R19.0072	Strategic and Development Management Policies			Policy DH2: Heritage assets	Islington Society	Other	Refer to previous reg 18 comments. We welcome the rewording of policy DH2 Part I to strengthen the significance of Locally Listed Buildings and shopfronts. We welcome the inclusion of a definition of non-designated heritage assets in Appendix 9: Glossary and abbreviations.	Support	Support noted.
R19.0072	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	Islington Society	Other	Based on the life-time use of existing stock, we continue to a recommend a sustainable lifetime of greater than 75 years. Recommendation: Add Section I to Policy S3, "All Residential and nonresidential building should be capable of an expected life of greater than 75 years"	Object	Policy S10: Circular Economy and Adaptive Design sets out building design and construction requirements intended to keep buildings and materials in use for as long as possible. This includes the requirement for developments to be designed and constructed to be flexible and adaptable to changing requirements and circumstances over their lifetime, including changes to the physical environment, market demands and land use. Part D of Policy S10 to require the Adaptive Design Strategy to include the overall 'design life' of the buildings in the development. In addition to the other requirements of this policy, this will help to ensure that buildings are constructed to have longer lives.  Policy H11 refers to proposals for purpose built Private Rented Sector (PRS) development and seeks to ensure that PRS schemes commit to provide rental accommodation for the lifetime of the building. The reference in Part B (iv) of this policy to 'the lifetime of the building, generally no less than 50 years' relates specifically to the covenant length in relation to PRS proposals, which uses a fairly short building lifetime as a proxy. This is not the council's position on what the actual life of a building will be.
R19.0072	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design	Islington Society	Other	Policy S1 Part B does not differentiate between New Buildings and Existing Building Stock New buildings should aim higher. Recommendation: Add after "all buildings in Islington will be zero carbon by 2050 ", "and all new buildings will be zero carbon by 2025".	Object	Islington Council is committed to reducing carbon emissions. Part B of Policy S1 states that "The council will promote zero carbon development, with the aim that all buildings in Islington will be zero carbon by 2050.' This aim is in accordance with the new London Plan's objective that London is zero carbon city by 2050 and includes both existing buildings and new development. Achieving this aim will include activities across council departments, including projects to make improvements to the energy efficiency of existing buildings in the borough and energy retrofitting, as well requiring new buildings to be net zero carbon. Improvements to the energy efficiency and energy supply of existing buildings is generally outside the scope of planning policy and will be the responsibility of other council departments. The policies in the Local Plan seek to contribute to achieving this aim by requiring new developments to be net zero carbon and this is what Policy S1 Part C refers to, as well as Policy S4. Policy S1 does reference the climate and environment emergency declared by the Council, which states that the Council will strive to achieve net zero carbon by 2030.
R19.0072	Strategic and Development Management Policies			Policy H1: Thriving communities	Islington Society	Other	Refer to previous reg 18 comments on H1 requesting inclusion of buy to leave policy. Note this is covered by Policy H2 Part H	Not stated	Noted.
R19.0072	Strategic and Development Management Policies			Policy DH4: Basement development	Islington Society	Other	The Islington Society is sensitive to the significant adverse impacts that basement development has on neighbouring properties and the wider area. Reiterate suggested wording from Reg 18 response and note that wording remains unchanged. They do not agree with the comments in the consultation Statement p.91. There should be a presumption against basements. Recommendation: Change "The Council will only permit basement development where it is demonstrated ...." to "The Council will not permit basement development unless it can be demonstrated ...."	Object	The wording change does not change the operation of the policy. It just inverts the emphasis. It still defers suitability of basements to the criteria set out in the policy.
R19.0072	Strategic and Development Management Policies			Policy DH3: Building heights	Islington Society	Other	Refer to previous reg 18 comments requesting greater restriction of tall buildings in line with the Core Strategy approach. No further comment	Not stated	Noted.
R19.0072	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Society	Other	The most salient and welcome words in this section appear in paragraph 7.1: the reference to a reduction in travel distances. It conflicts with the Crossrail 2 project in the terms used in paragraph 7.10. The originally safeguarded scheme was designed to reduce the need to travel by reducing the distances travelled on routes between one place and another, by the provision of new interchange points. This interchange of passengers would free space on overcrowded trains and facilitate the use of existing services at stations close to central London. The Council should continue to press for a metro scheme between north-east and south-west London with a station at Essex Road, rather than an ever longer distance project as Crossrail 2 that will probably not be funded.	Not stated	The Local Plan refers to Crossrail 2 but none of its policies are predicated on it. The project does not yet have a business case let alone funding. It will be a consideration for future plans if the project proceeds. The suggested metro scheme would also need to be led by TfL.
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part A	Islington Society	Other	The "negative impacts" of developments need to be prevented and those which have happened in the last ten years reversed. Mitigation is not sufficient.	Object	The policy is not retroactive - and can only apply to new developments.
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Society	Other	The reference to interchange is welcome but in practice the interchange at Archway and Highbury Corner is more difficult and unwelcoming, particularly for residents of Haringey and Hackney respectively. The same may happen at Old Street. Bus passengers from New North Road (four bus routes) wishing to transfer to the Underground will face a longer walk and the need to cross one of two major roads – at present no road crossing is necessary though the pavement width is inadequate	Not stated	Noted - however the T1, T2 and T4 policies should deliver better, more legible and accessible interchanges with more direct pedestrian crossings.
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Society	Other	They argue that the removal of gyratory systems has worsened modal interchange at stations, and increased traffic. Improving bus to rail interchange would make public transport more attractive than private cars.	Not stated	It is difficult to judge the effect of gyratory removal project just yet. The Council's transport team is carrying out this evaluation.
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part G	Islington Society	Other	Welcome the emphasis on minimising non-sustainable modes, rather than maximising trips by sustainable mode. But there is a focus on cycling and walking instead of public transport. Even if cycling increases, public transport and non sustainable modes will still support most trips in London.	Not stated	Islington's Transport Strategy has a 87% target for all trips to be made by sustainable and active travel modes by 2041. An important proportion of trips in Islington is short journeys, which could be easily walked and cycled. TfL strategic cycling analysis (June 2017) highlights that cycling is the transport mode in London which has the biggest potential for growth, this is why it is presented as a key mode to support extra trips in Islington. It is noted that the policy does not explicitly prioritise specific sustainable modes over others.
R19.0072	Strategic and Development Management Policies			Policy T3: Car-free development, Part H	Islington Society	Other	Journeys that could equally well be made by bus, or a combination of bus and rail should be promoted in preference to car clubs (policy T3H).	Not stated	The car club policy is supported to reduce car ownership rather than to detract trips from public transport. The priority of transport policies is clearly focused on sustainable modes.
R19.0073	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process		Resident	Paragraph 1.67 states that an 18 metre distance between windows of habitable rooms must be ensured to protect privacy for residential development. This does not however apply across a public highway. Respondent comments that Bunhill and Clerkenwell has many narrow streets of around 9m - 11m wide and the current clause would not require development to mitigate loss of privacy here. New commercial development increasingly operates for 24 hours and will have a greater impact on surrounding residential uses. Request made to amend the plan to acknowledge the consideration of possible loss of residential privacy specific to the context of Bunhill and Clerkenwell's narrow street urban form	Object	The 18 metre distance is a minimum distance which applies in the specified circumstances. This does not preclude other sites, including where an office overlooks a residential use across the public highway, from being resisted due to case-specific issues of overlooking. Policy PLAN1 allows for such contextual assessment. It is not considered appropriate to introduce a broad caveat as requested, as the suggested circumstances are unlikely to materialise consistently.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0074	Strategic and Development Management Policies			Policy H1: Thriving communities, Part Q	Unite Students	Developer	The policy as drafted aims to prevent the delivery of any co-living schemes in the borough, as the policy states that “Largescale HMOs – such as co-living schemes – will generally be refused as they are not considered to make the best use of land and undermine efforts to deliver affordable housing and other land use priorities of the Local Plan”. This needs to be replaced by a policy which allows the delivery of co-living developments on suitably located sites including allocated housing sites. This is on the basis that the emerging London Plan recognises that co-living developments can provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. Allowing suitably located co-living developments in the borough would therefore help diversify the borough's housing offer and provide a greater choice of homes for single person households.	Object	The housing topic paper provides further discussion on the Council's approach to large-scale HMOs. It is noted that the Mayor of London has not raised any concerns regarding the large-scale HMO element of policy H1 or policy H10, and considers the Local Plan to be in general conformity with the London Plan.
R19.0074	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs), Part C(iii)	Unite Students	Developer	We would like to stress that Unite acknowledge that wheelchair accessible housing is an important requirement and agree that homes should be accessible for everyone. As outlined in our representations to Policy H6, Unite are committed to providing wheelchair accessible units and ensuring that their student accommodation is fully accessible. It is, however, important to highlight that providing 10% of bedspaces as wheelchair accessible is not a specific requirement for co-living developments as per draft Policy H18 (Large-scale purpose-built shared living) of the emerging London Plan. As pointed out previously, we understand the 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Those who live in conventional housing are generally of an older demographic than those living in co-living developments, suggesting that the proportion of those who have a disability and require wheelchair accessibility would be greater than the demographic affiliated with co-living accommodation. We would thus recommend that the 10% requirement need not strictly apply to this development type due to its generally younger demographic and differentiation from conventional housing, as sui generis rather than C3 use class.	Object	The housing topic paper provides further discussion. It is noted that the Mayor of London has not raised any concerns regarding the policy H10 10% wheelchair requirement, and considers the Local Plan to be in general conformity with the London Plan.
R19.0074	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs), Part C(iv)	Unite Students	Developer	The drafted policy requires large scale HMOs to provide on-site affordable housing, with cash in lieu payments not being acceptable in any circumstances. This policy opposes emerging London Plan Policy H18, section 8 which stipulates that co-living developments must deliver a cash on lieu contribution towards conventional C3 affordable housing. This policy should therefore be revised to be in accordance with the emerging London Plan policy.	Object	The housing topic paper provides further discussion.
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part A	Unite Students	Developer	This policy is seeking to prevent the delivery of any new PBSA. This is directly contrary to the adopted and emerging London Plan policy. Policy should allow delivery of PBSA on suitably located sites including allocated housing sites.	Object	Discussion is provided in the specialist housing topic paper. The policy is justified by virtue of the amount of purpose built student accommodation delivered in the last 10-15 years, that which remains in the supply pipeline and the need to prioritise conventional housing and employment growth. We note that the GLA response considered the draft plan to be in general conformity with the draft London Plan and made no comment on this element of policy H6.
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(ii)	Unite Students	Developer	There is no evidence that 10% of bedspaces in PBSA should be wheelchair accessible and thus this policy is unsound. Requirement should not exceed 1% or not in excess of 5% in line with BR. Unite's experience in London is that only 0.07% of their portfolio is occupied by wheelchair users. Information provided in Appendix A of response to support this. Unite note their commitment to ensuring PBSA schemes are inclusive to all; adaptations can be made based on needs of individual user as there is a lead in time prior to individuals moving in. In order to meet the requisite design standards this results in larger student bedrooms and kitchens, thus fewer standard units per development can be provided. This has the knock on effect of reducing the overall supply of PBSA number of units; increasing the cost and rent levels of existing stock and placing more pressure on the supply of conventional homes. Consider that 10% requirement intended to target shortfall for older demographic, which has greater proportion of disability.	Object	Discussion is provided in the specialist housing topic paper.
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(iii)	Unite Students	Developer	There is no valid planning policy reason for seeking the provision of bursaries as part of new PBSA. There should be a requirement that the Council provides an annual monitoring report and a clawback mechanism if the money is not spent within 5 years. Also suggest that any referable applications should not include bursary requirement as it would affect viability in combination with the affordable rent requirement.	Object	Justification is provided in the specialist housing topic paper. In terms of viability student accommodation was tested as part of the Local Plan with a modelled scheme which is viable at 35% affordable rent levels and also with a bursary payment of 5% of annual gross rent (rent per annum) for a 30 year period.
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(vi)	Unite Students	Developer	Support criterion v and requirement for occupation by students but not the restrictions on use of PBSA as short term visitor accommodation set out in criterion vi. This is not consistent with the London Plan. The use of PBSA outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply as the property is in use as PBSA throughout the as it is needed for student use. Use of housing in Islington for short term accommodation is particularly acute in Islington through Air BnB for example which the Council has acknowledged. Criterion vi of this policy should therefore be deleted.	Object	Discussion is provided in the specialist housing topic paper.
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(vii)	Unite Students	Developer	Object to the inclusion of a policy seeking 35% affordable rent as consider there is no evidence that this level of provision can be secured across London. Further object to the level of prescription in providing the maximum viable amount of affordable student accommodation due to the lack of evidence in securing such levels of affordable student accommodation in London. Consider the policy unsound and should be deleted.	Object	This policy aligns with that proposed by the emerging London Plan. The Mayor's regulation 19 response encourages maximisation of affordable student accommodation. However, the council's priority is for the provision of student bursaries, where the provision of both affordable rents and bursaries is demonstrably not viable.
R19.0075	Strategic and Development Management Policies			N/A - general comment		Resident	The representation does not comment on specific Local Plan policies, but makes a number of comments and complaints about rough sleeping, trees removed and not replaced, the construction of substation near Calshot / Collier Street, the wellbeing of residents, the management of Islington Council, crime, dirty streets, loss of green space and plants,the behaviour of developers.	Not stated	There are no specific comments on Local Plan policies in the representation. As a general point, some of the issues raised are covered by the Local Plan, including a strategic approach to green infrastructure which affords strong protection to, inter alia, green areas and trees.
R19.0076	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Backgrounds Prop Hire	Business	Support for policy SP3 in relation to protection/promotion of industrial uses in the Vale Royal/Brewery Road LSIS. Support on the provision of hybrid space in LSIS. The respondent suggests that further support from the council is needed on transition between B-uses on ancillary/hybrid space. The respondent changed existing ancillary space from office to storage to accommodate business needs but he still pays rent/business charges for office use.	Support	Support noted.
R19.0076	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Backgrounds Prop Hire	Business	Support for policy B1 in relation to protection/promotion of industrial uses in the Vale Royal/Brewery Road LSIS.	Support	Support noted.
R19.0077	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Brandon Road N7 Ltd	Landowner	Respondent is concerned about the restriction on B1(a) business space from policy SP3 which will result in an inefficient use of land and it is not consistent with the council's evidence. Proposes drafting policy SP3 in accordance to London Plan 65% plot ratio benchmark for retaining industrial/storage capacity, but without restrictions on the introduction of flexible B1 uses (including office).	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion. The Council's approach to industrial uses is consistent with the London Plan, as confirmed by the Mayor's conformity response at regulation 18 and 19 stages.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0077	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Brandon Road N7 Ltd	Landowner	Respondent objects to blanket restrictions that buildings should not exceed more than 20m in height. The respondent defends that the character of Brandon Road (and wider LSIS) is not sensitive in townscape terms and is not justified in the council's evidence base.	Object	<p>The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>
R19.0077	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Brandon Road N7 Ltd	Landowner	View of the Market Place Clocktower from Randell's Road to the south has no merit and should be removed.	Object	The Clocktower is an important local landmark. Views of the clocktower are a key element of the local townscape and add to local distinctiveness. Policy DH2 provides further detail.
R19.0078	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	H.J Francis Ltd	Landowner	Respondent supports the general aim to maximise new office floorspace through policy B1, particularly for the inclusion of the SME sector.	Support	Support for the aim to maximise the delivery of new business floorspace noted.
R19.0078	Strategic and Development Management Policies			Policy B2: New business floorspace	H.J Francis Ltd	Landowner	Owner of the site rear 2 Melody Lane, London N5 2BQ considers that the site provides a suitable location to maximise the level of office employment generation in accordance with the targets set out in the adopted London Plan and the emerging DLP. Therefore, we consider the LSIS designation restricts and jeopardises the development potential at the site and request that it is removed accordingly. It provides a negative response to the evolving character of this part of Melody Lane, which has become increasingly residential in recent years. In addition, the designation conflicts with the current planning application which seeks to deliver C3 residential use and B1 (a) office floorspace. This would provide a compatible mixed-use development which would deliver much needed housing as well as maximising the job creation at the site, in accordance with the main national and local policy aims. Furthermore, when assessed in tandem with draft Policy B3 'Existing business floorspace', (discussed in the next section) the site would not be able to be used to provide B1 office use. Overall, it is evident that Melody Lane has undergone a significant transition over the last two decades. While the area was originally dominated by industrial uses, it is clear that the area has evolved and is now a mixed-use area that includes office based employment and residential houses.	Object	Justification for the proposed new LSISs is provided in the employment topic paper. It is part of the newly proposed Melody Lane LSIS. This designation considers the site's proximity to the existing Employment Growth Area of industrial character, recognising the current storage function that the site has in line with the wider concentration of industrial businesses in the Melody Lane area.
R19.0078	Strategic and Development Management Policies			Policy B2: New business floorspace	H.J Francis Ltd	Landowner	Part F(ii) should be deleted as it is overly restrictive and could result in innovative design solutions for new office development being refused planning permission. For example, there are many instances of office development within London which have made innovative and efficient use of vacant car parks of other basement floors which have little or no access to daylight or sunlight. However, these spaces can be well planned and designed to provide additional employment floorspace. Such spaces are well suited for meeting rooms and back of house functions or artificially lit office floors. Furthermore, new office development is generally not required to have adequate levels of daylight in terms of the relevant BRE guidance, unlike residential use.	Object	Policy is considered justified. It does not set prescriptive requirements or reference BRE; What is adequate would therefore depend on the individual site context.
R19.0078	Strategic and Development Management Policies			Policy B1: Delivering business floorspace; Policy B3: Existing business floorspace	H.J Francis Ltd	Landowner	Consider B1 part E and B3 part C are overly restrictive in terms of promoting no net loss of existing industrial floorspace, which prevents the potential delivery of other suitable business floorspace. Suggest wording to allow for B1a floorspace where there is no net loss of employment floorspace.	Object	Protection of industrial floorspace is important to prevent further losses. The approach set out in B1 and B3 is consistent with the London Plan.
R19.0078	Strategic and Development Management Policies			Policy B4: Affordable workspace	H.J Francis Ltd	Landowner	The ambitious employment growth targets set out within this draft Local Plan could be jeopardised if too many financial burdens are placed on commercial development proposals. The additional burden of affordable workspace could make commercial proposals less viable (or unviable) and might therefore reduce the number of sites coming forward for new employment development. Whilst there may be a case for some form of affordable workspace (or a financial contribution towards it) on some very large schemes (e.g. 10,000 sq. m+) we do not consider that it is appropriate to apply this to any scheme of 1,000 sq. m+, which at the lower size threshold is still relatively small. On this basis, we consider that the requirement for affordable workspace should be removed to encourage commercial redevelopment schemes to come forward and in enhance their viability.	Object	Discussion of viability testing of affordable workspace is set out in the viability topic paper.
R19.0078	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	H.J Francis Ltd	Landowner	Respondent objects to the extension and promotion of industrial uses in this site as these would be in direct conflict with residential uses due to increase in traffic/parking as well as noise and amenity. The majority of the Melody Lane site is contained within a mews and is accessed via a narrow passageway, which makes difficult for large vehicles to access/operate and unsuitable for LSIS designation.	Object	Industrial uses does not mean large vehicles are automatically needed. An LSIS could accommodate light industrial uses normally comprising 'cleaner' industrial activities, with the transport requirements of this use class generally being less onerous.
R19.0079	Strategic and Development Management Policies			Policy SP5: Nag's Head and Holloway	iQ Student Accommodation	Developer	Consider that Policy SP5 is inconsistent with policy H6 in respect of the part of the policy which permits redevelopment/intensification of PBSA on sites with existing student accommodation. SP5 restricts to solely to sites allocated for student accommodation and does not allow on sites with existing accommodation.	Object	The policy will be amended through minor modifications to the Local Plan to address this inconsistency as there are various sites through the spatial strategy area that are in existing use as student accommodation.
R19.0079	Strategic and Development Management Policies			Policy H1: Thriving communities	iQ Student Accommodation	Developer	Consider that policy H1 part M is not positively prepared and does not conform with the NPPF or reflect the presumption in favour of sustainable development. Suggest that the policy should be amended with the inclusion of words 'other than on suitable sites in line with relevant policies'. Consider that this will contribute to meeting objectively assessed need and help deliver sufficient supply of homes to meet needs of different groups in line with Chapter 5 in NPPF. Reference the PPG which identifies that all student accommodation can be included towards Council's housing requirement. Identifies that if new student accommodation is not provided then funding for new bursaries and affordable student accommodation will not provided.	Object	Discussion is provided in the specialist housing topic paper. The policy is justified by virtue of the amount of purpose built student accommodation delivered in the last 10-15 years, which remains in the supply pipeline and the need to prioritise conventional housing and employment growth. We note that the GLA response considered the draft plan to be in general conformity with the draft London Plan and made no comment on this element of policy H6.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0079	Strategic and Development Management Policies			Policy H4: Delivering high quality housing; Policy H6: Purpose-built Student Accommodation	IQ Student Accommodation	Developer	Support intensification of existing PBSA sites and provision of accommodation which provides a high standard of amenity for occupiers. Consider that policy H6 by way of reference to H4 and application of space standards is not applicable because student accommodation is not considered a dwelling house but is considered sui generis so space standards should not apply as Building Regulations apply to new dwellings only.	Object	The reference in H4 is essential to ensure high quality housing. The Council recognises that H4 does not apply directly but the thrust of H4 can be applied on a case by case basis, in order to achieve high quality housing.
R19.0080	Strategic and Development Management Policies			Policy SC4: Promoting Social Value	Social Value Portal	Other	Support the policy which will deliver significantly more value for the communities directly and indirectly affected by new development. Urge the council to adopt the National Social Value Measurement (TOMS) Framework as the basis for developers to assess social value. This comprises 5 themes, 17 outcomes and 35 measures that were developed in collaboration with local government and private sector organisations. The TOMS are considered to meet the requirements of the Social Value Act as they are proportional and relevant to the contract; level the playing field for all developers whatever their size and capabilities; provide a means of consolidating answers into a single value which will help planning officers benchmark proposals; and will allow Islington to report the additional financial (social) value created by each development.	Support	Welcome the support for policy SC4 and appreciate the information on the National Social Value Measurement Framework. As stated in the policy's supporting text, the council may provide further guidance on delivering social value through an SPD. This will provide an opportunity to explore how the TOMS Framework might help to embed the social value approach in Islington. Currently, TOMS is considered too nebulous to embed within a DPD.
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	Respondent supports the creation of new B1a office in the Vale Royal/Brewery Road area, and argues that restricting offices in this area this would result in an inefficient use of land that is contrary to sustainable development objectives. It is also contrary to the London Plan's objectives (policy E4) and to the council's evidence base for the draft Local Plan.	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	Respondent objects to the arbitrary five storey building height limit set out in the proposed policy and considers that there is no evidence base which supports these restrictions based on the area's sensitive townscape to the character of Blundell Street/Tileyard Road (and the wider LSIS).	Object	<p>The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	Proposed policy hasn't been drafted in conformity with the NPPF, para 82 (re addressing specific locational requirements of different sectors). The respondent states that there has not been a clear and obvious engagement from the council with Vale Royal/Brewery Road businesses to understand/assess the specific locational requirements of specialist or new sectors.	Object	See the employment topic paper for further discussion.
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	View of the Market Place Clocktower from Randell's Road has no merit and should be removed from the draft plan because it restricts development and intensification.	Object	The Clocktower is an important local landmark. Views of the clocktower are a key element of the local townscape and add to local distinctiveness. Policy DH2 provides further detail.
R19.0082	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tom Copley and Nicky Gavron	Councillor	Respondents are concerned with the shift from current policy to restrict broader business uses in the Vale Royal/Brewery Road LSIS. Current policy sustains the balance between the maintenance of the LSIS and supports the importance of Tileyard as a creative cluster in the area.	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0082	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tom Copley and Nicky Gavron	Councillor	Respondent suggests that policy SP3 may be incompatible with the new London Plan policy HC5. The respondent encourages the council to consider Tileyard London as a Creative Enterprise Zone to provide a better long-term solution for the site and to create higher density quality jobs for residents.	Object	The London Plan supports the continuous growth and evolution of London's diverse cultural facilities and creative industries through policy HC5. The council do not consider the Vale Royal/Brewery Road LSIS to be suitable for a Creative Enterprise Zone (CEZ) as per the overarching strategy and designation of this area. Policy HC5 encourages CEZ in co-operation with the Mayor. The conformity responses received from the Mayor are fully supportive of the spatial policy for the Vale Royal/Brewery Road LSIS and do not suggest that this area should be considered a CEZ.
R19.0083	Site Allocations	NH10: 45 Hornsey Road and 252 Holloway Road	Nag's Head and Holloway		Ashburton Trading Limited	Landowner	Support allocation for a tall buildings however question why the limit has been set at 37m. States that the evidence is not clear and robust. Believe that it is inappropriate to have a blanket borough wide height restriction and consider the policy to be unsound. Also believe the policy is not in line with London Plan policy D6 relating to optimising density. Representation includes wording changes to remove the limit of 37m.	Object	The council's approach to tall buildings is informed by detailed evidence and is in line with the draft London Plan. The tall buildings topic paper provides further information.
R19.0083	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees	Ashburton Trading Limited	Landowner	States that Part B of Policy G4 is very prescriptive and could preclude a beneficial scheme if it overshadowed one corner of a SINC for a small part of the year. States that Policy G4 should be more flexibly worded to avoid such consequences.	Object	There is flexibility in the wording of G4. The Council places significant weight on protection of biodiversity reflecting its importance, however impacts on biodiversity will be assessed on a case by case basis.
R19.0083	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Ashburton Trading Limited	Landowner	States that DH1 is unsound and not in line with London Plan Policy. Ask that Policy be amended to reflect the sensitivity of different views to change, and that those views which are important and sensitive to change should be protected. A proposal that is visible within a protected view is not necessarily harmful.	Object	<p>Protected views are unique and their protection is very important. Assessment of the impact on views will be made on a case by case basis, see policy DH2. The proposed amendment is not appropriate. The London Plan supports identification of local views. As part of the Local Plan review, the Council has reappraised local views to confirm that they are still relevant and accurate.</p> <p>The respondent seems to suggest that views are unnecessary due to the 30m height restriction but this is incorrect. The 30m restriction was informed in part by protected views, i.e. locations where buildings of 30m+ are suitable in principle are located outside of viewing corridors. However, that is not to say that views therefore enjoy full protection. There may be other instances where a building less than 30m can impact a view, and regardless, the views policy adds additional weight to the resistance of 30m+ buildings outside the identified location, in conjunction with DH3. The views policy and designations are also essential in order to guide any enhancement of views.</p>
R19.0083	Strategic and Development Management Policies			Policy DH3: Building heights	Ashburton Trading Limited	Landowner	Planning legislation is clear that planning applications should be determined on a site by site basis and on their own merits. Respondents believes that it is inappropriate to have a blanket borough wide height restriction and consider the policy to be unsound. Also believe the policy is not in line with London Plan policy D6 relating to optimising density. Amendment suggested to recognise instances where there may be opportunities for taller buildings which could deliver public benefits including enhancements to townscape.	Object	The claim that planning applications require site by site determination based on their own merits without regard to the development plan is incorrect. The Council's approach is wholly consistent with the London Plan, as confirmed by the Mayor of London's conformity response. Further discussion on the Council's approach to tall buildings and evidence base is set out in the tall buildings topic paper.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0084	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Sky Studios	Business	Respondent supports policy SP3 and recommends the promotion and preservation of industrial uses in the area, recognising that the area's industrial function is being encroached by corporate offices.	Support	Support for preservation and promotion of industrial uses in the Vale Royal/Brewery Road LSIS noted.
R19.0084	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Sky Studios	Business	The respondent objects to supporting text in paragraph 2.36 which relates to the building height limit of 20m considered for the Vale Royal/Brewery Road LSIS (supported in policy DH3). The restrictions that this policy may bring won't allow the respondent to build a rooftop studio that provides natural light in line with the production market needs because it reaches 22m and affects the viewing corridor between the Market Street Clocktower and the Randell Road bridge.	Object	The Policy states that proposals "must not exceed five storeys (and in some locations should be less)." The supporting text then goes on to say that the "urban design and character assessment undertaken for the LSIS and its wider context concluded that a maximum height of around 20m (approximately five commercial storeys) would be appropriate in the LSIS. 20m is not automatically acceptable and would be dependent on assessment against all relevant policies...". A 22m could meet these requirements in principle, as it would likely be no more than five storeys. Suitability would need to be determined on a case by case basis. Applications would also need to address any impact on the viewing corridor towards the Market Road Clock Tower.
R19.0085	Strategic and Development Management Policies			Policy G2: Protecting open space		Resident	Comments regarding Policy G2. States that it guarantee any protection of green spaces. States that improvements to be "investigated" where open space is lost is vague. Would like no net loss of open space.	Not stated	Policy G2 states that development is not permitted on any public open space and significant private open spaces, offering a very high level of protection for open space. The policy only permits loss of semi private amenity space in very limited circumstances (following the five criteria in the policy). Islington's policies seek to increase open space (Policy G3) and also green infrastructure (policy G1).
R19.0085	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees		Resident	Policy G4, section C, clause x could be expanded to "integration of food growing opportunities, especially community gardens and orchards."	Not stated	Criterion (x) states: 'Integration of food growing opportunities, where feasible and practical', which is considered sufficient.
R19.0085	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design		Resident	Policy S1 has a target of 2050. Given the impact of the sector, this has to be in contradiction to the Council's Emergency Climate Change target of 2030.	Not stated	This is explained in paragraph 6.5 of the plan which states: "The Council has declared an environment and climate emergency and will strive to achieve net zero carbon by 2030, ahead of the formal 2050 target set out in Policy S1. The Sustainable Design policies set out in the Local Plan will be kept under review and the Council may provide further supplementary guidance, ahead of any future Local Plan review, to facilitate delivery of the target earlier than 2050. Ultimately, planning is only part of meeting the net zero carbon target; our sustainable design policies are very ambitious but the ability to meet the target largely depends on many other measures outside the planning system, including changes to national legislation."
R19.0085	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions		Resident	S4 section G – What does "clearly demonstrated" mean in practice?	Not stated	With regard to part G of Policy S4 clearly demonstrated means that the applicant has provided detailed energy assessment in accordance with the policy and any relevant guidance.
R19.0086	Site Allocations	VR6: The Fitzpatrick Building, 188 York Way	Vale Royal/Brewery Road LSIS		Deepdale Investment Holdings	Landowner	Any further development, amendments to the planning permission or new planning applications should support the existing office use of the site. Any attempt to further intensify industrial uses could affect the viability and amenity of the implemented office scheme.	Not stated	The allocation reflects the extant planning permission for the site but requires that any future applications should be in accordance with the strategic priorities for the Spatial Strategy area. It is right that any changes to extant permissions should be subject to updated policy requirements, to reflect changes in local evidence and priority uses.
R19.0086	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Deepdale Investment Holdings	Landowner	Respondent is the owner of the building at 188 York Way, currently being redeveloped following permission (P2017/2937/S73). Respondent supports the creation of new B1a office in the Vale Royal/Brewery Road area, and argues that limiting this use this would result in an inefficient use of land that is contrary to sustainable development objectives, which will damage the economic potential of the area. It is also contrary to the London Plan's objectives (policy E4) and to the council's evidence base for the draft Local Plan.	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0086	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Deepdale Investment Holdings	Landowner	Respondent considers that proposed policy hasn't been drafted in conformity with the NPPF, para 82. The respondent states that there has not been a clear and obvious engagement from the council with Vale Royal/Brewery Road businesses to understand/assess the specific locational requirements of specialist or new sectors.	Object	The policy is considered to be consistent with the NPPF. See the employment topic paper for further discussion.  Consultation undertaken as part of the Local Plan preparation is detailed in the consultation statement, with further detail also set out in the Legal Compliance statement appendix 2.
R19.0087	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	1,067 set responses, received via <a href="https://startafire.co/tileyard/localplan/dont-let-islington-council-stop-the-future-growth-of-creative-industries">https://startafire.co/tileyard/localplan/dont-let-islington-council-stop-the-future-growth-of-creative-industries</a> . Responses express concern about the impact this proposal will have on the expansion of creative industries along with Tileyard London within this area.	Object	See response to points below.
R19.0087	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	Respondents strongly oppose to the restriction of additional office uses in the Vale Royal/Brewery Road LSIS if these are not in a predominantly industrial building, because it prevents job growth in creative industries. They propose that the council reconsiders the aim of policy SP3, and suggest removing part C (related to encroachment of offices in the LSIS).	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0087	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	Respondents oppose to Islington's draft plan which seeks to limit the height of new development under 30 meters.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper, including justification for the 30m height restriction.  The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.  The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.  Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.
R19.0087	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	Respondents support the development of a Creative Enterprise Zone, as per London Plan policy HC5, which will bring enhancement of the LSIS. They propose that council recognises two demarked areas to divide warehouse operations from creative industries in the Vale Royal/Brewery Road area, LSIS to the north and CEZ on the southern part of the LSIS (e.g. south of Brandon Road). This will help deliver the council's goals for employment and marginalised communities in line with priorities set by Fairness and Employment Commissions.	Object	The London Plan supports the continuous growth and evolution of London's diverse cultural facilities and creative industries through policy HC5. The council do not consider the Vale Royal/Brewery Road LSIS to be suitable for a Creative Enterprise Zone (CEZ) as per the overarching strategy and designation of this area. Policy HC5 encourages CEZ in co-operation with the Mayor. The conformity responses received from the Mayor are fully supportive of the spatial policy for the Vale Royal/Brewery Road LSIS and do not suggest that this area should be considered a CEZ. See the employment topic paper for further discussion.

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R19.0088	Strategic and Development Management Policies			Policy B2: New business floorspace	Fitzpatrick Team Developments Ltd	Landowner	The respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the council's response to their Reg 18 representations - as set out in the consultation statement - doesn't address the points raised. The property has been unsuccessfully marketed for several years since 2017. An appendix containing marketing evidence has been included in this response. The site has extant permission for the introduction of 4 residential dwellings and it is enclosed by residential uses.	Object	The Council considers that the issues raised have been adequately responded to (see page 65 of the consultation statement). Policy B3 allows for loss of floorspace in exceptional circumstances, which includes provision of marketing and vacancy evidence. Such evidence is not considered relevant for plan-making purposes, to a designation which will apply over a 15 year period. Marketing is a snapshot in time and there is no evidence that the site is wholly unsuitable for continued business use.
R19.0088	Strategic and Development Management Policies			Policy B2: New business floorspace	Fitzpatrick Team Developments Ltd	Landowner	Respondent suggests that the blanket restriction on residential use in Priority Employment Locations is contrary to national and regional planning policy guidance, and thus the wording "residential use will not be supported" should be deleted from Policy B2.	Object	The restrictions on residential use are justified in order to ensure that much need business floorspace is prioritised in PELs. In terms of housing delivery, Islington has a strong track record of high levels of housing delivery and will comfortably be able to deliver its housing target without relying on delivery through the release of existing business sites, including this site.
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	398 set responses, received via <a href="https://www.cleanairandgoodjobsforislington.co.uk/">https://www.cleanairandgoodjobsforislington.co.uk/</a> . Responses express concern over the impact the Local Plan will have on air quality and traffic congestion in the area; and the impact on jobs creation in the area - especially the availability of good quality jobs in the creative industries with restrictions on the expansion of Tileyard London.	Object	See response to points below.
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	<p>We are deeply concerned about the impact on air quality by prioritising certain industrial uses over other uses in this area. We reject the focus on polluting factories, meat-packing, take away kitchens and storage depots, over alternative uses including creative studios, music studios and less polluting activities. We believe that the industrial capacity of the area can be retained and co-located alongside flexible business space.</p> <p>Caledonian Ward in Islington has some of the worst air quality in Europe. The proposals in the Local Plan would aggregate this situation, particularly if there is increased use of HGVs in the area. It's unbelievable that our children could be exposed to more air pollution under these new council plans.</p> <p>Unless there is a full air quality assessment into the extent to which the revised Local Plan could impact on air quality in the area, we believe the Council's Local Plan could be subject to legal challenge by way of judicial review.</p>	Object	This is discussed in the sustainability topic paper.
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	We are also deeply concerned for the future of the creative industries and the impact on employment creation for Islington residents. We strongly oppose the proposal on Policy SP3 concerning the Vale Royal / Brewery Road Locally Significant Industrial Site ('LSIS') that: "any proposal which introduces additional offices, regardless of whether there is existing office use on-site, and which does not result in the building being in predominantly industrial use, will be refused."	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	We support the development of a Creative Enterprise Zone around the southern part of the LSIS (e.g. south of Brandon Road).	Object	See response to R19.0087 and employment topic paper for further discussion.
R19.0090	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Grainger Plc	Developer	Background on Grainger Plc, a leading provider of private rental homes in the UK. Note they have a number of partnership with public sector organisations including TfL, but currently no business sinterest in Islington. LBI have not considered a number of key positive aspects of build to rent, including improved housing delivery; long-term stable housing for local residents; priced for local residents; better housing standards; high quality design; improved health and wellbeing; support for and investment in local communities. Consider that H11 will reduce delivery of new homes and note LBI have not met the latest housing delivery test..Surprised to see that LBI do not consider there is a need for private rental accommodation, which is inconsistent with SHMA 2017. Suggest that policy and tax changes mean that buy-to-let investors will not be as prominent, and note that BtR can help to backfill this potential lessened supply. Council should assess an publish local need for private rented accommodation. Policy should allow for APR and DMR. Policy does not set out what form of AH is acceptable or state why APR/DMR is unacceptable. 50 year covenant prevents flexibility and will discourage investment; should be 15 years in line with London Plan. The clawback and covenant are both designed to ensure LPA can recoup AH if untis are sold privately, therefore it is unnecessary to include both. No evidence to justify Council's approach to restricting BtR.	Object	A number of issues raised are explained in the policy supporting text, and are also elaborated on in the Housing Topic Paper. In summary, the Council is not precluding private rent, as noted in paragraph 3.137; it is the BtR business model which the Council takes issue with, as it is a means to undermine policy requirements. None of the supposed benefits of BtR are unique to this development model. LBI did fail the 2018 HDT but the trigger for this is to provide a 20% buffer on the five year supply, not to take a laissez faire approach to approving any and every niche housing type. It is noted that Islington have only failed to meet our housing target once in over a decade, and that we can demonstrate a healthy Five Year Supply. Policy H11 does not say that the private rented sector has no role in meeting need; it refers to the specific PRS business model - see footnote 23. The SHMA does highlight that private rented accommodation has a role to play in meeting housing need but the overarching need is for affordable housing, and any development which undermines this will not be supported. There is no evidence of large scale voids or under-supply, as a result of buy-to-let policy and taxation changes; and also no suggestion the BtR is best placed to remedy this if it did materialise. As noted above the Council has a healthy FYS, and our housing target in the new London Plan has dropped significantly. Policy H3 supporting text provides further discussion on APR. Policy H11 clearly sets out that genuinely affordable housing is required from BtR developments; this is defined in the glossary. Policy H3 is cross-referenced in the supporting text and policy. A 50 year covenant reflects a fair assumption of a building's lifetime and is considered a reasonable quid pro quo. The covenant and clawback mechanism are not the same thing; covenant ensures that the units remain in private rent; clawback triggers if this is broken. Both are essential in order to disincentivise use of the PRS business model as a means to undermine affordable housing policy and other policy requirements. We note that the Local Plan is considered to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H11 of the Regulation 19 document.
R19.0091	Strategic and Development Management Policies			Evidence base, IDP	Great Ormond Street Hospital and Puttinu Cares Foundation	Business	The Infrastructure Delivery Plan (IDP) (Update Report 2019) Chapter 8 "Health and Social Care" sets out the commitment for London Borough of Islington and Islington CCG to work together to deliver the Long Term NHS Plan. The IDP makes no reference to GOSH, despite listing other healthcare organisations operating in adjacent boroughs. There is an identified need for such accommodation to be provided within the borough of Islington and the draft London Plan policy acknowledges that this issue transcends borough boundaries and needs to be considered as a cross-boundary issue.	Object	The supposed need is not integral to the operation of strategic infrastructure as detailed by the IDP. GOSH is not identified explicitly but the IDP does consider the North Central London (NCL) Sustainability and Transformation Plan which includes GOSH.
R19.0091	Strategic and Development Management Policies			N/A - general comment	Great Ormond Street Hospital and Puttinu Cares Foundation	Business	There is a distinct requirement for associated accommodation to be reasonably close to the relevant hospitals to make journey times for family members travelling to/from hospital manageable and the search area for new sites therefore becomes extremely limited. When taking a 15 minute walking distance from GOSH, there is only a limited search area for GOSH and charities such as Puttinu Cares to locate suitable sites for development to meet the clear needs of patients and their families. Respondent is seeking a policy to be introduced which would supports the use of land for specialist accommodation associated to hospitals, for use by families of patients rather than just patients themselves. Where there is protection of other uses in planning policy, that policy should include an explicit exception for development proposals for specialist accommodation where an exceptional case is demonstrated. Such an approach would be supported by the draft London Plan which states that boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS organisations to identify and address local health needs (Policy S2). Policy H14 of the draft London Plan also states that the delivery of supported and specialised housing which meets an identified need should be supported and that boroughs should undertake assessments of the need for short term, medium-term and permanent supported and specialised accommodation within their borough.	Object	Despite the respondents assertions, the use described would be akin to either self-contained housing or visitor accommodation. It would not be classed as supported housing under Local Plan policy H9 or London Plan policy H14, and, while it might be beneficial for families visiting hospitals, it is not an essential form of accommodation. The Council considers that this form of accommodation does not manifest in a particular need and is not covered by the assessment of housing needs envisaged by paragraph 61 of the NPPF. Likewise, it is not a local health need as covered by the London Plan policy S2. To be relevant under any of the policies cited above, the accommodation would need to cater for people with actual needs, not just those visiting such people. It is a form of accommodation that is nice to have rather than essential to have, and as such it is not relevant for the Local Plan; even if it was, the Local Plan has objectively assessed needs and has identified that housing and employment are the priority land use in the borough.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0092	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road	Grimaldi Holdings Limited	Business	Aspirations to improve levels of employment in this sustainable location are strongly supported, and it is agreed that Pentonville Road represents an excellent opportunity to improve its commercial offer to the benefit of London as a whole.	Support	Support noted.
R19.0092	Strategic and Development Management Policies			Policy B2: New business floorspace; Appendix 9: Glossary and abbreviations	Grimaldi Holdings Limited	Business	Reference to a variety of suitable business space including hybrid space is welcomed (with reference to Pentonville Road). Modern businesses require diverse types of employment space and support services to fit their needs. Development that directly supports commercial use can be equally important in creating a thriving business environment and in turn drives employment. The definition of hybrid space, included in the glossary is restrictive and refers to buildings that provide a supporting function to the central London economy. This definition would be more appropriate if it includes offices, industry, warehousing, retail, entertainment, etc. to nurture a flexible commercial area along Pentonville Road.	Object	CAZ fringe locations take pressure off the central London office market and can provide lower cost space (relative to the CAZ) which is suitable for SMEs. Part C of policy SP2 allows the provision of a range of business floorspace, including Grade A offices, co-working space and hybrid space. Hybrid space allows the introduction of industrial uses and a small element of office, and other supporting uses to the industrial function. The policy criterion is not prescriptive on the type of business floorspace workspace that can be provided in the King's Cross and Pentonville Road spatial area.
R19.0092	Strategic and Development Management Policies			Policy B1: Delivering business floorspace; Policy B2: New business floorspace; Policy B3: Existing business floorspace	Grimaldi Holdings Limited	Business	Respondent is concerned with the explicit mention of 'no net loss' of business floorspace in policies B1 and B3, and the objective of policy B2 to maximise business floorspace. This is potentially contrary to the council's aims to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types/sizes, affordable for a range of occupiers, including start-ups. There should be greater flexibility to allow the loss of office floorspace through redevelopment, provided it is suitably replaced with alternative employment generating use that supports the function of Pentonville Road as a commercial corridor. The definition of employment floorspace could be used to fit this purpose.	Object	The Employment Land Study 2016 (ELS) identified a need for 400,000sqm additional business floor space by 2036 across the whole borough; maximisation of new space is important in order to achieve this. Protection of existing space is integral to achieving this aim, as further losses would need to be offset by an even greater quantum of new space. The Local Plan sets out a range of potential types of business floorspace that could be provided.  Allowing the loss of office to be replaced by general employment floorspace will not meet the identified need for office floorspace, which accommodates a large proportion of existing and projected jobs.
R19.0092	Strategic and Development Management Policies			Policy B4: Affordable workspace	Grimaldi Holdings Limited	Business	The respondent is concerned about the requirement of policy B4 to lease the affordable workspace directly to the council rather than directly to an approved provider. It is suggested that the Inspector reviews the Procurement Strategy and Grant of Under-Lease Agreements for Affordable Workspace Operators 2019-2023 as we are concerned that the approach is not the most appropriate strategy against reasonable alternatives; including approaches adopted by other boroughs.. The respondent doesn't consider this strategy to be the most appropriate in comparison to other boroughs.	Object	Justification for affordable workspace is set out in the employment topic paper. The end users of such space is determined through a commissioning process, led by the Council's Inclusive Economy team, which focusses on ensuring social value outputs. Policy B2 also aims to secure a variety of types of employment space, including space for small firms.  The Council notes the earlier version of the 'justified' test of soundness, which required a plan to be the most appropriate strategy; the February 2019 NPPF paragraph 35b however requires an appropriate strategy, taking into account the reasonable alternatives. Policy B4 is considered to be sound.
R19.0093	Strategic and Development Management Policies			Policy H4: Delivering high quality housing		Resident	Welcomes dual aspect requirement but questions the requirements for generous areas of glazing and direct sunlight and the requirement to ensure that flats should not be predominantly north facing. This could cause problems with overheating.	Both	Support noted. Non north facing requirement only applies to single aspect units, and is necessary in order to maximise natural light. Policy S6 would also apply; this sets out requirements for managing heat risk.
R19.0093	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design		Resident	The target of being zero carbon by 2050 for all existing buildings is ambitious especially if you want to achieve it though energy reduction, rather than decarbonisation of the energy supply. My flat is all electric: I do not want to have air conditioning but high temperatures might force me into it.	Not stated	The target is ambitious but considered achievable. The Local Plan notes, however, that achievement is dependent on a number of future interventions including changes to legislation.
R19.0093	Strategic and Development Management Policies			Policy SP7: Archway		Resident	I note that some tall buildings are proposed near the tube station despite the conclusion in the appendix to the tall buildings report of 2018. My belief is that this is not an area for tall buildings. Additionally, most people living here will want to commute into central London on the tube but I doubt the Northern Line has the capacity to cope, especially given the developments on TfL land further north.	Object	The respondent cites the 'Tall Buildings evidence base to inform Core Strategy 2010', which is out of date. The Islington Tall Buildings Study published in 2018 identifies locations suitable in principle for tall buildings across the borough, based on a robust methodology. Policy DH3 applies to any application for a tall building, which would include consideration of the impact on local infrastructure.
R19.0093	Strategic and Development Management Policies			Policy SP6: Finsbury Park		Resident	Respondent welcomes paragraph 2.77 to improve capacity and access to Finsbury Park station	Support	Noted.
R19.0093	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport		Resident	Pedestrian areas need to be kept clear of obstacles such as dockless bikes. Bus stands need to be positioned so as not to obstruct the pavement.	Not stated	This is stated in Policy T4.
R19.0093	Strategic and Development Management Policies			Policy T4: Public realm		Resident	Increased public toilet accommodation supported, especially to support elderly citizens whose mobility can be constrained by the availability of toilets. Maps should be readily available showing the location of toilets.	Support	Support noted. Proposed mapping is not relevant for the Local Plan.
R19.0094	Site Allocations	NH7: Holloway Prison, Parkhurst Road	Nag's Head and Holloway		Line Planning	Business	Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in respect of inter-generational needs and the housing shortage. The CIL should reflect development plan policies and the Holloway Prison SPD. In relation to policy SC1 (social and community infrastructure) the community should have early sight of the Community Needs Assessment, which should demonstrate how the Women's Building will address the loss of support services for women that previously operated from Holloway Prison. The site should provide a London-wide or national base for women's support services that could be associated with rehabilitation, positive mental health, domestic abuse prevention etc. The site could promote work opportunities for women with training and education on the construction trades, and the inclusion of creative work-spaces for women. The council has a duty to co-operate with Camden Council with respect to provision for older people. Agree smaller scale retail provision would be suitable on Cardwell Terrace as set out in Policy SP5.	Not stated	Comments noted. Development proposals for Holloway Prison will be assessed against Local Plan policies and, as set out in the allocation, the Holloway Prison SPD will be given very significant weight in any future determination on the site. A main concern of the SPD is ensuring affordable housing is maximised on the site and the housing provided meets the borough's identified needs. The community will be consulted on development proposals for the site, including the required social and community infrastructure. CIL will be collected as set out in Islington's published CIL Charging Schedule and allocated in accordance with the borough's procedures. All major developments in the borough are required to offer construction training opportunities for Islington residents as detailed in the Planning Obligations (S106) SPD. The borough is aware of its duty to cooperate responsibilities.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities	Line Planning	Business	The thrust of this policy is supported. However, we recommend that in some areas the Council revisits the detail of its 2017 Housing evidence base (which relies on ORS report 2012 and 2014 data) to address evidence gaps, particularly with respect to more contemporary data on housing including homelessness and provision for older people. The Council should have the benefit of more up to date data so it can test the assumptions underlying the present and proposed policy approaches, to ensure that policy is sound and effective. The Plan should ensure that the housing needs of a range of groups and residents are being met. These policies could benefit from some modification to respond to current pressures on housing. Such modification could make the plan not only more deliverable but more visionary.	Object	The housing topic paper sets out justification for the policies in the thriving communities section, including discussion of relevant evidence.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part D	Line Planning	Business	The wording of this over-arching policy is supported.	Support	Support noted.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part G	Line Planning	Business	Small householder developers of say one or two units may find the affordable housing unit contribution a deterrent to redevelopment. A balance has to be struck with safeguards to protect small developers from exposure to undue costs which may inhibit small scale development from coming forward and thus conflict with London Plan policy and also householders / small landowner desires to improve the quality of buildings that they live in, own or manage. E.g. could the Council include an indication of the amount of this liability relative to the cost of a scheme e.g. on say a development of £1m or £2m, by way of illustration? Small developers typically will not plan sufficiently far ahead to understand their liabilities. They want to get access to this information quickly when preparing a financial appraisal and the detail could be produced in a form that is more readily accessible. With respect to the redevelopment of small sites and AH contributions, an arrangement for off site AH contributions is currently being reviewed by PINS in relation to the draft London Plan.If the Inspector recommends the proposed wording above the draft LP will need to reflect the off-site AH contribution approach and this should be reflected in text. Also check the NPPG.	Object	The small sites affordable housing topic paper provides further discussion. We note that the London Plan encourages boroughs to seek such contributions.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part J	Line Planning	Business	Amend the wording to “the size and mix” etc. Or state how “size mix” differs from size and mix. Cross refer this to Table 3.2 of H2. We support this subject to a caveat for a clarification of text on achieving housing quality.	Both	Support noted. Size mix is the relevant terms regarding the supply of units of various sizes. Where the Local Plan refers to the actual size of a unit in sqm, the term space standards is used.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part K	Line Planning	Business	Can the Council clarify the definition Conventional residential accommodation or perhaps avoid the use of the phrase which is rather meaningless? Does the Council mean family sized? Or does it just mean “self contained” (as in early drafts of the London Plan?). If in the current version of the London Plan please add a footnote to that effect. Does it mean accommodation with a space ratio appropriate to quality, number of persons and lawful in terms of occupation? H2. C and justification text 3.28 refers to ‘floorspace’ but there is no guidance on floorspace dimensions (other than minimum sizes in other policy). The ORS SHMA evidence base shows that too many families are living in accommodation that is too small for their requirements. Islington proposes that 2b 4p units are ‘family sized’ units. It’s also old wording from historic policies and is at risk of perpetuating low quality standards in terms of unit variety. The fact that other London Councils adopt this wording does not make the policy acceptable. The NPPF does say it is appropriate to set out a range of densities. The efficient use of land should respond to the type of housing offer and whether the offer matches housing preferences to enable people to stay together over the long term.	Not stated	Unlike suggested by the respondent, conventional (or self-contained) housing is a commonly understood term, used in the adopted and new London Plan and the London Plan AMR, and identified as one of the components of housing supply by the GLA - <a href="https://data.london.gov.uk/housing/housing-supply-data-sources/">https://data.london.gov.uk/housing/housing-supply-data-sources/</a> . To avoid further confusion, the Council will add definitions of conventional and non-self-contained housing in the Glossary, through a modification. The housing topic paper has discussion relevant to the other points raised, although it is slightly unclear what the respondent is referring with regard to some comments.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part K	Line Planning	Business	H1.K (specialist housing and vulnerable people) is strongly supported. Is there scope for further modification? We suggest that the justification text refers to the responsibility for ensuring that the housing provision is necessary and should therefore be supported by contributions from developers (probably in a pooling arrangement) as the S106 tests in terms of being site specific and mitigating the impact of the development proposal will not work for smaller sites. But arguably could work for strategic sites. The alternative is to use the CIL regime (derived from the Infrastructure Delivery Plan). ‘Relevant infrastructure projects’ should include housing related projects that are developed to meet emergency and short term housing needs (e.g up to 1 or 2 years) on site or could surely be funded by some pooled contributions that relate to ‘community safety’/ affordable housing (so householders who are eligible for universal housing credit would qualify). This may also have a cross cutting relationship with ‘preventing wasted housing supply’ policies which would enable developers to put this type of housing forward. It’s not clear to us whether the Update IDP 2019 document is actually adopted. Is there scope to amend it? Can legal advice be taken on using CIL for this purpose to mitigate against the constant financial crisis of funding such housing? Also see our paragraph 52 on this point.	Both	Support noted, although CIL cannot be used to develop housing. See response to policy H7 below, which is also relevant here.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part V	Line Planning	Business	Is Policy H1.V meant to also cross refer to Policy SC1 on social and community infrastructure?	Not stated	Policy H1 sets out the broad policy approach of the thriving communities section. Policy SC1 provides detailed policy regarding social infrastructure.
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part L	Line Planning	Business	H1. L and H7 We recommend a modification to this wording. We suggest it could be phrased differently e.g. Housing for older people will be predominantly met through conventional and supported housing. These will include models that support the independence of older people including co-housing, and forms of sheltered housing. Extra care home provision should be justified in the context of ‘need’ as indicated by demographic, health care, and social services data. This will ensure that there is sufficient housing provision to match the requirements for people with disabilities where conventional housing will not be adequate to meet need. The Council should not confuse the terminologies: co-housing with co-living. Does co-living need to be removed from the H Policies? We do not think there is a definition. Should the Council produce a Topic Paper on Housing for Older People (for the next housing review)?	Both	The Council’s approach to meeting older persons need is discussed in the specialist housing topic paper. It will principally be through conventional housing hence the suggested amendment is considered unsuitable. Co-living is covered by policy H11 as noted in the supporting text of that policy and policy H1. Co-housing is not a form of housing, it is an approach to designing communities. Co-housing could be acceptable in principle although there may be issues in terms of site optimisation and there are unlikely. Sheltered housing can be classed as older persons or supported housing; this is covered by paragraph 3.111 of the SDM.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraphs 14–15: The risk is that the mix of provision is dominated by 2b4p units. This may create units with very limited space e.g. without sufficient space or a mix which can offer a pipeline to families who require to upscale to 3/4 bed units. 2b4p will not meet the needs of growing families who need to have the right number of bedrooms, storage and study areas for education/work. 3 beds are required by law for a family with 2 kids with children of different sexes from age 10; otherwise there is statutory overcrowding. This is not mentioned in the policy justification text and could be helpful to include to remind developers.  Poor housing conditions such as overcrowding are a known factor in increasing the incidence of mental ill-health and these conditions may contribute to domestic violence as well. Small units can put pressures on young families to leave the unit before they ideally want to. Choice, comfort and greater permanence is what families want in general terms. Families should also be able to have space to accommodate temporary visitors.	Object	Two-bed units are considered the most suitable in general terms as they can accommodate a broad range of need including families. The size mix policy is flexible and can accommodate different mixes dependent on evidence of need. As noted in the housing topic paper, current evidence from the Council’s housing team indicates that 2b4p units are the priority size required.  While overcrowding could be a material consideration, it is not binding planning legislation. Two-bed units can provide important accommodation for families, even those with more than one-child. We note that the SHMA, in figure 63, shows that only 11% of Islington households have two or more dependent children.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraphs 16–17: Page 72 of the SHMA reports that Islington is worse than other London Boroughs for overcrowding: 29.1% of households in the study area are overcrowded based on an objective measure, which is much higher than England (8.7%). The Council needs to assess where the overcrowding is coming from and consider whether it has the correct policies in place to deal with this. Housing policy should actively address overcrowding so that the policy is justified, effective and meets the NPPF.  The relationship of space to occupants is relevant to Policy H4. It could be more logical to make H2 and H4 sequential so that ‘size mix’ is correlated with quality.	Object	Housing quality is extremely important, and any policy which undermines this would not be acceptable. Policy H2 has flexibility to allow for a range of housing sizes, but any units delivered must be high quality in line with policy H4. The housing policies are consistent with the NPPF and the London Plan. Alleviating overcrowding is not a specific requirement for plan-making, although it is a by-product in terms of meeting assessed housing need. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue.



Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraphs 18-21: Quality in terms of size standards should not become a race to the bottom, i.e. the minimum. A dominance of 2b4p category could contribute to an over- crowding problem in future housing cycles. Moreover that model serves developers most in terms of housing profit margins. It is not pegged to quality or monitored in terms of housing outcomes (of which we are aware).</p> <p>For some families with 2 kids, it is likely that the 2b 4p model will be out grown. Many families want to expand into larger spaces as children grow but they should not have to move home to do this. The life cycle of a family home needs to be looked at over a number of years, not just the short term. Families need to stay close to schools and their registered GP Practice. Severing those ties can be harmful to family and community life.</p> <p>The Council should not make policy to encourage the lowest common denominator of size mix across the board. It should encourage developers go above and beyond national minimum standards. Policy D4 Housing quality and standards London Plan are minimum housing standards.</p> <p>The basis for the size mix housing priorities and its assumptions set out in Table 3.2 therefore need to be tested and justified. Our reading is that the Table on mix size priorities is too high level as a starting point although it is merely indicative. But it does not give certainty to developers or the community and the policy should be finer grain referring to local circumstances in some cases.</p>	Object	The policy cannot be both indicative and fine grain. Policy H2 does encourage proposals to exceed minimum space standards, but it is important to note that these standards have been derived based on a decent amount of space for intended occupants. The size mix policy and space standards do not exist in silo. The Council has to plan for a range of needs and must make the best use of land. We encourage optimisation of housing sites to ensure this.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraph 22: This unit size may suit small young families but is not likely to meet the variety that the market could support and the housing variety that some developers and architects would be prepared to design and build for. Surely there is scope for more 3b provision including the bracket of intermediate-shared ownership.	Object	The size mix does not exist in isolation and there needs to be some recognition of affordability and other issues. Three-bed shared ownership units are unlikely to be affordable in Islington.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraph 23: The driver behind Policy H2 is presumably the NPPG standard test. But there is scope for nuance. H2B is a policy proposal that will drive down quality. The words “regardless of site size” should be removed as site size is a material consideration in decision making. We don’t think this is what is intended by the NPPG approach, guidance on density and so forth.	Object	The Council considers that all sites should optimise housing delivery, to make best use of land. Optimising does not mean quality is sacrificed, as policy H4 would also apply to any proposal. Optimisation is contextual and will be assessed on a case-by-case basis. The Council is unclear what the applicant means by the ‘NPPG standard test’.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraph 24: Optimisation does not mean maximisation. Alternatively, the policy could for example include extra wording as follows:-</p> <p>B (i) the contribution to meeting need for particular types of housing that will include addressing the backlog of overcrowding;</p>	Object	The Council is aware of the difference between optimisation and maximisation. Table 3.2 balances a number of factors to determine size mix priorities. Overcrowding would not be a particularly effective site-specific consideration for optimising every sites, although where information is available, this could be factored given the flexibility afforded by table 3.2 (noted in paragraph 3.31).
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraph 25: H2 text on conventional housing is therefore a policy which must be assessed against the correct data, recommendations about standards and other aspects of design quality. This is relevant to decision making so could be referred to in justification text. Is the 3.27 test from the NPPG? The standard method only leads to indicative trajectories and it would be helpful to clarify that in text. More could be done to explain the policy approach to decision making.	Object	Again, we are unclear what is meant by NPPG test or standard method, in the context of housing size mix. Policy H2 is based on the London Plan but tailored to the local context.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraphs 26-27: Quality and space standards should be assessed against lifetime needs. E.g. Many people are now working from home (and indeed are expected to do so by employers) and room sizes should reflect this reality. Requirements for a minimum of up to 2 desk spaces should be factored in – just as storage allocation was required to be factored into national housing standards some years ago. This will make home working a viable option.</p> <p>Families with disabled family members also need more space. In this regard ‘disability’ should surely extend beyond the wheelchair definition. People with special needs often require more space than both able bodied and mentally able people. It would therefore strengthen policy to include text to this effect in H2 (e.g.):-</p> <p>“all new homes must meet people’s lifetime needs and be adaptable. New housing developments should provide a variety of sizes to respond to changing needs in terms of bedroom provision and avoid over crowding. ”</p>	Object	Policy H4 requires high quality housing which is suitable for a broad range of occupiers, building on requirements set out in the London Plan. Minimum space standards are set out in the London Plan and do not factor in space for desks to accommodate home working.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraph 28: We refer the Council to MHCLG’s newly published National Design Guidance (October 2019) – see paragraph 67 which states that the built form of well-designed places should relate well to: the lifestyles of occupants and other users; this could be referenced in justification text. The issue about space links to the need to go above minimum standards. This could be a policy preference.	Object	The housing quality section of the housing topic paper discusses the National Design Guide. The document outlines fairly broad principles which the Local Plan is consistent with.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraph 29: From a viability point of view it may suit developers and Councils to meet principal provision on 2b 4p (so meeting Council housing unit targets). However, ultimately the test of good housing quality from the occupants’ point of view is not the response to viability. A balance has to be struck to safeguard the quality of the housing legacy.	Object	Two-bed units are not prioritised on the basis of viability. The housing topic paper discusses the justification for the housing size mix.
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraphs 30-31: The Council needs to mitigate risk by ensuring that there is housing variety in all locations. It should focus on keeping communities stable and secure, meeting needs for a variety of preferences.</p> <p>NPPF (paragraph 128) encourages Councils to work with applicants to bring proposals forward that take into account the views of the community. We are not aware that the Council have expressly consulted the community on borough wide housing choices and preferences.</p>	Object	Paragraph 128 relates to individual development proposals. The Council promotes pre-application and early engagement. The consultation on the Local Plan is separate but has been very wide ranging. The consultation statement provides further details.
R19.0094	Strategic and Development Management Policies			Evidence base, SHMA	Line Planning	Business	<p>The housing backlog also has to consider the number of ‘concealed homes’ in the approach to homelessness (SHMA page 67). The number of concealed families living with households in Islington increased from 709 to 917 over the 10-year period 2001-11 (Figure 50), an increase of 208 families (29%). And also a very old piece of data. The number of sharing households increased from 1,078 to 1,624 over the 10-year period 2001-11 (Figure 51), an increase of 546 households (51%).(SHMA page 68). Questions: is there a policy case for separating the categories of people caught by homelessness or inadequate homes for different reasons? Grouping them together in the way proposed is a conventional way of addressing this aspect of need but restricts policy solutions in finer detail. The distinct needs of the borough need to be identified. The provision of small sites to help meet vulnerable need could be a consideration (e.g. larger developers buying sites for 50+ homes but then providing an off site small site to help meet this type of need under a S106 or CIL obligation). The s106 “Community” heading in the SPD dated 2016 could then be amended in line with policy. At present it is not sufficiently explicit about the need to include a funding element for the above.</p> <ul style="list-style-type: none"> <li>• The link in terms of the relevance of the S106 statutory tests for the aged and victims of domestic violence (many of whom will have children with them) can be met by a ‘general needs’ justification.</li> <li>• Homelessness could have its own distinct test. Or provide clarity if a specific NPPG test applies</li> </ul>	Object	The SHMA methodology is robust and consistent with national policy and guidance. Policy H9 allows consideration of updated need during the plan period. See response to policy H9 re: suggestion for obligation.

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R19.0094	Strategic and Development Management Policies			N/A - general comment	Line Planning	Business	Policy needs to ensure that forthcoming housing schemes are fit for purpose and address projected and existing need. The Council should be adopting policy that will 'contribute to meeting an unmet need for development in the area'. This is entirely consistent with para 120 and 121 of the NPPF. The Council should be actively working with a range of developers and community groups to explore policies that make more effective use of land in terms of housing choices and provision. This means widening the range of schemes available more proactively and getting feedback and ideas from the community with respect to housing market distortions and the best way to address them. Data sets and proposals for policy wording need review, otherwise the proposed policies are at risk of being unsound. The Council needs to introduce a further data set on KPIs to monitor that its services are providing the right kind of housing access, particularly with respect to overcrowding, homelessness and older people. Policy could be more joined up in terms of its coherence and evaluation of its expected outcomes.	Object	The council's approach to meeting housing need is set out in the housing and specialist housing topic papers. The approach is consistent with national and regional policy. Some of the services mentioned sit outside planning.
R19.0094	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people	Line Planning	Business	Considers that the ORS data may not be considered sufficiently robust and should be checked against latest Government PPG guidance produced in July 2019. In addition points to reports from Clinical Commissioning Group around quantum of care homes in Islington vs rest of North London. On this basis disagrees with policy which states that there is no need for market extra care in the borough.	Object	Further detail on data for older people is provided in the topic paper which considers the specific local need for extra care housing in the borough. The topic paper also provides detail on why market extra care is not suitable in a borough like Islington.
R19.0094	Strategic and Development Management Policies			Policy H9: Supported Housing	Line Planning	Business	Considers that further up to date data on levels of homelessness should be used as a basis to seek funds from S106 / CIL to address the insufficient funding available to deal with housing vulnerable people.	Object	The Council considers that the approach taken which prioritises the provision of conventional affordable housing is the best way to deal with social issues created by the levels of unaffordable housing in the borough. Seeking further contributions to try and address housing for vulnerable people may jeopardise the overall quantum of affordable housing achieved which may affect housing for vulnerable people. Policy is H9 supports new supported housing in the borough.
R19.0094	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people; Policy H9: Supported Housing	Line Planning	Business	Seeking a policy trigger to be added to consider the potential for use of retail space for housing in recognition that high streets need to evolve.	Object	Retail policy recognises the need to be more flexible around the uses considered in town centres, however residential is not one of the uses considered. Once retail space is lost to residential it does not return. Other impacts such as provision of local services, community facilities, employment space and maintaining active frontages needs to be considered.
R19.0095	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	London & LA Ltd	Landowner	The Council has failed to identify the potential of the concrete batching plant site and adjoining Network Rail land off Randell's Road (York Way) for major mixed-use regeneration, including the potential for a tall building(s). The proposed local and protected viewing corridor from Randell's Road Bridge to the Market Road Clock Tower is flawed and unnecessarily hinders development in the area.	Object	The CEMEX plant was not put forward during any previous consultation. It was proposed as a site allocation during the preparation of the adopted site allocations but was removed following examination as the site was not considered appropriate for development. The site has operated for 50 years and CEMEX hold a long lease.  It is unclear what specific bit of land the respondent is referring to when they state "adjoining Network Rail land"; we note that site allocations KC1 and KC5 cover a significant portion of land adjacent to the rail line.  SP3 part F refers to views of a local landmark rather than a protected viewing corridor. Policy DH2 provides further detail.
R19.0096	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs)	Pause Living	Developer	Pause develop and operate purpose-built shared housing (sometimes referred to as co-living). They are concerned about approach to this type of housing set out in the Local Plan; this conflicts with the London Plan. The NPPF, London Plan and Islington SHMA set out significant need for housing. Purpose built shared housing can make a contribution to this. The Local Plan should positively enable the assessment of applications for co-living, even if it still prioritises conventional accommodation.	Object	We note that the Local Plan is considered to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H10 of the Regulation 19 document. A number of issues raised are explained in the policy supporting text, and are also elaborated in the Housing Topic Paper. Of most relevance is the fact that large scale HMO or co-living schemes are considered to undermine efforts to maximise affordable housing and will effectively waste precious land which could be used for more priority needs. This type of accommodation is potentially a flash-in-the-pan and not a sustainable model of development in the long-term.
R19.0097	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Sensible Music Ltd	Business	The respondent supports the promotion and preservation of industrial uses in the Vale Royal/Brewery Road LSIS.	Support	Support for the promotion and preservation of industrial uses in the Vale Royal/Brewery Road noted.
R19.0098	Strategic and Development Management Policies			N/A - general comment		Resident	Thank you for sight of these fascinating documents. To me, your plans seem excellent. I feel privileged to live in an area run by such a wise & clear thinking council.	Support	Support noted.
R19.0099	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	M & G Real Estate	Landowner	There is a reducing requirement from retail occupiers and the number of occupiers for retail space. The policy target to increase the amount of retail floor space within all centres should be amended to reflect the positive strategy as identified in paragraph 85 of the NPPF. Amendment should include an objective to increase all main town centre uses in town centres as it is not realistic to target only an increase in retail floor space.	Object	Although there is evidence of challenges facing traditional retailing, Islington's town centres and especially Angel continue to enjoy a thriving A1 retail market. Contrary to the respondent's representation, Policy SP4 does not focus purely on increasing A1 use floorspace. Part B states 'further retail, leisure and service uses are considered suitable across Angel Town Centre to support and enhance this offer and to meet the limited need for new floor space over the plan period'. Outside of Primary Shopping Areas, all main town centre uses are supported.
R19.0099	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	M & G Real Estate	Landowner	Paragraph 4.64 of the emerging local plan states 'there are significant structural challenges facing the retail sector from internet shopping to changing retailer and customer requirements and demand', yet Policy R1 maintains that retailing (A1) as the predominant town centre use. This protection will be even stronger in Primary Shopping Areas. This policy would be a backwards step and contrary to the NPPF para 85a that seeks to allow town centres to grow and diversify in a way that can respond to rapid changes in the retail market.	Object	Policy R1 acknowledges the challenges retailing and commercial centres face. However, A1 retailing still is and is expected to be the predominant town centre use. All policies are in line with the NPPF, with the approach taken towards town centres specifically designed to allow them to 'grow and diversify in a way that can respond to rapid changes in the retail and leisure industries'. This does not mean that spatial designations within town centres are now unnecessary. The PSA approach seeks to consolidate A1 retailing in a highly accessible and connected town centre core with remaining parts of the town centre open to change use between main town centre uses. The policy is fully flexible and will also allow change in PSA where evidence is provided.

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R19.0099	Strategic and Development Management Policies			Policy R2: Primary Shopping Areas	M & G Real Estate	Landowner	An approach requiring a proportion of units within the PSA to be Class A1 would be dated and inflexible. Instead a case by case consideration of a range of town centre uses that does not undermine the predominance of A1 retail is a better approach to securing long term vitality and viability. This will accord with Objective 5 of the Local Plan. Respondent cites CBI report (June 2019) that UK Retail Sales fell at its fastest pace for ten years, and that retailers' requirements for new floor space is significantly reducing as well as occupiers store portfolios. Respondent undertook a survey of the emerging Primary Shopping Area in Angel which was at 60.8% which makes a 60% A1 requirement here quickly unachievable and will lead to increased vacancies. It is therefore not a positive strategy and will become outdated within the 15-year plan period. The two-year marketing requirement is counter-productive to ensuring town centre vitality and viability. Some landlords are retaining some retailers temporarily on rates only deals while they market the premises, however, requirement for the unit to be vacant would mean a longer period of time to attract an occupier. The policy should not be overly prescriptive in setting specific percentage thresholds. It is crucial for landlords to be able to act decisively to meet opportunities to accommodate uses alternative to A1 use that can contribute to vitality and viability. Such an approach is required by the NPPF paragraph 91 and paragraph 85a that requires the promotion of long term vitality and viability of town centres.	Object	Identification of PSAs is consistent with the NPPF. A two-year marketing and vacancy requirement is appropriate in order to retain A1 uses in the PSA whilst giving flexibility over the plan period. Given that the PSAs cover the core parts of town centres vacancy rates will likely be limited (based on past trends) and therefore any vacancy which did materialise will not have a detrimental effect on the viability of the PSA and town centre as a whole. The Retail and Leisure Study 2017 acknowledges the challenges A1 retailing will experience, however the study also forecasts an increased convenience and comparison capacity need up to 2036. It is noted that Islington's town centres continue to enjoy a relatively thriving A1 retail market. As the respondent recognises, the Council has moved away from more prescriptive primary and secondary frontages in order to provide more flexibility to develop main Town Centre uses across large parts of the town centre. A case by case assessment of all change of use applications is a strategically weak approach to planning and provides no certainty for developers. Policy R2 is reflective of Objective 5 by making Islington's town centres commercially legible with a concentration of A1 retailing in an accessible, connected core, allowing other parts of the town centre to host a wider range of main town centre uses. The council's minimum PSA A1 thresholds are above the current A1 mix but current percentage is not the only determination when deriving the threshold; regard needs to be had of the context of the area, and as Angel is Islington's main retail centre, capable of drawing people from outside the borough, the PSA target is set at a level that is aspirational but achievable. The policy will also only be effective where existing A1 uses are changed; PSAs feature a number of other uses and the change of use of such uses would not further diminish the threshold as these are not bound by the threshold.
R19.0099	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	M & G Real Estate	Landowner	Policy R3 focuses on protecting A1-A5, D2 and Sui Generis main town centre use floorspace to designated centres. However, the policy should be updated such that it takes account of all main town centre uses as defined by the NPPF.	Object	The emerging Local Plan uses the NPPF definition of 'main town centre uses' which is clearly defined in the Local Plan glossary. Furthermore, A1-A5, D2, Sui generis uses cover all the uses defined in the NPPF. Page 143 states how B1 uses are also suitable town centre uses, however, proposals for B1 uses in town centres will be assessed against policy B2. The Local Plan also restricts other Town Centre uses such as hotels, limiting their suitability to specific locations.
R19.0099	Strategic and Development Management Policies			Policy R8: Location and Concentration of Uses	M & G Real Estate	Landowner	Respondent understands the aims of the policy but feels it is not appropriate to resist concentrations of food, drink and night time economy uses where these would add to vitality and viability of town centres. A case by case approach should be taken that seeks to no undermine the predominance of A1 retailing. Landlords and operators of commercial property assets have sought to provide a much wider offer to increase attraction and dwell times which has seen a substantial increase in leisure floor space. As such the policy should be more flexible.	Object	Policy R8 has quantitative limits on betting shops and Adult Gaming Centres and hot food takeaways in town centres, but otherwise does take a case by case approach in terms of limiting overconcentration. The Council considers that this approach will assist with protecting and enhancing vitality and viability.
R19.0100	Site Allocations	FP3: Finsbury Park Station and Island, Seven Sisters Road	Finsbury Park		LB Haringey	Statutory consultee	It is noted a number of Site Allocations within the Finsbury Park Area propose tall buildings as part of a cluster within that area. It is welcome that the proposed heights have been robustly considered in the Islington Tall Buildings study and it is considered the criteria within Policy DH3 are an appropriate framework to manage tall building proposals across the Borough including impacts on the visual amenity and views within adjacent authorities.  There is strong support for Site Allocation FP3: Finsbury Park Station and Island, and the allocation for improved underground and railway station infrastructure and public realm, which will help support growth on the Haringey side of Finsbury Park.	Support	Support noted.
R19.0100	Strategic and Development Management Policies			N/A - general comment	LB Haringey	Statutory consultee	Haringey remains committed to working with Islington on cross-boundary issues particularly in respect of the Finsbury Park area, where both boroughs have strategic objectives for managing growth.  With regards to the agreed strategic matters in the signed Statement of Common Ground between our Boroughs, and the content of the Proposed Submission Local Plan, Haringey broadly supports the objectives and policies within the Local Plan and consider it a sound and appropriate strategy.	Support	Support noted and commitment to ongoing engagement welcomed.
R19.0100	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	LB Haringey	Statutory consultee	There is specific support for Policy H2 and Islington's commitment to meeting its share of London's growth by adopting the Housing Target set out within the draft London Plan for Islington.	Support	Support noted.
R19.0100	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	LB Haringey	Statutory consultee	Policy H12: Gypsy and Traveller Accommodation is supported and considered sound, specifically provision A(i) and A(iii), noting that is unlikely that Haringey will be able to accommodate additional pitches above our own targets. Haringey therefore supports joint working with the GLA and working with other Boroughs on a sub-regional basis as one option to accommodate need.	Support	Support noted.
R19.0100	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	LB Haringey	Statutory consultee	Haringey also considers the policies to manage the retail areas of Islington, particularly those of Finsbury Park and Archway appropriate and support the Primary Shopping Areas defined and the direction of A1 retail to those locations, which will enhance the vitality of these town centres.	Support	Support noted.
R19.0100	Strategic and Development Management Policies			Policy ST2: Waste	LB Haringey	Statutory consultee	It is welcomed that Policy ST2: Waste, safeguards the Hornsey Street Re-Use and Recycling centre, and Haringey will continue to work with Islington and the five other North London Boroughs in progressing the North London Waste Plan through to adoption. Support is therefore given to criterion B of this policy as the appropriate strategy for ensuring sufficient land to meet waste management needs is through the North London Waste Plan.	Support	Support noted.
R19.0101	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	GMS Estates Limited	Landowner	Respondent is concerned about the restriction on B1(a) business space from policy SP3 which will result in an inefficient use of land and it is not consistent with the council's evidence. Proposes drafting policy SP3 in accordance to London Plan 65% plot ratio benchmark for retaining industrial/storage capacity, but without restrictions on the introduction of flexible B1 uses (including office).	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion. The Council's approach to industrial uses is consistent with the London Plan, as confirmed by the Mayor's conformity response at regulation 18 and 19 stages.

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R19.0101	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	GMS Estates Limited	Landowner	Respondent objects to blanket restrictions that buildings should not exceed more than 20m in height. The respondent defends that the character of Brandon Road (and wider LSIS) is not sensitive in townscape terms and is not justified in the council's evidence base.	Object	<p>The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>
R19.0101	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	GMS Estates Limited	Landowner	Respondent states that view of the Market Place Clocktower from Randell's Road to the south has no merit and should be removed.	Object	The Clocktower is an important local landmark. Views of the clocktower are a key element of the local townscape and add to local distinctiveness. Policy DH2 provides further detail.
R19.0102	Strategic and Development Management Policies			Policy B4: Affordable workspace	Studiomakers	Business	The respondent asks for further clarification about the definition of "peppercorn"; longer lease periods beyond 20 years that are more attractive to operators; to add cap per square foot to service charge requirements; to include lost community benefits in the formula for affordable workspace in lieu payments. The respondent also recommends a series of operational aspects such as marketing and agreeing the lease for the space early, and to vet and monitor eligible operators that will be managing the workspaces.	Not stated	The council's Inclusive Economy team manages the process for any affordable workspace secured, including terms for lease agreement. The end users of such space is determined through a commissioning process, led by the council's Inclusive Economy team, which focusses on ensuring social value outputs. Further information is set out in the council's Affordable Workspace Strategy.
R19.0103	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	British Property Federation	Business	BPF consider that policy H11 is extreme. The Council does not explain what is identified housing need in Islington? The mere fact it is willing to accept new developments with investors buying individual units would suggest there is a need for new Private Rented Sector (PRS) accommodation in the Borough, particularly as the Council pursues a number of policies that seek to ensure such new units are occupied. It cannot have it both ways. Either there is a need for PRS accommodation, or there is not? BPF also note that the policy contradicts the NPPF by restricting APR. BPF argue that some criteria is contradictory as the Council says there is no need but then requests a 50 year covenant (which is not justified). Clawback requirement is unnecessary alongside covenant. The Council argue there is no issue with housing delivery but they have failed the housing delivery test; excluding build to rent would therefore make policy unsound.	Object	A number of issues raised are explained in the policy supporting text, and are also elaborated in the Housing Topic Paper. In summary, the Council is not precluding private rent, as noted in paragraph 3.137; it is the BtR business model which the Council takes issue with, as it is a means to undermine policy requirements. A 50 year covenant reflects a fair assumption of a building's lifetime and is considered a reasonable quid pro quo. The covenant and clawback mechanism are not the same thing; covenant ensures that the units remain in private rent; clawback triggers if this is broken. Both are essential in order to disincentivise use of the PRS business model as a means to undermine affordable housing policy and other policy requirements. LBI did fail the 2018 HDT but the trigger for this is to provide a 20% buffer on the five year supply, not to take a laissez faire approach to approving any and every niche housing type. It is noted that Islington have only failed to meet our housing target once in over a decade, and that we can demonstrate a healthy five year supply.
R19.0104	Strategic and Development Management Policies			Policy R11: Public Houses	CAMRA North London Branch	Campaign	CAMRA fully support comments from Theatres Trust and GLA relating to marketing efforts to be a rent or sale price appropriate to the existing use and the supporting of new pub proposals in line with London Plan policy HC7. Welcome the addition of Appendix 1.	Both	Comment noted. Appendix 1 requires the property to be marketed at a price that reflects market value including independent professional valuation from at least three agents.
R19.0104	Strategic and Development Management Policies			Policy R11: Public Houses	CAMRA North London Branch	Campaign	Additional pub protection should be given in line with the Agent of Change principle in London Plan policy D12. Other protective policies, especially relating to the viability of a pub once assets like the kitchen or beer garden are removed or reduced. Consider the approach Camden Council have taken in paragraph 4.71 of their local plan.	Both	R11B(ii) and DH5 cover this, as explained by paragraph 4.162. Part A of policy R11 and 4.159 cover change of use of part of a pub.
R19.0104	Strategic and Development Management Policies			Policy R11: Public Houses	CAMRA North London Branch	Campaign	Islington should welcome ACV nominations for all public houses within the borough, similar to that stated in Camden Local Plan paragraph 4.73. The council should consider automatic ACV listings for a nominated list of pubs.	Object	Islington do welcome ACV applications, especially for uses such as pubs. ACV applications do not however preclude change of use of public houses, and just allows the community to have a chance to bid for the purchase of the building. Policy R11 offers strong protection for pubs and an ACV application would be a clear demonstration the pub has community or social value and would provide a strong basis for refusal of change of use. Automatic ACV listings would not be consistent with legislation which sets out requirements that each and every ACV application must address. It is noted that the PD rights referred to in para 4.73 of the Camden Local Plan have been amended; there are now no PD rights relating to A4 change of use.
R19.0105	Strategic and Development Management Policies			Policy H4: Delivering high quality housing, paragraph 3.80		Resident	Notes para 3.80 and requests that this applies to existing as well as new properties. Highlights quite a few issues relating to bins.	Object	Planning policies cannot be applied to existing development unless they were being redeveloped.
R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	<p>HBF note viability studies produced to support the plan.</p> <p>Some costs are assumed to be already 'embedded' within BCIS costs. See paragraph 2.41 of the December 2018 report. This cannot be assumed. Up until now many schemes are not entirely 'policy complaint' across the full range of policy requirements. To ensure that the assessment provides a reliable indicator of what development can viability accommodate, it would be helpful if the Council provided an overview of the percentage of affordable housing supply across its schemes over the last four years since the London Plan 2015 was adopted (the Minor Alterations to the London Plan that incorporated the optional technical standards). While affordable housing is only one of a number of policy requirements in the Islington Local Plan, it would provide a good indicator of the extent to which applicants have been able to be policy compliant.</p> <p>Nevertheless, we think it would be prudent for the Council to assess the cost of policy requirements listed in para. 2.41. to ensure that development will be viable. An alternative would be to factor in a contingency expressed as a percentage of total build costs including fees (base unit build costs, external and abnormal costs). This would cover the possibility that not all schemes in the recent past have incorporated fully all the elements of policy in the London and Islington local plans.</p> <p>We would also question some of the other value inputs into the appraisal that we consider may be pitched too low. Evidence from landowners would be helpful here and we urge the Council to engage with them to test the assumptions in the two reports.</p>	Object	<p>These issues are discussed in the viability topic paper.</p> <p>With regard to past delivery of AH, this is irrelevant for viability purposes as it would reflect the specific site circumstances at a given point in the past, whereas plan viability tests the viability of proposed policies. The methodology for site specific and plan viability is different, as noted in PPG, e.g. through allowing use of site typologies. Regardless of this, past AH delivery is identified in the AMR.</p>

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R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	The report assumes a rate of 6%. We think this is a little low. The HBF recommends 6.5 to 7% as a more reliable rule of thumb reflecting the range of companies operating within the residential development sector. Homes England uses a range of between 5-7%.	Object	These issues are discussed in the viability topic paper.
R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	The report assumes 3% for marketing. The HBF recommends a figure of between 3-5%. A higher figure would be more appropriate in weaker market areas.	Object	These issues are discussed in the viability topic paper.
R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	<p>The report assumes a profit margin of 18% for private development. The Harman review had suggested a minimum return on capital employed (ROCE) of 25% but this would depend on the degree of site-specific risk. The PPG suggests that a figure in the range of 15-20% of GDV could be used, but like Harman, states that the figure used should reflect the risk profile of sites in the borough. As the PPG states:</p> <p><i>For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.</i></p> <p>Compared to other areas in the UK, Islington is a relatively 'safe' market. However, given that the report assumes 6% return on GDV for affordable housing, and given that affordable housing will need to constitute 50% of the supply on each site, this assumption may pull-down the overall rate of profit to below 15% of GDV – i.e. below the minimum level recommended by the PPG. Our calculations indicate that this could pull profit down to 14.5% on schemes.</p>	Object	These issues are discussed in the viability topic paper.
R19.0106	Strategic and Development Management Policies			Introduction	Home Builders Federation	Business	Policy H2 provides a housing target that runs to 2028/29. The plan period should end at 2028/29 if it is unable to identify a land supply that beyond this date. The Local Plan should extend one year beyond the 10 year housing target end date (2028/29) as it will be adopted after the London Plan.	Object	<p>Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption. The plan period is not determined solely on the basis of housing land supply. We note that there are a number of evidence documents, notably covering housing, employment and retail, which project needs up to 2035, 2036 and 2036 respectively.</p> <p>With regard to the point raised on disparity between London Plan and Local Plan adoption dates, the housing targets derive from the London Plan, which itself is informed by the SHLAA. The SHLAA assessed capacity of actual housing sites and phased these to specific years based on borough knowledge. The London Plan target is based directly on this site-specific information. The HBF response relating to the plan period is confused as on one hand it states that a housing target shouldn't be rolled forward if there is no land supply, but then advocates doing this in the next sentence (based on a misunderstanding of how the London Plan targets work). Policy H2 advocates rolling the target forward but recognises that targets are likely to be reviewed ahead of 2028/29; the housing topic paper provides further discussion on this.</p>
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part E	Home Builders Federation	Business	<p>The term genuinely affordable could be misleading as the general public may think this refers to affordable home ownership. The policy should be recast to reflect the 70/30 tenure split. Notwithstanding this, policy should allow for full range of affordable housing specified in the NPPF Annex 2. HBF refer to research from the Affordable Housing Commission which highlights support for affordable home ownership. HBF also refer to the SHMA which indicates that there is an appetite for home ownership and an ability to afford low-cost home ownership products. They note strong national and local public support for policies that support home ownership, and state that this could be supported further through local measures to prioritise existing Islington residents by providing 'first dibs' opportunities as some housing providers already operate. HBF recognise issues with realism of aspirations for home ownership, but consider that the Council should avoid adopting a stance on housing supply that could be considered somewhat paternalistic by their constituents, and that Policy H1 and H3, consequently, should be more supportive of other types of affordable housing product.</p> <p>HBF suggests some additional wording which would recognise other affordable home ownership products and allow for alternative tenure splits based on a consideration of local circumstances and in response to expressed preferences of local people.</p>	Object	<p>The housing topic paper provides further discussion on these issues.</p> <p>The HBF are right to highlight scepticism that ownership aspirations may not be realised. Evidence from the SHMA clearly identifies issues regarding the affordability of various 'affordable' home ownership products. The scale of need for social rented accommodation is vast, so deferring to aspirational need is unlikely to be realised by those expressing the aspiration.</p> <p>The Council's approach is not paternalistic but realistic and based on strategic planning. Given Islington's scarce land resource, the Council's key concern is meeting housing needs based on actual evidence - not a stated preference - and promoting home ownership is not an arguably effective way of meeting these needs. Taking into account the evidenced housing needs in the borough, the Council's conclusion is that promoting unaffordable home ownership products because they would meet aspirations would be inconsistent with the objectives of strategic planning.</p>
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part F	Home Builders Federation	Business	Part F should clarify tenure split sought. Notwithstanding this, there should be flexibility in the tenure split to allow for other affordable home ownership products.	Object	Policy H2 sets out required tenure split. Genuinely affordable is defined in the glossary. The 70/30 split has been viability tested and it reflects identified need for housing in the borough. The housing topic paper provides further discussion on this.
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part G	Home Builders Federation	Business	Seeking AH contributions from small sites is inconsistent with national policy. Different definitions of small sites are noted. HBF consider needs to do more work, in line with the Draft London Plan and national policy, to identify more specific sites to help sustain delivery against the small sites target. The Council needs to do more work to interrogate its housing land supply to justify the disapplication of the national policy.	Object	Justification for the small sites contribution is set out in the small sites topic paper. There are different definitions of small sites but the plan is clear about which definitions apply. The Council's current adopted Local Plan seeks contributions from 1-9 units and the proposed policy is a continuation of this. The Council have set out a number of allocations on small sites consistent with national policy (paragraph 68 of the NPPF). We note that in terms of the small sites element of the housing target set out in the London Plan, Islington are the only borough where this is based on actual trends, hence demonstrating actual delivery of the quantum of units. Regardless, the London Plan supports use of the small sites component as a windfall assumption in housing trajectories, and this is supported in the London Plan inspector's report.
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part I	Home Builders Federation	Business	The Council needs to provide a SHLAA and Five Year Land Supply statement to support the delivery of the plan.	Object	The London SHLAA 2017 provides the basis for the housing requirement in Islington's Local Plan. The Council's latest FYS - covering the 2018/19 monitoring year - is available on the Council's website and shows a healthy Five Year Supply.
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part J	Home Builders Federation	Business	Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should be provided or the policy should be deleted.	Object	Policy H2 provides further detail with regard to size mix. The housing topic paper provides further discussion on this.

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R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part L	Home Builders Federation	Business	<p>Policy is unsound as it will fail to cater for the need for older persons housing as required by national and regional policy and guidance. The Local Plan will need to be revised to refer to the Draft London Plan older persons benchmarks. Policy should introduce a ‘presumption in favour of schemes involving older persons housing’ in the policy if the benchmark target is not achieved in both of the previous two years after the plan has been adopted. The presumption would dis-apply as soon as the benchmark target is achieved in the current year. Supporting paragraph 3.18 is unsound and unjustified in stating that the Council will reject applications for older persons housing; the effect of Islington Council’s decision not to provide any older persons housing would be to shift the burden of responsibility onto other boroughs. They would be faced with greater demands for older persons housing in their own areas as to make-up for those homes not being provided in Islington – in the order of 60 units a year. The Council’s rejection of older persons’ housing on the basis that it requires more communal space is mean-spirited. Communal areas are an essential part of housing for older people.</p> <p>Islington Council should avoid developing a reputation as borough that is only interested in housing the young and able-bodied. HBF quote research by WPI which argues how the provision of specialist older persons housing will help reduce the cost to the public purse in terms of reduced health and social care dependency.</p>	Object	The policy does not preclude specialist older persons housing, it prioritises conventional housing adaptation as the prime method of meeting the need for older peoples accommodation. Policy H7 provides detailed criteria which specialist accommodation will be assessed against. The housing topic paper provides further discussion on this and includes evidence from Islington's Commissioning team (older people) to support policy approach.
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part V	Home Builders Federation	Business	The policy is unclear about what is being required and how decision-maker can take policy into account. It is the responsibility of the Council as the plan-maker to make policies that cumulatively have the effect of ‘maximising social value’. These policy requirements should be specific and deliverable. Policy should be deleted.	Object	Policy SC4 sets out detail on maximising social value. The Local Plan as a whole does advance and deliver social value. The approach set out in H1 and SC4 aims to secure benefits above and beyond this. The policy is significantly flexible and can be applied on a case-by-case basis. It is ultimately up to an applicant to set out what (if any) measures are proposed as part of this policy.
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Home Builders Federation	Business	<p>Para. 3.22 of the Local Plan and table 3.1 suggests that the Council is relying on the GLA SHLAA 2017 for the identification of the housing land supply. This is unreliable. As the GLA itself recognises, the GLA SHLAA 2017 does not allocate land (para.1.5), site level information that the GLA draws upon is not publicly available (para. 1.6), and it is for each local planning authority to determine which of the sites in the SHLAA should be formally identified and allocated through their development plan (para. 1.6).</p> <p>Paragraph 4.1.8 of the Draft London Plan states that “boroughs should identify as many sites, including small sites, as possible via their Development Plan documents”.</p> <p>The GLA SHLAA cannot be relied upon by the Council to satisfy the requirement of para. 67 of the Framework. The Council needs to set out which large sites it is relying on for the first ten years of the Plan (to deliver the 10-year Draft London Plan requirement) and work to identify more specific small sites to address para. 68 of the NPPF. Para. 3.24 of the DILP states that a number of allocations have been made by the Plan but these will only address the large sites benchmark.</p> <p>Note that they have been unable to locate an up-to-date housing trajectory which would be helpful to interrogate whether the housing objectives of the Plan are deliverable.</p>	Object	The Council do not rely on the SHLAA for the identification of housing land supply. The Council have an up-to-date housing trajectory/FYS published in September 2019. The Site Allocations and AAP sets out housing capacity by spatial strategy area. Paragraph 3.24 is misquoted by the respondent - it notes that the majority of allocations address the large sites benchmark. What is also true is that the allocations also identify housing supply from small sites consistent with the requirement of paragraph 68 of the NPPF - this is discussed in the LBI response to comments on PLAN1 above.
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Home Builders Federation	Business	No reference to the London Plan small sites policy. Notes that table 6.3 of the GLA SHLAA which shows that in the last ten years – 2004/5 to 2015/16 housing completions on small sites from all sources (change of use, conversions and new build) was 7,080 in total or an annual average of 708. While this provides some reassurance that the DLP monitoring target of 484dpa from small sites is achievable, whether delivery at this rate can be sustained over the next ten years requires closer analysis. Considers that the Plan should be revised to explain how the Council will encourage small sites delivery in Islington including the application of the presumption in favour of small site development (referred to in supporting text in para. 1.29 but not in policy). This does also beg the question whether the weight of policy expectations introduced by the Islington Local Plan (e.g. the approach to affordable housing and Policy SC2: Play Space) are conducive to achieving 484 completions a year from small sites.	Object	Policy H2 requires all proposals - regardless of site size - to optimise use of a site; the policy was welcomed by the Mayor in his Regulation 19 conformity response. The London Plan inspectors report casts some doubt over the role of the 'presumption in favour of sustainable development', in light of the recommended reduction of the small sites element of the housing targets; regardless, Islington's approach is consistent with the Mayor's policy on small sites and increasing housing supply generally. In terms of the reliance on small sites to justify meeting future housing targets, we note that the London Plan (in para 4.1.8) advocates use of a windfall assumption in their housing trajectories, based on the small sites component of their housing target; this is supported by the inspectors report paragraph 174. Islington is unique amongst other boroughs in that our small sites component is trend based, meaning it is based on actual delivered capacity. While we recognise that the borough context is challenging in terms of ongoing site availability, the Council consider that the small sites element is deliverable going forward. The policies of the plan have been considered in the round and have been subject to viability testing; they are considered to be deliverable. The respondent offers no detail of what elements of specific policies are not conducive to achieving the small sites benchmark.
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing, Part A	Home Builders Federation	Business	<p>Part A is sound because it aligns with the Draft London Plan (DLP), although it is noted that the plan is potentially subject to change following the inspectors report.</p> <p>HBF note need figure of 1,150 from SHMA and provide standard method need for comparative purposes (a figure of 2,492dpa would be needed (1,800 households per annum using the 2014 household projections, based on a period 2017-2027, applying the latest median workplace-based affordability ratio of 15.69 for Islington, and applying a 20% cap).</p>	Not stated	The London Plan inspector's report has recommended a reduced overall housing target but Islington's figure for small sites remains the same. The SHMA and standard method figure are not applicable as the targets set out in the London Plan will apply, as per guidance in PPG. The housing topic paper provides further discussion on this. For clarity, the standard method figure set out is incorrect and does not follow method set out in PPG. The topic paper provides the correct figure for comparative purposes.
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing, Part H	Home Builders Federation	Business	<p>Part H requires developers to enter into a S106 obligation to ensure that all residential units will be occupied, which is inconsistent with CIL regulations and the NPPF.</p> <p>The policy is not supported by evidence; cites research from LSE and the Universities of Sheffield and York. Respondent notes GLA concern that a large proportion of property priced under £500k was increasingly being purchased by overseas buyers. This is of concern because this is the key entry level price bracket for UK residents and first-time buyers. The prime markets are less of a concern politically. The HBF has worked hard with the Mayor to introduce the so-called ‘First Dibs’ initiative whereby homes are marketed exclusively to Londoners for three weeks before they can be marketed overseas. This is referred to in para. 4.1.6 of the DLP. Most HBF members operating within London are signatories to this protocol. The HBF will be meeting with the GLA on the 13 November 2019 to review the parameters of the scheme and its effectiveness to date.</p>	Object	The requirement is considered necessary. The housing topic paper provides further discussion on this. The issue of overseas buyers is distinct from 'buy to leave'.
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part A	Home Builders Federation	Business	Part A is unsound because it is contrary to national policy. It fails to provide sufficient clarity for the applicant and decision-taker. The Plan, therefore, needs to be amended to make it clear that 50% affordable housing is the maximum that is to be expected from sites delivered on privately owned land. This is supported by the evidence from the two viability reports.	Object	The affordable housing requirements in the plan are clear. 50% is a strategic target over the plan period and reflects the London Plan; site specific policy is set out elsewhere in policy H3. Paragraphs 3.39 and 3.40 provide clarity. The viability topic paper provides further information on the level of affordable housing.
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part B	Home Builders Federation	Business	<p>Part B (ii) requires applicants to “exhaust all potential options for maximising the delivery of on-site affordable housing to reach and exceed the strategic 50% target...”</p> <p>This is unsound because it is unclear and lack of clarity, contrary to paragraph 16 (d) of the NPPF. This should be deleted. The Council should set out a clear requirement for affordable housing obligations. This should be 50% including on publicly owned land, bringing this into line with the Draft London Plan.</p>	Object	Part B(ii) works alongside Part B(i). Paragraph 3.45 gives clarity on the potential options to maximise delivery. The Mayor expressed support for the approach in policy H3 in his Regulation 19 conformity response. It is noted that Part B(ii) works in a similar way to policy policy H5(A)(2).

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R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part H	Home Builders Federation	Business	<p>The Plan is unsound in rejecting other forms of affordable housing defined in the glossary to the NPPF. Para. 62 of the NPPF requires plan-makers to apply the definitions contained in Annex 2 of the Framework. While we appreciate the desire of the Council to focus on social rent and intermediate homes, there may be instances where these other affordable products designed to improve home ownership will be appropriate and help to address the aspirations of Islington's residents.</p> <p>London Living Rent cannot be treated as the same thing as an affordable home ownership product. Suggest amended wording to allow intermediate element to include tenure types set out in Annex 2 of the NPPF. Supporting para. 3.56 should be deleted. Part H should also include additional words recognising that there may be circumstances where it is appropriate to provide affordable home ownership products as part of the affordable housing contribution. This would require the applicant to engage early with the Council to discuss the circumstances.</p>	Object	<p>With regard to other tenures set out in Annex 2 of the NPPF, the housing topic paper provides further discussion on this. Also see response to policy H1(E) above.</p> <p>London Living Rent is short/medium term rental product but the clear intent is for LLR homes to be sold within 10 years (as shared ownership); this is explicit in the Mayor's Affordable Homes Programme 2016-21 Funding Guidance, paragraph 17. Given that LLR units are therefore not within a rented tenure in perpetuity, it is reasonable to classify them as an affordable ownership product. Paragraph 4.7.5 of the London Plan supports this approach.</p>
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part J	Home Builders Federation	Business	<p>The dis-application of the Vacant Building Credit (VBC) is unsound because it conflicts with the national policy in para. 63 of the NPPF. The aim of this policy, along with the exemption from S106 obligations for affordable housing on small schemes, is to support small scale developers. Since Islington Council will rely heavily on developers of small sites to deliver the housing requirement (two thirds of the need) it is perverse that it is suspended this element of national policy. Part J and paragraph 3.61 should be deleted.</p>	Object	<p>The housing topic paper provides further discussion on this. In summary, the circumstances evident in the borough, particularly the scarcity of land and the significant need for affordable housing, justify a locally-specific approach. It is noted that the VBC is not dis-applied; the policy introduces specific criteria which an applicant would have to meet in order to make use of the VBC. We also note the response is not clear on application of VBC; VBC does not solely apply to small sites, although it was originally introduced in the same WMS as the AH small sites restriction; the VBC would therefore apply to any site, not just small sites.</p>
R19.0106	Strategic and Development Management Policies			Policy H4: Delivering high quality housing, Part B	Home Builders Federation	Business	<p>Part B and paragraphs 3.73-3.76 are inconsistent with national policy and guidance as it introduces additional information requirement for applicants in the form of the requirement in (i) to (iii). These additional requirements should be removed.</p> <p>Part B also fails to comply with national policy by failing to specify that the requirement for 10% of homes constructed to the M4(3) standard – wheelchair accessible homes – should, in the words of the PPG, "be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling" – i.e. to the affordable housing element of a scheme.</p>	Object	<p>Inclusive design is an important aspect of all developments, and ensures that where new housing is developed, it can accommodate a range of occupiers over its lifetime. The proposed policy reflects Islington's unique circumstances, making the best use of sites that do come forward and will avoid costly rebuilding and adaptations. The approach reflects the new London Plan, particularly the importance that this document places on inclusive design and a design-led approach to development.</p> <p>In practice, wheelchair accessible homes are usually those where the LPA has allocation rights, but this is not always the case. It is therefore considered reasonable for the policy to be worded in a general way to allow for different eventualities.</p>
R19.0106	Strategic and Development Management Policies			Policy H4: Delivering high quality housing, Part C	Home Builders Federation	Business	<p>Part C requires applicants to 'meet or exceed' the Nationally Described Space Standards adopted as policy through the London Plan in 2015. In terms of decision-taking, what is implied by the use of the word 'exceed' is unclear and is consequently contrary to para. 16 of the NPPF. Could a scheme be rejected if it only met the standard? The standard is the Nationally Described Space Standard. There is no requirement or obligation for the developer to have to exceed this. The word 'exceed' should be removed.</p>	Object	<p>The policy is clear that proposals must meet or exceed, meaning that a proposal would comply with policy by meeting the space standard. The Council support exceeding space standards, mindful of over-sized units as detailed in paragraph 3.78.</p>
R19.0106	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people	Home Builders Federation	Business	<p>As discussed above, the Policy should be revised by the Council to support the provision of older persons housing – both C2 and C3 – using the indicative benchmark in the London Plan as the basis for monitoring provision against needs.</p> <p>In terms of the assessment of housing needs, London is treated as a single housing market area. This means that para. 3.108 of the DILP carries much less weight. Therefore, the decision by the Council to dis-apply Draft London Plan policy H15 (or the current London Plan policy) would have consequences for other boroughs in London, as they would have to provide more homes for older people to compensate for Islington Council's unilateral decision.</p>	Object	<p>See LBI response to H1(j) above.</p> <p>Policy H7 would assist in meeting strategic need for older persons accommodation. London is classed as a single housing market for the purposes of strategic plan-making, but this does not preclude individual boroughs developing their own policies relating to meeting housing need, where justified.</p> <p>The Mayor's regulation 18 response noted that H7 <i>comprehensively follows and builds on the guidance set out in Policy H15 of the Draft New London Plan but should reflect the annual borough benchmark for specialist older persons housing set out in Table 4.4</i>. Discussion regarding the benchmark is provided in the housing topic paper. It is noted that the Mayor has not raised any further concerns in his Regulation 19 response.</p>
R19.0106	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process	Home Builders Federation	Business	<p>LBI need to encourage homes on small sites of 0.25ha or lower in line with NPPF paragraph 68; 2/3 of housing target is formed from small sites and policy H2 incentivises small sites delivery. HBF acknowledge importance of good design and that quality should not be compromised in small schemes, but consider that Part C will have resource implications for many small developers, especially in conjunction with other policies, therefore it would be helpful if the Council provided more support in other areas, such as compliance with its design requirements. HBF suggests some additional wording which requires specific applicable elements of Part C to be identified through pre-app (in relation to certain small schemes).</p>	Object	<p>Paragraph 68 relates to sites of no more than 1 hectare, not less than 0.25 hectares. As noted in the Site Allocations DPD paragraph 1.30-1.31, 14% of Islington's housing requirement over the plan period is identified on allocations of one hectare or less; this is consistent with the NPPF.</p> <p>Regarding the suggested amendments, pre-application advice is not mandated therefore there is no guarantee that meaningful discussion can take place. PLAN1 is essential in order to institute an integrated approach to design throughout the Local Plan; the criteria in Part C are all essential and well-established, and they provide a clear steer for applicants. This approach will ensure high quality development which makes the best use of sites. It also aligns with the design-led focus identified in the London Plan and which is being advocated in new national guidance.</p>
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part A	Home Builders Federation	Business	<p>Part A states that the Council will seek to maximise the positive effects on the environment and quality of life while minimising or avoiding negative impacts. It is unnecessary to say this in policy – this is a broad statement of intent. Instead the policy should simply focus on those elements needed to provide the levels of sustainable design that the Council wishes new development to achieve. Part A should be deleted as it does not add anything of real value in terms of guiding development activity or decisions.</p>	Object	<p>The Council disagree with this view. S1 sets out important overarching considerations which reflect the importance of what is possibly the most prominent land use issue at international, national, regional and local levels. It will work in conjunction with other policies in the Local Plan.</p>
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part B	Home Builders Federation	Business	<p>Similarly, Part B is a general statement of intent. It does not tell applicants what is expected from them.</p>	Object	<p>See response to S1(A) above. With regard to S1 Part B, this is where the Council's 2050 net zero carbon commitment is identified, hence Part B has an important role. This is consistent with the London Plan.</p>
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part C	Home Builders Federation	Business	<p>The hierarchy conflicts with national policy through promoting a energy hierarchy. The Building Regulations are not prescriptive. How energy efficiency targets are achieved should be a matter for the developer. The Council should not attempt to control the means. It must remain neutral in terms of the products and technology available and it must avoid using the planning system to give competitive advantage to the manufacturers and suppliers of specific products.</p>	Object	<p>The sustainability topic paper provides further discussion. The energy hierarchy is consistent with the London Plan. Guidance on energy efficiency measures is essential in order to ensure that emissions targets can be met first from minimising energy demand as this is the most efficient and cost effective way to reduce emissions. Paragraph 6.6 provides further explanation. Minimising demand and lessening the need for on-site renewables or carbon offset payments also ensures the best use of land and minimises impacts on other policies, e.g. green roofs where there is conflict between use for biodiversity purposes and facilitating PV.</p>
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part D	Home Builders Federation	Business	<p>Part D refers to Islington's carbon offset fund. The Council will need to make sure that contributions to carbon offsetting are not sought from small schemes of 10 units or less. This is in line with Government policy as outlined in the Written Ministerial Statement of March 2015.</p>	Object	<p>The sustainability topic paper provides further discussion. The Council considers that there are local circumstances to warrant continuing to seek offset contributions from small sites (less than 10 units). The contribution is a flat fee and is demonstrably viable.</p>
R19.0106	Strategic and Development Management Policies			Policy S2: Sustainable Design and Construction	Home Builders Federation	Business	<p>The policy is unsound as it conflicts with national policy. The Council in asking for a Sustainable Design and Construction Statement is interfering with the work of the Building Regulations through planning. The WMS of March 2015 states that LPAs may also need to review their local information requirements (in light of the WMS) to ensure that technical detail that is no longer necessary is not requested to support planning applications. The policy should be removed from the Plan.</p>	Object	<p>The cited WMS refers to technical detail no longer necessary (following the introduction of the WMS). The national policy picture has changed since 2015 and the WMS has been overtaken by the new NPPF (paragraph 44) and PPG guidance on local information requirements. Paragraph 44 notes that requirements should be kept to the minimum needed to make decisions, and that LPAs should only request supporting information that is relevant, necessary and material to the application in question. PPG adds that LPAs should take a proportionate approach to the information requested in support of planning applications. The requirements set out in S2 will be essential to ensure proper assessment against sustainability policies and to help with future implementation of these policies. While the policy does seek a range of information, this is considered proportionate.</p>

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R19.0106	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	Home Builders Federation	Business	Parts A and B conflict with national policy by requiring residential development to comply with BREEAM and the BRE Home Quality Mark. The WMS of March 2015, reflected the work of the Housing Standards Review, introduced a streamlined system of Building Control for housebuilders. Housebuilders are required to comply with the Building Regulations and the optional technical standards (if the latter are adopted by the Council through an update to its local plan, or in the case of London, through an update to the London Plan). From this it is apparent that the only standards that now relate to residential development comprise the Building Regulations plus the three optional technical standards. By requiring compliance with BREEAM and the BRE Homes Quality Mark the Council is clearly acting contrary to national policy. Parts A and B should be deleted.	Object	Policy S3 is supported by the London Plan and reflects a similar approach to existing policy. Seeking compliance with BREEAM is a well established requirement and is not considered overly onerous. The BRE Home Quality Mark applies in a similar vein to BREEAM. The WMS refers to commencement of legislation that is yet to take place; therefore there is nothing to preclude setting local standards where justified. The Council's energy study provides further discussion on the specific legislative context. It is also noted that the NPPF paragraph 20 highlights the need for strategic policies in plans to, inter alia, address climate change mitigation and adaptation. Paragraph 149 further elaborates that plans should take a proactive approach to mitigating and adapting to climate change. Policy S3 is fully in line with the NPPF in this regard.  It is necessary to apply a level of prescription in terms of different BREEAM schemes and achievement of specific credits, in order to achieve a high level of sustainable design and ensure delivery of other Local Plan sustainability objectives.
R19.0106	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part D	Home Builders Federation	Business	National policy allows plan-makers to adopt policies for energy efficiency in residential developments to go 19% beyond current Part L of the Building Regulations. This would take you to a level equivalent to about Level 4 of the withdrawn Code for Sustainable Homes. The Draft London Plan requires applicants for major schemes to achieve a 35% reduction beyond current Part L (Draft Policy S12). By contrast the DILP requires applicants on large schemes to achieve a 39% improvement on Part L where they are able to connect to a heat network (Part D (iii)). This goes much further than either national or local policy, hence it is unsound. The DILP should be amended to align with the London Plan.  Part D (iii) adheres to the national policy by requirement a 19% improvement on Part L.	Object	Part D relates to regulated and unregulated emissions, which explains the distinction between the London Plan. We note that the London Plan policy S12(DA) encourages such an approach. The reduction requirement is higher where connection to a heat network is possible, in order to ensure additionality in terms of reductions; without a higher target, there is a risk that developers will use the heat network to largely or solely justify emissions reduction and this will not incentivise other methods to reduce emissions on-site. The policy provides further detail on the assessment of future energy use, which will assist with policy implementation.
R19.0106	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part F	Home Builders Federation	Business	Part F is unsound in requiring compliance with an energy hierarchy. This is for the reasons we have already articulated in response to Policy S1.	Object	See response to S1(C).
R19.0106	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part G	Home Builders Federation	Business	As discussed above, part G is contrary to national policy in seeking cash contributions for carbon offsetting from minor developments. The DILP should be amended to reflect this exemption.	Object	See response to S1(D).
R19.0106	Strategic and Development Management Policies			Policy SC2: Play space	Home Builders Federation	Business	Part C requires all major developments – i.e. those of 10 units or more – to make provision for play space. This requirement could represent an obstacles for some small site developments, and given the Plan's heavy reliance on small sites to meet the housing requirement, plus the observation by the council in para. 1.26 that development sites are decreasing significantly, this may be difficult to achieve. This is particularly the case on tightly bounded small brownfield sites. Suggest more flexible wording of policy.	Object	The principle of providing play space is well established and supported by the London Plan. The inspectors report supports the London Plan policy which seeks new play space. The LBI policy already provides the flexibility sought, using the London Plan benchmark as a starting point but recognising (in paragraph 3.167) that Islington's context may make delivery of play space difficult.
R19.0106	Strategic and Development Management Policies			Policy SC3: Health Impact Assessment	Home Builders Federation	Business	The need for Health Impact Assessments is superfluous as the aims will be achieved by other planning policy objectives in the Local Plan. This policy should be deleted. It will merely generate waste-paper and only add unnecessarily to the cost of development. This will ultimately detract from the sum of real benefits that could accrue to the public without bringing any tangible benefit.	Object	The requirement for HIAs is well established and is also sought by the London Plan. An HIA is an important tool to ensure that proposals provide full consideration of health impacts of a proposal. They improve the quality of schemes and therefore do add value. Guidance is provided to assist with the production of HIAs, which ensures that the process is not onerous or costly. The policy states that HIAs should be proportionate to the size of the development.
R19.0106	Strategic and Development Management Policies			Policy SC4: Promoting Social Value	Home Builders Federation	Business	We are not sure what is meant by 'maximising social value' and how this might be measured by the applicant or assessed by the decision-taker. There is the risk that applications could be arbitrarily rejected on the basis of being deemed to have failed to promote social value sufficiently. This is what is suggested by supporting para. 3.183. The policy consequently fails to comply with national policy. The overall objective of making sure that new residential development contributes to wider social good will be met through the other various and specifically worded policies contained in the DILP, such as affordable housing, play space, bio-diversity net gain, S106 obligations towards education and health surgeries etc. The policy is superfluous and should be deleted.	Object	See LBI response to H1(V) above. Paragraph 3.183 in no way suggests that applications will be arbitrarily refused. Paragraph 3.183 notes that compliance with other policy requirements will achieve social value but it encourages additional social value; this very much puts the ball in the applicant's court in terms of provision of additional social value and the weight given to this would be a case-by-case judgement.
R19.0107	Strategic and Development Management Policies			Policy SC3: Health Impact Assessment	Kentucky Fried Chicken Ltd	Business	Policy SC3 is unsound as it is: positively prepared and is not based on objective assessment of the existing or required nutritional intake on offer; justified, as it requires a HIA without specifying its format or scope; effective, as the supporting text suggests all A5 use proposals will be scoped -in to HIA, yet would relate to a use capable of change within the same use class; consistent with national policy with (PPG53-005) requiring HIA only where significant impacts are expected.  Propose amendment of Part A of Policy SC3 to delete "and developments where potential health issues are likely to arise," and consequential amendment of the supporting text.	Object	The requirement is considered appropriate; what constitutes a 'development where potential health issues are likely to arise' will be determined on a case by case basis. Paragraph 3.176 states that Hot Food Takeaways (HFT) may trigger an HIA screening (not a full HIA) but it is not an explicit requirement. Evidence suggests that HFTs contribute to obesity which is a significant health impact, hence it is relevant to refer to HFTs in paragraph 3.176 as a potential trigger for an HIA screening. The format and scope of an HIA would depend on the proposal; the Council have prepared guidance to assist with HIA production and the policy encourages an HIA screening to be undertaken as early as possible in the development process. SC3 is not inconsistent with the cited section of the PPG.
R19.0107	Strategic and Development Management Policies			Policy R8: Location and Concentration of Uses	Kentucky Fried Chicken Ltd	Business	Respondent considers Policy R8 is not: positively prepared, as it is not based on objective assessment either of the existing or required concentrations of uses or of the numbers of A5 uses in areas within 200m of schools; justified, as there is no evidence of proliferation; effective, as there is no evidence that A5 uses cause obesity more than any other use where food and drink is sold or that their existence within 200m of schools is a greater cause of obesity than their existence generally; or consistent with national policy, which PPG53-004 only allows policies to limit proliferation subject to evidence.  Propose deletion of Part B (i) and (ii) of Policy R8.	Object	Further discussion of the issues raised is provided in the retail topic paper.
R19.0108	Strategic and Development Management Policies			N/A - general comment	LB Hackney	Statutory consultee	Welcome the continuing engagement on planning policy documents being prepared by both boroughs, including the above documents, and Hackney's Local Plan and emerging area based plans for Shoreditch and Dalston. Hackney supports the overall vision and objectives of the draft Local Plan, which broadly align with Hackney's new Local Plan (2033) and the draft Future Shoreditch Area Action Plan. For the vast majority of policy areas, the approach proposed in the draft Plan aligns with Hackney's approach and is supported. This includes policy approaches regarding affordable housing delivery, protecting and promoting industrial floorspace and affordable employment floorspace and policies to secure the ongoing vitality and viability of Finsbury Park. The majority of policies will enable cross-boundary impacts to be considered effectively to mitigate or prevent any adverse impacts on Hackney and we welcome the ongoing engagement on planning matters to fulfill duty-to-cooperate requirements.	Not stated	Comments and support noted.



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R19.0108	Strategic and Development Management Policies			Policy DH3: Building heights	LB Hackney	Statutory consultee	<p>Whilst we acknowledge that Islington has a fundamentally different approach to Hackney on tall buildings as set out in our response to your Reg 18 consultation, Hackney are still not convinced that identifying the maximum permissible height for site allocations in a strategic borough-wide planning document is the best way of ensuring high quality development. Hackney are concerned that Policy DH3 as currently drafted, does not adequately address the potential impact of tall buildings on Hackney's local character, historic townscapes and landscapes. Further that it could potentially restrict development opportunities on adjacent sites that are outside of the Islington borough boundary and within Hackney.</p> <p>We remain concerned regarding the impact of sites identified in Table 8.1 which are close to the borough boundary and are specified as suitable for Tall buildings, within Finsbury Park and the City fringe opportunity area. The two specific site allocations that are of concern are site B1; the proposed Finsbury Park Station tower, and site G1; a proposed tower on the south-east corner of the City Road junction which are allocated for very tall buildings. We are concerned that these sites have the potential to detrimentally impact on Hackney's local character and conservation areas. Additionally, as discussed at our recent meeting, Hackney intends to designate a new Conservation Area for the Brownswood area in early 2020, which will directly adjoin the Finsbury Park strategic area.</p> <p>Hackney would therefore request that the current policy DH3 be amended to include consideration of the impact on local character and in particular the adjoining borough conservation areas.</p> <p>Hackney are also concerned that policy DH3 could potentially restrict development opportunities on adjacent sites that are outside of the Islington borough boundary. Hackney would therefore request that a further criteria is included to ensure that proposals for tall buildings do not constrain the development potential on adjoining sites, including sites within adjoining boroughs. This will ensure that guidance of relevant neighbouring authorities and the Council's planning policies, Area Action Plans, and other guidance will be taken into consideration.</p>	Object	Further discussion on Islington's approach is provided in the tall buildings topic paper. The policy would include cross boundary considerations but the Council will make this explicit through modifications to the Local Plan policy DH3.
R19.0109	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Legal and General UK Property Fund	Developer	Respondent comments that the retail sector is experiencing a significantly challenging market with rapidly evolving requirements. This evolution will require the introduction of ancillary and alternative uses. The mix of retail spaces is also important with larger spaces being demanded, interspersed with smaller, more affordable units. The policy review should allow for flexibility. Suggested addition to the policy: 'Where the loss of above or below ground retail (A1-A5) floorspace is proposed, the applicant should provide justification that the loss would not harm the vitality or viability of the town centre'.	Object	The council have acknowledged the changing retail environment with Policy R3 working in conjunction with Policy R2 which responds to this change by allowing significant parts of town centres outside Primary Shopping Areas to enjoy a more flexible use class mix. Policy R6 addresses the protection and promotion of small shop units whilst allowing amalgamation of units where this would not be detrimental to the character or amenity of an area. This allows a range of shop sizes to establish appropriately. Policy R3 already addresses the need for town centre development to not adversely affect vitality, vibrancy or viability and not involve the loss of ancillary floorspace. At present Islington's town centres are performing well with vacancy rates at good or reasonable levels.
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	<p>The respondent states that the policy raises the proportion of affordable workspace from 5% to 10%.</p> <p>In relation to viability, the respondent states that the viability evidence base doesn't discuss the impact of this policy on redevelopment or extension to buildings. This evidence suggest that not all sites would be able to accommodate additional affordable workspace.</p> <p>In the response it is proposed that wording of the policy changes to consider the following:</p> <p>- "net additional" as opposed to overall proposed floorspace;</p> <p>- development should "normally" incorporate 10% of affordable workspace;</p> <p>- the affordable workspace proportion should be considered "additional proposed" B1a/B1b floorspace;</p> <p>- the affordable workspace should be leased to the council for "10 years" instead of 20 years as the latter is not a viable approach for the majority of schemes that B4 policy will apply to.</p>	Object	<p>An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the Viability Topic Paper.</p> <p>It is the intention of the policy to require 10% of overall gross B-use floorspace. Where development comprises an extension to provide additional business floorspace, and the development includes refurbishment / improvement to the existing business floorspace, it considered that requiring 10% affordable workspace from the overall gross business floorspace is appropriate as the whole floorspace will attract an increased rental rate. Where development comprises of an extension only, 10% affordable workspace from the additional workspace would be required, where the total additional floorspace exceeds 1,000sqm - see paragraph 4.47.</p>
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	The respondent states that the requirement for the proportion of affordable workspace to be within the development building could lead to issues regarding costs of service charges. Discounted service charges would be easier to apply if the developer manages the space directly.	Object	This would be a consideration of the AW commissioning process. If service charges were significant then this could be compensated in terms of the rental rates and other elements of the 'offer' from prospective workspace providers. It is also noted that AW should be factored into the design of schemes, hence it should be possible to ensure that AW is accessed separately in circumstances where exorbitant service charges are envisaged. Discounted space let directly by developers does not address Islington's objectives regarding delivering an inclusive economy.
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	The respondent suggests that additional detail concerning the implications of the council's lease of the affordable workspace is provided as part of the supporting text (e.g. handover process, management, service charge costs, lease agreement terms).	Object	The council's Inclusive Economy team manages the process for any affordable workspace secured, including terms for lease agreement. The end users of such space is determined through a commissioning process, led by the council's Inclusive Economy team, which focusses on ensuring social value outputs. Further information is set out in the council's Affordable Workspace Strategy.
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	The respondent asks that provision of SME floorspace is supported and recognised in the new proposed policies, to enable a more flexible approach to addressing this need in more financially or physically constrained sites.	Object	The proposed Local Plan policy B2 promotes the provision of a range of workspace typologies (including co-working, hybrid space and lower specification office space) suitable for SMEs. This is in line with London Plan policy E2 which seeks to protect and promote the provision of low-cost business space. The current policy which allows SME space as part of the affordable workspace provision has not proven effective in delivering actual affordable workspace, hence it is not considered sensible to repeat the policy in the new Local Plan. Policy B4 requires actual affordable workspace but does have flexibility for an off-site contribution in certain circumstances where on-site delivery is not possible - see paragraph 4.52.
R19.0110	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London First	Business	BtR is playing an important role in London's housing market, including increasing the overall supply and accelerating the construction of new homes; supporting greater choice for tenants in the rental market; delivering a better quality of rental product that is professionally managed; and providing boroughs with an opportunity to generate a long-term income stream to invest in local priorities. Reference 2019 report which explains BtR; encourage Council to review this. Policy H11 fails to appreciate the broader benefits that build to rent provides and there is a danger that the policy will deter new investment into housing in the borough. BtR would help the council to meet its housing targets whilst also improving the quality of the private rented sector accommodation. Policy H11 is inconsistent with NPPF and London Plan, including with regard to suitable AH tenures. Encourage LBI to reconsider Policy H11 so that it provides a framework to support build to rent development which would help to deliver several benefits to Islington as an area and to its existing and future residents	Object	A number of issues raised are explained in the policy supporting text, and are also elaborated in the Housing Topic Paper. We note that the Local Plan is considered to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H10 of the Regulation 19 document. The Council will consider the report cited but note that we have already given full consideration to the mooted benefits of purpose built PRS during the drafting and refinement of the Local Plan.
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Welcome and support policies H1 and H12 as a positive step in acknowledging traveller communities in the borough and the need to provide culturally suitable accommodation.	Support	Support noted.
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Support the target for 10 pitches in Policy H12 but needs to be monitored in the AMR to ensure accountability.	Object	As set out in the Local Plan section 10 the AMR monitoring indicators are not fixed and may change over different iterations of the AMR. However the provision of pitches for gypsies and travellers would count towards the Council's five year housing supply, which therefore would be monitored and included in the borough's housing trajectory.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies and Travellers	Campaign	The Local Plan needs to provide more detail on the sites being assessed as part of housing provision and requirements to demonstrate a 5 year supply of land as set out in the NPPF and PPTS.	Object	The council has set out a process for meeting need which recognises that the need identified is not new accommodation need but a need for different accommodation based on the definition used. The process identified is clear that it in the first instance council land will be considered as part of the new build housing programme. The process for assessment of Council owned sites is underway. Further detail is provided in the gypsy and travellers topic paper.
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Consider that site allocations are being excluded at this stage which is not compliant with the boroughs public sector equality duty. Also response considers that if left for a further 5 years the supply of land will be even scarcer. Given that 8 pitches need to be delivered in the first five years of the Plan, Policy H12 as it currently stands is not positively prepared and effective. Respondent considers that at this advanced stage of plan preparation the Council should have information including ; a detailed and realistic appraisal of the sites in the council housebuilding programme, a list of potential sites on which the council can work jointly with the GLA, and an assessment of site allocations which could identify where it is possible to include a small number of pitches as part of larger development or small sites. Strongly recommend that the Council consults with Gypsies and Travellers in the Borough on site options for accommodating the identified need, before submitting the Local Plan for examination.	Object	The process set out in the policy is clear that in the first instance the approach will be to consider council land. This approach is considered positive, although the constraints of Islington are recognised - the Local Plan makes clear that the assessment of need would be best done at the sub-regional level where constraints and current levels of provision could be better considered. Notwithstanding this the Council has considered its Public Sector Equality Duty (see the IIA for details) and produced an evidence base which uses the definition set out in the new London Plan. Sites do not have to be identified as site allocations to be considered deliverable. The process for assessment of Council owned sites is underway. Further detail is provided in the gypsy and travellers topic paper.
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Consider that the potential for working with the GLA and neighbouring boroughs to be highly unlikely given the stage of neighbouring boroughs' Local Plans and their own unmet need for Gypsy and Travellers. Suggests collaboration with the GLA to consider provision of pitches in other development planned on land owned by the GLA group, for example land owned by Transport for London.	Object	The Local Plan makes clear that the assessment of need would be best done at the sub-regional level, in conjunction with the GLA, where constraints and current levels of provision could be better considered. The council considers this principle is important given the context of the borough; the shortage of land and the need to optimise development potential; high land values; and acute need for social rented housing, which present significant challenges in meeting the gypsy and traveller need. A sub-regional assessment would enable boroughs to work together to consider how to address need and unmet need, and would be considered a part of the duty to co-operate. Irrespective of neighbouring boroughs Local Plan production the boroughs of Camden and Haringey have agreed they are committed to meeting the needs of gypsy and travellers and the importance of sub-regional work as part of this. This has been made clear in Statements of Common Ground with these boroughs. We also note that the London Plan inspectors report recommends a sub-regional assessment and we understand that the GLA will take this recommendation forward in the 'Intend to Publish' version of the London Plan.
R19.0111	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	London Gypsies & Travellers	Campaign	To ensure that Gypsy and Traveller accommodation is of equally high standards, point A should be modified to include 'specialist housing identified in policies H6 to H12'	Object	The Council will amend policy H12 via a modification to the Local Plan to make clear that any accommodation should be of a high quality in line with policy H4.
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Recommends that the council should consider making reference to negotiated stopping as a meanwhile use and adding as part of policy H12 and R9 in line with the evidence base.	Object	The evidence base supports introduction of a negotiated stopping policy and recognises this as a corporate approach with the land identified used in the short term, for instance less than 28 days in a year, which may not require planning permission. Therefore it is not considered necessary to include reference in planning policy.
R19.0112	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	N7 Collective	Campaign	<p>The respondent supports policy SP3 and describes the broad variety of creative and non-creative uses that take place in the Brewery Road under the classification of "light industrial". The respondent recognises the delicate nature of this ecosystem, its great location in relation to central London, and acknowledges the pressure that the area is under, particularly because of the encroachment of glass and steel towers.</p> <p>The respondent particularly supports paragraphs SP3 para 2.30 on recognising employment benefits of SME creative industries; paras 2.33-35 for the promotion and preservation of industrial uses; para 2.37 on the protection of industrial buildings which reflect the history/heritage of the area; para 2.39 on the outwards redirection of the frontages and encouragement of building-street interfacing; and para 2.40 on delivery and servicing capacity.</p>	Support	Support noted for the aim of policy SP3 to support creative production activities in the area.
R19.0113	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Quod	Business	<p>Quod have been approached by a number of clients who are considering investment in the Borough but have significant concerns over the wording of draft Policy H11, as it is currently drafted. The Policy is unnecessarily restrictive in its approach to Build to Rent (BtR), contrary to the National Planning Policy Framework (NPPF) (2019) and Guidance, and is consistent with the Local Plan evidence base, and the existing London Plan and draft New London Plan (July 2019). The policy is not considered sound. Respondent provides links to parts of national land regional policy they consider reinforces these claims. As a minimum, Part A of Policy H11 should be deleted to ensure the policy does not prejudice the delivery of private rented housing as part of an overall response to meeting needs in the Borough.</p> <p>Evidence suggests that the private rented sector has an important current, and future role, in meeting housing need in the Borough and it would be inappropriate therefore to arbitrarily limit the delivery of this type of housing to scenarios where the delivery of conventional housing is demonstrated to be undeliverable. The most recent available information on the mix of tenures in the Borough sets out that rented affordable (c.42%) and private rented (c.26%) make up 68% of housing tenure in LB Islington.</p> <p>The NPPF 2019 does not promote the prioritisation of one type of housing provision over another, rather it is based on a response to evidence of need. Islington represents one of the smallest geographical council's areas in the country and the market for housing will inevitably not respect borough boundaries. Each of the adjoining Councils (Camden, Hackney and Haringey) all exhibit market characteristics not dissimilar to Islington and each of these Councils (along with regional policy) encourage BtR or PRS as a part of a policy response to dealing with evidenced housing needs in their area. There is no evidence presented which justifies this approach to resolving housing need and nothing which sufficiently differentiates Islington from surrounding Councils to warrant their proposed approach to private rented schemes.</p>	Object	<p>A number of issues raised are explained in the policy supporting text, and are also elaborated in the Housing Topic Paper. We note that the Local Plan is considered to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H10 of the Regulation 19 document.</p> <p>To note, the Council is not precluding private rent, as noted in paragraph 3.137; it is the BtR business model which the Council takes issue with, as it is a means to undermine policy requirements. The respondent includes affordable rented accommodation as part of their assessment of existing tenures, but this is misleading as it skews the proportions. One of the main reasons justifying policy H11 is to ensure continued delivery of social rent; the policy clearly has no implication on the delivery of this tenure.</p> <p>The NPPF neither promotes or restricts prioritisation of certain types of housing, it merely requires the need for different types to be assessed and reflected in policy; this is clearly subject to the usual plan-making process and discussions. LBI have fully considered the range of development needs and the potential for addressing these, which is challenging given local circumstances including a lack of sites. The Local Plan unashamedly seeks to meet priority needs, particularly affordable housing. The Council's approach is a positive one that seeks opportunities to meet the development needs of their area, consistent with paragraph 11a of the NPPF.</p> <p>The characteristics of adjacent boroughs are irrelevant in the context of Islington's Local Plan. There could be a number of reasons why other boroughs have decided to promote BtR.</p>
R19.0113	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Quod	Business	No evidence is presented by LB Islington to support restriction of APR. This implies that the only obstacle to this type of provision is the level of rent and whether this is sufficiently discounted from its market rent level to meet identified affordable housing need. It is inappropriate for the policy to remove the opportunity for APR in the absence of any understanding of its relative rent pricing point and understanding how this relates to the market rent and other affordable products. This is inconsistent with the London Plan and NPPF. An APR product, for instance, set at a % of open market rent, delivering a starting rent equivalent to London Living rent, is manifestly affordable housing in the context of the evidence base, the London Plan and the NPPF. The provision of APR should not be prevented from coming forward by the policy wording. The wording of part (ii) should be amended to state that APR may be included, where it can be demonstrated as genuinely affordable housing.	Object	Policy H3 supporting text provides further discussion on APR and is cross-referenced in the H11 supporting text and policy. The overwhelming need in Islington is for social rented accommodation. Price point is not by itself justification for Discounted Market Rent. The allocations process for DMR is unlikely to focus on those truly in need, unlike Social Rent allocated according to the Council's waiting list. The London Living Rent allocations process also allows more nuanced focus on those in need.
R19.0113	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Quod	Business	Policy H11 (A)(iv) proposes that private rented sector units are held under a restrictive covenant for the lifetime of the building which is expressed as "generally no less than 50 years" with sales to the open market (individually or as a group) not to be allowed during this period. Requiring developers to commit to a 50-year covenant is far in excess of the 15-year convent period required by the draft London Plan, with 15-years generally applied by other London Boroughs. There is no justification within the published LB Islington evidence base to explain this approach. As such, it is not clear why the council have opted for a 50-year timeframe and why this length of time is considered necessary or appropriate. Applying a 50-year timescale will adversely affect the ability to fund this type of provision and prevent schemes from remaining flexible to allow for market changes over their lifespan. It is likely that a 50-year covenant will make any potential BtR schemes uninvestable and undeliverable. The wording of part (iv) should be amended to state that PRS units are held in a covenant of no less than 15 years, consistent with London policy.	Object	A 50 year covenant reflects a fair assumption of a building's lifetime and is considered a reasonable quid pro quo, to disincentivise use of the PRS business model to undermine policy requirements. We note that the Local Plan is considered to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H11 of the Regulation 19 document. The policy does not preclude the selling of BtR units to another developer, who could then continue to operate as BtR; therefore there is sufficient flexibility.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0114	Site Allocations	N/A - general comment	N/A		Sunnyside Road Land Limited	Landowner	Consider the council is unjustified in choosing not to allocate 87 Sunnyside Road and it is not sound to prohibit residential development on the site. Whilst it is agreed there should be some retention of employment generating uses on site, residential-led development would be suitable. Intensification of business use has the potential to be detrimental to nearby residential amenity and may detract from the conservation area. Do not agree that the site is inaccessible.	Object	Site restrictions offer limited scope for intensification so allocation is not considered warranted. As the site is in lawful business use the council would seek to retain and intensify this in line with policy if proposals were brought forward for the site.
R19.0115	Strategic and Development Management Policies			N/A - general comment	The Bomb Factory	Business	Respondent fully supports ambition to make Archway a cultural quarter. The Bomb Factory Art Foundation exists as a crucial resource for a large group of local contemporary artists. The organisation wishes to maintain their charitable status in Archway and expand in the future. Respondent has received notification that in 2021 a 50% rent increase can be expected. Current Bomb Factory building should be protected from further development and the old jobcentre at 1a Elthorne Road would be ideal as an artist hub and should be designated a cultural space.	Support	Support is noted. Bomb Factory would receive strong protection from change of use as it is a B1 use. 1 Elthorne Road features as a site allocation and is designated for business led mixed use development including provision of SME workspace, which is in line with the Bomb Factory's operation.
R19.0116	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Creative Quarter Neighbourhood Forum	Campaign	The respondent objects to policy SP3 and states that it will have a detrimental impact on local businesses and employees as it prevents the creation of business expansion space by restricting additional office space. Respondent proposes the introduction of flexible business space on upper floors and the retention of industrial uses at lower levels.	Object	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0116	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Creative Quarter Neighbourhood Forum	Campaign	Respondent objects to the height limit restriction of 20m in the Vale Royal/Brewery Road LSIS and also states that this will prevent business expansion/employment creation.	Object	The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.  Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.
R19.0117	Strategic and Development Management Policies			Policy SP5: Nag's Head and Holloway, Part K	Waitrose Limited	Business	Concern that the removal of the Nag's Head gyratory system could have an adverse effect on the store, and negatively impact the health of the Town Centre. Accessibility here is understood in terms of vehicular access.	Object	The respondent's concern seems to stem from the potential reduction of accessibility by private cars in accessing their store and Nag's Head Town Centre. The Local Plan is clear that development should be car free and this is supported by the London Plan. Essential parking for operational purposes may be justified on a case by case basis but the existence of car parks on a site is not in itself justification for continued car parking. Gyratory improvements would achieve many benefits sought by the Local Plan; reduction in access by private car would likely be significantly outweighed by such benefits, even in the worst case scenario where Waitrose could no longer viably operate. However, the Council considers that this would be highly unlikely given the accessibility of the site by sustainable modes, which would likely improve significantly with gyratory improvements. It should be noted that any gyratory scheme would be brought forward, and consulted on extensively, by TfL.
R19.0118	Site Allocations	Site capacity assumptions	N/A		Thames Water	Statutory consultee	In order to make a more detailed assessment of each site's individual needs we would need to know specific numbers for each site, and not for an overall area. We would encourage the Council and Developers as per policy ST4 to contact Thames Water as early as possible to discuss each allocation in detail. Comments provided on a number of allocations as per comments provided at Reg 18.	Not stated	Information has been added to relevant site allocations in response to previous Thames Water representations requiring developers to engage with Thames Water at the earliest opportunity to discuss implications for water and waste water.
R19.0118	Strategic and Development Management Policies			Policy ST4: Water and wastewater infrastructure	Thames Water	Statutory consultee	Support the policy, which reflects comments made by Thames Water in response to an earlier consultation. It is considered to be a strong policy.	Support	Support is noted.
R19.0118	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Thames Water	Statutory consultee	Support the policy, specifically the requirement for all development to adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site, and in the context of links with wider-than-site level plans. Also support the requirement to ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy.	Support	Support noted.
R19.0119	Site Allocations	N/A - general comment	N/A		Sport England	Statutory consultee	Overall, Sport England is concerned that some site allocations advocate the loss of sports facilities without sufficient robust justification that the sites are surplus. Sport England does not, therefore, consider some of the allocations sound at this stage. It is advised that the allocations advocating loss of sports facilities/D2 space should be amended to ensure that they are retained or replaced unless it can be robustly demonstrated that the facility is surplus to the boroughs' current and future needs. The Council's Sports Facilities Update 2018 might be of assistance when considering what facilities are required to meet current and future needs.	Object	As noted in response to individual allocations, the Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Site Allocations	ARCH10: Elthorne Estate, Archway	Archway		Sport England	Statutory consultee	Advise the lost sports facilities should be replaced for this allocation to accord with the NPPF.	Not stated	Noted. The draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Site Allocations	ARCH7: 207A Junction Road	Archway		Sport England	Statutory consultee	State the existing D2 floorspace must be reprovided as part of any development to align with national policy.	Not stated	Noted. The draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Site Allocations	AUS8: 161-169 Essex Road	Angel and Upper Street		Sport England	Statutory consultee	Suggest that other D2 uses are considered for the site to address need identified in the Council's Sports Facilities Update 2018.	Not stated	Noted. The site allocation states that a mix of uses, including leisure uses, are considered suitable on the site.
R19.0119	Site Allocations	BC11: Longbow House, 14-20 Chiswell Street	B & C: City Fringe Opportunity Area		Sport England	Statutory consultee	Sport England is likely to object to any proposals that prejudice the use of the adjacent playing field such as reducing its size or increasing the risk of ball strike from cricket balls for example.	Not stated	Noted. Any proposal affecting the redevelopment of private open space featuring existing sports provision would be considered in line with policies SC1 and G2.
R19.0119	Site Allocations	BC15: Richard Cloudesley School, 99 Golden Lane	B & C: Central Finsbury		Sport England	Statutory consultee	Recommend that the new sports facilities address local community needs.	Not stated	Policy SC1 part F states that development resulting in the provision of new social and community infrastructure, such as school sports facilities, will be required to enter into Community Use Agreements to allow and promote community access to such facilities.
R19.0119	Site Allocations	BC3: Islington Boat Club, 16-34 Graham Street	B & C: City Road		Sport England	Statutory consultee	Welcome the proposed refurbishment of the facilities. Should ensure that the function and use of the building is not eroded, and the residential uses proposed are located so as not to affect the operation of the boat club.	Not stated	Noted. The draft Local Plan has strong policies to protect sports provision.
R19.0119	Site Allocations	FP2: Morris Place/Wells Terrace (including Clifton House)	Finsbury Park		Sport England	Statutory consultee	Object to the potential loss of a yoga studio on site. This is not in accordance with the NPPF, paragraph 97 or Sport England's Policy unless there is a robust assessment that identifies the D2 facility as surplus to the boroughs' needs.	Not stated	Yoga facilities were not specifically assessed as part of the council's Sports Facilities Update 2018, the scope of which was agreed with Sport England. The draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Site Allocations	NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road	Nag's Head and Holloway		Sport England	Statutory consultee	Concerned that development would involve the loss of the snooker hall on the site. Suggest that if the allocation does not require a replacement facility for sporting use it does not comply with NPPF paragraph 97 and Sport England policy and cannot be considered sound.	Not stated	Snooker facilities were not specifically assessed as part of the council's Sports Facilities Update 2018, the scope of which was agreed with Sport England. The draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Site Allocations	NH13: 166-220 Holloway Road	Nag's Head and Holloway		Sport England	Statutory consultee	Unclear if the site has any sports facilities, for example a sports hall. If there are such facilities on site then these should be retained or replaced to ensure that the allocation aligns with national policy.	Not stated	As far as the council is aware there are no sports facilities on site. Nevertheless, the draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0119	Site Allocations	NH14: 236-250 Holloway Road and 29 Hornsey Road	Nag's Head and Holloway		Sport England	Statutory consultee	Unclear if the site has any sports facilities, for example a sports hall. If there are such facilities on site then these should be retained or replaced to ensure that the allocation aligns with national policy.	Not stated	As far as the council is aware there are no sports facilities on site. Nevertheless, the draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Site Allocations	OIS16: Harvist Estate Car Park	Other Important Sites		Sport England	Statutory consultee	Any redevelopment of the site should retain the existing MUGA/sports pitch.	Not stated	Noted. The draft Local Plan has strong policies to protect sports provision, which would require demonstration that any proposed loss would not impact on the level/standard of provision.
R19.0119	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Sport England	Statutory consultee	Sport England supports the policy intention to enhance the green infrastructure network which will provide physical and mental wellbeing benefits. With regard to policy G1 reference should be made within the supporting text to updated Sports Facilities evidence to inform when the intervention of sports pitches and facilities would apply.	Not stated	G1 focuses on green infrastructure. Policy SC1 would apply re: sports facilities, and could operate in conjunction with G1. Paragraph 5.1 notes the potential sport function of GI.
R19.0119	Strategic and Development Management Policies			Policy G2: Protecting open space	Sport England	Statutory consultee	Sport England welcomes the policy intention of protecting all open spaces including private open spaces not designated in Figure 5.1, which displays the public open space designations. However, it should be noted that the open spaces designations includes some school playing field land and should there be a circumstance where a school is redeveloped on site there is no criteria requiring replacement provision in line with NPPF 97(b). Consideration should be had to inserting such provision.	Not stated	Policy G2 protects significant private open spaces, which includes school playing fields, which is in line with NPPF paragraph 97(b).
R19.0119	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Sport England	Statutory consultee	Supportive of the policy which contains many facets of Sport England's Active Design Guidance principles such as co-location of facilities; walkable communities; and connected walking and cycling routes. Supports part F of the policy, which provides a positive approach to enabling community access to sports facilities in line with NPPF para. 121; and the use of the Council's updated Sports Facilities evidence to inform Community Needs Assessments.	Support	Support noted.
R19.0119	Strategic and Development Management Policies			Policy SC2: Play space	Sport England	Statutory consultee	Supportive of the policy which will provide physical and mental wellbeing benefits.	Support	Support noted.
R19.0119	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Sport England	Statutory Consultee	Supportive of the policy promoting physical activity by ensuring that all development proposals must take account of active travel and ensuring that the design of development must prioritising safe and convenient access and use by sustainable transport modes, namely walking, cycling and public transport.	Support	Support noted.
R19.0119	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Sport England	Statutory Consultee	Supportive of the policy promoting active travel and the provision of appropriate infrastructure to support cycling, which are principles contained within Sport England's Active Design Guidance.	Support	Support noted.
R19.0119	Strategic and Development Management Policies			Policy T4: Public realm	Sport England	Statutory Consultee	Supports the policy with meeting a number of principles of Sport England Active Design Guidance such as high quality streets & spaces and appropriate infrastructure which would encourage dwell time.	Support	Support noted.
R19.0119	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Sport England	Statutory consultee	Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has some synergy with policies of the Area Action Plan and the Council's overriding objectives of the Local Plan, particularly in relation to encouraging healthy communities. Sport England recommend that the links between the Area Action Plan and Active Design are developed further and are really drawn out in the document by having clear references to Active Design, its principles and the Active Design Checklist within the Area Action Plan. Active Design principles and the checklist, for example, could be added to the design requirements for the developments/enhancements of Finsbury Square, Old Street Station, Old Street and Clerkenwell Road Corridor, City Road and many others. More information on Active Design, including the guidance, can be found via the following link;	Object	The principles of active design are embedded in the Local Plan, notably in objective 6 which was amended in light of previous SE comments. It is not necessary to repeat active design in all policies.
R19.0119	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use; Policy BC2: Culture, retail and leisure uses	Sport England	Statutory consultee	SE highlight research on the economic and societal benefits of sport. State that the Council should consider D2 sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications. Although paragraph 2.13 does appear to recognise that leisure uses are employment generating and can support the office function of an area Sport England recommends that this is reflected in both Policy BC1: Prioritising Office Use and Policy BC2: Culture, Retail and Leisure Uses.	Object	Sport and recreation facilities are generally considered under the D2 assembly and leisure use class and are identified as such because of different impacts to class B uses. Whilst there maybe some benefits to locating sport and leisure uses in employment areas, given the evidence of need for employment land in the borough and the scarcity of development opportunities, it is not considered an appropriate strategy for the Council to specifically consider sporting facilities acceptable to locate in identified business locations. It is noted that D2 uses could be a supporting use as part of the 10/20% non-office uses allowed by BC1.
R19.0120	Site Allocations	BC20: 50 Farringdon Road	B & C: Farringdon		Picton Property Income Ltd	Landowner	Consider the allocation should be amended to recognise the potential to bridge over the adjacent railway cutting, providing a development platform that will enable commercial development and creation of a new public square. This approach promotes the comprehensive development of the site and would result in multiple public benefits.	Not stated	There are significant potential barriers to development involving decking over a railway cutting. In this case that includes the high cost of such work when balanced against the site's limitations, including the protected viewing corridor. For this reason the Council is unsure the proposed amendment to the allocation is deliverable within the Plan period and does not think it is appropriate to amend the site allocation as suggested. This does not preclude such a scheme from being brought forward where justified.
R19.0120	Site Allocations	BC28: Angel Gate, Goswell Road	B & C: City Road		Picton Property Income Ltd	Landowner	State the allocation should be amended to allow for residential use as part of a mixed-use scheme to promote viability and deliverability. This was encouraged by the Inspector assessing the original allocation of the site through the Finsbury Local Plan (2013). The development considerations should be altered to support residential use and make it clear that the buildings to the north of the site within the Duncan Terrace/Colebrooke Row Conservation Area and the listed building at 320-324 City Road would not form part of any redevelopment.	Not stated	Since this site was first allocated, updated evidence has demonstrated a significant need for new office floor space in the CAZ. The Angel Gate site is considered to be an important opportunity to deliver an increase in office floorspace, which is both viable and deliverable without residential use enabling development in this location.
R19.0120	Strategic and Development Management Policies			Policy DH2: Heritage assets	Picton Property Income Ltd	Landowner	Respondent considers that there is ample opportunity to enhance views, whilst also providing new development opportunities (see detailed representations in relation to 50 Farringdon Road). Such proposals should be entertained if applicants can demonstrate that there is a qualitative and quantitative enhancement to such views. We consider that the current policy approach is overly restrictive, inflexible and draconian. Alternative, more flexible wording is suggested.	Object	Protection of views is an important aspect of the Local Plan. It would not be appropriate to identify circumstances where infringement of views is acceptable, as this significantly undermines the notion of a protected view.
R19.0120	Strategic and Development Management Policies			Policy DH3: Building heights	Picton Property Income Ltd	Landowner	Respondent considers the restriction on potential building heights (30 metres and above and / or twice the height of the surrounding context) is too restrictive and may not be able to adequately respond to all eventualities. They state that this could result in development proposals failing to optimise the development potential of sites, in conflict with Section 11 'Making effective use of land', within the National Planning Policy Framework (February 2019). They also set out that 30 metres represents a 6 or 7 storey building which are commonplace in Central London. The representation also states that the policy pays little regard to design quality in assessing the impact of tall buildings.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0120	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Picton Property Income Ltd	Landowner	The respondent supports the council's general aim to maximise the amount of business floorspace.	Support	Support noted on the general aim for maximisation of office space.
R19.0120	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Picton Property Income Ltd	Landowner	The respondent proposes to recognise the introduction of residential uses alongside new business floorspace to part B of policy B1 to enhance scheme viability and delivery (in line with adopted London Plan policy 4.3 for mixed use development and office).	Object	Support for the aim to maximise the delivery of new business floorspace noted. The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional office floorspace up to the year 2036. The development of business floorspace is therefore a key priority. The proposed amendments would not be conducive to maximising new business floorspace. The respondent references the adopted London Plan but it is noted that the Local Plan will need to demonstrate consistency with the current emerging London Plan. The GLAs conformity response welcomes the council's proposed approach.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0120	Strategic and Development Management Policies			Policy B2: New business floorspace	Picton Property Income Ltd	Landowner	The respondent proposes changes to part A of policy B2 to show that although proposals should aim to prioritise business floorspace within CAZ and BC AAP, residential and other uses will be acceptable where they enhance scheme viability and delivery as part of a commercial-led scheme. In addition, the respondent proposes amendments to part A (i) of the policy to consider residential uses in this part to support scheme viability and to assist in the delivery of mixed and balanced communities.	Object	<p>The location of Bunhill and Clerkenwell is particularly suited to development of business uses. The area has easy access to the major centres of business and employment and comprises the majority of Islington's CAZ. Local and regional evidence is clear that the CAZ is the location with the most demand for Grade A office space. Given the economic importance of the area, increasing the supply of business floorspace in the Bunhill and Clerkenwell area is essential to maintaining and developing business and job growth. Conversely, a shortage of business space is the major threat to business and job growth in Bunhill and Clerkenwell, Islington and London as a whole. Predominantly office development is therefore the priority.</p> <p>The demand for business floorspace is extremely high. The Council's Employment Land Study (ELS) forecasts significant employment growth for the period between 2014 and 2036, where an additional 50,500 additional jobs are expected. To meet this demand, the ELS, identified a target of 400,000sqm of office space, up to the year 2036. In terms of supply, there is no current identified pipeline which will come close to meeting this demand. This highly constrained supply / demand balance reinforces that need to prioritise office development over the development of other uses, such as residential. Further, the introduction of residential use has the potential to harm the primary economic function of the area.</p> <p>This approach is in line with new London Plan (draft with proposed changes, July 2019) Policy SD5, which has now gone through examination, and which states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ.</p> <p>The Bunhill and Clerkenwell AAP Topic Paper provides further details.</p>
R19.0120	Strategic and Development Management Policies			Policy B2: New business floorspace	Picton Property Income Ltd	Landowner	The respondent recommends that part F (ii) of policy B2 is deleted because it restricts innovative design and efficient use of vacant car parks of other basement floors which have little or no access to daylight and could be used for meeting rooms. Office development does not generally require to have adequate levels of daylight according to BRE guidance.	Object	The Council considers that it is important to ensure that business floorspace is of a high quality and will be conducive to occupation into the future. The policy is not considered onerous and does not, for example, set prescriptive standards. It would still allow scope for 'innovative design'.
R19.0120	Strategic and Development Management Policies			Policy B4: Affordable workspace	Picton Property Income Ltd	Landowner	The respondent recommends that the affordable workspace requirement/policy B4 is removed, because the need for affordable workspace must be balanced with overall scheme viability and other competing development demands such as CIL charges and S106 financial contributions, including potential affordable housing contributions if residential uses were promoted.	Object	Discussion of viability testing of AW is set out in the viability topic paper.
R19.0120	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Picton Property Income Ltd	Landowner	Picton Properties Ltd. are wholly supportive of the Council's ambition to focus regeneration and development within the Bunhill and Clerkenwell area, in light of it being a centre for employment and business and the increased activity that will result from the Elizabeth Line.	Support	Support noted.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Note the anticipated demand for new office floorspace over the plan period but consider that part A of policy BC1 should be amended to provide flexibility and assist the delivery of potential development sites that may not be located in core commercial centres within the AAP. They suggest adding "However, supporting residential and other uses will be acceptable where they enhance scheme viability and delivery as part of a commercial-led mixed-use scheme."	Not stated	This issue is discussed in Bunhill and Clerkenwell AAP topic paper.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Consider that policy BC1 part B, which requires developments of 500sqm or more of any use class to be 80 or 90% office use, to be unreasonable, and that it might act as a deterrent for other commercial uses (e.g. retail) coming forward for new employment or leisure (e.g. a gym or restaurant) development. They consider that this requirement should relate to proposals for new office-led development only. They also consider the 80% requirement to be high, and suggest changing the proportion down to 50%. Amended wording suggested.	Object	This issue is discussed in Bunhill and Clerkenwell AAP topic paper.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Suggest amended wording for Part C to make specific reference to B1a office development only. For example, small-scale development by non-commercial office developers (e.g. a retail unit) should not be required to adhere to this policy requirement (as currently drafted) and we consider that this would be an unreasonable requirement.	Object	This issue is discussed in Bunhill and Clerkenwell AAP topic paper. The Council is not convinced that limiting the office-led requirement to office schemes will be a particularly effective amendment in terms of meeting the need for new office floorspace.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Consider that part D(iv) should be made more flexible to allow residential development in more areas, in particular not just wholly residential areas such as housing estates, but also predominantly residential areas and semi residential areas.	Object	Given the mixed use character of much of the BCAAP area this amendment could mean that large areas would be acceptable for solely residential development if this change was made (i.e. the priority for office development would not take effect). The council is giving priority to office uses and the exception must only apply to areas where offices would be unacceptable (potentially solely residential areas) to be an effective policy.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Picton Property Income Ltd	Landowner	Generally supportive of the aims of this policy.	Support	Support noted.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Picton Property Income Ltd	Landowner	Picton state that while they support the aim to optimise employment provision in redevelopment proposals they also state that the City Road area is a less established office location. They therefore suggest amending the policy to state that residential uses will be supported in this area, especially where it improves the viability of commercial led mixed use schemes.	Both	To meet the need for office floorspace to allow the economy of the borough to grow and to support the strategic CAZ role, the Council is prioritising development of office floorspace across the BCAAP area, including City Road. To meet this need the Council will need to maximise opportunities for office development, so removing large areas from this policy is not appropriate.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Picton Property Income Ltd	Landowner	Concerned that the policy wording under BC4 part D which states 'Goswell Road / City Road junction' to be more suitable for smaller offices they do not wish for this policy to restrict the ability of our client to promote large Grade A office floorplates as part of any potential redevelopment of Angel Gate.	Not stated	BC4 part D does not preclude development of grade A offices with large floorplates, and the BCAAP in general supports this type of development.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon	Picton Property Income Ltd	Landowner	Support the aim of predominantly office uses in the Farringdon area but also would like to clarify that this could include an element of residential use.	Not stated	A scheme in this area could include residential uses provided the scheme achieves percentage of office floorspace in the net uplift of 80%.
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon	Picton Property Income Ltd	Landowner	Suggest a number of changes to BC5 part H to allow and encourage the decking of the railway line in this area. Picton have submitted detailed material in support of the concept of decking over the railway line. They believe they can develop in this area in order to support London Plan aims to as Farringdon as an area of intensification. They also state that the local viewing corridor should not be stringently applied and that LV1 may be seen as viewing plane rather than a corridor. They also state that roof terraces in this area could provide new views to St Paul's. A new development here could also provide a new public square.	Not stated	The Council does not object to the principle of decking over railway lines. While we support the ongoing discussion into this concept, the planning case has not been demonstrated to the Council sufficiently to embody any specific recommendations into the Local Plan. The lack of reference in the Local Plan does not preclude such a scheme from coming forward, should actual tangible detail materialise. We note that the respondent relies on Policy 2.13 of the adopted London Plan as part of their justification, which relates to Intensification Areas; these designations will soon be defunct, having not been replicated in the new London Plan.
R19.0121	Site Allocations	BC50: Queen Mary University, Charterhouse Square Campus	B & C: Historic Clerkenwell		Islington Living Streets	Campaign	Strongly agree that 'development should prioritise a new pedestrian route through the site from Charterhouse Buildings to Rutland Place'.	Support	Support noted.
R19.0121	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	Islington Living Streets	Campaign	Add: 'Enhance town centres and shopping areas, by reducing traffic, improving the public realm, widening pavements and removing on-street parking spaces, eg on Islington High Street, near Duncan St. eg remove parking spaces on Upper Street.'	Object	The Council find this amendment unnecessary. R1 Part J in conjunction with transport and spatial strategy policies provide a strong basis to enhance the public realm and promote sustainable modes of transport.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0121	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Living Streets	Campaign	Key concerns are about the commitment to sustainable transport. Respondent mentions a number of approaches and initiatives to achieve this, including Low Traffic Neighbourhoods; Clean Air Walking Routes; developing and improving accessibility; creating new walking routes; removing parking spaces, especially where this would lead to public realm improvements and add to the vibrancy of areas, eg on Islington High St; offering a parking permit scrappage scheme where a free two-year membership to a car club is provided (cf Camden Council's proposal); and encouraging parklets on the road in place of parking places	Not stated	A number of these issues are addressed in other Local Plan policies, e.g. spatial strategy policies. The transport strategy is also relevant; the Council will add a reference via a modification to the Local Plan to this in the policy supporting text, for clarity.
R19.0121	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Living Streets	Campaign	Concerned that large hotels will be accessed by coaches, adding pollution and congestion; the Council policies should seek to prevent this.	Object	Policy R12 relates to hotels. Hotels are only permitted in the borough on allocated sites and on sites with existing visitor accommodation in Town Centres and the CAZ. In accordance with policy T5, delivery and servicing plans are required for developments that impact on the amenity of residents and businesses, the operation of the public highway amongst other considerations. No parking bays, other than blue badge and loading bays will be provided to hotel developments.
R19.0121	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Islington Living Streets	Campaign	Add 'The Council will take every opportunity in new developments to create walking and cycling routes (cf Charterhouse Sq complex)	Object	This is covered by T1, T4 and the Urban design guide and Streetbook. Pedestrian permeability is a core planning objective in Islington.
R19.0121	Strategic and Development Management Policies			Policy T3: Car-free development	Islington Living Streets	Campaign	7.24: states 'For residential development, on-street accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed.' This figure seems very high considering the low level of car ownership among disabled people in Islington. Surely it should be proportionate to the percentage of disabled people in the borough who own cars.	Object	The parking bays will not be provided from the outset, but activated when a demand materialises. The 10% is therefore a maximum rather than a minimum.
R19.0121	Strategic and Development Management Policies			Policy T3: Car-free development	Islington Living Streets	Campaign	7.26 - describes parklets and cycle storage as 'temporary use of existing under-utilised parking spaces'. Why are they temporary? Islington already has an excessive number of parking spaces in many areas, and they will become even more redundant with the predicted fall in car ownership.	Object	The temporary character of the parklets is designed to allow conversion for a blue badge holder when the demand materialises.
R19.0121	Strategic and Development Management Policies			Policy T3: Car-free development, Part J	Islington Living Streets	Campaign	Add: 'On street charging points must not be erected on the pavement.'	Object	Policy T3.J supporting text 7.31 sets out that charging points must be provided within the parking space (on the carriageway) to minimise street clutter and avoid impacts on the pedestrian environment.
R19.0121	Strategic and Development Management Policies			Policy T4: Public realm, paragraph 7.43	Islington Living Streets	Campaign	Planters do not need to be on the pavement. Therefore add after 'pavement planters' 'planters in the road in place of parking spaces'. At end add 'We will work with local people and community groups to encourage them to develop ideas for planters and take responsibility for them.'	Object	This is more related to the transport strategy rather than planning policy. The Streetbook SPD and Policy T4 however include criteria that supports the installation of planters off pavements.
R19.0121	Strategic and Development Management Policies			Policy T4: Public realm, Part D	Islington Living Streets	Campaign	D. Privately Owned Public Spaces (POPS) Insert. 'The Council will not permit these to be used for private car parking as it encourages an unsustainable mode to transport'.	Object	This is covered by T3 car free policy.
R19.0121	Strategic and Development Management Policies			Policy T5: Delivery, servicing and construction, Part B	Islington Living Streets	Campaign	Add a statement in (iii) the section on Construction: 'Every effort should be made to ensure the pavement and cycle lanes are not blocked during construction. Where this is unavoidable, space must be taken from the road way to make provision for footways and cycle lanes.'	Object	Policy T5, in conjunction with policy T1 and T2, includes sufficient criteria to mitigate impacts from construction on pavements and cycle lanes.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Challenges	Islington Living Streets	Campaign	Suggestion of adding: 'This will be achieved by a range of measures, in particular the introduction of Low Traffic Neighbourhoods and Clean Air Walking routes.' to paragraph 165.	Not stated	This part of the BCAAP sets out the challenges, the policies and actions are not set out in this section. With regard to the Low Traffic Neighbourhoods and Clean Air Walking routes, Islington's transport strategy will contain reference to livable neighbourhoods throughout. The Council will add a reference via a modification to the Local Plan to the supporting text of policy T1 for clarity.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Challenges	Islington Living Streets	Campaign	Climate change: Para 1.69-72; insert 'reduction in motor vehicle use, whether by diesel, petrol or electric vehicles'	Not stated	The Council supports the reduction of vehicle traffic through the Local Plan more generally, which prioritises active travel throughout. This includes the car free policy which specifically does not not exclude electric vehicles. Policy T2 also contains policy to minimise the impacts of non sustainable forms of transport including requiring developments to demonstrate that the use of private vehicles has been minimised.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Challenges	Islington Living Streets	Campaign	Open space etc. 1.73, add 'The Council will press ahead with improvements to Clerkenwell Green, and will come forward with proposals for Faringdon Square.'	Not stated	The Local Plan supports these schemes but has no direct control over them coming forward.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Islington Living Streets	Campaign	Para 2.15 states 'The Council has designated four local shopping areas in Bunhill and Clerkenwell. Add 'The Council will semi-pedestrianise the other 3 areas in the same way it has Exmouth Market'	Not stated	In general the Council supports public realm schemes which improve conditions for walking and cycling, and that reduce the impact of traffic. We have not set out detailed aspirations for these spaces in the BCAAP as the design solutions for these streets, should they come forward for public realm improvements, must be based on detailed and site specific analysis undertaken by the transport planning team.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Islington Living Streets	Campaign	Policy BC3, F states 'The Council will also explore ways to improve the busy Old Street and Clerkenwell Road for pedestrians and cyclists'. This is too feeble. It should say: 'The council will remove through motor traffic, except buses, to improve the busy Old Street and Clerkenwell Road for pedestrians and cyclists'.	Not stated	The extent of public realm improvement schemes, for example, whether the scheme will result in the removal of motor vehicle traffic, is a matter that requires detailed and site specific analysis and research, potentially consultation, and potentially joint working with Transport for London. For these reasons the Council cannot set out these matters in the AAP to this level of detail.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Islington Living Streets	Campaign	3.31 states 'City Road Basin and Graham Street Park are places of recreation and relaxation, and should be enhanced by ensuring pedestrian access is provided on all sides of the basin'. We strongly support this policy.	Support	Support noted.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon	Islington Living Streets	Campaign	Add in this section: 'reduce traffic on Cowcross St and establish a public space at south end of St John St, including closing the road to motor traffic. Remove EV charging points from Cowcross St and ensure EVCPs are not installed in areas to be designated for shopping or improvement.'	Not stated	The Bunhill Community Plan has earmarked St John Street for a pedestrian and public realm improvement scheme. Electric vehicles charging points would be assessed by other Local Plan transport policies.
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC6: Mount Pleasant and Exmouth Market	Islington Living Streets	Campaign	Para 3.48 states: 'The busy Farringdon Road and Rosebery Avenue cross through this area. The junction of these two roads is located near Exmouth Market and there is an opportunity to improve this area for pedestrians and cyclists'. Insert: 'We will focus on improving the Clean Air Walking route along Amwell St to Faringdon, reducing traffic at the south end of Amwell St and make major improvements to the pedestrian crossing of Rosebery Avenue'.	Not stated	Following advice from TfL the Council has begun a public realm improvement project for pedestrian and cycle improvements in the Amwell Street area. As with other public realm improvement works the detail and form or the changes will not be set out in this document as it is based on site specific analysis, research, and consultation.
R19.0122	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Bee Midtown	business	The respondent supports policy B1 to boost office space within EC1 and to deliver a range of workspace types/unit sizes which are affordable to a range of small occupiers.	Support	Support noted for promotion of office space in EC1 and to deliver a range of workspace types/unit sizes for SMEs.
R19.0122	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Bee Midtown	business	The respondent supports policy B3 to protect existing business floorspace in the borough.	Support	Support noted for policy protection of business floorspace across the borough.
R19.0122	Strategic and Development Management Policies			Policy B2: New business floorspace	Bee Midtown	business	The respondent supports policy B2, part A(i) to prioritise business space and the provision of a range of workspaces to suit the needs of different occupiers. The respondent is keen to see the introduction of measures which could encourage new developments to provide workspaces with a range of affordability and sizes.	Both	Support noted for prioritisation of business space and the provision of a range of different workspace typologies. The policy supports a range of business typologies.

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R19.0122	Strategic and Development Management Policies			Policy B2: New business floorspace	Bee Midtown	business	The respondent supports part D of policy B2 to ensure that new office locations are of high-quality design and accessible, and prioritise sustainable transport.	Support	Support noted for policy requirements on high quality design, accessibility and promotion of sustainable transport from new office development.
R19.0122	Strategic and Development Management Policies			Policy B2: New business floorspace	Bee Midtown	business	The response includes the respondent's own research of EC1 to demonstrate that within the last five years architecture and design, and advertising sectors have grown in the area, alongside the creative and media.	Not stated	Comments noted.
R19.0122	Strategic and Development Management Policies			Policy B4: Affordable workspace	Bee Midtown	business	The respondent supports part A of policy B4 to provide 10% of affordable workspace, but want to see more details on how this is delivered, including the criteria that the council will use for businesses to be put on the list/manage workspace, viability assessments and details on how off-site contributions are being used.	Both	The council's Inclusive Economy team manages the process for any affordable workspace secured. The end users of such space is determined through a commissioning process, led by the council's Inclusive Economy team, which focusses on ensuring social value outputs. Further information is set out in the council's Affordable Workspace Strategy.
R19.0122	Strategic and Development Management Policies			Policy B4: Affordable workspace		business	Local developers are concerned that the new policy could impact their viability as this is an additional demand placed on development. It is suggested that this initiative is monitored so that future development does not impact on businesses within the area, regardless of their size.	Object	Discussion of viability testing of AW is set out in the viability topic paper.
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury	Islington Living Streets	Campaign	3.58 City University, Northampton Sq states 'Improve accessibility both within the campus and connect it to the surrounding area' This must mean public accessibility, and particularly northwards from the square to Spencer St	Object	The Local Plan supports these schemes but has no direct control over them coming forward. Specific details will be determined as and when proposals are submitted.
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use; Policy BC2: Culture, retail and leisure uses	Bee Midtown	Business	The respondent supports policy B1 to boost office space within EC1 and to deliver a range of workspace types/unit sizes which are affordable to a range of small occupiers.	Support	Support noted for promotion of office space in EC1 and to deliver a range of workspace types/unit sizes for SMEs.
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Bee Midtown	Business	We concur with proposals which would allow new retail, food, drink and entertainment venues to open up in the Clerkenwell area, where it is shown that it will improve its character. We believe it's important that Islington Council maintain a more flexible approach on the Clerkenwell cumulative impact policy and encourage a diversification towards non-vertical drinking establishments. We believe that a policy which increases these types of premises, whilst respecting the local neighbourhood can help increase dwell time of those who work in the area and consequently could trigger economic growth in the area through the provision of more local jobs and services. Policy BC2D provides an opportunity to transform the evening economy within Farringdon and Clerkenwell. Members are keen for their employees to be able to socialise within the area and believe that it is possible to achieve a regulatory balance which supports the evening and night-time economy whilst respecting the local residents. We welcome Policy BC2, which seeks to encourage active frontages for ground floor space – such as retail and leisure uses. We believe that this would be an effective way to ensure that ground floor space is efficiently used for a purpose which can help boost the local economy as well as improving it for all those who work, visit and live in the area. Such a policy helps create a vibrant atmosphere in the local area and establishes it as a key central London destination. In particular we welcome the priority given to entertainment uses within Farringdon around the station as it is set to expand.	Support	Support noted. Planning is governed by use classes. Both vertical and non-vertical establishments could fall within A3, A4 or a mix of these uses. As such the planning system is a blunt tool to control this. It should be noted however that the draft plan has a number of policies to protect and promote restaurants, cafes and other retail/leisure uses. Cumulative impact areas are part of the licensing regime, and while they can be material in terms of planning applications, this would depend on case-by-case circumstances; they are not automatically determinative.
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon; Policy BC8: Historic Clerkenwell	Bee Midtown	Business	As the popularity of the Farringdon and Clerkenwell area continues to grow we welcome the specific support of policy BC5 for the importance of cultural and leisure venues within the area including the globally renowned design sector within Clerkenwell. The area continues to have a significant cultural role with special historic character and heritage assets. While the opening of the Elizabeth Line will thoroughly improve connectivity to the area from across London, with an estimated 200,000 passengers projected to travel through Farringdon every day, it will also put significant pressure on Farringdon and Historic Clerkenwell's public spaces. There is a need to ensure that new developments and investment reflects this new role with a focus on enhancing public realm to promote pedestrian circulation and high quality linked public spaces. As such, we support and would like to work with the council to ensure that development in the area promotes public realm improvements which are conducive to active travel and sustainable methods of transport. This includes the proposed improvements surrounding the Clerkenwell Road and Goswell Road junction, improved pedestrian access at Turnmill Street and Farringdon Road and in Clerkenwell Green. We would be keen to discuss these plans further as they progress and offer our support to help them move forward. The unrivalled transport networks, attractions and location of EC1 means that the area has the opportunity to be a commercial beacon for London. We look forward to continuing working with Islington to ensure we are at the forefront of promoting sustainable modes of transport and making the area more pleasant to visit, work and live in.	Support	Support noted. The Local Plan includes a number of policies to promote new public open space and public realm improvements. In terms of delivering schemes, this is done through CIL/S106 through engagement with communities and businesses, as detailed in the community plans.
R19.0123	Site Allocations	FP9: 221-233 Seven Sisters Road	Finsbury Park		Muslim Welfare House	Landowner	Support the allocation but are concerned that the requirement to deliver a significant amount of business floorspace may not provide sufficient cross-subsidy to deliver their goal of an enhanced community facility. Request that the allocation is amended to enable community use to be provided alongside 'business floorspace and/or residential use'. The allocation should acknowledge that the site is in multiple ownership and may not be delivered as a whole.	Both	Islington's Employment Land Study highlights the need for 400,000sqm of additional B1a floor space by 2036. The core area of Finsbury Park is predominantly commercial therefore the requirement for a significant amount of business floorspace with an element of residential is an appropriate allocation. The allocation highlights that the site is in mixed private ownership, which may mean it comes forward in a piecemeal fashion. However, the development considerations for the allocation state that the provision of a tall building should be linked to the comprehensive development of the entire site.
R19.0124	Site Allocations	BC22 Vine Street Bridge	B & C: Mount Pleasant and Exmouth Market		Bendenis Properties Limited	Landowner	Support for the introduction of new public realm through the conversion of Vine Street Bridge to public open space. Also states that a substantial development opportunity exists to create a more unified public realm by encompassing the land to the north of Vine Street Bridge, in between Farringdon Road and Farringdon Lane. Site Allocation BC22: Vine Street Bridge should be replaced with a larger allocation encompassing the land edged red (see plan) with an allocation for a mixed-use, high density development comprising a new public open space.	Both	There are significant potential barriers to the suggested scheme as it involves building over the railway line. These barriers include viability due to the high cost of development over a railway line when balanced against the site limitations, including the local viewing corridor. For this reason the Council does not think it is appropriate to create a wider site allocation as suggested. This does not preclude such a scheme from coming forward where justified.
R19.0124	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Bendenis Properties Limited	Landowner	DH1 is unsound and unjustified and conflicts with the London Plan in its policy to protect all views, including strategic views, local views, and views of local landmarks. The policy should be amended to reflect the sensitivity to change of different views. A proposal that is visible is not necessarily harmful.	Object	Protecting a view does not mean that it cannot change at all, it depends on how a proposal affects a view, for example if it blocks the objective that is to be viewed (e.g. St Paul's Cathedral), this is a different impact to if a proposal is within a lateral assessment area, or frames a protected view. The Council will consider each proposal on its merits.
R19.0125	Site Allocations	FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street	Finsbury Park		Dawnelia Developments One Limited	Landowner	The amendment to this existing site allocation to remove the potential for 'an element of residential use' renders it unviable. This is unjustified and the inclusion of residential accommodation is necessary to make a mixed-use development scheme deliverable.	Object	Some existing allocations have been amended where updated evidence has led to changing policy requirements. The site is located in a specialist commercial area and is currently in commercial use. The allocation for retail-led mixed use development with complementary office/workshop uses on upper floors aligns with the council's priorities for Fonthill Road and the wider Finsbury Park Spatial Strategy Area.
R19.0125	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Dawnelia Developments One Limited	Landowner	Respondent claims there is no evidence of traders on Fonthill Road wanting to start or could viably reinvigorate clothing manufacturing again as all goods are now imported from overseas (e.g. Asia) where prices/wages are lower. The council cannot control the different A1 uses that may seek to establish on Fonthill Road and there is no evidence other A1 uses e.g. electrical goods store would need workshop/maker space. It is suggested that all text in paragraph 2.69 from 'Fonthill Road used to be...' onwards should be deleted.	Object	The limitations of the use class order are noted but this does not in itself mean that protection of the specific function is unsuitable. The respondents claim that the area is in 'terminal decline' is not supported by evidence. There is already still some manufacturing on Fonthill Road and the council has not encountered any explicit views from traders that supporting 'maker space' is undesirable. Supporting manufacturing will also help diversify the area, making it more self-sustaining and able to benefit local supply chains and labour. The Council's Inclusive Economy team work with traders to gauge their views and support people with skills training to pass on garment manufacturing skills. There is a growing demand for sewing and craft skills shown by the success of the Fashion Technology Academy in Haringey which work in partnership with Islington Council. Islington and Haringey have been successful in securing funding from the GLA's Good Growth Fund to support this manufacturing revival.

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R19.0125	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Dawnelia Developments One Limited	Landowner	Respondent notes Finsbury Park has been identified as a CAZ satellite location although this is not founded on evidence that clearly demonstrates there is a current or likely demand from small businesses to locate in Finsbury Park. The London Plan also does not identify Finsbury Park as a CAZ satellite location. New business floorspace is only likely to come forward as part of mixed use development as 100% commercial would not be viable in Finsbury Park. Part D should be amended to reflect this. Paragraph 2.70 should recognise the potential for a CAZ satellite at Finsbury Park dependent on demand for employment space in the CAZ exceeding the supply.	Object	The Employment Land Study 2016 (ELS) identified a need for 400,000sqm additional business floor space by 2036 across the whole borough. This is a significant increase and one that cannot be met solely through development in the CAZ. The ELS specifically states 'while given its hyper-connectivity, Finsbury Park could be a potential satellite location'. The ELS also shows the demand of 400,000sqm and it would be poor planning to only plan for additional business floor space when it is clear all existing supply has reached full capacity. The Local Plan is a strategic document that looks ahead 15 years, making it entirely appropriate to envisage the areas in which significant future need can be accommodated. Town Centres are considered suitable for development of business floorspace, in national and regional policy as well as the adopted Local Plan.
R19.0126	Site Allocations	BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 & 21-23 Leonard Street; BC48: Castle House, 37-45 Paul Street; and Fitzroy House, 13-17 Epworth Street and 1-15 Clere street	B & C: City Fringe Opportunity Area		EMA Textiles Ltd	Business	The representation states that the site allocations surrounding the representors site, BC41 and BC48, compliment their site and are supported. The representation also supports the Local Plan which will proactively meet both its residential and employment floorspace targets.	Support	Support noted.
R19.0127	Site Allocations	BC11: Longbow House, 14-20 Chiswell Street	B & C: City Fringe Opportunity Area		Metropolitan (Chiswell) Limited	Developer	Concerned that policy DH3 would prevent the redevelopment of the building as the site is currently taller than 30m but not allocated as appropriate for a tall building. Request amendment to the allocation to state that as the existing building is over 30m, development of a tall building is suitable on site. Suggest amendment to estimated timescale.	Object	The justification for the Council's approach to tall buildings is discussed in more detail in tall building topic paper. It is unclear whether the amendment to the timescale would be predicated on a change to the building heights approach as sought; the Council therefore has not amended the timescale. This does not preclude the site coming forward earlier.
R19.0127	Strategic and Development Management Policies			Policy DH3: Building heights	Metropolitan (Chiswell) Limited	Landowner	Respondent is owner of site BC13: Longbow House. Objection is raised to Draft Policy DH3 as it is considered overly prescriptive and has not provided a robust and credible evidence base. The draft policy is considered unacceptable in its current state. It should be more adaptable to provide more possible locations for tall buildings on an area basis, as per the approach of the Core Strategy, Development Management Policies and Finsbury Local Plan. The City Fringe Area section of the Tall Buildings Study defines the sifting process to narrow down the areas where tall buildings could be appropriate through application of six principles. Respondent has provided their own assessment of the Moorgate Cluster against each of these principles with specific reference to Longbow House. Despite the detailed explanation of the process of sieve testing within the Tall Buildings Study the actual "Local search and sieve approach for the City Fringe" at Appendix G of the document does not show any evidence that the Longbow House site has been tested as to the potential to accommodate a tall building, despite the site being within an existing tall buildings area, the existing building being over 30m and proposed in existing and emerging policy for redevelopment 'a scale and height that is consistent with neighbouring buildings and the immediate context,' which includes adjoining buildings of 34.6m and 46m. Clearly in absence of any specific considerations to our client's site in the 'Tall Building Study', it is unclear why 14-20 Chiswell Street has not been included as a site suitable to accommodate a tall building. Amended policy wording put forward.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0127	Strategic and Development Management Policies			Policy B4: Affordable workspace	Metropolitan (Chiswell) Limited	Landowner	The council's viability study shows that one site is not viable if the requirement for affordable workspace is extended for more than 10 years. The respondent suggests amendments to policy B4 for the provision to be for 10 years instead of 20 (including supporting text in paras 4.51 and 4.52).	Object	This is discussed in the Viability Topic Paper.
R19.0127	Strategic and Development Management Policies			Policy B4: Affordable workspace	Metropolitan (Chiswell) Limited	Landowner	The respondent suggests that a new requirement is added to policy B4 (new part H), which considers lower proportions of affordable workspace provision where development is not viable (according to Viability SPD) and off-site contributions on a case-by-case basis where size or quality of affordable workspace from development is insufficient.	Object	This is discussed in the Viability Topic Paper.
R19.0127	Strategic and Development Management Policies			Policy B4: Affordable workspace	Metropolitan (Chiswell) Limited	Landowner	The respondent proposes that supporting text in para 4.47 (policy B4) is amended so that affordable workspace provision is only applies to new floorspace for proposals involving redevelopment or extension..	Object	It is the intention of the policy to require 10% of overall gross B-use floorspace. Where development comprises an extension to provide additional business floorspace, and the development includes refurbishment / improvement to the existing business floorspace, it considered that requiring 10% affordable workspace from the overall gross business floorspace is appropriate as the whole floorspace will attract an increased rental rate. Where development comprises of an extension only, 10% affordable workspace from the additional workspace would be required, where the total additional floorspace exceeds 1,000sqm - see paragraph 4.47.
R19.0128	Strategic and Development Management Policies			Policy B2: New business floorspace; Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Noble House Projects Ltd	Landowner	Respondent is landowner of site at 4 Blundell Street within LSIS. Respondent notes that there has been significant change in the eastern edge of the LSIS (Blundell Street/Caledonian Road) with the introduction of non-industrial uses falling outside B1c, B2 and B8, and considers that this demonstrates that the evidence base is out of date. The response makes reference to the development at 423-425 Caledonian Road a housing-led development scheme that introduced non-industrial uses, including residential. It is proposed that the LSIS boundary is amended and that the following sites which fall outside B1c, B2 and B8 are removed, in line with SP3(A): -Peabody site - Housing -Cally Public House - A4 use class -Break out café sandwich bar - A3 use class -2 Blundell Street - A1 use class -6 Blundell Street - B1 offices  Reference is made to the LSIS heights study which notes that a mix of open B Use Classes could be supported in Brewery Road/Blundell Street for the future. It is evident that the drafted local policies of the Regulation 19 Local Plan do not support a mix of employment uses within the LSIS. Therefore, the eastern part of the LSIS is no longer compatible with the LSIS.	Object	Further detail on the LSIS, including its function and the justification for the proposed policy, is set out in the employment topic paper. SP3 Part C acknowledges that some non-industrial uses are suitable in principle in the LSIS. The policy will ensure that future schemes, even on sites which are not currently in industrial use, should prioritise such uses. The Council does not agree that the changes in the area renders evidence out of date. The LSIS heights study and the ELS have informed the drafting of the policy but they are not the only considerations.
R19.0128	Strategic and Development Management Policies			Policy SP3: Vale Royal Locally Significant Industrial Site, Part A	Noble House Projects Ltd	Landowner	None of the uses to the east of the LSIS fall within the uses identified in Part A	Object	As noted in response above, the fact that there is a lack of B1c B2 and B8 uses in this area does not render the LSIS designation for this area obsolete. The designation is essential to prioritise industrial uses in future and consolidate and enhance the role of the wider industrial area which, by virtue of its location in close proximity to the CAZ, has significant potential to provide an important servicing role for the internationally significant concentration of businesses in the CAZ. This aligns with the London Plan and its evidence base.



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R19.0128	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part B	Noble House Projects Ltd	Landowner	<p>In relation to SP3 (B), the respondent suggests that the policy should acknowledge alternative options for sites that are not capable of delivering industrial use due to design, size or legal use constraints, and that SME space beyond the designated industrial uses is supported in the area. The council acknowledge that the main feature of hybrid space is that it straddles between different uses classes but the policy is restrictive in its definition of hybrid space, just recognising flexibility between industrial uses and considering office as ancillary space.</p> <p>The respondent suggests that industrial SME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment floorspace through other uses. Policy SP3 restricts the ability of employment sites to be fully optimised and conflicts with section 11, paragraph 117 of the NPPF (2019): 'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed/brownfield land'.</p>	Object	<p>The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. The development of office use and other uses with a supportive function of the area's primary economic activity may be only permissible as a small component (no more than a 20% proportion of the scheme) that forms part of a hybrid workspace scheme with a predominant industrial land use (B1c, B2 and B8, or Sui Generis use akin to an industrial use).</p> <p>The respondent provides no evidence that industrial SME uses are not appropriate or feasible above first floor. The London Plan evidence base demonstrates a number of potential intensification options involving multi-floor industrial uses.</p>
R19.0128	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part C	Noble House Projects Ltd	Landowner	In relation to SP3(C), the respondent defends that a landowner with a lawful use should not have uses withdrawn/imposed by the LPA and that the existing uses on site should be a material consideration for future redevelopment. It mentions that the Agent of Change policies protect existing industrial uses and neighbouring uses.	Object	<p>The LSIS is Islington's most significant remaining industrial area, and as such the council seeks to protect its industrial function. Introduction of other uses such as offices and residential could significantly undermine this function. This area has been an industrial area for much of its recent history. The Local Plan cannot withdraw existing uses from consideration where they come forward for development as this would be contrary to the strategy for the area.</p> <p>As noted above, the policy is justified in seeking to guide future land uses in line with the strategy for the area.</p>
R19.0128	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part E, F and G	Noble House Projects Ltd	Landowner	In relation to building height limit in the LSIS, the respondent recommends that parts E, F and G are removed from SP3 and dealt with in the design policy. The response makes reference to surrounding developments of 11 storey (Peabody housing), including 7 and 8 storeys on Brewery Road and Market Road, which are not in accordance to the height limit of five storeys that is proposed for the area.	Object	<p>The presence of other tall buildings within the area does not justify the building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>
R19.0129	Site Allocations	BC10: 254-262 Old Street (east of roundabout)	B & C: City Fringe Opportunity Area		Owner of 250-254 Old Street	Landowner	The approach taken by the allocation is supported. 250-254 is an underutilised site given that it is currently a two-storey building set back from the road. It is considered to present an excellent development opportunity for optimisation and recognition should be given to this in the allocation. The allocation does not refer to suitable heights for the site although the adjacent building, Albert House, is identified in the Tall Buildings Study as potentially an appropriate location for a local landmark building. The site is not affected by any strategic viewing corridors, falls largely outside of a conservation area, and has a limited number of residential properties close by which limits the potential daylight/sunlight impacts of development.	Support	Support noted. LBI's approach to tall buildings is in line with the draft London Plan and underpinned by comprehensive evidence. Where sites have been identified as being suitable for tall buildings, the location/siting of the taller element is specified. On this site, the Tall Buildings Study identified Albert House and not 250-254 Old Street or 262-264 Old Street as potentially suitable for a tall building. Further discussion is provided in the tall building topic paper.
R19.0129	Strategic and Development Management Policies			Policy DH3: Building heights	Owner of 250-254 Old Street	Landowner	Policy should be amended to also state that buildings above 30m in height will be acceptable where it can be demonstrated through design, townscape and heritage analysis that the site is suitable for heights of 30m or more.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0129	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Owner of 250-254 Old Street	Landowner	The respondent supports policy aim to deliver business floorspace in the CAZ and BC AAP, and for refusal of proposals that do not demonstrate maximisation of new business floorspace.	Support	Support for the maximisation of employment floorspace in CAZ and BC AAP noted.
R19.0129	Strategic and Development Management Policies			Policy B4: Affordable workspace	Owner of 250-254 Old Street	Landowner	The respondent considers that for policy B4 to be deliverable, requirements for a 10% provision should be only based on the uplift of employment floorspace and asks for this to be clarified in the policy. Respondent considers that the amount and rent levels of AW is not justified or based on proportionate evidence. The affordable workspace lease term, for 20 years or longer if greater than 10,000sqm, would significantly harm the viability of future schemes and place risk on deliverability of office space. It is proposed that a 10 year term is more appropriate.	Object	An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the Viability Topic Paper. Provision of affordable workspace is essential to ensure a diverse economy and to allow development of a range of businesses, many of which could not afford to locate within Islington otherwise. This is discussed further in the employment topic paper.
R19.0129	Strategic and Development Management Policies			Policy B4: Affordable workspace	Owner of 250-254 Old Street	Landowner	The respondent considers that the policy should consider single occupier scenarios and that it accepts in-lieu payment or off-site delivery where feasible.	Object	The provision of on-site affordable workspace is preferred over the use of financial contributions to deliver affordable workspace. A formula to explain affordable workspace in-lieu contributions has been included in policy B4.
R19.0129	Strategic and Development Management Policies			Policy B4: Affordable workspace	Owner of 250-254 Old Street	Landowner	The respondent recommends that part F of policy B4 is applied where viable and necessary because some occupiers may not require a high standard fit-out, and this will have an impact on the viability of the scheme.	Object	Viability testing indicates 10% of gross floorspace at Category A fit out can be delivered, for a period of 20 years at peppercorn rent. The viability topic paper provides further discussion.
R19.0129	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	Owner of 250-254 Old Street	Landowner	The respondent states that the policy should allow flexibility where is not appropriate to provide on-site construction training, allowing for a financial payment instead.	Object	The Planning Obligations (S106) SPD notes that, should it not be possible to provide these placements, the Council will seek an equivalent contribution (based on a formula set out in the SPD).
R19.0129	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Owner of 250-254 Old Street	Landowner	Question why precise heights are listed for Inmarsat and Albert House, when the client's property offers an opportunity to mediate between the two sites with height. States that it should be included as a tall buildings site.	Object	The Council considers that the Tall Buildings Study is a robust basis for the proposed approach set out in the draft Local Plan. This approach is consistent with the draft London Plan. Further discussion is provided in the tall building topic paper.
R19.0129	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Owner of 250-254 Old Street	Landowner	"The diagram appears to show the area at the front of our client's site as 'protected open space'. This land is within our client's ownership and currently comprises an area of hard standing. It should therefore not be designated as protected open space. The redevelopment of the site would use this space to make best use of the site and re-instate the historic building line which would have a townscape benefit. The diagram should be amended accordingly."	Object	There is no protected open space within site BC10. The Council will amend mapping through modification to the Local Plan to avoid confusion.
R19.0130	Site Allocations	NH7: Holloway Prison, Parkhurst Road	Nag's Head and Holloway		Peabody Group	Landowner	Supportive of the allocation for residential-led development. Request that the allocation is amended to allow for buildings taller than 30m outside of the local viewing corridor. In addition, suggest that the requirement for development to be phased so that essential infrastructure such as open spaces and community facilities is completed prior to residential occupation is impractical and overly onerous.	Both	Support noted. The Holloway Prison site was subject to detailed appraisal and is not considered suitable for tall buildings. The council considers that completion of essential infrastructure prior to residential occupation is necessary to protect the amenity of existing and future residents and is not an onerous requirement.
R19.0130	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Peabody Group	Landowner	Refer to CBRE representation (on behalf of Peabody, R19.0178) in Appendix 4.	Object	See response to Peabody R19.0178
R19.0131	Site Allocations	BC33: Oliver House, 51-53 City Road	B & C: City Fringe Opportunity Area		The Methodist Church	Landowner	Allocation welcomed. Estimated delivery timescale of 2021/22 to 2025/26 is in line with landowner's aspirations for the site. Feel that a more flexible approach to the range of uses possible at the site would allow effective development to come forward suitable to respond to the business needs of the area. Intensification of office uses at the site could easily be achieved at the same time as the delivery of other uses such as retail and community facilities at basement and ground floor levels. Request allocation is amended to allow for 'office-led mixed-use development'.	Both	The site was previously in business use and is located in an area where this is the priority land use. Policy BC1 would allow up to 10% of any net additional floor space to be in non-office use.

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R19.0131	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	The Methodist Church	Landowner	The Methodist Church supports the anticipated growth of office floorspace in the area as well as the enhanced provision of retail and cultural floorspace. The allocation of Oliver House (Policy BC33) will be a strong contributor to this strategic objective and would be able to deliver a mix of uses in accordance with Policy SP1.	Support	Support noted.
R19.0131	Strategic and Development Management Policies			Policy H1: Thriving communities	The Methodist Church	Landowner	Policy H1 seeks to enhance the social value of development within the borough. The Methodist Church are supportive of part S and V of this policy which encourage the development of social and community infrastructure required to support the borough's residents and the maximisation of social value on development sites. Community floorspace is essential for the maintenance of strong, vibrant and healthy communities and the council should be supporting the provision of these uses as part of a mixed-use development across the borough.	Support	Support noted.
R19.0131	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	The Methodist Church	Landowner	Policy S3 states that all non-residential and mixed use developments proposing more than 500sqm net additional floorspace are required to achieve BREEAM 'Excellent' standards and must make reasonable endeavours to achieve 'Outstanding'. Although this approach is commendable, the policy wording should be amended to provide greater flexibility and determined on a case-by-case basis subject to design constraints and viability.	Object	These requirements have been found to be viable in the Local Plan Viability study. It is necessary to require high standards of sustainable design in order to contribute to climate change mitigation. Further discussion is provided in the sustainability topic paper.
R19.0131	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	The Methodist Church	Landowner	The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2 the word maximisation is replaced with 'the majority of new/additional floorspace is business floorspace'.	Object	The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional office floorspace up to the year 2036. The development of business floorspace is therefore a key priority and the policy requirement to maximise elevates this as the high priority for development in relevant areas. Maximisation would be a case by case judgement outside of the BCAAP area, which prescribes specific percentages of office floorspace required. The proposed amendments would not be conducive to maximising new business floorspace.
R19.0131	Strategic and Development Management Policies			Policy B2: New business floorspace	The Methodist Church	Landowner	The respondent supports the aim to prioritise office delivery in the BC AAP but recommends making reference to office-led mixed use development in the BC AAP.	Both	See response to policy B1.
R19.0131	Strategic and Development Management Policies			Policy B4: Affordable workspace	The Methodist Church	Landowner	The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unreasonable and a conflict of interest to lease to a particular organisation such as the council who is also the planning authority.	Object	The Council's Inclusive Economy team manages the process for any affordable workspace secured. The end users of such space is determined through a commissioning process, led by the council's Inclusive Economy team, which focusses on ensuring social value outputs. Further information is set out in the council's Affordable Workspace Strategy.
R19.0131	Strategic and Development Management Policies			Policy B4: Affordable workspace	The Methodist Church	Landowner	The respondent is concerned with how off-site financial contributions will impact on the viability of schemes. This policy hasn't been properly tested and has the potential to harm development.	Object	Securing affordable workspace is a priority for the Council. Proposed Policy B4 requires the provision of affordable workspace from major development proposals in various locations throughout the Borough. The provision of on-site affordable workspace is preferred over the use of financial contributions to deliver affordable workspace.  Local Plan viability testing indicates that the provision of at least 10% affordable workspace, from major employment development (over 1,000sqm), can be achieved in the identified locations without negatively impacting overall scheme viability. Viability testing indicates 10% as a minimum can be delivered, for a period of 20 years at peppercorn rent.
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use, Part B	The Methodist Church	Landowner	The Methodist Church support the strategic objective to deliver 400,000sqm office floorspace. However, at present, the Plan does not meet the Council's own strategic objectives to deliver high quality office floorspace, maintaining and developing business and job growth. The Oliver's House site (proposed allocation BC33) is located within the City Fringe Opportunity Area. Part B. (i) identifies that new development proposals providing 500sqm or more net increase in floorspace in the City Fringe Opportunity Area must comprise at least 90% office floorspace. Whilst the Methodist Church appreciate the primary objective of providing office floorspace in the City Fringe Opportunity Area, the policy should introduce more flexibility by ensuring that development viability is considered, and the individual circumstances of each development proposal is taken into consideration in the policy wording. Suggest an amendment which removes specific percentage requirement and requires the majority of floorspace to be office floorspace. This amendment is necessary to ensure that employment-led development is not stymied by an arbitrary threshold and ensure that office-led development can continue to be delivered in the borough. As currently drafted, the policy is unjustified and is contrary to the emphasis in the National Planning Policy Framework (2019) that mixed use developments should be encouraged in appropriate locations.	Object	The proposed amendment would not maximise essential business floorspace in the borough's most prominent business location. Further discussion is provided in the BCAAP and employment topic papers.
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use, Part C	The Methodist Church	Landowner	Part C. seeks to ensure that new development proposals in the Bunhill and Clerkenwell area which are not compliant with Part B. are office-led. Even though the policy identifies the meaning of 'office-led', it remains unclear which other uses are acceptable and what the Policy defines as 'majority' of floorspace. Suggest amendment to allow other uses explicitly. Without this added flexibility, the Council will not be able to deliver their required employment floorspace and this would render the Plan unsound.	Object	Policy BC1 Part C reflects the overarching priority for business floorspace but does not prescribe a specific percentage. Maximisation would be determined on a case by case basis. The policy is considered to be clear.
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use, Part D	The Methodist Church	Landowner	The Methodist Church supports the inclusion of Part D of the policy which provides exceptions for sites where circumstances may prevent them from providing the quantum of floorspace currently prescribed by Parts B and C of the policy. However, a further circumstance should be included in the list which refers to: "vi. proposals for mixed use development that would provide enhanced social value and enhanced provision of community facilities." An addition should also be made to circumstance iii. which recognises the importance of non-residential institutions as serving a public service. "iii. where a proposal is publicly funded or serves a public service, such as educational, medical, or research institutions and non-residential institutions." These additions enable the delivery of mixed-use, employment-led schemes and ultimately supports the Council in meeting their identified office floorspace need within the plan period.	Object	The suggested amendments are not considered appropriate; they would create very broad exceptions which would undermine the aims of the policy. Even where an exception is not triggered, the policy allows for provision of a certain level of non-office uses
R19.0132	Strategic and Development Management Policies			N/A - general comment	Tileyard London Limited	Landowner	Respondent sets out Introduction to Tileyard; and the economic benefits of the Tileyard Cluster	Not stated	Comments noted. The Council has considered this information as part of the employment topic paper.
R19.0132	Strategic and Development Management Policies			N/A - general comment	Tileyard London Limited	Landowner	Respondnet sets out the case for continued growth of the Tileyard Cluster. The continued growth of the Tileyard economic cluster is strongly supported by the NPPF, which states at paragraph 80 that, planning policies should help to create the conditions in which businesses can invest, expand and adapt, and that significant weight should be placed on the need to support economic growth and productivity. Following on from this, paragraph 82 states that planning policies should recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries. Further guidance is provided in the Planning Practice Guidance in terms of ensuring there is sufficient land available to meet the needs of specialist, or new, economic sectors, which underlines the importance of the local planning authority working positively with the businesses that have established at Tileyard.	Object	The employment topic paper discusses the issues raised by TLL.

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R19.0132	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site; Policy B1: Delivering business floorspace; Policy B2: New business floorspace	Tileyard London Limited	Landowner	<p>References the ELS which states that the area is suitable for intensification of hybrid uses through provision of hybrid/flexible space. Also references policies E2, E4, E6 and E7 of the London Plan.</p> <p>Restricting the ability to create additional flexible B1 space, alongside industrial and warehouses uses, would simply place additional pressure on the existing (limited) building stock resulting in the conversion of existing floorspace to B1(a) under permitted development rights.</p> <p>Draft Policy SP3 of the draft Islington Local Plan fails to recognise the fundamental ingredients behind the significant success of the LSIS to date despite the clear recommendations of its own Employment Land Study, and the prima facie economic and employment benefits that have resulted from the emergence of the Tileyard creative cluster. Tileyard supports the recommendations of the Employment Land Study, (and draft London Plan), that there should be no net loss of industrial floorspace capacity within the LSIS. However, the consequence of draft Policy SP3 (parts C and D), which presume against the introduction of additional flexible business space (within Class B1a), regardless of the existing use on a site, would severely limit any potential future growth of the creative cluster and the economic benefits arising, and represent an inefficient use of land.</p> <p>Accordingly, the land-use policy framework (for the LSIS as a whole, and certainly the southern part of it) should seek the retention of existing industrial and storage uses (on a floorspace basis, or on the basis of a 65% plot ratio, whichever is the greatest), but also permit the introduction of flexible B1 business floorspace as part of mixed-use developments. This approach would enable the more efficient use of land in accordance with sustainable development objectives and would optimise economic outputs for the LSIS, the borough and the wider economy.</p>	Object	The employment topic paper provides the Council's response to these points. The GLA conformity response highlights that the council's approach to industrial land is consistent with the draft London Plan.
R19.0132	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard London Limited	Landowner	<p>Objection to arbitrary five storey building height limit. Area is not sensitive to townscape. Argues that area should accommodate transformational change envisaged in the draft London Plan for an economic base that exists and wants to grow.</p>	Object	<p>The presence of other tall buildings within the area does not justify the building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>
R19.0132	Strategic and Development Management Policies			N/A - general comment	Tileyard London Limited	Landowner	<p>Respondents consider that the local planning authority is in breach of Section 19(3) of the Planning and Compulsory Purchase Act 2004 as the way in which the proposed LSIS policy has been formulated does not accord with the standards set out in the Council's SCI.</p>	Object	The legal compliance statement provides detailed comments in response to the representations made on the Statement of Community Involvement. In summary, the Council considers that the preparation of the Local Plan is fully compliant with the SCI.
R19.0132	Strategic and Development Management Policies			Integrated Impact Assessment	Tileyard London Limited	Landowner	<p>Respondent has commissioned an independent review of the IIA, which considers that the IIA process for the draft Local Plan is deficient, particularly in respect of the assessment of 'reasonable alternatives', as well as substantial flaws in the application of the IAA methodology itself. Furthermore, the Council failed to prepare or consult on an IAA for the Regulation 18 draft Local Plan 2018, removing the opportunity for the authorities or the public to have early or effective consultation on the impacts of the emerging Plan, or to show how the IIA has influenced the emerging plan as it has evolved. As a result of the deficiencies identified, the respondent considers that the IIA process has failed to comply with the Regulations and guidance to demonstrate that the chosen strategy is appropriate when considered against reasonable alternatives, as required by the test of soundness. The findings are not considered credible, justified or robust and, as a consequence, the IIA is neither fit for purpose, nor legally compliant, such that the draft Regulation 19 Local Plan cannot be considered sound.</p>	Object	The legal compliance statement provides detailed comments in response to the representations made on the Integrated Impact Assessment. In summary, the Council considers that the IIA meets all relevant requirement and that the representation does not identify any legitimate deficiencies with the IIA process.
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	The Methodist Church	Landowner	<p>The Methodist Church supports the development of retail and leisure uses in predominantly commercial areas. We suggest, however, making it clearer that 'predominantly commercial areas' includes the City Fringe Opportunity Area.</p> <p>Part D. (i) states that new A Class uses are permitted where they would not harm vitality, viability, character, function or amenity of the area. The Methodist Church would like to see further guidance on how the LPA defines 'harm' in these instances.</p>	Object	The term 'predominantly commercial areas' is considered appropriate without further explanation. Harm would be assessed on a case by case basis; a Local Plan cannot front load every possible consideration and variant of harm.
R19.0133	Site Allocations	VR5: 4 Brandon Road	Vale Royal/Brewery Road LSIS		VDC Trading Limited	Landowner	<p>The allocation (and other Vale Royal allocations) considered unnecessary in the context of the existing LSIS designation and should be removed. There is no reason why these sites should be allocated above other sites in the LSIS. Notwithstanding this, the proposed uses and heights are overly restrictive: greater flexibility should be provided in terms of B class floorspace and the height restriction should be removed. Suggest the allocation is amended to state that flexible B class floorspace will be permitted where there is no loss of B1(c), B2 or B8 floorspace. Given the existing 5-storey height of the site plus the proposed moratorium on flexible B class uses, question how the objectives of intensification or modernisation could actually be achieved.</p>	Object	The site was identified through pre-application discussions which indicated that development was likely to come forward on this site. The allocation is in line with the LSIS designation that is based on a detailed evidence base. The GLA response supports the council's approach for the LSIS. A restrictive approach is needed to safeguard the most significant remaining industrial land in the borough, but it is not considered that this approach would prevent intensification and/or modernisation of the site. Height restrictions are supported by evidence.
R19.0133	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	VDC Trading Ltd	Landowner	<p>Proposed amendment of policy B1, part B to introduce greater flexibility in maximising new business floorspace, through recognition of design constraints, and quality and type of employment space provided.</p>	Object	The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional office floorspace up to the year 2036. The development of business floorspace is therefore a key priority. The proposed amendments would not be conducive to maximising new business floorspace.
R19.0133	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	VDC Trading Ltd	Landowner	<p>Proposed amendment of policy B1, part E to accept the introduction of flexible B-uses (e.g. through colocation of B1 with intensification of industrial uses) and Sui Generis uses akin to industrial uses, subject to the requirements of the specific LSIS designation. Additional amendments proposed to para 4.14 to reflect part E amendments and to allow the release of industrial land to manage issues of vacancy/to meet wider planning objectives through industrial intensification, co-location and substitution.</p>	Object	The Council considers that the co-location with non-industrial uses is not considered acceptable as it could compromise the economic function and future economic growth of the LSISs. The GLA conformity response highlights that the council's approach to industrial land is consistent with the draft London Plan.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0133	Strategic and Development Management Policies			Policy B2: New business floorspace	VDC Trading Ltd	Landowner	Proposed amendment of policy B2, part C to accept the introduction of flexible B-uses, subject to the requirements of the specific LSIS designation. Additional amendments proposed to para 4.23 in line with amendments proposed to part C, and removal of para 4.31 as design is prescriptive and prevents intensification. The respondent states that that part C is contrary to NPPF section 6, paras 80-82 on addressing specific locational requirements of different sectors and making provision for knowledge and tech-driven clusters.	Object	<p>The Vale Royal/Brewery Road LSIS accommodates many of type of uses suggested in the Mayor's evidence for the new London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in the ELS, this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses which are based primarily in industrial units and support Islington's wider creative sector.</p> <p>Some of these creative production businesses in the LSIS have actively engaged with the council during the Local Plan consultation process. They support the council's plans to protect and intensify industrial uses in the area and have shared their concerns on the difficulties in finding space to expand and grow their businesses, and, in particular in finding alternative available premises that suit their business needs if they had to relocate. These businesses have also raised concerns over the changing character of some of the development proposals planned in the area.</p> <p>There are also other emerging industrial uses in the LSIS which benefit from this location being close to the CAZ such as trade suppliers (plumbers and builders' merchants); artisan bread makers; catering companies; and distribution companies (wine distributor).</p>
R19.0133	Strategic and Development Management Policies			Policy B4: Affordable workspace	VDC Trading Ltd	Landowner	Proposed amendment of policy B4 to provide additional flexibility and recognise the viability implications of requiring affordable workspace in the LSIS, considering site constraints, scheme design and viability.	Object	Discussion of viability testing of AW is set out in the viability topic paper.
R19.0133	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	VDC Trading Ltd	Landowner	Proposed amendment of policy SP3, part A to allow co-location of non-industrial uses. The respondent proposes that loss of industrial floorspace should be permitted in exceptional circumstances where applicant can demonstrate continuous marketing of vacant floorspace for at least 2 years.	Object	The Council considers that the co-location with non-industrial uses is not considered acceptable as it could compromise the economic function and future economic growth of the LSISs. The GLA conformity response highlights that the council's approach to industrial land is consistent with the draft London Plan.
R19.0133	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	VDC Trading Ltd	Landowner	Removal of wording in policy SP3, part C. Criteria should allow flexible B1 floorspace to be permitted as part of new development/change of use where there is no loss of B1c, B2 or B8. The respondent refers to the land use outcome from the appeal decision at 22-23 Tileyard Road and 196-228 York Way to justify this change.	Object	See response to B1 and SP3A above.
R19.0133	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	VDC Trading Ltd	Landowner	Removal of wording in policy SP3, part E. Considered overly prescriptive in restricting other uses.	Object	<p>The presence of other tall buildings within the area does not justify the building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p>
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	The Methodist Church	Landowner	The Methodist Church supports the 'maximisation' of business floorspace as well as the importance of providing a range of business floorspace in the City Fringe Opportunity Area as encouraged by Part C of this policy. However, as set out previously at BC1 above, this policy aspiration should not be overly prescriptive, in terms of the amount of floorspace required to be offices, and instead a focus on 'office-led' development should be prioritised.	Object	See response to policy BC1.
R19.0134	Site Allocations	BC25: Land adjacent to the Mount Pleasant Sorting Office	B & C: Mount Pleasant and Exmouth Market		Taylor Wimpey Central London	Developer	Agree that the site is a strategic allocation but think it should be made clear that the developer should have flexibility to deliver the strategic allocation in its most optimised form. Support the aspirations of the allocation and continue to work on detailed designs for high quality public open space, genuinely affordable housing and affordable workspace.	Support	Support noted. Consider the allocation is appropriate as drafted.
R19.0134	Bunhill and Clerkenwell Area Action Plan			Policy BC6: Mount Pleasant and Exmouth Market	Taylor Wimpey Central London	Developer	The allocated site is also covered by Policy BC6: Mount Pleasant and Exmouth Market. We support the policy initiatives to encourage public realm improvements and further development in the area with the regeneration of the Clerkenwell Police Station. Part B of the Policy seeks to preserve and enhance Exmouth Market as a destination for food, drink, retail and entertainment uses. The retail offer provided within the Mount Pleasant Sorting Office Site will support and enhance the current offer.	Support	Support noted
R19.0134	Bunhill and Clerkenwell Area Action Plan			Policy AAP1: Delivering development priorities	Taylor Wimpey Central London	Developer	Proposes that the wording of policy AAP1 is loosened. It currently states that uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted. The representation states that to include flexibility within the strategic allocations to be determined on a case by case basis. This is to take account of changing market needs and the longer view development cycle of the strategic sites.	Object	If conditions change and a site should be developed for a use which is not listed on the site allocation the Council has the powers to grant planning permission for a scheme which is a departure from the plan.
R19.0135	Site Allocations	FP13: Tesco, 103-115 Stroud Green Road	Finsbury Park		Grovesworld Limited	Developer	Support the allocation but consider the need to optimise the potential of the site is not clearly set out. Office is an appropriate town centre use but is not included in the allocation. The allocation should be clear that the suggested uses are not the only uses that may be appropriate for this important town centre site. This is an important opportunity to enhance this part of Stroud Green Road and there is scope for increased height, massing and density on the site. The re-provision of the food store offers an opportunity to deliver a more efficient layout and improved customer experience, at the same time as optimising opportunities for other appropriate uses.	Both	Islington has a significant, evidenced need for additional housing. The site was identified through the 'call for sites' for the GLA's Strategic Housing Land Availability Assessment (SHLAA) as having potential for re-provision of the supermarket and residential development, which has been reflected in the allocation. Given the priority development need for housing the council does not consider that the allocation should be amended to include other uses. The design of any proposals, including appropriate height, massing and density and the impact of these on surrounding residential amenity, will be assessed as part of the planning application process.
R19.0135	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Grovesworld Ltd	Developer	It appears that there is a minor error in the residential cycle parking standards, in Table A4.1: where it sets out '1.5 per bedroom' we believe, following the draft London Plan, that this should state '1.5 spaces per 2 person 1 bedroom dwelling'.	Not stated	The table will be amended via modification to reflect the London Plan standards.
R19.0135	Strategic and Development Management Policies			Policy SC2: Play space	Grovesworld Ltd	Developer	<p>The requirement of all major development to make provision for on-site publically accessible play space is not deliverable on constrained sites and smaller sites. Major developments include sites delivering 10 or more homes; this would include individual apartment blocks at the smallest scale and constrained sites at a range of scales. In many cases it will be a far better outcome to improve existing community play spaces, in terms of the range and quality of play equipment and opportunities for play, than to try to impose a requirement for a large number of disconnected play spaces with limited play value, which may in reality generate less opportunities for social interaction between different groups.</p> <p>We suggest that this policy should be worded to allow for a site-specific assessment and exceptions and for contributions to appropriate play spaces within the vicinity, where this achieves the most positive outcome. Furthermore, a policy threshold which more realistically can deliver the policy expectations would be much more effective and this could cross-reference the site allocations document to identify appropriate known sites where a valuable amount of publically-accessible play space can be accommodated. This should take account of child yield on a per-unit basis, so that sites which would generate an on-site need for a meaningful amount of play space should be the focus for on-site provision.</p>	Object	The principle of providing play space is well established and supported by the London Plan. The inspector's report supports the London Plan policy which seeks new play space. The LBI policy already provides flexibility, using the London Plan benchmark as a starting point but recognising (in paragraph 3.167) that Islington's context may make delivery of play space difficult.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0135	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design; Policy S4: Minimising greenhouse gas emissions	Groveworld Ltd	Developer	The requirements of the sustainable design policies are detailed and multi-faceted and will need to be applied in tandem with London Plan requirements. Viability testing of the full extent of these requirements, particularly policy requirements which take effect at a later date, including the implementation of 'Full' Fabric Energy Efficiency Standards from 2022, must be considered problematic where the build cost implications cannot be fully known.	Object	The Mayor has stated that the Local Plan is in conformity with the London Plan. The Local Plan viability study factors in a range of sustainable design requirements. We note the findings of the energy study, cited in paragraph 4.17 the viability study, which notes:  <i>The energy modelling has concluded that compliance with the 'interim' FEES, and future transition to 'full' FEES, will discourage poorly efficient buildings (i.e. those proposing an inefficient form alongside inefficient specifications) without precluding a wide range of residential developments in Islington. The FEES have the potential to assist viability because designers will be able to achieve greater energy efficiency by improving building form, in addition to specification, which is likely to be cost neutral or potentially cost positive.</i>
R19.0135	Strategic and Development Management Policies			Policy S5: Energy Infrastructure	Groveworld Ltd	Developer	The requirement for all major developments to have a 'communal low-temperature heating system' is unnecessarily prescriptive and may not be the best approach on a given site; the technological means to achieve the policy targets should be left open to allow for flexibility. Decarbonisation of the National Grid should also be factored into the need for on-site energy generation over the plan period.	Object	The energy study and sustainability topic paper provide further discussion. Decarbonisation of the electricity network has no bearing on heat networks. The energy study factors in low/zero carbon heat networks and decarbonisation of the grid in its modelling, and still shows some residual emissions that require further reduction to meet the 2050 target. The approach is consistent with the London Plan.
R19.0135	Strategic and Development Management Policies			Policy S5: Energy Infrastructure	Groveworld Ltd	Developer	Under policy S5 G it is unreasonable that the LPA would be able to determine, at its discretion and without the need to provide evidence, that a future network is likely to be operational within three years of grant of planning permission. The policy should require the LPA to provide justification for its position in this respect.	Object	The plans for the decentralised energy network are long term plans produced by the Council's energy team. The relevant plan at the point of application will provide a firm basis against which to assess any proposal.
R19.0135	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing; Evidence base, Viability	Groveworld Ltd	Developer	The proposed policy, which excludes viability as a material consideration in all but exceptional circumstances, would severely hamper the ability of applicants to come forward with deliverable schemes and indeed to even reach application stage, given that no developer or funder would progress with a scheme which is not viable. This threatens delivery of the plan and conflicts with national policy. Respondent considers that Islington's approach, based on exceptional circumstances, which are to be determined solely by the LPA, contradicts the NPPF. There are a range of legitimate circumstances in which viability would be a relevant consideration and, given Islington is proposing an ambitious affordable housing target, it is essential that a 'safety valve' is allowed for, to ensure that delivery is not prejudiced over the plan period. Sites with a high Existing Use Value, but where it is beneficial for redevelopment to come forward, to optimise the use of land, would be particularly challenged by the draft policy approach. Where viability is assessed in accordance with the approach set out in national policy and guidance, and in accordance with GLA and LBI policy and guidance, the council should accept such viability assessments as legitimate material planning considerations.	Object	These issues are discussed in the viability topic paper. The Mayor has noted that Islington's approach is consistent with the London Plan.
R19.0135	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing; Evidence base, Viability	Groveworld Ltd	Developer	In addition, the multi-faceted approach to viability review would place a further significant burden on developers, both in terms of procedural requirements and more fundamentally in terms of added risk, which would have a knock-on effect on funding and the cost of funding, and a circular impact upon viability. To require viability review of single-phase sites is contradictory to the currently adopted London Plan and it would not address relevant circumstances for review i.e. in relation to a multi-phased sites built over a long programme which spans economic cycles. It is also inconsistent that the draft policy only allows viability to be assessed in 'genuinely exceptional circumstances', whilst the supporting text (para. 3.15) requires a pre-implementation review mechanism for all schemes which include social housing, which presumably includes even those schemes which would deliver an amount of affordable housing compliant with the draft policy. Para. 2.52 then refers to an advanced-stage review mechanism for schemes delivering less than 50% affordable housing, again in spite of the fact that the draft policy all but excludes the submission of a viability assessment as a material planning consideration. Planning permissions are effective for three years and this period was reduced from five years in order to incentivise implementation within that period. It is notable that during the last recession it was necessary for the Government to introduce measures (in 2009) to allow the extension of this time period in order to prevent permissions unnecessarily lapsing. It is not necessary for an LPA to introduce measures to further restrict the operable time period of a planning permission, through the use of early review mechanisms on single phase schemes. On the basis of the policy as worded, it is our view that the plan is unsound. Referring to the soundness tests set out in the NPPF: the plan would introduce requirements which would undermine the delivery against objectively assesses needs of the local authority, the strategy is not appropriate given that reasonable alternatives exist (i.e. a policy that would allow viability considerations and would not require onerous review mechanisms on single-phase sites), the plan would be inconsistent with national policy and would threaten the delivery of sustainable development. We therefore suggest that the policy should be re-worded so as not to discount site-specific viability as a legitimate material planning consideration and to restrict review mechanisms to multi-phased sites where they are not fully compliant with policy at the time of the planning decision.	Object	These issues are discussed in the viability topic paper. The Mayor has noted that Islington's approach is consistent with the London Plan.
R19.0135	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Groveworld Ltd	Developer	Studio units, as a limited part of the mix of homes on a site, can provide valuable and high quality homes which are more affordable and accessible for those with lower incomes and/or at an earlier stages in their lives. Whilst it is helpful that the supporting text (para. 3.34) refers to up to 5% provision, the requirement to provide evidence of exceptional circumstances to justify the provision of studio units is unreasonable. Furthermore, the suggestion that, in place of studio units, other units that already meet space standards should be enlarged, instead of providing studio units, is unjustified and would undermine housing delivery. We suggest that the policy should clearly allow for up to 5% of market homes to be studios, with justification only required for a high level of provision.	Object	The council considers that, generally, studios/bedsits are not a sustainable form of accommodation and therefore do not constitute the best use of land. The policy provides reasonable criteria to assess suitability; it is not considered appropriate to automatically allow 5% provision as per the respondents suggestion as this could undermine the Council's aim to secure higher quality housing of a size that is actually needed.
R19.0135	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Groveworld Ltd	Developer	With regards to market housing, developers are best-placed to assess the appropriate mix within a scheme, with regards to both market demand and scheme deliverability. Flexibility is important in this, in order to underpin affordable housing provision. The higher priority for three-bedroom homes than one-bedroom homes is not reflective of market conditions, with regards to both demand and affordability considerations. Two-bed homes can be considered family homes and are clearly more accessible to a wider range of household incomes, they also tend to underpin development viability better and therefore support delivery. Furthermore, where para. 3.31 notes that the housing priorities table represents a 'snapshot in time' this is true of market housing just as much as for affordable housing, and para. 3.31 should not solely refer to a potential requirement to vary the affordable housing priorities mix over time. It is helpful that the housing priorities table is broadly set out and avoids specific percentage requirements for each unit size and type; however, viability testing of the plan cannot therefore reflect the full range of housing mix that could be considered compliant with table 3.2 and this should be borne in mind with regards to the need for site-specific viability testing and the need to vary the housing mix, especially within the market tenure, in order to support affordable housing and other policy objectives. We suggest that a link between housing mix and viability is expressly acknowledged within the policy and that the market housing priorities allow equal weight to one and three bedroom homes.	Object	The housing topic paper provides justification for the proposed size mix. The mix is not entirely prescriptive (i.e. it does not set out a percentage) and therefore there is some degree of flexibility already built in.
R19.0135	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Groveworld Ltd	Developer	Policy SP6 notes residential uses will only be acceptable on upper floors in the town centre. Suggested that it should be specified this only applies to retail frontages and not back land sites, otherwise this could limit contributions to the housing supply. The relevance of site allocation policy should be made explicit due to acceptability of residential to be made on a case by case basis.	Object	The Council find that the proposed changes are unnecessary. The policy on residential use in town centres is clear when Local Plan is read in the round.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0136	Site Allocations	Site selection process	Vale Royal/Brewery Road LSIS		C. Carnevale Limited	Landowner	Consider the strings attached to the site allocations are indicative of an ever more restrictive policy regime which will make future good management of their site more difficult and increase the possibility of 'bad neighbours'. The development considerations in the allocations are not flexible enough in terms of use class or building heights and should be amended.	Object	The loss of industrial floorspace experienced in Islington is significantly above benchmark release figures, as set by the Mayor in the current London Plan and supporting guidance. The Vale Royal / Brewery Road LSIS is under significant development pressure to deliver office floorspace. Such development could seriously harm the area's primary economic function and could lead to the deterioration and gradual loss of industrial uses in this area. The introduction of B1 space is permitted, when provided as part of a hybrid workspace scheme, but it must constitute a small proportion of the overall proposal. The Council recognises the employment potential from B1 development, which is why B1 is strongly encouraged in the CAZ, Priority Employment Locations and Town Centres. The council's approach is supported by the Mayor, and is considered to be in line with the draft London Plan.
R19.0136	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	C Carnevale Ltd	Landowner	The area is not "sensitive" from a visual impact or townscape perspective but represents a highly sustainable location to optimise redevelopment opportunities, and so should not be subject to an unjustified and mechanically-applied blanket policies (including those on height).	Object	<p>The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>
R19.0136	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	C Carnevale Ltd	Landowner	The strengthening of policies will fetter their future ability to develop at this location, or indeed to raise secured finance on normal commercial terms. Respondent provides information and context re: the LSIS and industrial uses. It is clear from both the Council's own evidence base and the Mayor's emerging London Plan that protecting appropriate land for industrial and warehouse uses can be justified. However, it is equally clear that a rigid and inflexible preservation of the LSIS for solely industrial and warehouse uses without any flexibility would completely disregard the recommendations of the Council's own evidence base, and would fail to comply with the Mayor's objective to make more efficient use of land through the co-location of industrial activity with other uses. As currently drafted Policy SP3 of the draft Islington Local Plan therefore fails to recognise the fundamental shift which has already taken part in this part of the LSIS, despite the observations of its own Study. In this context, my clients support the recommendation of the Study, (and draft London Plan) that there should be no net loss of industrial floorspace within the LSIS. However, the consequence of draft Policy SP3 (parts C and D), which presume against the introduction of additional office space, would serve to artificially limit potential future growth and prosperity, to no good planning purpose. A more appropriate policy framework (for the southern part of the LSIS) would seek the retention of the existing amount of industrial and storage use (based on quantitative floorspace), but with a flexibility to enable the introduction of B1 business floorspace (including offices), as part of mixed-use developments that would enable the more efficient use of land in accordance with sustainable development objectives. My clients therefore object to Policy SP3 as currently drafted	Object	The Council's Employment Land Study (2016) provides a detailed analysis of the character and function of the Vale Royal / Brewery Road LSIS. It provides commentary on the uses, building typologies, and occupants and notes that much of the LSIS is industrial use. There is B1 accommodation within the LSIS, however, it is evident that the primary economic function is industrial. The Council rejects the idea that there has been a fundamental shift to B1 use in the LSIS. A restrictive approach is needed to safeguard the most significant remaining industrial area in the borough. The GLAs conformity response highlights that this approach is consistent with the draft London Plan.
R19.0137	Site Allocations	NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road	Nag's Head and Holloway		Embankment Building and Development Ltd	Landowner	Landowner wishes to redevelop the site for serviced accommodation. Supports the allocation as the site is available, suitable and viable for development. However, is concerned about the allocated uses (mixed-use residential and business). Given the site's high PTAL and the predominantly residential nature of the surrounding area it could accommodate a range of uses including C1 serviced apartments. The existing buildings on the site are in a poor state of repair and it would not be viable to re-provide the existing level of business-use floorspace. This was acknowledged in a 2005 planning permission for the residential-led development of the site and a reduced amount of commercial floorspace. The site allocation should provide an indicative minimum development capacity, including height and density. Concerned with the requirement for a consistent design approach between the sites, this is restrictive and it is not always possible to align differing development aspirations. The allocation should be amended to require a consistent design approach where possible.	Both	Restriction of visitor accommodation is necessary in order to meet other priority development needs, particularly for conventional housing and office floorspace. The council's policy requirements have evolved in response to changes to its evidence base, and its approach to visitor accommodation has been supported by the GLA. The representations refer to a 2005 planning permission for the site which is no longer relevant given the changing circumstances of the borough. Indicative capacities are not included within individual allocations as the specific quantum of development will be determined in line with relevant policies. The two parts of the site share an internal courtyard so it is considered appropriate that they develop a consistent design approach. Such an approach will achieve the best possible design outcome.
R19.0137	Strategic and Development Management Policies			Policy R12: Visitor accommodation	Embankment Building and Development Ltd	Landowner	Part A is too restrictive and inconsistent with regional policies. There should be increased locational flexibility, by taking into account the surrounding uses and local context. 392-394 Camden Road is therefore an appropriate site for serviced apartments. A clause should be added after A(ii) to read 'sustainable sites with high access to public transport will also be considered'.	Object	The retail leisure and services culture and visitor accommodation topic paper provides further justification for the policy approach.
R19.0138	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation does not comply with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space which are all in undersupply in the area. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.	Object	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
R19.0139	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road		Canal and River Trust	Statutory consultee	Welcome the amendments made to the development considerations in response to previous representations.	Not stated	Comments noted.
R19.0139	Site Allocations	N/A - general comment	Angel and Upper Street		Canal and River Trust	Statutory consultee	Welcome the amendments made to the development considerations of draft allocations AUS1-7, AUS9, AUS10, AUS13, AUS16 and AUS18 in response to previous representations.	Not stated	Comments noted.
R19.0139	Strategic and Development Management Policies			Policy S5: Energy Infrastructure	Canal and River Trust	Statutory consultee	We welcome the reference in point 6.60 to the role waterways can play in heating and cooling. Our waterway network was included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy) and it provides an overview of the opportunity that exists in London. The technology required to deliver cooling from canal water is already successfully used in London.	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy S7: Improving Air Quality	Canal and River Trust	Statutory consultee	We continue to advocate that the impact of overshadowing can have negative impacts in terms of air quality as our boaters will not be able to successfully use solar panels to power their boats. We recommend there be reference in policy S7 to the impact of overshadowing and that the impact is mitigated through the provision of electric bollards alongside development.	Not stated	This is covered by other policies, particularly PLAN1.
R19.0139	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Canal and River Trust	Statutory consultee	We welcome the addition of point L to policy S9, requiring development where feasible, utilise adjacent waterways for non-potable water and point P requiring all development protect water quality and demonstrate there will be no negative impact on the quality and point Q, protect and improve the benefits provided by the water environment.	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	Canal and River Trust	Statutory consultee	We note the addition of point 3.153 and welcome ongoing engagement with the council on the provisions and facilities required by our boaters. We have reviewed the Gypsy & Traveller Accommodation Assessment in the evidence base and would advise there is a finite canal corridor that passes through Islington and we are sceptical that there would be capacity for 7 new permanent moorings on the main line of the canal. There is potentially scope for new permanent moorings within the water space at City Road Basin if an appropriate scheme for its reconfiguration could be developed, following consultation with relevant stakeholders. However, it is unclear to us whether such an approach would be acceptable under the terms of policy SP2 and G2, as drafted. Our online mooring policy sets out our policy on new moorings.	Not stated	Moorings will be suitable if they meet criteria in relevant policies.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0139	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part C	Canal and River Trust	Statutory consultee	The Canal towpaths provide excellent opportunities for physical activity, accommodating both pedestrians and cyclists	Not stated	The policy is for new spaces, not existing ones. Wherever new shared footpaths are provided, there should be a delineation, unless the width does not allow it.
R19.0139	Strategic and Development Management Policies			Policy T4: Public realm	Canal and River Trust	Statutory consultee	We continue to recommend microclimate and levels of sunlight available and heritage value should be included as considerations in public realm design.	Not stated	This is covered by other policies, particularly PLAN1.
R19.0139	Strategic and Development Management Policies			Policy T5: Delivery, servicing and construction	Canal and River Trust	Statutory consultee	Support waterborne freight	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	Canal and River Trust	Statutory consultee	We are pleased to see the protection of the structural integrity and heritage value of the Islington Tunnel has been included in this policy (point P).	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Canal and River Trust	Statutory consultee	We welcome policy G1 C now requiring development assess the value and benefits of existing green infrastructure on-site and adjacent to sites. We note that (point 5.1) for the purposes of the Local Plan 'green infrastructure' includes 'blue infrastructure' and that the definition of blue infrastructure is provided in the glossary, referring to canals and their multi-functional role.	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy G2: Protecting open space	Canal and River Trust	Statutory consultee	State that the policy is not sufficiently flexible as it does not allow any development on public open space which includes canals. States that this may prevent open space benefits from being realised. The policy should be amended to support schemes with net benefits in order to avoid unintended consequences. Suggest the policy is reworded to state: "A. Development is not ordinarily permitted on any public open space and significant private open spaces, except where it facilitates their functional use as open space, for example boater facilities".	Object	Due to the shortage of open space in the borough, lack of potential for new open spaces, high demand, and projected population growth the Council places great weight on preserving all existing open spaces. While we recognise that some interventions improve the use of open spaces developers should look to using existing structures or nearby sites rather than impinging on open space.
R19.0139	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees	Canal and River Trust	Statutory consultee	We are pleased to see at point 5.36 recognition that lighting can have a negative impact on bats, birds and amphibians and that it needs to be carefully considered in development proposals.	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Canal and River Trust	Statutory consultee	We note point D requires the council conserve or enhance Islington's heritage assets including 'historic green spaces,' which we believe intends to include the Regent's Canal, however we request that the canal be specifically included as a heritage asset to be conserved so that it is clear it is afforded protection under policy DH1. The Regent's Canal is the principal historic waterway that passes through the Borough and we suggest that this should be recognised in the supporting text.	Not stated	Part J. of SP2 states: "King's Cross has a distinct character, and the area contains a number of heritage assets, including the Regent's Canal and a number of listed buildings. The area's character will be protected and enhanced, with high quality design encouraged to respect the local context of King's Cross and its surroundings."
R19.0139	Strategic and Development Management Policies			Policy DH3: Building heights	Canal and River Trust	Statutory consultee	We note and welcome the additional point included in policy DH3, that unacceptable overshadowing be prevented (F(viii)).	Support	Support noted.
R19.0139	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road	Canal and River Trust	Statutory consultee	Welcome inclusion of cyclists in policy SP2 part H and reiterate suggestion that the Regent's Canal should be included in Figure 2.3 as a location for improved cycle/pedestrian connections. SP2 does not adequately address the tension between the need for residential moorings and moorings for leisure use on Regent's Canal. Consider that the policy, or supporting text, should state that some loss of long-term leisure moorings for the development of residential moorings may be acceptable where it leads to the provision of more appropriate facilities, better management of the network and local area and better conditions for all users.	Not stated	As stated in the council's response to the Regulation 18 representations, the council does not support giving residential moorings priority over leisure moorings. The suggested amendment to SP2 part H is not appropriate. The council considers its approach to be justified and in accordance with NPPF paragraph 35 as it seeks to meet the borough's objectively assessed needs. Policy SP2 Part G seeks improved east-west access for pedestrians and cyclists. Figure 2.3 visualises this broadly, but does not reflect a specific location/scheme, therefore a Regent's Canal scheme may also be acceptable. It is not considered necessary to add further detail on Figure 2.3.
R19.0139	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Canal and River Trust	Statutory consultee	Disappointed that none of previous representations at Regulation 18 regarding enhancements to the Canal have been included in policy or the Infrastructure Delivery Plan update.	Object	The Infrastructure Delivery Plan update is intended to be a living document with regular updates supported by information from infrastructure providers like Canal and River Trust.
R19.0139	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Canal and River Trust	Statutory consultee	We note that policy BC4 City Road includes wording that again, only allows residential moorings that do not impact on leisure moorings. This wording is not considered appropriate, as per our comments made in relation to SP2 above. We have concern that this wording would not allow for at an individual site level, residential moorings to lead to a loss of long-term leisure moorings, for example, if this leads to the provision of more appropriate facilities, better management of the network and local area and better conditions for all users. We would suggest this policy be re-worded to provide more flexibility to read: "G.(iv) there is no adverse impact on leisure provision that cannot be adequately mitigated". This wording would provide the flexibility for residential moorings that result in better outcomes for boaters on the network, on a site-specific basis and suggest that the current wording does not constitute the most appropriate strategy, as required by para 182 of the NPPF (2012) and a justified strategy required by para 35 of the NPPF (2019).	Object	See response to policy SP2.
R19.0140	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Corporation of London	Statutory consultee	We think it would be useful for the supporting text of Policy SP1 to acknowledge the importance of joint working between the Corporation of London and Islington.	Support	Support noted
R19.0140	Strategic and Development Management Policies			Policy DH2: Heritage assets	Corporation of London	Statutory consultee	Support the protection given to cross-boundary views of St Paul's Cathedral in Policy DH2 and particularly welcome the guidance provided in Appendix 6, which explains how the alignment and the heights of Islington's Local Views relate to the City of London's St Paul's Heights policy and its Protected Views SPD	Support	Support noted
R19.0140	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Corporation of London	Statutory consultee	Support the identification of the Clerkenwell Farringdon Cultural quarter which complements the City of London Corporation's aspirations for the adjoining Cultural Mile area. Have asked for two words to be added to the text: 'proposed' relation of the Museum of London, and 'possible' moving of Smithfield Meat Market from its current location.	Support	Support noted. The Council will make suggested changes through modifications to the Local Plan.
R19.0140	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Corporation of London	Statutory consultee	Want reference to encouraging future cross-borough co-operation increase in pedestrian movements and visitor and retail activity near the City of London.	Support	Support noted. The Council will make suggested changes through modifications to the Local Plan.
R19.0140	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Corporation of London	Statutory consultee	Support the identification of Farringdon and Whitecross Street as Local Shopping Areas in the AAP.	Support	Support noted.
R19.0141	Site Allocations	BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	B & C: City Fringe Opportunity Area		Lamb's Passage Real Estate Limited	Landowner	Support the allocation but are unclear if the council is seeking comprehensive office development of the whole site. The part of the site in the respondent's ownership is available and suitable for office development but what happens to the rest of the site is beyond their control. They should not be fettered by unreasonable restrictions requiring comprehensive development of the whole site. Assessment work carried out on the site suggests an office scheme can come forward that both maximises building footprint and the amount of office floorspace delivered.	Support	Information on potential office scheme noted, the detail of this would be assessed as part of the planning application process. The site allocation reflects the boundaries of the extant permission and the council's view is that a comprehensive scheme would better realise development potential, but does not preclude schemes coming forward on a piecemeal basis.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0141	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process	Lambs Passage Real Estate Ltd	Landowner	B (i) Contextual – the definition of ‘site’ should be appropriate and proportionate to the realistic scope of an applicant to deliver development on land within their control.  B (ii) Connected & (iii) Inclusive– ‘mix of uses’ should be considered in the physical land use context and not be an encumbrance on bringing forward future development of a site if its proposal is limited to a single land use.	Object	PLAN1 sets out the approach for developing proposals for all sites. Every site will be different and the principles are flexible enough to be applied on this basis. A specific definition of ‘site’ is not necessary.  PLAN1 does not prescribe multiple uses on a site. Suitability for a mix of uses would be dependent on the site context and adherence to relevant land use priorities as noted.
R19.0141	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell; Policy B1: Delivering business floorspace; Policy B2: New business floorspace	Lambs Passage Real Estate Ltd	Landowner	Support for development within the Bunhill and Clerkenwell AAP area delivering office use and that the AAP should prioritise and support the office function of the area.	Support	Support noted.
R19.0141	Strategic and Development Management Policies			Policy G2: Protecting open space	Lambs Passage Real Estate Ltd	Landowner	States that privately owned surface level car parks are not open space and should not be protected. This should be recognised in the policy wording.	Not stated	The Local Plan policies do not suggest that grade level car parks will be considered as open space and the Council does not believe it is necessary to make this clarification in the policy wording. The inference of the response is that the Council should provide a schedule covering the whole borough noting what is and is not open space - such an approach would be undesirable.
R19.0141	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lambs Passage Real Estate Ltd	Landowner	The requirement to deliver business floorspace (different types, sizes, affordability) must be appropriate and subject to viability of proposed schemes.	Not stated	An explanation of the results from the viability assessment in relation to the deliverability of office-led schemes is set out in the Viability Topic Paper.
R19.0141	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lambs Passage Real Estate Ltd	Landowner	The plan should recognise that a different standard should apply to the central area (CAZ), where there is a requirement for greater intensity of land use activity/closer proximity between neighbouring buildings. This should justify a measured relaxation of environmental and amenity standards that may otherwise constrain development and prevent the maximisation of new business floorspace.	Not stated	The Council argue that such an approach runs counter to the notion of strategic planning and sustainable development. It is not appropriate to prioritise substandard development; quality is more important than quantum as a general principle. The suggested approach would also have significant adverse sustainability impacts if it required significant renovations in future or led to a shorter functional building life.
R19.0141	Strategic and Development Management Policies			Policy B2: New business floorspace	Lambs Passage Real Estate Ltd	Landowner	Part F (iv) of policy B2 to demonstrate cumulative contribution to a range of spaces is too onerous given that the primary delivery mechanism to deliver office space will be market led. This requirement is contradictory and creates tension with the policy objective to maximise office floorspace, considering the changing role of office occupation in the digital economy and the requirements of a dynamic market.	Object	The proposed Local Plan policy B2 promotes the provision of a range of workspace typologies (including co-working, hybrid space and lower specification office space) suitable for SMEs. This is in line with London Plan policy E2 which seeks to protect and promote the provision of low-cost business space.  Ensuring that Islington is a place where small and micro enterprises (SMEs) can do business is key priority for the Council. Islington accommodates a substantial amount of small and micro enterprises – in 2019, over 88% of enterprises comprised less than 9 people. Therefore, protecting premises for occupation by SMEs, and promoting the delivery of a range of spaces are key principles embedded in the current Local Plan. This is also a key objective of the Mayor of London who set out his commitment to ensuring a range of different types of workspace, to accommodate the growth in London’s businesses, in his Economic Development Strategy. It sets out that he wants to ensure there is adequate business space at competitive rents across the capital and will work with partners to identify innovative models that deliver genuinely affordable workspace. The council doesn't consider that criterion F(iv) of policy B2 conflicts with the policy objective to maximise business floorspace (see Employment Topic paper).
R19.0141	Strategic and Development Management Policies			Policy B2: New business floorspace	Lambs Passage Real Estate Ltd	Landowner	The respondent states that part F (v) is unnecessary as by definition an activity that is ancillary to the business function of the premises is in lawful terms part of the overall business use..	Object	Paragraph 4.27 provides further information on part F(v). It is considered appropriate to control suitable ancillary uses through policy; a use could be demonstrably ancillary but unsuitable, hence the policy gives a means of control, for instance through condition.
R19.0141	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lambs Passage Real Estate Ltd	Landowner	The respondent recommends that the affordability levels of the workspace provided should be subject to a financial viability assessment on a case-by-case basis.	Object	Discussion of viability testing of AW is set out in the viability topic paper - the NPPF encourages requirements to be set out and tested in Local Plans.
R19.0141	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lambs Passage Real Estate Ltd	Landowner	Property owners should have the right to decide who and what organisations may occupy the affordable workspace premises. It is unsound and inequitable in a market economy for affordable workspace to be leased to the council, and for the council to have a responsibility for the selection of occupiers.	Object	Proposed Policy B4 requires the provision of affordable workspace from major development proposals in various locations throughout the Borough. The end users of such space is determined through a commissioning process, led by the Council's Inclusive Economy team, which focusses on ensuring social value outputs. This process operates currently and works efficiently. It is no different to the provision of other such obligations such as financial contributions whose spending is determined by the Council. Policy B2 also aims to secure a variety of types of employment space, including space for small firms. The UK regulatory framework within which the economy operates requires planning permission to be determined in accordance with the development plan. Securing affordable workspace is a priority for the Council and is being sought through the development plan.
R19.0141	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lambs Passage Real Estate Ltd	Landowner	Criterion for off-site contributions under para 4.52 must also be subject to financial viability	Object	Discussion of viability testing of AW is set out in the viability topic paper. The policy priority is on-site provision; where off-site is justified, the level of contribution is informed by the formula. The policy should not incentivise off-site contribution through a general allowance for site-specific viability, as this could affect the level of AW secured and undermine delivery of key Local Plan objectives.
R19.0141	Strategic and Development Management Policies			Appendix 9: Glossary and abbreviations	Lambs Passage Real Estate Ltd	Landowner	The affordable workspace definition, contained in appendix 9 should be amended to reflect the above comments.	Object	See comment above re: policy B4.
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Lambs Passage Real Estate Ltd	Landowner	Supports the policy assertion that office floorspace is the clear priority land use across the entire Bunhill and Clerkenwell AAP area.	Support	Support noted.
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Lambs Passage Real Estate Ltd	Landowner	Support for the policy requirement to maximise new business floorspace.	Support	Support noted.
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Lambs Passage Real Estate Ltd	Landowner	It must be for the owners and developers of new office floorspace to ensure that it meets the requirements of a dynamic market. Being sufficiently flexible and responsive to future market conditions in the context of delivering viable new office development schemes, with the risk that that entails, demands that the overriding type of office floorspace delivery must be market driven.	Support	Comment noted. No objection to policy stated.
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy AAP1: Delivering development priorities	Lambs Passage Real Estate Ltd	Landowner	Supportive of the policy seeking to ensure that the uses identified as appropriate for each site allocation are delivered, with the caveat that a site may have extant planning permission for alternative land uses which must be recognised by site specific policy.	Support	Support noted. Where an extant permission exists on an allocated site but the permitted uses differ from the allocated uses the allocation may state that in the event that new/amended proposals are submitted for the site they should accord with the allocation. It is appropriate that any revised or new proposals should be subject to updated policy requirements which reflect updated evidence.
R19.0142	Site Allocations	OIS5: Bush Industrial Estate, Station Road	Other Important Sites		LaSalle Investment Management	Business	The allocation should be expanded to include Sui Generis uses akin to industrial uses in line with other policies in the Plan. The future market demand and long term suitability of the site for industrial uses is uncertain, bearing in mind the site's location is isolated from other industrial clusters and adjacent to a residential area. There must be scope to consider alternative employment/commercial development and the co-location/mix of uses to ensure the site remains viable.	Object	The council considers industrial uses to be those which fall within B1c light industrial, B2 general industry and B8 storage and distribution, as well as certain Sui Generis uses with a clear industrial function. However, co-location with non-industrial uses is not considered acceptable at the site as it could compromise the economic function and future economic growth of the LSIS. We note that the GLA consider that our draft plan is in general conformity with the draft London Plan.



Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	The respondent supports the maximisation of employment floorspace on employment locations but objects to policy criterion B as it is too negative and would not result in new business/industrial floorspace that makes an effective use of previously developed LSIS land to meet business needs (it makes reference to NPPF para 117 on safe and healthy living conditions and para 122 on efficient use of land). Proposed changes to part B of the policy include having regard to design constraints, the quality and type of employment space provided, as well as the needs of potential occupiers and viability.	Object	The demand for business floorspace is extremely high. The Council's Employment Land Study (ELS) forecasts significant employment growth for the period between 2014 and 2036, where an additional 50,500 additional jobs are expected. To meet this demand, the ELS, identified a target of 400,000sqm of office space, up to the year 2036. In terms of supply, this reinforces that need to prioritise office development over the development of other uses.
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	Part E has the potential to restrict innovative co-location and mixed use development and it conflicts with other parts of the plan in terms of permitted type of uses. The respondent proposes the introduction of non-industrial uses, considering exceptional circumstances such as: need to facilitate needs of modern industry; renewal or regeneration for employment-led schemes; or when proposals don't compromise operation of employment use in the area.	Object	The Council considers that the co-location with non-industrial uses is not considered acceptable as it could compromise the economic function and future economic growth of the LSISs. The GLA conformity response highlights that the council's approach to industrial land is consistent with the draft London Plan.
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	The respondent suggests that part E of policy B1 is amended to include SG uses akin to industrial.	Object	Policy B1 reflects the most prevalent industrial uses. SG uses akin to industrial are relevant and are referenced in other policies. Amendment is not considered necessary.
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	The respondent proposes to include "in accordance with policy B5" to part F of policy B1.	Not stated	Amendment is considered unnecessary.
R19.0142	Strategic and Development Management Policies			Policy B2: New business floorspace	LaSalle Investment Management	Landowner	Part A of policy B2 contains duplication of objectives set out in part B of policy B1 regarding the maximisation of business floorspace and should be deleted. The NPPF requires local plans to avoid unnecessary duplication of policies that apply to a particular area.	Object	Policy B2(A) builds on policy B1(B) which sets out the broad strategic approach to business floorspace in the borough. B2 provides more detail on the locational context where business floorspace should be prioritised and maximised. Whilst policy B1(B) refers to locations suitable for the provision of business floorspace in general terms, policy B2(A) refers to employment locations where office business floorspace should be protected and intensified, in order to meet office floorspace targets. It is not an unnecessary duplication.
R19.0142	Strategic and Development Management Policies			Policy B2: New business floorspace	LaSalle Investment Management	Landowner	Part C of policy B2 prevents alternative employment floorspace to be brought forward to regenerate the site. The respondent suggests considering project viability and exceptional circumstances such as the ones the respondent proposed for part E of policy B1.	Object	The ELS sets out that industrial restructuring has been underway for many years. This reflects changes in the wider UK economy, and its shift towards a largely serviced based economy. This shift has resulted in a dramatic decline in industrial premises, particularly in high land value areas such as in Central London, where most boroughs seem to have lost space at similar rates. For Islington, 436,000sqm of industrial floorspace was lost between 2000 and 2012. In terms of rents, the ELS concludes that severely constrained supply and sustained take-up are combining to maintain rents at a relatively high level. Local agents have reported that there is a lack of comparable rental evidence on Islington's most significant concentration of industrial land, in the Vale Royal/Brewery Road LSIS, due to a lack of transactions (vacancy levels are estimated at no more than 3-5%, below optimal levels recommended for business floorspace).  In terms of future requirements, the ELS reports that what remains of Islington's industrial land is projected to continue to diminish. For industrial land there is a forecast loss of 90,000sqm of floorspace for the period 2014-2036. This is in line with the targets set out in the Land for Industry and Transport SPG and Islington's designation as a 'restrictive loss' (now referred to as 'retain' in the London Plan policy E4). Nearly one-third of the forecast floorspace loss is already in the planning system through existing permissions, which means that it is recommended that the Council should strengthen its policies to avoid further loss of its limited industrial stock, and seek to maintain an appropriate vacancy rate within industrial premises to allow businesses a level of choice in the market (see Employment Topic paper).
R19.0142	Strategic and Development Management Policies			Policy B2: New business floorspace	LaSalle Investment Management	Landowner	Part F (ii) of policy B2 and supporting para 4.31 are too prescriptive and should not be expressed as a policy.	Object	The Council considers that the quality of floorspace is vitally important to ensure that it remains suitable for a range of occupiers. Floorspace which is designed poorly could have shorter functional life and would therefore have adverse sustainability impacts if it was to be prematurely redeveloped/demolished. The approach ensures that proposals make the best use of land in the borough.
R19.0142	Strategic and Development Management Policies			Policy B3: Existing business floorspace	LaSalle Investment Management	Landowner	The marketing evidence required in Part B (i) and paragraph 4.33 for 24 months vacancy test is unreasonable and unnecessary. The respondent suggests that the usual marketing period of industrial premises is 6 months prior to the existing lease expiring to minimise gaps in occupation. The respondent proposes deleting references to vacant floorspace and to vacancy.	Object	The 24-month period of marketing evidence required builds on adopted policy DM5.2(A) and reflects the priority of the policy to protect and intensify business floorspace to accommodate job growth projections for the local plan period (50,500 additional jobs for the plan period up to 2036). This policy requirement reflects the limited capacity that the existing business floorspace supply has to accommodate demand driven by job growth, and considers the wider negative impacts that further losses of business floorspace could have in the wider economy.
R19.0142	Strategic and Development Management Policies			Appendix 1: Marketing and vacancy criteria	LaSalle Investment Management	Landowner	The requirements of marketing and vacancy go beyond what is usually undertaken by commercial agents. The respondent objects to points b) and c) to erect advertisement board as it attracts squatters/travellers and it is unnecessary. The respondent has also concerns about points e) and H) because they are too prescriptive in terms of the marketing exercise and on the requirement of valuation from three agents.	Object	The criteria contained in Appendix 1 builds on Appendix 11 from the adopted Development Management Policies DPD. They are considered proportionate and appropriate. It is up to the site owner to take steps to prevent squatters, with advertising boards being a common feature nationwide.
R19.0142	Strategic and Development Management Policies			Policy B4: Affordable workspace	LaSalle Investment Management	Landowner	Part B of policy B4 should be subject to viability. Part C of policy B4 should be reduced to 10 years because it is not justified by evidence. The reference to space being leased to the council to 20 years and in perpetuity should be removed from the policy and supporting paras 4.44 and 4.51.	Object	Discussion of viability testing of Affordable Workspace is set out in the viability topic paper. The council's Inclusive Economy team manages the process for any affordable workspace secured. The end users of such space is determined through a commissioning process, led by the council's Inclusive Economy team, which focusses on ensuring social value outputs. Further information is set out in the council's Affordable Workspace Strategy.
R19.0142	Strategic and Development Management Policies			Policy B4: Affordable workspace	LaSalle Investment Management	Landowner	Part F of policy B4 should not include fit out requirements because it onerous, prescriptive and unlikely to be viable. The respondent objects to supporting paras 4.54 and 4.55 and has requested to remove these from the plan.	Object	Although there is no set definition for Category A Fit Out standards, the council has included the minimum requirements considered for this category in paragraph 4.54 of the Strategic and Development Management Policies document. Fit out can be determined on a case by case basis. Category A fit out has been factored into the plan viability testing of Affordable Workspace and found to be viable.
R19.0142	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	LaSalle Investment Management	Landowner	Job and apprenticeship requirements contained in parts A, B and supporting para 4.60 of policy B5 should apply to proposals that result in an uplift of 1,000sqm GEA and should be subject to viability. The respondent states that the policy provides no justification as to why training and job opportunities would be sought for an uplift of 500sqm employment floorspace which falls under "minor" category of development.	Object	The threshold set out in the draft policy is considered appropriate. This figure is carried through from the current adopted policy. The Planning Obligations (S106) SPD notes that, should it not be possible to provide these placements, the Council will seek an equivalent contribution (based on a formula set out in the SPD).
R19.0143	Site Allocations	8C48: Castle House, 37-45 Paul Street; and Fitzroy House, 13-17 Epworth Street and 1-15 Clere street	B & C: City Fringe Opportunity Area		Lion Portfolio Ltd	Landowner	Supportive of the revision which combines the Castle House and Fitzroy House allocations into one. However, feel that the Tall Building Study does not adequately detail why this location was discounted as unsuitable for a tall building. The potential for the site to accommodate a tall building should not be discounted at this stage. The site should be subject to a detailed appraisal to assess its suitability for a tall building.	Both	The support for the allocation is noted. With regards to the Tall Buildings Study, the council considers that it provides a robust basis for the approach set out in the draft Local Plan. The council's approach is consistent with the draft London Plan. Further discussion on the council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0143	Strategic and Development Management Policies			Integrated Impact Assessment	Lion Portfolio Ltd	Developer	In our view the integrated impact assessment accompanying the submission draft plan should have considered the approaches advocated above as "reasonable alternatives" to the proposals in the submission draft local plan.	Object	The IIA did consider an alternative 'criteria based' approach. It was found to have a negative impact compared to the locational approach, and therefore not taken forward.
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	The Tall Buildings Study is not sufficiently robust, is overly restrictive and could unnecessarily hinder potential development in the Borough. Key concerns about the methodology are: design as a means to mitigate impact not adequately considered, visual assessment not based on accurate visual representations, and does not account for change within the local search areas over the plan period. Analysis undertaken is too broad and too general to exclude individual sites. Policy D1 of the London Plan does not require identification of individual sites. The approach advocated in Draft London Plan policy D8 is not a wholly prescriptive that can rule out the potential for tall buildings outside of areas identified potentially suitable for tall buildings.	Object	The Council considers that the Tall Buildings Study is a robust basis for the proposed approach set out in the Local Plan proposed submission. The Council's approach identifying locations where tall buildings may be appropriate is in line with Policy D8 part B(1) of the draft Local Plan, which does not preclude identifying individual sites. Our approach is supported by the GLA. Changing the policy so that any site could be considered appropriate for a tall building, as suggested here, would not be consistent with Policy D8, part B(3) which states that tall buildings should only be developed in locations that are identified in development plans. The methodology adopted by Urban Initiatives provides an appropriate assessment and producing accurate visual representations (e.g. verified views and photo-realistic images) would not be proportionate, nor practical.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	Suggest that proposals for tall buildings should be guided to the atrategic search areas identified in the tall buildings study then scrutiinised on a site by site basis through the planning application process. This approach is in conformity with policy requirements and is one that has been considered appropriate for other existing and emerging local plans in London	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	The details of the qualitative judgements that have been made about ruling out areas potentially suitable for tall buildings is not clearly detailed in the Tall Buildings Study. E.g. Conservation areas were not subject to automatic exclusion, but large areas were ruled out with details provided. Exclusion of views not based on verfied views or detailed designs of potential tall buildings. Impacts on views should be based on accurate visual representations.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	The Tall Buildings Study uses basic 3D modelling that does not include landscaping of other existing details.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	TBS conclusions are not based on detailed and up to date townscape analysis and do not consider all potential impacts of tall buildings at the specific sites identified.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	The allocation sites of Castle House and Fitzroy House have now been combined as a single allocation site (Allocation Site No. BC48) and this has not been considered by the TBS.	Object	The Council considers that the merged allocation will have no bearing on the TBS assessment. It is noted that the original assessment which informed the TBS took place before any allocations were identified even in draft form; allocations therefore are irrelevant.
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	Respondent suggests a number of amendments to policy DH3.	Object	The suggested changes do not accord with the Council's approach of identifying locations for tall buildings, and not permitting tall buildings in locations not identified for tall buildings.
R19.0143	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Lion Portfolio Ltd	Developer	Our client is generally supportive of the spatial strategy policy, which identifies the Bunhill and Clerkenwell area as the area in the borough expected to see the most significant levels of growth, particularly business floorspace and that this growth must be managed to secure a high quality and sustainable urban environment.	Support	Support noted.
R19.0143	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Lion Portfolio Ltd	Developer	Suggest change of wording to allow sufficient scrutiny of development proposals for tall buildings to be considered on a site by site basis, in line with comments on the TBS.	Object	See responses to policy DH3.
R19.0143	Strategic and Development Management Policies			Policy DH2: Heritage assets	Lion Portfolio Ltd	Developer	Change DH2 B to 'conserve or enhance' not 'conserve and enhance' to bring in line with the legislation	Object	Suggest making this change as part of a modification to the Local Plan.
R19.0143	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lion Portfolio Ltd	Developer	We support the strategic aim of an uplift of 400,000 sqm of B1 office floorspace in the borough over the plan period. Additionally, we are supportive of Islington's strategic aim to encourage the delivery of new business floorspace to enable this figure to be achieved. The employment land study was undertaken in 2016 and therefore the demand for business floorspace is now likely that over 400,000sqm for office floorspace is now required. The respondent suggests adding this target into policy text of B1. As referenced within supporting paragraph 4.7 quoted above, the borough is significantly constrained in terms of land supply, and we are concerned that this, combined with certain restrictive emerging policies, will depress the delivery of this 400,000 sqm and suppress the economic growth of the borough overall. The restrictive policies include policies concerned with tall buildings, and affordable workspace, both of which are addressed in detail within this letter.	Object	The employment topic paper provides further analysis of recent office development and sets out an updated position in terms of the required quantum of office floorspace. It is not necessary or desirable to embed the 400,000sqm figure within the policy. We note paragraph 4.8 of the plan which highlights the difficulty of meeting the target. The Local Plan has considerd development needs in the round and has set out a range of policies to meet these needs as far as possible. The respondent is advocating for a fromal office floorspace target in order for this to attract more weight and therefore be more likely to outweigh, on balance, other policies such as the restrictions on tall buildngs, which are also objected to.
R19.0143	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lion Portfolio Ltd	Developer	Respondent cites the London Office Policy Review which notes that Islington will have a composite requirement for 373,000sqm of space between 2016 and 2041 and a capacity of only 233,910 sqm equating to a 189% shortfall. The LOPR also identifies a constrained sub-market in the Tech City component of Islington. Losses through PDR cited in LBI ELS a worrying trend which is continuing and means that the delivery of B1 office floorspace is a pressing need across the borough. The LBI Employment Land Study (2016) does not identify where the delivery of the targeted 400,000sqm will be achieved. Within the draft Local Plan documents, the only indication of the locations in which the borough envisages this 400,000 sqm of B1 office floorspace coming forward is within the 'site capacity assumptions' which are indicative figures based on calculating the amount of floorspace the allocated sites could sustain, however, the individual quantum derived from each site is not specified. Instead, the quantum's are prescribed to Spatial Strategy Areas, representing a very light touch approach to identifying land supply for the need of B1 office floorspace. Furthermore, there is no adequate explanation as to how the Council arrived at these figures, because the potential amount of floorspace that could be delivered from individual sites is not evidenced at all. Additionally, the site capacity assumptions for the Spatial Strategy Areas covered by the draft Local Plan equate to the provision of 136,100 sqm B1 office floorspace over the plan period. The site capacity assumptions for the Spatial Strategy Areas within the Bunhill and Clerkenwell represents an unaccounted shortfall of 62,500 sqm of B1 office floorspace over the plan period, when compared to the 400,000 sqm requirement. AMR details losses of B1 in recent years. The redevelopment of Castle House and Fitzroy House (the site owned by the respondent) can deliver at least a year's worth of targeted demand (27,000 sqm) or potentially more, however, we will be unable to do so without modifications to other unnecessarily restrictive policies. This is not a site-specific issue, and it is considered that a substantial number of other sites within the borough will also encounter this issue, culminating in a detrimental undersupply of B1 office floorspace against the predicted need. The impacts of this will be highly negative for the borough as a whole and indeed London given the national importance of this area. It will mean that existing rental rates are driven up due to a chronic lack of supply and an increasing demand, which over the plan period is likely to drive some businesses out of the borough, harmfully impacting on the borough's economic well-being.	Object	The employment topic paper provides further discussion on these issues. Capacity assumptions have been prepared on a site by site basis, as demonstrated in the site allocations topic paper. Office floorspace is a key priority but it is not the only priority. Strategic planning must involve a number of considerations. It would therefore be strategically inappropriate for LBI to allow laissez faire office development in order to meet a specific target, and ignore other key issues such as the quality of such space, the impact on character due to building heights, etc.
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	The respondent states that there is no planning justification to preclude other appropriate bodies from operating the space. Policy E3 notes that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents. Charities or developers/owners of commercial space could also provide such space and manage it to co-locate like-minded organisations. Additionally, it is unclear exactly how LBI will source appropriate occupiers to fill the targeted 40,000sqm of affordable workspace or what is considered a peppercorn rate. For instance, does this include or exclude Service charges and Insurance. These points require further clarification.	Object	Local Plan viability testing indicates that the provision of at least 10% affordable workspace, from major employment development (over 1,000sqm), can be achieved in the identified locations without negatively impacting overall scheme viability. Viability testing indicates 10% as a minimum can be delivered, for a period of 20 years at peppercorn rent.  The end users of such space is determined through an established commissioning process, led by the Council's Inclusive Economy team, which focuses on ensuring social value outputs. The respondent proposes a different model which would not achieve the same benefits.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	With a targeted quantum of 400,000 sqm of B1 office floorspace over the plan period, the 10% affordable workspace requirement equates to 40,000 sqm of affordable workspace provision overall, which is a very large amount. The provision of 40,000 sqm of affordable workspace could create a market in which the majority of new B1 office offers in the borough comprise either affordable workspace, or grade A office offers.	Object	<p>It is important to note that there is no specific target for Affordable Workspace delivery. It is not logical to assume that 10% of the 400,000sqm office floorspace required will come forward, as this assumes that all floorspace will be delivered through major development (the trigger for policy B4). It is likely that a significant amount will come forward from minor development such as extensions. Ensuring that Islington is a place where small and micro enterprises (SMEs) can do business is a key priority for the Council. Islington accommodated a substantial amount of small and micro enterprises – in 2019, over 88% of enterprises comprised less than 9 people. Therefore, protecting premises for occupation by SMEs, and promoting the delivery of a range of spaces, are key principles embedded in the current Local Plan. This is also a key objective of the Mayor of London who set out his commitment to ensuring a range of different types of workspace, to accommodate the growth in London's businesses in his Economic Development Strategy. It sets out that he wants to ensure there is adequate business space at competitive rents across the capital and will work with partners to identify innovative models that deliver genuinely affordable workspace.</p> <p>Furthermore, proposed Local Plan policy B2 promotes the provision of a range of workspace typologies (including co-working, hybrid space and lower specification office space) suitable for SMEs. This is in line with London Plan policy E2 which seeks to protect and promote the provision of low-cost business space.</p>
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	Restrictive policies limiting the development of office floorspace will consequently drive up office rental values, increasing the overall need for affordable workspace. The respondent states that the lease requirement for a period of at least 20 years is likely to significantly harm the viability of future schemes and increase the challenges of delivering development in Islington. The respondent quotes "less prescriptive" approaches to affordable workspace from LB Hackney and City of Westminster.	Object	The policy requirement for the provision of affordable workspace is a mechanism to allow the Local Plan viability testing to indicate that the provision of at least 10% affordable workspace, from major employment development (over 1,000sqm), can be achieved in the identified locations without negatively impacting overall scheme viability. Viability testing indicates 10% as a minimum can be delivered, for a period of 20 years at peppercorn rent.
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	The council's own viability evidence base suggests that office intensification within areas of the CAZ and the Opportunity Area would not be viable with policy B4 in place.	Object	Discussion of viability testing of Affordable Workspace is set out in the viability topic paper.
R19.0144	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites		Ministry of Justice	Landowner	Request an extension to the site boundary and suggest a separate adjoining site at Wellington Mews should be allocated for residential use. State the prison constitutes national, not local, infrastructure and it should not be necessary to justify the loss of social infrastructure at the site. Suggest it is not appropriate to refer to a 'heritage-led' scheme within the allocation and justification section as opposed to the development considerations. State that it is unnecessary to refer to 'genuinely' affordable housing, as affordable housing should be in accordance with the London Plan definition. Unreasonable to have an expectation for the provision of in excess of 50% affordable housing without accepting the submission of viability evidence. Considering the heritage constraints at the site the allocation should explicitly acknowledge it is an exceptional case and that a viability assessment will be needed. Concerned that the requirement for active frontages along Caledonian Road will unduly constrain design options and should be relaxed. In addition, requiring a new east-west and north-south access through the site where possible could limit the development potential of the site. The reference to upgrading the wastewater network is onerous and unnecessary.	Both	<p>Amend the site boundary as a modification to the Local plan.</p> <p>Given the heritage constraints placed on Wellington Mews by its close proximity to the Grade II listed Pentonville Prison buildings, the scope for significantly intensifying its use is considered limited and an allocation unnecessary. This does not preclude an application coming forward for the site and the principle of residential use is supported.</p> <p>Policy SC1 would apply as a prison constitutes social infrastructure. However, a loss could be justified through evidence of a rationalisation programme. Heritage assets on site would necessitate a balance between maximising housing and protecting heritage, hence the heritage led approach, which has been supported by Historic England.</p> <p>As set out in the Local Plan there are a number of forms of affordable housing that will not be acceptable in Islington and as such 'genuinely affordable housing' has meaning within the context of the Plan and the borough's aspirations for future housing delivery.</p> <p>Reference to viability is not appropriate in the allocation, and would be justified on a case-by-case basis.</p> <p>Redevelopment of the Pentonville Prison site offers an opportunity to knit the closed site with its blank facades back into the surrounding community. The provision of active frontages on Caledonian Road is considered an appropriate design response and not unduly onerous. The requirement for new access routes through the site 'where possible' has in-built flexibility as acknowledged in the representations.</p> <p>The reference to upgrading the wastewater network has been included at the request of Thames Water and is an appropriate design consideration.</p>
R19.0145	Site Allocations	BC38: Moorfields Eye Hospital	B & C: City Fringe Opportunity Area		Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Developer	Concern that the wording of the site allocation is too prescriptive in relation to the location of the public realm and the location of the tall buildings. The new public space could be provided on the junction of Peerless Street and Baldwin Street, and sets out the benefits of this arrangement. They suggest changing the wording to something more flexible such as 'A new public space must be provided as the focus of the development'.	Object	The Council considers that Cayton Street, in principle, is the most appropriate location for new open space. Coupled with the required north-south route, the open space would be located optimally for access from all directions.
R19.0145	Site Allocations	BC38: Moorfields Eye Hospital	B & C: City Fringe Opportunity Area		Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Developer	Suggest more flexible wording regarding the location of tall buildings: Instead of 'The northwest corner of the site (corner of Cayton St/Bath St) could potentially accommodate a building of up to 50 metres (approximately 12 commercial storeys). A tall building of up to 70 metres (approximately 17 commercial storeys) could be accommodated on Peerless Street, north of the junction with Baldwin St' they suggest: 'The northwest quadrant of the site (around the corner of Cayton St/Bath St) could potentially accommodate a building in the order of 50 metres (approximately 12 commercial storeys). A tall building in the order of 70 metres (approximately 17 commercial storeys) could be accommodated on the western part of Peerless Street'. This is based on further work especially on views undertaken by the developer since the previous pre application meeting.	Object	The location of the tall buildings on site is informed by the Tall Buildings Study (TBS). There is further discussion on the TBS approach in the tall buildings topic paper.
R19.0145	Site Allocations	BC38: Moorfields Eye Hospital	B & C: City Fringe Opportunity Area		Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Developer	The representation states that the plan should place more priority on the need for using the site as facilitating development for construction of a new eye hospital, rather than an opportunity for provision of affordable workspace. This has been set out in detail in the previous (regulation 18) representation	Not stated	We consider that it is not appropriate to acknowledge the facilitating nature of the development within the allocation itself, as it would undermine local planning objectives. Facilitating development could be a material consideration as part of any planning application that comes forward, as on the cited Central Foundation scheme.
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	Supportive of the emphasis in the dBCAAP towards commercial uses in the area. It is understood from the dBCAAP that the erosion of office floorspace in the area has limited space for employment uses, a crucial part of any functioning city. We note that the draft Policies Map Changes continue to propose the extension of the City Fringe Opportunity Area Planning Framework (OAPF). We still strongly support this amended designation and welcome the provisions within the GLA's CFOAPF that this designation brings.	Support	Support noted.
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	The policy seeks the Site to be redeveloped as a high-quality business quarter. We continue to welcome this position. We would also question what is meant by the term 'substantial amount of affordable workspace'. This should be clarified given the scheme is facilitating a new eye hospital and research facility. We also welcome the emphasis on active uses but again question what is meant by 'necessary social infrastructure'. The policy would benefit from clarity on what these mean.	Both	Support noted. Reference to substantial amount of affordable workspace refers to the Council's requirement for affordable workspace set out in policy B4 of the SDM, which applies to all office developments and does not introduce additional policy requirements over and above that set out in policy B4. The reference to necessary social infrastructure refers to potential for legacy uses on the site; these will be subject to further discussions. The wording does not provide any additional constraints over and above policy SC1 re: loss of social infrastructure.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	Welcome to recognition of Oriel at paragraph 3.9. Would like added that receipts from the sale of the Site will be used exclusively to fund the new hospital, education and research facility at Kings Cross.	Not stated	It is not considered appropriate to include reference to receipts in planning policy.
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	Strongly support the principle of locating two or more tall buildings on the site.	Support	Support noted.
R19.0146	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road		Regent's Wharf Unit Trust	Landowner	Support the allocation but consider the wording is overly restrictive and inconsistent with the aspiration to support economic growth and maximise the provision of business floorspace. The allocation for 'limited intensification of business use floorspace' should be changed to 'intensification of business floorspace'. Reiterate earlier representations regarding the development considerations (unnecessary as they are addressed elsewhere in the Plan).	Both	The allocation is considered to be appropriately worded as there is limited development potential at the site due to designated heritage assets. The development considerations are also deemed appropriate.
R19.0146	Strategic and Development Management Policies			Policy B4: Affordable workspace	Regent's Wharf Unit Trust	Landowner	The level of affordable workspace provision is excessive and its application (indicated in supporting Paragraph 4.47) remains unjustified in the Council's supporting evidence-base. Furthermore, the respondent considers that the current requirements discourages the redevelopment of poor quality office buildings to meet the needs of modern office occupiers and undermines the Council's target to deliver a net uplift of 400,000sqm of office floorspace by 2036.	Object	Justification for the Affordable Workspace requirement is set out in the employment topic paper.
R19.0147	Site Allocations	N/A - general comment	N/A		Royal UK Properties III LLC	Landowner	Reiterating suggestion made in Reg 18 representation that Edward Rudolf House, 69-85 Margery Street, WC1X should be allocated as a development site for business floorspace. The site is currently vacant, the last tenants having moved out in September 2019. The existing building has relatively poor quality office space and energy efficiency so does not meet modern occupier needs. The site is suitable for business and/or employment-led redevelopment, which can be delivered in the next 5 years. The principle of redevelopment has been agreed in pre-application discussions with council officers. Consider the council's reasons for not allocating the site (limited scope for intensification and impact on heritage assets) are insufficient and the site presents a wholly deliverable and suitable development prospect.	Not stated	As stated in the council's response to the representations submitted as part of the Regulation 18 consultation, site restrictions offer limited scope for intensification so allocation is not considered justified but development of the site for office use would be supported where heritage policies are met.
R19.0147	Strategic and Development Management Policies			Policy B4: Affordable workspace	Royal UK Properties III LLC	Landowner	The respondent states that policy B4 is not specific enough and requires more detailed guidance for fit-out requirements. The council acknowledges that there is no standard definition for Category A Fit Out and para 4.54 is very general.	Object	Although there is no set definition for Category A Fit Out standards, the council has included the minimum requirements considered for this category in paragraph 4.54 of the Strategic and Development Management Policies document. Fit out can be determined on a case by case basis.
R19.0147	Strategic and Development Management Policies			Policy B4: Affordable workspace	Royal UK Properties III LLC	Landowner	Policy B4 is written broadly suggesting there is no differentiation in terms of conventional workspace and affordable workspace. Invariably this will impact on the viability and deliverability of a scheme, and on construction and build costs. The respondent makes reference to policy E3(C) for defining specific locations and areas for affordable workspace provision of certain kinds.	Object	Policy B3 sets out general design standards for all business floorspace. Policy B4 and para 4.43 sets out specific requirements/standards for affordable workspace. The policy is considered clear in terms of differentiation between affordable workspace and conventional SME space. Our current adopted Local Plan does not differentiate between low cost space and affordable (subsidised) space, which has caused issues with implementing the policy. Our draft plan has a clear requirement for affordable workspace, and requires a range of office typologies to be provided within new development across Islington, including small units.  The proposed Local Plan policy B2 promotes the provision of a range of workspace typologies (including co-working, hybrid space and lower specification office space) suitable for SMEs. This is in line with London Plan policy E2 which seeks to protect and promote the provision of low-cost business space.
R19.0147	Strategic and Development Management Policies			Policy B4: Affordable workspace	Royal UK Properties III LLC	Landowner	Policy B4 doesn't provide express evidence in respect to the 10% affordable workspace figure required and on the impacts that this may have on local markets including whether there is indeed clear demand for this type of space. The respondent considers that affordable workspace provision should be subject to necessary viability testing and this should be considered in the draft Local Plan Policy. In relation to this, the respondent makes reference to NPPF para 35 in relation to the soundness justification of the proposed strategy.	Object	Discussion of viability testing of Affordable Workspace is set out in the viability topic paper.
R19.0147	Strategic and Development Management Policies			Policy T3: Car-free development, Part G	Royal UK Properties III LLC	Landowner	Comment on blue badge accessible parking. They think that non residential accessible parking requirements are too high, and could compromise servicing arrangements. Parking standards could be instead decided on a case by case basis. They want to understand the calculator of 1 in 33 for non resi uses.	Object	Justification of the accessible parking requirements is set out in the transport topic paper. The Planning Obligations SPD sets out detail on the calculation.
R19.0148	Site Allocations	NH3: 443-453 Holloway Road	Nag's Head and Holloway		Skylla Properties Limited	Landowner	Request that the draft allocation is amended to reflect the uses supported in the adopted site allocation - housing, business uses including offices and warehousing, and commercial uses along Holloway Road. A previous planning permission demonstrated that residential use was suitable on the site alongside commercial uses. Residential use may also play an important enabling role in delivering new employment space. The current/previous use section should be amended to state 'office B1 (a) and Warehousing (B2/B8)'.	Object	Updated evidence demonstrates a significant need for new office floor space so this is the priority on this site. The current/previous uses for the site are based on the documents that supported the planning application.
R19.0148	Strategic and Development Management Policies			Policy B2: New business floorspace	Skylla Properties Ltd	Landowner	We support the general thrust of the policy, in particular the objective for intensification, renewal and modernisation of existing business floorspace. However, the current wording of the policy would preclude residential use coming forward in Priority Employment Locations. Whilst we acknowledge the importance of delivering employment uses in the Priority Employment Locations, residential use can act as enabling development providing value to deliver new and improved employment floorspace. Furthermore, a residential consent was granted for our client's site (LPA Ref: P2013/3213/FUL). In order to ensure that the delivery of employment space is maximised we propose that the policy is amended to allow residential use as part of mixed use schemes where it is demonstrated that the maximum viable amount of employment floorspace is being delivered. The current approach to this policy is not considered to be in consistent with the National Planning Policy Framework (NPPF). There should be a recognition that not all uses within these locations are optimally located, and that flexibility should be allowed to reflect the precise nature of the existing uses and the site circumstances.	Object	Restrictions on residential use are considered necessary in the smaller employment areas such as PELs, otherwise there is potential for their function to be undermined and/or for business floorspace to not be maximised.
R19.0148	Strategic and Development Management Policies			Policy B4: Affordable workspace	Skylla Properties Ltd	Landowner	Concerns about viability of scheme with 10% proportion.	Object	Discussion of viability testing of Affordable Workspace is set out in the viability topic paper.
R19.0148	Strategic and Development Management Policies			Policy B4: Affordable workspace	Skylla Properties Ltd	Landowner	It is considered that in order for this policy to be deliverable, the 10% requirement for affordable workspace should be required on the uplift in employment floorspace only and it is recommended that the policy is clarified as such. There is also a concern that the amount of affordable workspace required and the requisite rent levels of the affordable workspace is not justified or based on proportionate evidence, as required by Paragraph 35 of the NPPF. The draft wording requires the affordable workspace to be leased to the council at a peppercorn rate for a period of at least 20 years. From our experience, this requirement is likely to significantly harm the viability of future schemes and place severe risk on the deliverability of developments in the borough. It is proposed that provision for a 10-year period would be more appropriate.	Object	An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the Viability Topic Paper.  It is the intention of the policy to require 10% of overall gross B-use floorspace. Where development comprises an extension to provide additional business floorspace, and the development includes refurbishment / improvement to the existing business floorspace, it is considered that requiring 10% affordable workspace from the overall gross business floorspace is appropriate as the whole floorspace will attract an increased rental rate. Where development comprises of an extension only, 10% affordable workspace from the additional workspace would be required, where the total additional floorspace exceeds 1,000sqm - see paragraph 4.47.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0148	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	Skylla Properties Ltd	Landowner	The wording of the policy should be amended to allow flexibility where it is not appropriate to provide on-site construction training opportunities a financial payment can be made towards training initiatives or similar.	Object	The Planning Obligations SPD sets out a formula for calculating off-site contributions where it is not possible to provide on-site placements.
R19.0149	Site Allocations	BC8: Old Street roundabout area	B & C: City Fringe Opportunity Area		TfL Commercial Development	Landowner	TfL CD acknowledges and welcomes the continuation of site allocation BC8 'Old Street Roundabout Area'. TfL CD also accept the currently proposed land uses on the site, including commercial and retail along with public realm improvements as part of the gyratory improvement works. However, TfL CD believe that the allocation should reference the future potential for redevelopment of the site, as discussed above, to make the most efficient use of land in line with paragraphs 122 of the NPPF. Making the most efficient use of available land is especially important in locations which have an identified land shortage such as the Bunhill and Clerkenwell Area Action Plan (see paragraphs 1.52 of the Area Action Plan Document). In addition, surface level retail units could be better promoted in the site allocation to complement public realm improvements.  TfL CD will continue to explore development opportunities at Old Street Roundabout, which could enhance local context and potentially provide income to support wider redevelopment and much needed upgrade of Old Street station. We suggest that this site allocation is altered to reflect that development proposals for the site may come forward in the future, depending upon changing market trends and demand, and therefore should not be precluded from consideration.	Object	See response to comments on BCAAP policy BC3
R19.0149	Site Allocations	ARCH2: 4-10 Junction Road	Archway		TfL Commercial Development	Landowner	Welcome the site allocation but suggest it is amended to include residential use. The site is adjacent to a public transport hub and represents an opportunity for a highly sustainable development providing significant amounts of business, retail and residential floorspace. The council's suggestion that the town centre is predominantly commercial is not seen as sufficient justification to completely preclude residential use.	Both	As stated in the council's response to the representations submitted as part of the Regulation 18 consultation, much of Archway's business floorspace has been lost under PD rights. To meet Islington's need for 400,000sqm business floorspace, business use has to be prioritised in appropriate locations such as Archway Town Centre.
R19.0149	Site Allocations	ARCH7: 207A Junction Road	Archway		TfL Commercial Development	Landowner	Welcome the allocation and agree that any redevelopment of the site would look to re-provide the D2 community use.	Support	Noted.
R19.0149	Site Allocations	AUS12: Public Carriage Office, 15 Penton Street	Angel and Upper Street		TfL Commercial Development	Landowner	Welcome the allocation but consider that proposed uses should be more balanced to allow more housing, where this would still support the re-provision and enhancement of business space, in line with London Plan policy SD5 part G.	Both	The site is located in Angel Town Centre and is within the CAZ, therefore commercial space should be considered a priority. The GLA have confirmed their support for the council's approach.
R19.0149	Site Allocations	AUS7: 1-7 Torrens Street	Angel and Upper Street		TfL Commercial Development	Landowner	This site has a PTAL of 6 and the potential to deliver significant residential development. The allocation should be amended to include residential use.	Both	This site is both within the CAZ and Angel Town Centre. To meet Islington's need for 400,000sqm business floorspace, business use has to be prioritised in appropriate locations such as this.
R19.0149	Site Allocations	FP3: Finsbury Park Station and Island, Seven Sisters Road	Finsbury Park		TfL Commercial Development	Landowner	Support the idea of over-station development but think a residential-led mixed-use development would accord with the draft London Plan. The allocation should not preclude residential-led development where this would still allow for ample business floorspace.	Both	The council considers its response to the Regulation 18 consultation representations is still valid: the Employment Land Study highlights the need for 400,000sqm of additional B1a floor space by 2036. The core area of Finsbury Park is predominantly commercial therefore business-led development with an element of residential is an appropriate allocation.
R19.0149	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway		TfL Commercial Development	Landowner	Support the allocation and agree there is potential for decking over the railway land. However, consider that development should be residential-led given the site's highly accessible location and strong PTAL. The allocation should be amended to say residential development is prioritised above the station.	Both	Support noted. The council continues to think that office development should be prioritised in this location given the area's commercial nature.
R19.0149	Site Allocations	KC4: Former York Road Station	King's Cross and Pentonville Road		TfL Commercial Development	Landowner	Welcome the allocation, and support the aim to re-open the station with residential over-station development that preserves and enhances the listed building. Feel that the allocation should focus more on the potential for residential development and less on business uses as the site is not in the CAZ, has a high PTAL level and potential for improved transport connections in the future.	Both	The site is in a CAZ-fringe location where proposals for new business floorspace are required to maximise the provision of business floorspace. The allocation includes residential use but it is considered appropriate to focus on business-led development in this location.
R19.0149	Site Allocations	OIS21: Former railway sidings adjacent to Caledonian Road Station	Other Important Sites		TfL Commercial Development	Landowner	Support the allocation and will seek to bring forward development of a residential-led, mixed-use scheme with retail uses at ground level that protects the station.	Support	Support noted.
R19.0149	Strategic and Development Management Policies			Policy H1: Thriving communities	TfL Commercial Development	Landowner	TfL CD supports the objectives of this policy to increase the supply of new housing in suitable locations. However, the policy must acknowledge that development should be optimised in close proximity to transport nodes in order to unlock development in the most sustainable locations. This would be in line with DLP Policy H1 Increasing Housing Supply and NPPF Chapter 11 making effective use of land.  TfL CD strongly supports the push for high-density housing development outlined in paragraph C. This aligns with DLP Policy D6 Optimising Housing Density. However, we suggest that this policy explicitly acknowledges that development should be optimised in close proximity to transport nodes in order to unlock development in the most sustainable locations.  In the consultation statement it is noted that the Council considers the plan to support development close to transport nodes through objectives, a variety of policies and the spatial strategies; it would be useful for the Council to identify which policies these are. In addition, focusing high density development in the most sustainable locations is a key theme in the NPPF and the draft London Plan. As such, this should be reflected in Local Plans and it is considered that this should be referenced in Policy H1 which is currently a broad focusing policy.	Both	Support noted. The plan is very clear that the key growth locations in the borough correlate largely around the key transport nodes. Likewise, there are a variety of policies which support prioritising development near public transport nodes, for example H1 and T1.
R19.0149	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	TfL Commercial Development	Landowner	TfL CD supports part B of this policy which states that development proposals must demonstrate that the use of the building/site is optimised. This aligns with DLP Policy H1 Increasing Housing Supply, Policy D6 Optimising Housing Density and NPPF Chapter 11 making effective use of land.  TfL CD supports paragraph 3.25 which highlights the boroughs support for delivering housing on small sites. This aligns with DLP policy H2 Small Sites which stipulates that boroughs should pro-actively support well-designed new homes on small sites.	Support	Support noted
R19.0149	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	TfL Commercial Development	Landowner	TfL CD welcomes the objective to provide a minimum of 50% affordable housing across the borough over the plan period. TfL CD is committed to delivering 50 % affordable housing (by habitable room) across its portfolio as instructed by the Mayor. TfL have significant land holdings in the borough and look forward to working collaboratively with Islington to deliver affordable housing on appropriate sites within our ownership, in line with DLP policy H5 delivering affordable housing.  However, Paragraph 3.44 states that Islington are not promoting a 'portfolio approach' to affordable housing delivery. It stipulates that each individual site must deliver affordable housing in line with the relevant part of DLP policy H3 and the Council will not accept lesser delivery to compensate for other sites. TfL CD follow a portfolio approach in line with DLP policy H5 which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. This policy conflicts with DLP policy H5 and as such the local plan as drafted is not sound.	Object	It is vital that each and every site capable of delivering affordable housing (AH) delivers the maximum amount in line with the Local Plan. The portfolio approach undermines the Council's approach to AH. The Mayor has not raised any concern with Islington's approach to the portfolio approach in any previous conformity responses. Our AH policy will mean schemes providing less than 50% (where a site is in public ownership) will be refused permission; the portfolio approach cannot co-exist with this policy. We note that the policy does not preclude the Mayor 'calling in' certain schemes which are considered strategically important, if he considered that instituting the portfolio approach had wider London benefits.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0149	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	TfL Commercial Development	Landowner	Policy H11 is overly negative and inconsistent with the London Plan. The supporting text to this policy focuses on BtR being a way to deliver housing quickly but states that, due to supply and demand within the borough, houses for sale will be built just as quickly so BtR is not applicable to Islington. This is an over simplification of the purpose of BtR and does not acknowledge the wider benefits that BtR development can provide. Respondent sets out some key benefits of BtR. With regard to paragraph 3.140, in terms of affordable housing, Affordable Private Rent (or Discounted Market Rent - DMR) is an accepted tenure of affordable housing when provided as part of a BtR, as set out in the NPPF (Annex 2 and paragraph 64) and the draft London Plan policy H13. As such, part ii of this policy is not consistent with national policy and the Local Plan as drafted is not sound. Table 3.2 in the draft Local Plan demonstrates that there is a high need for DMR 1-bed and medium need for DMR 2-bed housing – BtR developments which can provide DMR would have a big role to play in meeting this demand. As stated in the SHMA 2017 paragraph 6.138, private rented housing (which would be provided by a BtR product) offers a flexible form of tenure and meets a wide range of housing needs. Furthermore, the draft London Plan requires that 30% of the affordable element of a BtR scheme be provided at London Living Rent (LLR) levels. LLR is a GLA mandated rented housing product, with rents strictly controlled by the Mayor of London and set yearly on a ward by ward basis, calculated using data from local earnings and house prices. The draft London Plan sets out that LLR has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public's trust as being genuinely affordable, and will be backed by the GLA who will update it every year.	Object	A number of issues raised are explained in the policy supporting text, and are also elaborated in the Housing Topic Paper. There is no robust evidence that BtR is better placed than a standard model of conventional housing delivery to provide the broad range of benefits identified. In summary, the Council is not precluding private rent, as noted in paragraph 3.137; it is the BtR business model which the Council takes issue with, as it is a means to undermine policy requirements. None of the supposed benefits of BtR are unique to this development model. Policy H11 does not say that the private rented sector has no role in meeting need; it refers to the specific PRS business model - see footnote 23. The SHMA does highlight that private rented accommodation has a role to play in meeting housing need but the overarching need is for affordable housing, and any development which undermines this will not be supported. Policy H3 supporting text provides further discussion on APR. Policy H11 clearly sets out that genuinely affordable housing is required from BtR developments; this is defined in the glossary. Policy H3 is cross-referenced in the supporting text and policy. We note that the Local Plan is considered to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H11 of the Regulation 19 document.
R19.0149	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	TfL Commercial Development	Landowner	The Council's response in the consultation statement noted the amendment to the draft London Plan which allows boroughs to require social rent as part of a Development Plan policy. Paragraph 4.13.9A of the draft London Plan states that "Where justified in a Development Plan, boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent...) on BtR schemes in accordance with Policy H7 A." This DLP policy refers to the ability of development plans to require a 'proportion' of affordable housing to be social rent rather than all of the affordable housing provision, and the policy and supporting text doesn't provide a justification for the complete restriction on Affordable Private Rent as required by the DLP policy. Therefore Policy H11 is not sound.	Object	Policy H11 does not seek all affordable housing as social rent; it seeks a 70:30 social rent:intermediate tenure split. Paragraph 4.13.9A states that the proportion of low cost rent (social rent or LAR) is to be determined by the borough in line with policy H7. Policy H7 allows for a 70:30 tenure split as required by Local Plan policy H11A(ii). The policy is clearly consistent with the London Plan. As noted above, the Mayor considers the Local Plan to be in general conformity with the new London Plan and the Mayor has not raised any issues with policy H11 of the Regulation 19 document.
R19.0149	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	TfL Commercial Development	Landowner	With regard to part a (iv) regarding covenants, committing to a 50-year covenant is in excess of the 15-year covenant period set out in policy H13 of the draft London Plan. There is no evidence within the draft policy to explain the justification for the significant extension of this period. Whilst it is acknowledged that policy H13 of the DLP does note in footnote 54 that covenant periods are expected to increase as the market matures, in the shorter term it is likely that a 50-year covenant will be unacceptable for investors or institutional lenders, with the result being that the product could not be supported. The policy should not purposely be worded to make it difficult to deliver BtR development; as such it should be reworded to ensure appropriate flexibility for an evolving market.	Object	A 50 year covenant reflects a fair assumption of a buildings lifetime and is considered a reasonable quid pro quo, to disincentivise use of the PRS business model as a means to undermine affordable housing policy and other policy requirements.
R19.0149	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	TfL Commercial Development	Landowner	Paragraph 35 of the NPPF requires that policies are positively prepared. It is not considered that, as currently drafted, the policy is positively worded and seeks to meet the area's objectively assessed needs. This policy does not seem to take into account the findings of the LB Islington Strategic Housing Market Assessment 2017 (SHMA) . The SHMA 2017 states that within Islington 28% of households are of the private rented tenure and paragraph 3.81 notes that "The major area of growth in the housing market in Islington and Camden is likely to continue to be in the private rented sector with more houses in multiple occupation and households who are meeting their own housing costs." Rented accommodation therefore forms an important part of the housing make-up of the borough, and the SHMA sets out that there is a strong demand for this type of housing. The provision of purpose built, professionally managed rented accommodation with a security of tenure for renters is a more appropriate way to meet rental demand in the borough than through unregulated individual private landlords. We note that the 2017 Islington SHMA establishes that the existing private rented sector in the borough has the highest proportion of housing with no heating (4%) and in disrepair (7%). TfL have recently entered into a joint venture to deliver Build to Rent homes across TfL sites within London. The vision of the partnership is to create high quality rental homes for London in sustainable communities, maximising affordable housing, driving speed of delivery, ensuring stable returns for TfL to invest back into transport infrastructure and leading innovation in the BtR sector. TfL is committed to the provision of this type of accommodation and believes that BtR will play an important role in both addressing housing demand and also providing a high quality, professionally managed product in a market where quality of product and management is often poor.	Object	As noted above, the policy is specifically aimed at the BtR business model and does not restrict private rent generally. There is no evidence that BtR will achieve the benefits, over and above PRS that arises generally, e.g. general private letting of market housing, HMOs. The proportions of housing without heating or in disrepair, quoted from the SHMA, are considered a small proportion of overall stock.
R19.0149	Strategic and Development Management Policies			Policy DH3: Building heights	TfL Commercial Development	Statutory consultee	We suggest this policy recognises that tall buildings, when located in highly accessible locations, are a prime opportunity to optimise housing delivery, particularly in a borough with limited land supply and high housing demand.	Not stated	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0149	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	TfL Commercial Development	Statutory consultee	Policy B1 is not clear if the provision of different workspace typologies requires the inclusion of employment floorspace.	Object	Policy B2 (A) sets out the locations where the provision of business office floorspace is prioritised predominantly in the CAZ, CAZ Fringe Spatial Strategy Areas and Priority Employment Locations. This policy considers the provision of a range of workspace typologies in line with the different office properties identified in the market in different parts of the borough, allowing Grade A offices, serviced offices, co-working spaces, hybrid workspace and other types of flexible workspace and lower specification office space suitable for SMEs. In addition, criterion F of policy B2 sets out requirements for new business floorspace in terms of design and quality, and policy B4 requires the provision of affordable workspace from major development proposals involving 1,000sqm of B1a/b1b floorspace.
R19.0149	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	TfL Commercial Development	Statutory consultee	The plan appears to put more weight on business floorspace. Residential and employment uses can coexist, an inclusion of residential may make a scheme viable and enable provision of business floorspace. The respondent quotes NPPF para 103 on supporting sustainable transport objectives through limiting the need for travel, and para 1.0.8 from the draft London Plan on mixed-use developments to support London's economy and to create stronger communities.	Object	The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional office floorspace up to the year 2036. The development of business floorspace is therefore a key priority. However, housing and mixed use development is supported in many areas and sites. The Council has considered development needs in the round and has set out an approach in the Local Plan which will make the best use of land to meet these needs.
R19.0149	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport; Policy T3: Car-free development	TfL Commercial Development	Statutory Consultee	Support car free development	Support	Support noted.
R19.0149	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	TfL Commercial Development	Statutory consultee	TfL CD believe that Policy BC3 Paragraph G, which resists built development in the centre of the Old Street Roundabout, is overly restrictive. TfL CD state that Paragraph G unjustifiably assumes that an innovative development which combines high density development and a greatly improved public realm cannot be achieved. Furthermore, Policy BC3 Paragraph G assumes that built development on the site will negatively impact upon the future legibility of the open space and public realm. Suggest that Policy BC3 Paragraph G is removed or altered to encourage future development on the Old Street Roundabout site as part of overall area improvements.	Object	While the Council acknowledges the benefits of development in the area generally the Council priority for this key location of Old Street roundabout, as part of the transport hub, is for improved public realm, public open space, and improved access to the station. This allocation is justified by the strategic location of the Old Street roundabout as the central public space of the East London Tech City Area and entrance to a major national rail link. An attractive efficient public realm is key to the success of the area. The policy and allocation allows some small scale retail development.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0150	Site Allocations	VR10: 34 Brandon Road	Vale Royal/Brewery Road LSIS		Christine Humphreys and Matthew Marchbank	Landowner	Consider previous representations have not been taken into account. Intensification of industrial uses at the site difficult due to delivery/servicing/parking issues. This could be eased if Brandon Road were made one-way and parking bays added. As it stands the industrial use of the site should be minimised and residential/ office 'hybrid' use increased.	Object	The Council's response to previous representations is set out in the consultation statement. Maintaining industrial uses within the Borough is a key priority, such uses play an important role in supporting both the local and London-wide economies. Residential and office development could seriously harm the area's primary economic function and lead to the deterioration and gradual loss of industrial use in this area. The introduction of B1 space may be permitted, when provided as part of a hybrid workspace scheme.
R19.0151	Site Allocations	BC12: Cass Business School, 106 Bunhill Row	B & C: City Fringe Opportunity Area		City, University of London	Business	Rather than reinstating the wording of the adopted allocation as requested in previous representations, the council has sought to constrain the allocation further by suggesting that 'increased teaching facilities may be suitable where ...'. This is negatively worded and should be changed to 'will be suitable where ...' or removed in its entirety.	Object	Consider the amended allocation wording to be appropriate and not negatively worded.
R19.0151	Site Allocations	BC46: City, University of London, 10 Northampton Square	B & C: Central Finsbury		City, University of London	Business	Rather than reinstating the wording of the adopted allocation as requested in previous representations, the council has sought to constrain the allocation further by suggesting that 'increased teaching facilities may be suitable where ...'. This is negatively worded and should be changed to 'will be suitable where ...' or removed in its entirety.	Object	Consider the amended allocation to be appropriate and not negatively worded.
R19.0151	Strategic and Development Management Policies			Introduction: Vision and objectives	City, University of London	Landowner	Pleased that Council is committed to working with local universities and recognises the role they play, as per paragraphs 1.3 and 1.38. However, they consider that the detailed policy wording does not reflect and does not offer enough flexibility for the objectives to be achieved.	Not stated	Comments noted. Further comments on detailed policy wording are provided and responded to below.
R19.0151	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	City, University of London	Business	The blanket approach to protecting all views as out in Policy DH1 is inappropriate and not in line with the emerging London Plan approach. The policy should be amended to reflect the sensitivity of different views to change. The fact that a proposal is visible within a view does not mean that it will be harmful. This policy is unsound.	Object	The Council is required to protect views set out in the LVMF. In addition the Council also has designated local views which it seeks to protect. As noted in the draft London Plan paragraph 7.3.6, local views should be given the same degree of protection as strategic views. We note that the GLA consider that our draft plan is in general conformity with the draft London Plan. The respondent misquotes draft London Plan; paragraph 7.3.1, first and foremost, states the Mayors intention to protect the composition and character of views, particularly if they are subject to significant pressure from development (and this wording is in bold for emphasis). We consider that the respondent's suggested changes would undermine the principle of protected views.
R19.0151	Strategic and Development Management Policies			Policy DH2: Heritage assets	City, University of London	Business	The emerging Local Plan seeks to resist substantial harm to conservation areas and listed buildings. They consider that this is not consistent with national policy, and should be drafted according to paragraph 195 of the NPPF which states that substantial harm will be resisted unless there are substantial public benefits.	Object	The Council consider that policy DH2 is consistent with the NPPF.
R19.0151	Strategic and Development Management Policies			Policy DH3: Building heights	City, University of London	Business	It is inappropriate to have a blanket policy against tall buildings, the policy should include flexibility. The evidence base does not study the whole borough on a site by site basis. The policy should recognise that tall buildings can deliver public benefits including enhancements to the townscape. Without this the policy is unsound.	Object	Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0151	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	City, University of London	Business	The council has a restrictive approach to business and employment floorspace. Para 4.6 makes distinction between the two terms 'business' being B-use classes and 'employment being a broader term which includes office and education. The respondent states that the majority of jobs come from a few larger businesses, as well as local universities, hospitals and the council itself, as per para 4.10. The respondent proposes that part B of policy B3 welcomes proposals for higher educational use/research facilities that create employment. The respondent also suggests that these proposals should not require marketing evidence.	Object	Business uses are the priority as they are a high density employment use which can accommodate more jobs per sqm (and hence make the best use of land). The ELS notes that the majority of businesses in the borough are office based. The proposed amendment would undermine the Council's approach to meeting jobs projections as it could lead to the loss of business floorspace to be replaced by much less significant employment generating floorspace. Re: para 4.10, this states that the majority of jobs comes from a few large businesses as well as universities, hospitals, etc. These large businesses are office based. It is noted that university employment will also include some office based elements.
R19.0152	Site Allocations	OIS21: Former railway sidings adjacent to Caledonian Road Station	Other Important Sites		Historic England	Statutory consultee	Not opposed to the principle of development of the site but concerned that there has not been any analysis of the heritage significance of the Grade II listed Caledonian Road station, and whether this significance would be affected by development within the parameters set out in the allocation, which includes the possibility of a 12 storey building. Strongly urge some analysis of the likely impacts on the historic environment.	Both	The location is considered suitable in principle for tall building developments. Any proposal for a tall building has to fully satisfy the criteria set out in clause F of Policy DH3 including conserving and enhancing designated and non designated heritage assets.
R19.0152	Strategic and Development Management Policies			N/A - general comment	Historic England	Statutory consultee	We note and welcome the amendments to the Plan made in response to our comments in the previous round of consultation. Indeed, we welcome the Plan as a whole and consider that it offers an excellent platform for the effective conservation and enhancement of the Borough's historic environment. As such, we only have very minor comments in relation to this document.	Support	Comments noted. Response to further comments provided below.
R19.0152	Strategic and Development Management Policies			Policy DH2: Heritage assets	Historic England	Statutory consultee	We would suggest the inclusion of a footnote at paragraph 8.32 with a weblink to the Archaeological Priority Area review document ( <a href="https://historicengland.org.uk/content/docs/planning/apa-islington/">https://historicengland.org.uk/content/docs/planning/apa-islington/</a> )	Not stated	The Council will make this change via modification to the Local Plan.
R19.0152	Strategic and Development Management Policies			Policy DH2: Heritage assets	Historic England	Statutory consultee	Please note that St John's Gate was de-scheduled some time ago (although it remains a Grade I listed building). This comment also applies to para 3.66 in the Bunhill & Clerkenwell Area Action Plan.	Not stated	The Council will make this change via modification to the Local Plan.
R19.0152	Strategic and Development Management Policies			Policy DH2: Heritage assets, Paragraph 8.35	Historic England	Statutory consultee	We suggest adding at the end: 'We recommend pre-application consultation with the Greater London Archaeological Advisory Service (Historic England) for all development sites over 0.5 hectares and for smaller development sites in Archaeological Priority Areas – see GLAAS consultation guidelines at <a href="https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/">https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/</a>	Not stated	The Council will make this change via modification to the Local Plan.
R19.0152	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury	Historic England	Statutory consultee	Please note that St John's Gate was de-scheduled some time ago (although it remains a Grade I listed building). This comment also applies to para 3.66 in the Bunhill & Clerkenwell Area Action Plan.	Not stated	The Council will make this change via modification to the Local Plan.
R19.0153	Site Allocations	AUS6: Sainsbury's, 31-41 Liverpool Road	Angel and Upper Street		Lothbury Investment Management	Landowner	The exclusion of residential use from AUS6 does not comply with national and regional policy. There is no evidence to support the requirement for a significant amount of business floorspace at the expense of housing in this location. The viability appraisal does not take into account abnormal costs impacting on the site, without the higher land values associated with residential development the policy objectives for the site will not be deliverable. The scale of development envisaged in the viability study does not optimise the true capacity of the site or the objectively assessed needs for the borough.	Object	These issues are discussed in the housing and viability topic papers. The council has balanced plan priorities and reflected this in relevant allocations. This location is fundamentally commercial, hence the focus on commercial development. There is no explicit priority for housing above other uses set out in national or regional policy. We note that policy at both tiers highlights the importance of business floorspace to facilitate a healthy, successful economy. The GLA response to the draft plan explicitly supports the chosen approach set out in draft Policy B2, to prioritise its delivery within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe spatial strategy areas (including Angel and Upper Street, King's Cross and Pentonville Road), and within Islington's town centres and Priority Employment Locations. The response noted that the draft plan was in general conformity as drafted. The Local Plan Viability Study was undertaken using typologies to reflect the type of development likely to come forward during the Plan period. The typologies were based on allocated sites but the assessments included in the Viability Study do not constitute site-specific viability appraisals of the kind that would form part of the consideration of a planning application. Similarly, the quantum of development assumed for the typologies does not constitute the actual acceptable quantum of development for a site as that is something that will emerge during the planning process.
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	The Islington Draft Local Plan Viability Study produced by BNPP considers a scale of development (29,788m <sup>2</sup> (GIA)) which does not optimise the true capacity of the site or the objectively assessed needs for the borough. Given the location of the Islington Tunnel, innovative and possibly expensive ground solutions will be required to deliver the policy objectives for the site. This should be recognised in the site allocation AUS6. Quod requested at regulation 18 stage the working appraisals undertaken within the Islington Draft Local Plan Viability Study produced by BNPP. These have yet to be sent to Quod.	Object	The viability topic paper has further discussion on this issue. Re: the request for information, the Council corresponded with quod as part of regulation 18 consultation and stated that 'the Council's Local Plan Viability Study clearly sets out the adopted input assumptions as well as the assumptions that underpinned the typologies adopted in the area wide viability study in the main body of the report and at the appendices, sufficient to inform responses to the draft Local Plan consultation.'

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	Background provided on the Sainsbury's site. Respondent considers the site represents an excellent opportunity for Islington Council and Angel Town Centre to improve vitality and viability. It represents an excellent opportunity to achieve enhanced permeability, enhanced economic activity, new homes and a substantial improvement to the urban realm. Improved place-making along Tolpuddle Street can be achieved through active and animated road frontages and an appropriate sense of place.	Not stated	Comments noted.
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	Chapter 3 Thriving Communities of the Regulation 19 Plan recognises the need for housing in the borough. It states that Islington faces an "extreme set of circumstances when it comes to need and land supply". It notes that land supply in Islington is constrained and that local evidence demonstrates that the need for new housing in the borough is "significant". In this context land supply for conventional housing and genuinely affordable housing is considered "the top priority" because it is the most sustainable use of land in Islington. In line with strategic policy, proposed developments in Islington which result in the reduction of land supply for housing which could reasonably be expected to be suitable for conventional housing (such as an allocated site) will be refused. This statement emphasises the importance of housing to the Council. Given the identified housing need, and limited land supply it remains unclear why residential uses have been excluded from AUS6, certainly when site AUS6 is the kind of site that offers a good supply of land, and is a low density retail warehouse site. The Council accepts that housing is the top priority and sustainable use of land in Islington. National policy and the London Plan seeks ambitious growth targets for the Capital. Regulation 19 Policy H2: New housing states that Islington aims to meet "and exceed" the housing target of 7,750 units by 2028/29, which equates to an annualised target of 775 per annum and that housing proposals must demonstrate that use of the site is "optimised". Removing residential uses from AUS6 would compromise the Council's policy to meet and exceed its minimum housing target. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council's housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the exclusion of residential uses at AUS6.	Object	The Housing topic paper provides further discussion on these issues.
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	Chapter 3 Thriving Communities of the Regulation 19 Plan recognises the need for housing in the borough. It states that Islington faces an "extreme set of circumstances when it comes to need and land supply". It notes that land supply in Islington is constrained and that local evidence demonstrates that the need for new housing in the borough is "significant". In this context land supply for conventional housing and genuinely affordable housing is considered "the top priority" because it is the most sustainable use of land in Islington. In line with strategic policy, proposed developments in Islington which result in the reduction of land supply for housing which could reasonably be expected to be suitable for conventional housing (such as an allocated site) will be refused. This statement emphasises the importance of housing to the Council. Given the identified housing need, and limited land supply it remains unclear why residential uses have been excluded from AUS6, certainly when site AUS6 is the kind of site that offers a good supply of land, and is a low density retail warehouse site. The Council accepts that housing is the top priority and sustainable use of land in Islington. National policy and the London Plan seeks ambitious growth targets for the Capital. Regulation 19 Policy H2: New housing states that Islington aims to meet "and exceed" the housing target of 7,750 units by 2028/29, which equates to an annualised target of 775 per annum and that housing proposals must demonstrate that use of the site is "optimised". Removing residential uses from AUS6 would compromise the Council's policy to meet and exceed its minimum housing target. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council's housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the exclusion of residential uses at AUS6.	Object	A number of issues raised are explained in the policy supporting text, and are also elaborated in the Housing Topic Paper. This response fails to appreciate how housing need and housing targets are identified. As noted above, the Mayor of London sets out strategic London-wide need then identifies capacity constrained housing targets. Islington's SHMA is still a relevant consideration, for example in relation to affordable housing need, but the OAN figure identified is not relevant for plan-making purposes. The Local Plan, at paragraphs 3.2 to 3.4, clearly explains this. Housing capacity has been established through an in-depth exercise assessing the capacity of hundreds of sites across Islington (as discussed below). Site AUS6 is not considered an appropriate housing site as its location and existing uses clearly suggest commercial development should be prioritised, to address other identified development needs. The employment and site allocations topic papers provide further discussion of the specific site and needs for employment land. The Council's housing trajectory demonstrates a healthy FYS. The HDT has specific measures related to underdelivery, which in the case of the 2018 results means that Islington need to provide a 20% buffer on their FYS. The buffer is demonstrated in the latest housing trajectory. There is absolutely no indication that failing the housing delivery test means that more housing sites should be allocated through the plan-making process at the expense of meeting other development needs. If Islington continue to demonstrate under-delivery, this may in future trigger the presumption in favour of Sustainable Development, meaning that on a case-by-case basis certain policies which restrict housing supply could be given less weight.
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	Policy H11 seeks to restrict the provision of purpose built private rented accommodation over the plan period. Proposals in the Borough will not be permitted unless an applicant can demonstrate to the council's satisfaction that a range of provisions and tests can be met. This represents a new policy direction for the Council as the adopted plan does not include any provisions which seek to restrict the tenure of market housing coming forward. We consider that the proposed policy fails to conform to the National Planning Framework and Guidance and is inconsistent with the local plan evidence and the London Plan. As a consequence, a range of policy amendments are necessary to make the policy effective and justified. The policy is driven by the suggestion that in order to deliver the target levels of 'Genuinely Affordable Housing' the draft local plan should prioritise the delivery of 'conventional housing'. The draft plan does not define the term 'conventional housing' and this term does not feature in the current 2014 – 2019 housing strategy nor does it feature in the principle evidence base namely the SHMA 2017. As currently drafted what constitutes 'conventional housing' can only be deduced by exception i.e. by identifying the types of housing which are considered by the Regulation 1 plan to not be generally supported. These are variously referenced as comprising extra care market housing (para 3.17) build to rent (paragraph 3.15 & 3.137) and student housing (paragraph 3.16). The plan should provide clear links to the how the evidence base for housing relates to the concept of 'conventional housing' being prioritised by the current plan policy proposals. The current mix of tenure across the Borough shows owner occupied (c.28%), rented affordable (c.42%), private rent (c.26%) and relatively small elements of rent free and shared ownership.	Object	Policy H11 does not aim to restrict new housing being rented privately - see footnote 23; it aims to prevent use of a specific business model (purpose built PRS) being used to undermine affordable housing and other policy requirements. To clarify, the council has no issue with the market element of a scheme being rented privately, and is not seeking to restrict this.  Conventional (or self-contained) housing is a commonly understood term, used in the adopted and new London Plan and the London Plan AMR, and identified as one of the components of housing supply by the GLA - <a href="https://data.london.gov.uk/housing/housing-supply-data-sources/">https://data.london.gov.uk/housing/housing-supply-data-sources/</a> . Policy H11 was revised at Regulation 19 stage to remove reference to conventional housing. For avoidance of doubt, the units created through a BtR scheme would be classed as conventional.  The respondent cites tenure mix from the Census 2011 which highlights the significant proportion of social rent in the borough. Further detail on affordable housing and housing need is provided in the housing topic paper.
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development, Evidence base	Lothbury Investment Management	Landowner	The NPPF identifies at paragraph 59 that the Government's objective is to significantly boost the supply of homes. Paragraph 61 adds further context by identifying that council's must, in formulating local plans and policies assess the particular size, type and tenure of housing needed for a range of different groups who need housing including (but is not limited to) those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own. The NPPG provides guidance on these particular groups and how their needs might be identified as well as being explicit that this assessment is distinct from the standard method of assessment housing numbers. The 2017 SHMA prepared on behalf of the Council by ORS considers the role of the private rented sector as part of section 7. This identifies its importance as a core component of the local housing market with its proportion of the overall market growing in response to demand from a range of households who either can't, or don't wish to, enter the owner-occupied sector as well as its role (with the support of housing benefit) as an alternative form of affordable housing. Respondent cites Figure 97 from the SHMA 2017 shows that between 84% and 97% of the private rented accommodation (depending on whether you consider single family households or multi adult households) occupy private rented accommodation without recourse to housing benefit. This illustrates the sector is not for the most part acting as an 'alternative' to the affordable housing sector and is consequently providing a core component of the overall market housing offer. The growth in size of this sector in conjunction with generally rising rents is a strong indicator of unsatisfied demand for this accommodation and as identified on the Council's private rented sector part of their web service "Islington is a popular place to rent so there is very high demand for rented properties".	Object	The Council does not dispute that the private rented sector has a role in meeting need; it is the specific BtR model that this policy focuses on. Leaving this aside, the SHMA demonstrates a clear need for social rented housing; this is discussed in the housing topic paper.  Figure 97 does show that a high proportion of existing PRS is occupied without recourse to housing benefit, but this this does not, as the respondent claims, illustrate that the sector is not for the most part acting as an 'alternative' to the affordable housing sector. Receipt of housing benefit is not the only indicator of need for affordable housing. Consideration of other factors including the proportion of income spent on rent is important. As noted in the SHMA, there has been a marked change in the pattern of benefit claimants in the private rented sector since the welfare reform changes were first introduced in 2011 (see figure 37). Inner London boroughs have consistently seen a reduction in the number of claimant households. This suggests that the private rented sector in Inner London is already beyond capacity for LHA claimants given the current level of financial support which is available and implies that Inner London boroughs such as Islington will be displacing those in need of affordable housing as there is limited possibility of them being accommodated in the private rented sector.  The respondent has cited figure 97 but has excised the discussion of the implications of figure 97. Figure 98 puts the issue into perspective, showing that only 40% of households in PRS can afford a property of the size needed. Paragraph 7.21 states that <i>"Only 40% can afford a market rent property of the size required compared to 71% that can afford a bedsit or room. Taking into account that only 16% receive HB support and the predominance of smaller properties occupied, this suggests that some of these households are occupying smaller properties than they need and it is probable there is some overcrowding. Some households may be cutting back on other essentials to pay the rent."</i> Considering this, the picture of PRS in Islington is not as sanguine as suggested.  The repondent quotes the Council's PRS website. We do not dispute that Islington is a popular place to rent, but popularity does not equate to affordability.



Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development, Evidence base	Lothbury Investment Management	Landowner	<p>The household survey which accompanied the 2017 SHMA identified a number of key financial parameters for those households living within the Borough. Of those in rented or shared ownership accommodation</p> <ul style="list-style-type: none"> <li>- 81% of these households have no savings for a deposit. (ref Question D7a)</li> <li>- Of those who had savings over 50% had less than £30k (for use as a deposit). (ref Question D7)</li> <li>- 81% of households who pay rent or a mortgage say it is either 'well within budget', 'about right' or 'just manageable' (Q D9).</li> <li>- 86% of the same group say they are not considering the prospect of falling into arrears. (Q D10a)</li> </ul> <p>These headlines illustrate that many households in rented accommodation have limited capacity to afford to purchase in an expensive Borough like Islington where market sale products generally require significant deposits or existing equity. Whilst the provision of shared ownership could target some of these households it will not be accessible to or appropriate for all households currently residing in the private rented sector. Evidently there will be households on incomes above those which would prioritise them for the range of rented affordable products (including London Living rent Affordable) but who still have insufficient savings for an open market or shared ownership purchase. Respondent provides CACI income profile (figure 2 of response) which illustrates the extent of these middle-income households (45k to 90k) who could be 'frozen out' of the housing market where only open market sale or rented affordable products come forward.</p>	Object	<p>The Council note that unaffordability of ownership products does not by default make PRS affordable. We again highlight that the majority of need is for social rented accommodation. The respondent suggests that there are a number of households on incomes – cited range is between £45k and £90k using CACI data - which would be 'frozen out' of a range of rented affordable products (including London Living rent) but who still have insufficient savings for an open market or shared ownership purchase. The Council notes that the threshold for LLR is £60k which shows that a large proportion of the supposed 'frozen out' households could access LLR. Leaving this aside, the income profile cited (which is presumably gross income but this is not confirmed) shows that approximately 63% (almost two-thirds) of households have an income less than £45k; this again would lend weight to the overwhelming need for genuinely affordable housing, particularly as the same income profile shows that a quarter of households have an income of less than £20k. Figure 75 of the SHMA shows the distribution of gross income in a similar manner to the respondents table; the results are not too dissimilar on face value, although actual comparison is difficult without further detail on the respondents information</p> <p>Figure 78 provides further evidence that market rent is not affordable to the majority of households. At 30% of income, only 15% of households can afford market rent. At 45% of income, which is a very high proportion, only 25% of households can afford market rent. As a comparison, the same table shows that nearly half of households cannot afford target rent based on 30% of income.</p>
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	<p>By implication where demand in the private rented sector is not met then these households will either be displaced from the Borough or will look to the affordable waiting list to resolve their housing need. This is an important dynamic to understand in light of the identified need for affordable housing. Evidently additional demand from those who could meet their needs within the private rented sector will limit the ability of the council to meet their identified backlog and newly arising affordable need. To this end the role of the Private rented sector, particularly where this provides quality new units, should be recognised as providing a resource which meets needs and which reduces the pressure on the existing and planned affordable housing supply.</p> <p>The 2017 SHMA identifies at figure 98 that market rent is comparatively more accessible than owner occupation, shared ownership at a 50% share and only slightly below that for shared ownership at 25% share. In the context of a policy which appears to prioritise owner occupation schemes over private rented it is hard to justify the Regulation 19 policy supporting text at 3.16 which states that "conventional residential development is by far the most sustainable form of residential development as it meets the broadest spectrum of housing need". This assertion is not cross referenced to any evidence base and it is not clear how this is supported as the 2017 SHMA appears to conclude that the private rented sector offers affordability to self-contained households well above that of the owner-occupied sector.</p>	Object	As noted, the overwhelming need is for affordable housing. The approach taken by the respondent seems to suggest that there are plenty of households who can pay market rent and Islington are stifling their ability to rent privately suggesting households would then look to affordable housing. Households seek affordable housing because they cannot afford anything else. As noted above (figure 78 SHMA), the majority of households can only afford market rent if they spend high proportions of income on rent, which has a significant effect on living standards and health, amongst other things.
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	<p>The provisions of Policy H11 places a test on the provision of purpose built private rented sector development which is not justified by the evidence base. Evidence suggests that the private rented sector has an important current and future role in meeting housing need in the Borough and it would be inappropriate therefore to arbitrarily limit the delivery of this type of housing to scenarios where the delivery of conventional housing is demonstrated to be undeliverable. The NPPF 2019 Paragraph 61 does not promote the prioritisation of one type of housing provision over another rather it is based on a response to evidence of need. It is instructive to note that Islington represents one of the smallest geographical council's areas in the country and the market for housing will inevitably not respect borough boundaries. Each of the adjoining Councils (Camden, Hackney and Haringey) all exhibit market characteristics not dissimilar to Islington and each of these Councils encourage Build to Rent or Private Rented Schemes as a part of a policy response to dealing with evidenced housing needs in their area.</p> <p>There is no evidence presented which justifies this approach to resolving housing need and nothing which sufficiently differentiates Islington from surrounding Councils to warrant their proposed approach to private rented schemes. As a minimum Part A of Policy H11 should be deleted to ensure the policy does not prejudice the delivery of private rented housing as part of an overall response to meeting needs in the Borough.</p>	Object	This section of the response is very similar to the response from Quod, reference R19.0113. The Council's response to R19.0113 provided above is also relevant here.
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	<p>Part A of Policy H11 details the criteria for private rented schemes to meet as part of an application. Part ii identifies that Affordable Private Rent (APR) is not considered to be an acceptable affordable housing tenure. No evidence is presented to support this save for a short reference at paragraph 3.54 of the Regulation 19 Plan. This implies that the only obstacle to this type of provision is the level of rent and whether this is sufficiently discounted from its market rent level to meet identified affordable housing need.</p> <p>It is inappropriate for the policy to remove the opportunity for APR in the absence of any understanding about its relative rent pricing point and understanding how this relates to the market rent and other affordable products. An APR product, for instance, set at a % of open market rent which delivers a starting rent equivalent to London Living rent is manifestly affordable housing in the context of the evidence base, the London plan and the NPPF. This sort of provision should not be prevented from coming forward by the policy wording. Part A(ii) should be amended as per suggested wording.</p>	Object	This section of the response is very similar to the response from Quod, reference R19.0113. The Council's response to R19.0113 provided above is also relevant here.
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	<p>Policy H11 (A)(iv) proposes that private rented sector units are held under a restrictive covenant for the lifetime of the building which is expressed as 'generally no less than 50 years' with sales to the open market (individually or as a group) not to be allowed during this period. Part v of the policy however, identifies that if this covenant is 'broken' then a clawback mechanism will be applied to maximise affordable housing.</p> <p>The application of a 50 year covenant is unreasonable and does not reflect the normal maximum covenant period for this type of provision of c.15 years. Applying a 50 year timescale will adversely affect the ability to fund this type of provision and prevent the scheme from remaining flexible to allow for market changes over its lifespan. It is not clear why the council have opted for a 50 year timeframe and why this length of time is considered necessary or appropriate.</p> <p>The key requirement is for a Private Rented Scheme to provide an appropriate clawback in respect of affordable provision where it reverts to open market sale either in part or as a whole. Provided the level of clawback reflects the level of obligation required were the scheme to have come forward at planning stage as an open market sale proposal then the integrity of the plan remains intact. Adding a further provision which makes a commitment for an initial period for the private rented proposal of 15 years ensures that this clawback will not normally be triggered in the early stages following delivery.</p> <p>Adjustments to Part vi are necessary to align with the proposed amendments to part v where a part release of the covenant is taken forward as an option.</p>	Object	This section of the response is very similar to the response from Quod, reference R19.0113. The Council's response to R19.0113 provided above is also relevant here.
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	Adjustments are considered appropriate to part vii to reflect that a range of tenancy lengths and options will be appropriate for schemes of this type but it is prescriptive to require that all tenants will be offered tenancies of at least three years.	Object	The policy wording is consistent with the London Plan.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0153	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	Lothbury Investment Management	Landowner	Policy fails to recognise the extensive residential floor space at upper floors in Angel Town Centre, incorrectly influencing a perception of character and role. Policy SP4 refers to site AUS6 but does not include residential uses for the site which the respondent objects to. Policy SP4 Part I should also recognise the ability for the site to deliver residential as well as business uses. Excluding residential uses on site AUS6 is overly restrictive given the capacity improvements expected with Crossrail2.	Object	The Housing topic paper provides further discussion on the non-inclusion of residential uses on site AUS6. Angel may have residential uses on upper floors and in locations not occupying main retail frontages but Angel is predominantly commercial. Residential uses at ground floor will harm the commercial function and on upper floors can harm operational functioning of individual units. Residential development at ground floor level can also cause negative amenity impacts for residential occupiers as well as reducing viability of future leisure uses. Crossrail 2 is currently unfunded, so it is not considered appropriate to amend an allocation and undermine a key plan priority to reflect something which is uncertain. Notwithstanding this, there is no justification for prioritising housing as a result of Crossrail 2; office uses could be utilised as part of any development that came forward as a result of Crossrail 2.
R19.0153	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	Lothbury Investment Management	Landowner	Part F and paragraph 4.71 makes an unsubstantiated statement which the respondent opposes and should instead read 'residential uses should also prevent/mitigate risk of future impacts through design and the agent of change principle'.	Object	Further discussion is provided in the retail topic paper.
R19.0153	Strategic and Development Management Policies			Policy R2: Primary Shopping Areas	Lothbury Investment Management	Landowner	Respondent seeks clarification as to whether 60% A1 mix benchmark refers to just ground floor or all floor space. It should be related to ground floor only.	Not stated	The Primary Shopping Area refers to commercial units with a ground floor presence. This includes spaces on upper floors and basements that are ancillary to the ground floor commercial function. Paragraph 4.88 provides further guidance.
R19.0153	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Lothbury Investment Management	Landowner	Part H states applications for residential uses not involving a change of use of existing A1-A5, D2, Sui Generis uses must be located on upper floors. Residential uses will require a ground floor entrance/exit which will be a residential use so the policy should be amended to clarify this.	Not stated	Paragraph 4.99 provides guidance on this issue.
R19.0153	Strategic and Development Management Policies			Policy B2: New business floorspace	Lothbury Investment Management	Landowner	<p>Notes that the draft Local Plan takes a different approach to the adopted plan by seeking business floorspace as an absolute priority. The evidence base to support this approach is now dated and should be updated for purposes of the policy review. Expresses surprise that inflexible recommendations of evidence have been taken forward without taking into account wider development plan policies.</p> <p>The policy states that the introduction of uses that could undermine the primary economic function of that particular area will not be allowed. The policy refers to the "specific role and function" of the Angel and Upper Street location suggesting that that this is solely a business location, akin to the City of London or Canary Wharf. It is not. It is a mixed use town centre which includes residential development, as acknowledged by the adopted Islington Core Strategy. The approach taken within Policy B2 is inflexible.</p> <p>Part E states that all development proposals involving business floorspace (including affordable workspace provided in line with policy B4) must have regard to the following: (i)-(iv). These policies are excessive and have not been viability tested.</p>	Object	<p>The employment topic paper provides further discussion of these issues. The council have carefully considered all evidence in the round in arriving at policies in the draft plan. There is clearly considerable need for new office floorspace hence the plan puts in place a strong policy priority to maximise delivery of new floorspace. This priority works in conjunction with the priority for housing; the council can demonstrate a healthy five year supply of housing to meet projected targets.</p> <p>The council does not consider the evidence is dated. There has been no significant shifts in market circumstances or context that would render the conclusions, and the need for a large amount of new floorspace to meet projected jobs growth, invalid. The respondent has not sought to provide any robust commentary on the methodology or the reasons why it is considered dated.</p> <p>The document does not claim that Angel and Upper Street is akin to the City or Canary Wharf; it notes that the area is an important business location and within the CAZ. Angel does have residential uses but in no way can they be considered equitable, in terms of their influence on the function and character of the area, to commercial retail and business uses. This is evident from even a cursory walk through the area or a light touch research exercise. The lack of existing office on the site does not affect a proposed allocation. If suitability of an allocation was predicated on the same use existing on site currently, this would preclude residential uses also.</p>
R19.0153	Strategic and Development Management Policies			Policy DH3: Building heights	Lothbury Investment Management	Landowner	Buildings of more than 30 metres are only acceptable in-principle: (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or (ii) within specific sites identified in relevant spatial strategy policy.	Not stated	Comments noted.
R19.0153	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lothbury Investment Management	Landowner	Policy not supported by viability evidence.	Object	Discussion of viability testing of Affordable Workspace is set out in the viability topic paper.
R19.0154	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Cycle Islington	Campaign	<p>Support the revamp of the cycle parking space numbers. The increase in accessible spaces is particularly welcome, but want to understand the logic behind it. Would like to see amendments:</p> <ul style="list-style-type: none"> <li>• The rules must clearly state how applicants should provide space for two-tier racks. LCDS has clearance standards.</li> <li>• Circulation and clearance requirements should refer to LCDS requirements rather than case by case to maximise utility.</li> <li>• LBI should also create a specific cycle parking design guide as Hackney and Camden have done/ TfL also has a useful document on Workplace Cycling Requirements which could serve as a model.</li> <li>• While it's good that the council is encouraging Sheffield stands (Appendix 4, ppg 5), we recommend setting requirements which disallow or (at the very least) strongly discourage known-poor rack types</li> <li>• The Council should require applicants to be explicit about what type of stores (with manufacturer if possible) and where exactly each rack will go.</li> <li>• Social safety concerns need to be taken into account when determining where to put cycle parking: overlooking, lighting, CCTW....</li> <li>• New developments should put cycle parking on the ground floor wherever possible. If in the basement, ramps must be accessible. Lift is a last resort, and should meet LCDS requirements for size.</li> </ul>	Support	The Local Plan already covers the points raised, considering the transport policies alongside other policies such as PLAN1. The spatial approach delivers a quantum of space and layouts that will need to be shown on plans. Applicants can choose the type of racks, although vertical or 'butterfly' racks will be resisted. Appendix 4 refers to relevant guidance which can be judged on a case by case basis.
R19.0154	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport, Part C	Cycle Islington	Campaign	Businesses should use cargo cycles for their delivery and transportation needs, as they offer a clean air and cheap alternative to motor vehicles. The Council should take a proactive approach to working with businesses to find delivery solutions which eliminate as many motor vehicle journeys as possible.	Not stated	Policy T5.B.viii states that proposed delivery arrangements must investigate the potential for non motorised delivery modes.
R19.0154	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport, Part C	Cycle Islington	Campaign	Support the Council's skepticism of shared space schemes. However, the most important element of any scheme which involves cars is the volume of traffic. For example, a "shared space" high street scheme which excludes cars entirely for all but essential deliveries at quiet times of the day could work well. In such a scenario, a non-existent kerblane might very well be the best solution for pedestrians and cyclists the rest of the time. It's important to spell out the essential criterion for a successful pedestrian-friendly street environment: removing non essential car traffic	Both	The policy is clear about its contextual approach, based on the Streetbook SPD. Therefore when there are very low volumes or no traffic at all, shared spaces may be acceptable. However to guide visually impaired and blind pedestrians the Council will favour kerbs at a height of at least 60mm. The Streetbook SPD and the public realm T4 and PLAN1 all spell out the criteria for a pedestrian friendly street environment.
R19.0154	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part E	Cycle Islington	Campaign	Lime and Jump bikes could be transformative, and are currently meeting a need for ebikes which TfL and the Council have been unable to meet—especially in the north of the borough. Even though street clutter is an issue, Islington should rather instead develop a set of guidelines for responsible operators, making it easy for a new entrant how to minimise disruption and maximise utility. Since a large number of cycle journeys start and end in different boroughs, Islington should work with TfL to come up with common standards to simplify governance and remove regulatory uncertainty for dockless cycle hire operators.	Object	The Council is actually allowing many operators of dockless cycles in Islington. However, the paragraph is necessary because of the potential for clutter and chaotic parking are real issues in Islington and can lead to inaccessible pavements.
R19.0154	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part E	Cycle Islington	Campaign	Wherever possible, remove cycle and pedestrian permeability barriers when planning new developments. Redevelopment is a chance to fix issues of impermeability and design for a future which prioritises carbon-free modes. Developments must not install barriers which exclude cargo cycles and wheelchairs, or aggressive rumble strips or speed bumps. Kerb cuts must be added where necessary. There must be gaps between buildings to enable through routes for cycles, especially when such access will link residential streets beyond the development to existing or planned cycle routes.	Not stated	Policies T1, T2 and T4 all support this.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0154	Strategic and Development Management Policies			Policy T3: Car-free development, Part E	Cycle Islington	Campaign	T3E: We support the direction that all on-street electric vehicle charging points are to go in the parking spaces themselves - However, new on-street charging points must not interfere with future cycle infrastructure. As such, the planning process must disallow EVCPs which would need to be removed or relocated in order to build cycle infrastructure. The Local Plan should disallow EVCPs on streets with more than 2000 PCU per day which do not have cycle tracks yet. The kebline here should be safeguarded for future cycle tracks. When the tracks are installed with space for car parking, then the EVCPs can be installed at the same time. Only low-traffic residential streets should qualify for EVCPs without cycle ways. The Council must also refer to the network of planned cycle routes before approving new EVCPs, even on quieter streets, to ensure there is no conflict.	Object	The Council already works with the planned cycle routes in mind when installing EVCP. For fast charging points, it would however be counter productive to locate them on residential streets, as they are likely to generate more traffic. Slower charging points could however be located on quieter streets. As the policy clarifies, the location of EVCP will be assessed case by case, taking a contextual approach based on the Streetbook policies. It is not possible to 'future proof' the entirety of the main roads in Islington for cycle racks by preventing the installation of EVCP on them. This does not preclude the Council to install them sensitively in a way that does not hinder cycle environment.
R19.0154	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Cycle Islington	Campaign	Recommends safeguarding future kerblines from infrastructure providers construction of new equipment which could obstruct cycle routes	Object	Introduce change via a modification to the Local Plan to include reference to cyclists as well as pedestrian movements in paragraph 9.12.
R19.0155	Site Allocations	FP7: Holloway Police Station, 284 Hornsey Road	Finsbury Park		Metropolitan Police Service	Statutory consultee	The loss of Holloway Police Station is part of the MPS' estate rationalisation programme so the loss of social infrastructure is compliant with draft policy SC1. As such the reference to 'justifying the loss of social infrastructure' should be removed from the allocation. The MPS do not agree that the location of the site lends itself to ground floor offices/ workspace. Given the residential nature of the area around the site a wholly residential scheme is appropriate.	Both	It is appropriate for policy SC1 to apply to this allocation, as a police station constitutes social infrastructure. However, a loss could be justified through evidence of the MPS' estates rationalisation programme.  The council does not agree that the site is not appropriate for office/workspace use as it is located in close proximity to Finsbury Park and Nag's Head Town Centres.
R19.0155	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Metropolitan Police Service	Statutory consultee	The proposed growth in homes, offices and other uses will significantly increase the need for policing and the cost for associated infrastructure including staff set up costs, vehicles and technology. This represents a legitimate infrastructure requirement that should be accounted for within Islington Council's Section 106 Agreement and/or Community Infrastructure Levy. We consider that until such time as CIL is collected for police infrastructure, funding should be collected through Section 106 contributions from individual developments to ensure that the necessary funding is accounted for in the meantime.	Not stated	Consideration of securing contributions for policing, and whether this would constitute infrastructure, is a matter for any future CIL review, or if appropriate, as part of any future revisions of the S106 SPD. The rationale set out in the response is that development increases the need for policing; this may be true, but it is also true that the design of schemes can help prevent crime, hence reducing the need for policing.
R19.0155	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Metropolitan Police Service	Statutory consultee	The MPS is requesting that the emerging Islington Local Plan includes a section highlighting the importance of the delivery of District Ward Offices in schemes referable to the Mayor. The MPS is already having success in securing DWOs with developers (through planning applications) and Local Planning Authorities (through planning policy). In many cases, Local Authorities and developers consider the requirement to have a positive impact on development proposals.	Object	Suggested addition is unnecessary. Policy SC1 would, in principle, already support such provision where proposed. No specific allocations for such provision have been put forward by MPS.
R19.0156	Site Allocations	BC31: Travis Perkins, 7 Garrett Street	B & C: Central Finsbury		Travis Perkins Plc	Landowner	Previous representations have been taken into consideration. Support the allocation as currently drafted.	Support	Support noted.
R19.0156	Strategic and Development Management Policies			Appendix 9: Glossary and abbreviations	Travis Perkins Plc	Landowner	TP wish to record their support of the amended glossary definitions and in particular the inclusion of builders' merchants within the glossary definition of industrial floorspace.	Support	Support noted.
R19.0156	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Travis Perkins Plc	Landowner	Draft Policy B3 ('Existing Business Floorspace') relates to all business floorspace, where existing business uses are industrial in nature (i.e. B1(c), B2, B8 or sui generis uses which are akin to industrial uses). It states that there must be at least no net loss of industrial uses as part of development proposals. Employment generating sui Generis uses are therefore protected. TP wish to record their support for this policy.	Support	Support noted.
R19.0156	Strategic and Development Management Policies			Policy B2: New business floorspace	Travis Perkins Plc	Landowner	The respondent supports policy B2 to ensure that industrial, business and Sui Generis uses such as builders' merchants are protected in Employment Priority Areas.	Support	Policy support noted on consideration of Sui Generis uses akin to industrial uses, such as Builders' Merchants.
R19.0156	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Travis Perkins Plc	Landowner	The respondent supports policy B3 which ensures that there is not net loss of industrial business uses, and that employment generating Sui Generis uses are protected.	Support	Support on protection of industrial uses (including Sui Generis uses akin to industrial) noted.
R19.0156	Strategic and Development Management Policies			Appendix 9: Glossary and abbreviations	Travis Perkins Plc	Landowner	The respondent supports the definitions of industrial floorspace and business floorspace, in particular the inclusion of Builders' Merchants (SG use)	Object	Support noted.
R19.0157	Site Allocations	AUS11: Proposed Collins Theatre, 13 17 Islington Green	Angel and Upper Street		Berjaya UK Investment and Development Limited	Landowner	Consider the site allocation is superfluous. The site has been constructed, the vast majority of it has been completed and the residential accommodation is occupied. There are existing and emerging policies protecting commercial and theatre uses so the allocation will not bring forward any additional protection. If the council does wish to allocate the site they should formalise the site as a cultural use, and not specifically a theatre as policy R1 does not differentiate between specific cultural uses. The whole of the site, including the completed residential use, should be included in the allocation.	Object	The purpose of the allocation is specifically to support the permitted theatre use on the site which has not yet been delivered, and therefore the council does not consider that the allocation should be amended to require a broader 'cultural' use. The other uses referred to by the respondent were delivered in accordance with the planning permission and are not relevant to this allocation.
R19.0157	Strategic and Development Management Policies			Policy R9: Meanwhile/temporary uses	Berjaya UK Investment and Development Limited	Landowner	Respondent supports approach. However, the time allowed for temporary uses is not of sufficient time to attract potential occupants. The time period should be extended to two years which will ensure large sites are not unduly impacted by the policy. The two-year period represents a common period for pre-submission discussions and determination of large planning applications reflecting a desire for land owners to avoid the under-utilisation of sites.	Object	The council consider a two year temporary use period to be too long and risks precluding permanent development. Although large sites may be subject to lengthy applications, the council consider that the policy approach is appropriate for the Islington context as Islington has very few large sites and the meanwhile use policy will mainly apply to small sites in town centres and the CAZ.
R19.0158	Site Allocations	ARCH1: Vorley Road/Archway Bus Station	Archway		Better Archway Forum	Local society	A 15-storey building will overshadow housing and be contrary to studies on energy use and overall densities.	Object	LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building locations are only acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation
R19.0158	Site Allocations	ARCH2: 4-10 Junction Road	Archway		Better Archway Forum	Local society	Relocating the portacabins which block the tube station entrance would be an important improvement that boosts the retail frontage.	Not stated	Comment noted. It is not considered to require amendment to the allocation.
R19.0158	Site Allocations	ARCH3: Archway Central Methodist Hall, Archway Close	Archway		Better Archway Forum	Local society	The address is 11 St John's Way, N19 3QS	Not stated	Not clear that respondent is correct based on internet search. Issue has not been raised by landowner.
R19.0158	Site Allocations	ARCH4: Whittington Hospital Ancillary Buildings	Archway		Better Archway Forum	Local society	Improving public transport access to the hospital would be a significant benefit. Buses terminating from the south could turn in the Magdala Avenue forecourt. Highgate Hill buses 4, 143, C11 and W5 terminating at Archway could continue to turn at Upper Holloway Station.	Not stated	Comment noted, not considered to require amendment to the allocation.
R19.0158	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway		Better Archway Forum	Local society	These fully functional buildings could have been used to shelter homeless people. Would use of the s215 procedure be appropriate?	Not stated	The temporary use of the site prior to development falls outside the remit of the Site Allocations DPD, although policy R9 does encourage this. Use of s215 of the Town and Country Planning Act, which can compel landowners to clean sites where they are adversely affecting the amenity of the area, is unlikely to achieve the desired outcome.
R19.0158	Site Allocations	ARCH7: 207A Junction Road	Archway		Better Archway Forum	Local society	Work here could be made dependent on the re-opening of Junction Road Station, providing a clear and immediate public benefit.	Not stated	LBI are not aware of TfL priority for such a scheme, thus it is not considered appropriate to amend the allocation.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	Adopt the Healthy Street policy	Not stated	Our policies are in line with that approach.
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	It would be useful to reopen Junction Road station on the Gospel Oak to Barking Line, to improve public transport accessibility in that area	Not stated	The Council is not aware of any TfL priority for such a scheme, but we note that it does not need to be explicitly stated in the Local Plan in order to come forward. Local Plan transport policies would provide in principle support in any event.
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	There has been an apparent reduction of traffic on main roads, but also a degree of displacement of secondary road, such as St John's Grove, which is negative	Not stated	The Low Traffic neighbourhood approach carried out by the Transport Strategy may help in that sense.
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	There is an increase in vehicle speed on main roads, especially Holloway Road and Junction Road. Public realm interventions, such as narrowing the carriageway with build outs and trees could help in that respect	Not stated	This is supported by Local Plan transport policies and the Transport Strategy.
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	Islington should talk to TfL to terminate buses to stop at points of demand, such as Whittington Hospital and Upper Holloway, this would free up 2 lanes of traffic on Archway Road for housing over a combined heat and power facility overlooking the footway at Hornsey Lane. 26. Better interchange, not worse, was a starting aspiration for the welcome removal of the gyratory, and if re-introduced by simple re-organisation of bus stops, would encourage travel via Archway, to the benefit of businesses and greater safety on the street.	Not stated	Unclear what the respondent is referring to here. Bus routes are a matter for TfL and fall outside the Local Plan, although the Local Plan transport policies encourage close working with TfL.
R19.0158	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Better Archway Forum	Local society	Given LB Islington's steps to make the borough more cycle friendly, there is still considerable scope for improvement and in particular it would be desirable to have a target for modal shift of more than 5% in 21 years – the lowest of any inner London borough. A Quietway around Archway for cycling is desirable, away from heavy HGVs and polluted roads, away from buses	Not stated	A new cycleway is planned from Regent's Canal to Highgate, which goes through Archway. The Council is also working on a borough wide HGV ban.
R19.0158	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Better Archway Forum	Local society	The cycle hangars are great but too expensive. As hangars accommodate 6 cycles on one parking space the fee per head should be one sixth of a parking fee	Not stated	This is not relevant for the Local Plan.
R19.0158	Strategic and Development Management Policies			N/A - general comment	Better Archway Forum	Local society	We warmly welcome the generation principles of the Plan including among other issues the commitment to young people, to protecting the environment and the active designation of Archway as a cultural quarter. There is much else that we could commend so please take it as read that we are supportive of what the Plan sets out. The following are suggestions where we believe there is scope for increasing the effectiveness of the proposals. We appreciate that some of the points here are strictly speaking matters for TfL but include them as part of the local picture.	Support	Comments noted.
R19.0158	Strategic and Development Management Policies			N/A - general comment	Better Archway Forum	Local society	One of the best ways of achieving public safety is to ensure 'eyes on the street'. For this reason it may be helpful to specify that all development, whether residential or business, must feature a clear sense of connection with the public space with doors directly from the street and windows large enough to clearly signal active use of the building. Point 8.72 proposes improving permeability. However, the Space Syntax study of the Girdlestone Estate in 2008 found that one of the key underlying problems with the estate was that there is too much permeability, so those responsible for anti-social behaviour can easily evade detection. Policy favouring permeability should ensure that integral to that is an assessment of potential impact on crime and anti-social behaviour and where permeability is sought, it is only with measures which will keep the space safe. Simple cut-throughs such as proposed on the Holborn Union site may prove a great deal more problematic than helpful. In effect permeability needs to be across what has been called 'defensible space' and/or what the Rowntree Foundation called LOTS (Living Over The Shop), ie spaces which are actively overlooked and/or in a clear sense of ownership.	Not stated	Permeability is an important principle but actual design of schemes will be a case by case consideration, taking into account local context. There are a number of policies which would cover the issues raised, including PLAN1. Paragraph 8.72 relates to surface permeability i.e. the ability of water to drain easily.
R19.0158	Strategic and Development Management Policies			Policy H1: Thriving communities	Better Archway Forum	Local society	We are all too well aware of the on-going housing problems for many in the borough and welcome the expectation that new housing will take account of the needs of families. We welcome also the requirement for dense design but note that this is best achieved through low and medium rise, parallel 'streets' and inward-looking 'courts' rather than high rise - as in the paper by Professor Steadman of UCL - <a href="https://journals.sagepub.com/doi/10.1068/b39141">https://journals.sagepub.com/doi/10.1068/b39141</a> . We are disappointed to understand that LB Islington does not support co-housing projects. Because these offer shared facilities they often encourage residents to live in smaller accommodation than otherwise, and the social support they provide leads to significant savings in support services. Their success in countries like the Netherlands is proof that they can be highly effective.	Both	Comments noted. The Local Plan requires housing density to be optimised while restricting tall buildings over 30m to specific locations. Specific design and heights will be assessed on a case by case basis. The respondent does not define what they mean by co-housing. The Local Plan restricts co-living proposals due to concerns about housing quality and the impact on affordable housing.
R19.0158	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design	Better Archway Forum	Local society	This policy is of course vital given the concerns regarding global warming, but in monitoring planning applications we have seen two issues:  - Applicants who meet the required standards by providing only tiny windows, resulting in a G4S prison van appearance. High quality double or even triple glazing provides excellent insulation and the active frontage and eyes on the street should not be impeded by attempts to reach BREEAM standards on the cheap. - Applicants promise green elements to the scheme which never actually materialise. Green roofs are a classic example of this, for example at Archway Heights on the Archway Road. There is little benefit to be had from policy which is not or cannot be enforced, so whatever standards are required, there must be a way of ensuring that the promises at the planning stage are met.  Even the Evening Standard is reporting that to improve sustainability there needs to be a reduction in demolition of existing buildings. Inclusion of a requirement that the carbon footprint of demolition and rebuilding is included in any eco calculation would be result in more genuine carbon reduction rather than simple box ticking.  While there are areas in the borough which are specifically at flood risk, the floods in Blackstock Road and Upper Street have made it clear that with under investment by Thames Water, floods can happen anywhere in the borough and cause extensive damage and disruption. Sustainable drainage is imperative and should be required as widely as possible.	Not stated	The Local Plan has a number of policies which will ensure high quality sustainable design, which includes daylight and sunlight requirements as well as specific BREEAM standards. Policy G5 provides specific requirements for green roofs, including requirement for a maintenance plan.  Policy S10 promotes the circular economy which looks to reduce demolition and promote reuse of buildings.  Policies S8 and S9 provide detailed requirements re: managing flood risk and implementing sustainable drainage.
R19.0158	Strategic and Development Management Policies			Policy S7: Improving Air Quality	Better Archway Forum	Local society	Improvement of air quality is vital. The work carried out by Tufnell Park Parents monitoring walking routes to local schools and nurseries found that the only place which did not breach EU air quality standards was Dalmeny Park – a space surrounded by tall Victorian houses and full of mature trees. The situation is clearly very serious and for this reason, as well as encouraging walking and cycling, it will be important to reduce parking spaces as availability of parking prompts trips by car.	Not stated	Policy S7 provides detailed requirements to improve air quality. Policy T3 requires car free development.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0158	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Better Archway Forum	Local society	<p>We note point 5.2 protecting green areas. Given the vital role these play not just in providing health-giving greenery for residents but supporting insect and bird life and the wider eco system, it would be helpful to include in the recognised green spaces for example the smaller surroundings of community buildings like Caxton House, Harry Rice Hall, Hargrave Hall and other 'public' areas such as the space around schools, churches, in playgrounds and so on. Although not very clear, it does appear that the map of green spaces in the Plan does not include any of these, notably excluding the extensive garden downhill from St Joseph's on Highgate Hill. Given that this includes trees which are subject to TPOs this really should be shown.</p> <p>Given their importance ideally policy would require that new green spaces provided in developments be made over to public ownership to prevent for example play spaces only being made available to children living in privately owned accommodation. This would also ensure that the greenery could not then be clawed back at any later stage but becomes a permanent public benefit.</p> <p>Also useful would be to recognise the combined value of back gardens, for example between Whitehall Park and Harberton Road. Recognising the greenery as effectively one green space, rather than garden by garden, could offer greater grounds for refusing excessive extensions where a sustained programme of rear extensions can gradually erode what was originally a relatively significant area of greenery. Again, if this were to be shown on the map of green space that would be helpful.</p> <p>Point 5.2 states that loss of some green space 'may be acceptable where specific criteria are addressed'. This will be seized upon by any developer, whether appropriate or not. For this reason it is not helpful to include it. If genuine, LB Islington may obviously negotiate such a loss in exceptional circumstances.</p> <p>That greenery is of course important for managing heat risk and on point S6 Managing heat risk, it would be helpful for policy to actively require more trees, together with care for those trees in the first four years of life, ensuring that they are watered during what are increasingly hot summer months.</p>	Not stated	<p>GI includes a variety of spaces both designated and undesignated. Policy G2 provides further detail on the protection of GI. Policy G3 details when new public open space will be required. The Local Plan promotes tenure blind development and policy H5 and paragraph 3.95 state that access to communal space should not be restricted on the basis of tenure.</p> <p>Private gardens are defined as GI.</p> <p>Re: loss of green space, the Local Plan places a strong presumption against this, as set out in policy G2. The quote repeated by the respondent relates to open space on housing estates. The policy balances against allowing development which meets important needs, i.e. affordable housing, while ensuring that any loss is minimised and reprovided space is of a higher quality. The policy also requires other spaces such as car parks to be investigated in the first instance.</p> <p>Policy G4 has detailed criteria to protect and promote trees.</p>
R19.0158	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment; Policy DH3: Building heights	Better Archway Forum	Local society	<p>Point 8.55 of the draft plan includes a number of issues regarding tall buildings, not least wind blight and the Tall Building Study carried out for LB Islington noted that nowhere in the borough was suited to tall buildings so it is clear that there is considerable reason not to permit these. In addition we would highlight the report by Professor Philip Steadman of UCL on the very questionable sustainability of tall buildings. He finds that those above 20 storeys have a carbon footprint two and a half times those of six storeys or under - <a href="http://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results">www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results</a> and <a href="http://www.tandfonline.com/doi/full/10.1080/09613218.2018.1479927">www.tandfonline.com/doi/full/10.1080/09613218.2018.1479927</a> offer information on his research. This refers to office buildings. Professor Steadman says they also looked at residential buildings but without access to actual energy consumption data. However, a statistical approach again showed a steep increase in the intensity of energy use with height. The high energy cost is a particular concern for social housing where the cost of running the building must be paid for out of public money. Professor Steadman has also found that tall buildings are not the densest form of housing – see link above. Given that they are widely unpopular with potential tenants, there does not appear to be good reason to build them other than for private profit. We therefore believe Policy DH1 F, if kept, should be amended. Tall buildings do not make the best use of land because they do not optimise the amount of development on a site, and policy should make that clear so that planning decisions can be made in the light of that knowledge. We note also that tall buildings are particularly expensive in terms of maintenance so are liable to become much more run down than properties where maintenance is easier and more affordable. And of course they now require a great deal of investment in fire safety. Tall buildings do not appear to offer long term value, whatever the short-term return.</p>	Object	<p>The tall buildings study identified a number of locations which are suitable, in principle, for buildings over 30m. There is no convincing evidence on a heightened sustainability impact of tall buildings; regardless, a tall building must comply with various sustainable design requirements set out in chapter 6 of the Local Plan, and cross-referenced in policy DH3. We note that in certain circumstances, low-rise development can be high density, but this very much depends on site context. It is considered appropriate to allow development of tall buildings on certain sites to maximise development opportunities to meet identified housing and employment needs. Issues of maintenance and fire safety would be considered as part of any assessment of a tall building application, in line with policy DH3.</p>
R19.0158	Strategic and Development Management Policies			Policy DH2: Heritage assets	Better Archway Forum	Local society	<p>Recent reports by Savills show that pre 1900 buildings are particularly appreciated across London and neighbouring boroughs protect far more of their older building stock than Islington, generally with extensive Conservation Areas. Without more CAs than currently exist in Islington there is significant danger that many of the older buildings will be gradually lost, to the detriment of the borough as a whole. If more Conservation Areas are not considered desirable a blanket protection for pre 1945 or at least pre 1900 properties would be extremely helpful as these are not just attractive but generally offer highly flexible and dense, street-based housing. In terms of preserving specific buildings of interest, there has been an up-date of the Locally Listed buildings for the borough as a whole but this updated list does not appear to have been adopted as yet. It would be to the benefit of the wider built environment for that to be dealt with as a matter of urgency – as we discovered at the appeal regarding the Methodist Hall. A key feature of successful design in Islington is the importance accorded to the ground floor of buildings, which are generally taller than upper floors and more ornate. Without this feature, the part of the building most visible to the public looks compressed and 'mean'. A requirement to reflect that quality would be extremely helpful in ensuring decent quality new builds and would have the benefit of reflecting a successful element of earlier design.</p>	Object	<p>Blanket protection of buildings from a certain era is not justified. Conservation areas and listings exist to give heightened importance to specific areas and buildings - this is the appropriate avenue to give further protection. The update of locally listed buildings sits outside the Local Plan. Re: the response on ground floors, it is not particularly clear why this is being suggested. If the ground floor of a building has particular merit in design terms, this would be factored into any assessment of design.</p>
R19.0158	Strategic and Development Management Policies			Policy DH3: Building heights	Better Archway Forum	Local society	<p>In consideration of the Historic Environment we note the reference to contextual area. Given that in Archway developers use the existence of three tall buildings as 'context' to build more, we would suggest that the term should be 'wider contextual area'. The majority of Archway for example is not made up of tall buildings and planning decisions should be able to take into account the bigger picture which is predominantly 19th century terracing.</p>	Object	<p>Paragraph 8.53 provides clear guidance related to determining the surrounding context height re: tall buildings.</p>
R19.0158	Strategic and Development Management Policies			Policy DH6: Advertisements	Better Archway Forum	Local society	<p>The acknowledgement of the problem of advertising hoardings masquerading as phone kiosks is very helpful. Given the pressure to approve these it may be useful to make the position even firmer. In a borough where mental health is a significant concern it may be helpful to acknowledge that advertising is known to act as an additional stress to those with mental health issues, and of course is particularly so to those on low incomes.</p>	Not stated	<p>Comments noted. The policy is considered sufficiently detailed. Other Local Plan policies would allow for assessment of health impacts where a legitimate issue was raised.</p>
R19.0158	Strategic and Development Management Policies			Policy DH6: Advertisements	Better Archway Forum	Local society	<p>In terms of basement applications outside Conservation Areas it would be very helpful to also require that unless a lower ground floor / front area forms part of the original design, this will not be permitted because of the impact on the continuity of frontages and integrity of the neighbouring streetscape.</p>	Not stated	<p>The suggestion is overly onerous. Part B would allow for case by case assessment of such issues where there was evidence to demonstrate harm.</p>
R19.0158	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	Better Archway Forum	Local society	<p>Respondent welcomes support given to retail and other uses including pubs and other small businesses. Respondent also makes comment that specific uses that are to be supported should be stated instead of the name of the business.</p>	Support	<p>Support is noted. It is not clear what the suggestion is in relation to, as all planning policy works within the Use Class Order and not by specific business. Furthermore, retail uses are protected from conversion to residential uses in town centres, local shopping areas, and dispersed locations.</p>
R19.0158	Strategic and Development Management Policies			Policy R2: Primary Shopping Areas	Better Archway Forum	Local society	<p>Respondent is puzzled that the map indicates that Archway town centre primary frontage is not designated as extending down Holloway Road to the branches of Sainsbury's and Tesco's, but that there is a proposal that the retail frontages should extend up Highgate Hill, behind the Archway Tavern, where there would be no retail continuity. This makes no sense, particular as the creation of retail frontages on the Holborn Union site would have the effect of adding additional, unnecessary mass to a site where the proposed height of new buildings is already unpopular. The aim, especially in the current retail environment, should be to consolidate not dissipate the retail frontages, and the map should be adjusted to take account of the actual situation and extend the town centre down Holloway Road.</p>	Object	<p>The PSA does not include Tesco or Sainsbury's as it is not considered to be the core part of the TC. Re: the respondents other comments, we note that the PSA does not extend up Highgate Hill, nor does it include the Holborn Union (Archway Campus) site; both locations fall outside the TC.</p>

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R19.0158	Strategic and Development Management Policies			Policy DH7: Shopfronts	Better Archway Forum	Local society	The prevention of solid shuttering on shop fronts should be specified. Solid shuttering creates an intimidating townscape and can facilitate burglars by allowing them to enter the rear of the premises unobserved. Shops will also lose the promotional advantage of window displays at night.	Object	Policy DH7 specifies that shopfront design must 'enhance natural surveillance and activate the frontage'. The Islington Urban Design Guide SPD is also cited in the supporting text and will be used to assess shopfront proposals. The guide specifies security shutters must always be placed internally and comprise an open mesh or grille as solid shutters are unsightly, prevent natural surveillance, attract graffiti and obscure window displays.
R19.0158	Strategic and Development Management Policies			Policy R10: Culture and the Night Time Economy	Better Archway Forum	Local society	Archway cultural quarter designation is welcome, however, it should be clarified that the cultural offer here is more than the conventionally 'arty'. Such night time activities should terminate at midnight to avoid anti-social behaviour. Designating Archway Tavern as an active element of the cultural quarter may be helpful in prompting either a sale or arrival of a more capable manager to start running the building.	Not stated	The cultural quarter designation in Archway takes account of the range of cultural organisations in Archway that include music venues, theatres, film organisations, theatrical and design educational institutions, community hubs and artists' studios. The night time economy is defined in the London Plan as economic activity between the hours of 6pm and 6am and Policy R10 requires new cultural uses, particularly in Cultural Quarters to mitigate/prevent any adverse impacts on the amenity of surrounding uses. Part D of Policy R10 also states new night time economy uses must demonstrate there would not be significant adverse effect on amenity or function, particularly impacts on residential uses, which would consider the management of anti-social behaviour. Archway Tavern is included within the Archway Town Centre and Cultural Quarter designation so any future development of the Archway Tavern must complement the Cultural Quarter. The council does not have powers to force a landowner to bring a premises into use.
R19.0158	Strategic and Development Management Policies			Policy R11: Public Houses	Better Archway Forum	Local society	Respondent suggests it would be helpful to set out some examples of how to robustly demonstrate social value. Archway Tavern has been closed for so long there is no clientele, while the Whittington and Cat had its designation as an Asset of Community Value ignored by the owners.	Not stated	The policy gives some examples of demonstrating social value but it is not considered appropriate to give an exhaustive list in order to ensure flexibility. Although an ACV can have material planning weight, it is not a planning designation.
R19.0159	Site Allocations	KC1: King's Cross Triangle Site	King's Cross and Pentonville Road		CEMEX	Business	Reference to Cemex and the agent of change policy (DH5) should be made in the constraints and development considerations section to state that development will need to mitigate against the noise from this existing concrete batching plant site.	Not stated	It is not considered appropriate to use development considerations to protect a specific named business. Policy DH5 would offer strong protection without reference in site allocation.
R19.0159	Site Allocations	KC2: 176-178 York Way & 57-65 Randell's Road	King's Cross and Pentonville Road		CEMEX	Business	Reference to Cemex and the agent of change policy (DH5) should be made in the constraints and development considerations section to state that development will need to mitigate against the noise from this existing concrete batching plant site.	Not stated	Not considered appropriate to use development considerations to protect a specific named business. Policy DH5 would offer strong protection without reference in site allocation.
R19.0159	Strategic and Development Management Policies			Policy DH5: Agent-of-change, noise and vibration	CEMEX	business	<p>CEMEX welcomes the principle of the Agent of Change Policy contained in the draft submission plan, but CEMEX considers that the policy does not go far enough in addressing the particular issues faced by existing businesses and operations such as CEMEX which are considered to be existing noise generating activities – whether from the site operations or associated traffic. CEMEX has found in London and elsewhere in the country, that LPAs have not ensured that new developers, particularly for residential developments, adequately mitigate their developments from existing noise, vibration and emission's, despite CEMEX objecting to proposals on these grounds. Such mitigation may mean no opening windows or vents, no balconies and no sleeping or living accommodation overlooking or facing the site. The installation of mechanical ventilation may also need to form part of the new development close to such existing uses. Without LPAs ensuring proper mitigation measures are in place and implemented by developers for new sensitive developments, the then new occupants of such sites can threaten the closure of these sites under nuisance laws.</p> <p>Policy DH5 B describes new development being located close to sensitive uses – but does not reflect the fact that new sensitive uses may try to be developed alongside existing noise generating uses. Under the agent of change approach and in particular, this policy it is the developer introducing the sensitive use into the existing environment – and so if they require planning permission to be granted they should ensure that the users of their proposed development are properly mitigated from the existing noise environment of businesses such as CEMEX. As such Clause C and D need amending to reflect that the agent of change approach may be a developer trying to introduce a use into an existing environment – which needs to be mitigated to ensure that once occupied – the owners or residential tenants are not adversely impacted by the existing operations. Existing established businesses need to ensure that they are allowed to continue to operate. Paragraph 8.66 reflects the principle that new noise sensitive developments in proximity to an existing noise generating uses must follow the agent of change principle – but this to needs to be written into the actual policy to carry weight. This carries less weight when written as supporting text. As such CEMEX would like to see Policy DH5 changed to address this and have a clause/s which reflect more closely the draft Policy set out in the London Plan Policy D12.</p>	Object	The Council amended the supporting text in response to CEMEX's previous comments, including the addition of paragraph 8.87 to clarify how the policy wording would be applied. We consider that the policy addresses CEMEX's concerns.
R19.0159	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road	CEMEX	Other	CEMEX would like to see their site included within the CAZ boundary. Three of the four tall building sites identified in the policy neighbour the CEMEX site. In promoting these sites Islington should consider the existence of the CEMEX site and also the 'agent of change' policy, which may influence the use and design of any development on these sites. Figure 2.3 identifies the potential for improved connections in the vicinity of Randell's Road. Any improvements for cyclists and pedestrians must consider HGV movements associated with the CEMEX operations. CEMEX would like to be involved in any discussions regarding transport improvements around its site.	Not stated	The CEMEX site is protected for business use through Policy B3; extension of the CAZ is not considered to be justified, especially if it was to solely strengthen protection for one operator. Policy DH5 would apply to applications, there is no need to repeat in SP2; Policy DH3 also has a specific criterion requiring that tall buildings not prejudice the ongoing functionality of a local area. East to west routes are indicative and any new/improved routes would consider the existing road network and nearby uses to ensure efficiency and safety. Consultation would take place on any changes to the road network.
R19.0160	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road			Resident	The development considerations should state that any development should respect the amenity of Treaty Street to the north of the site, having consideration to the amplification of sound over water.	Not stated	Current allocation and policy wording would ensure adverse impacts of development on residents are mitigated/prevented.
R19.0160	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road		Resident	Policy SP2 part H should be amended to read 'access to the canal should be improved, although increased access must not cause detrimental impacts, particularly for biodiversity or for residents'	Not stated	Considered that other policies ensure adverse impacts of development on residents are mitigated/prevented and the suggested amendment is not necessary.
R19.0161	Strategic and Development Management Policies			N/A - general comment	Natural England	Statutory consultee	No comment	Not stated	Noted
R19.0162	Site Allocations	AUS11: Proposed Collins Theatre, 13 17 Islington Green	Angel and Upper Street		Theatres Trust	Campaign	Support the allocation and welcome that it refers applicants to the Theatres Trust.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Theatres Trust	Statutory consultee	Support the policy, especially Parts G, H, I and M	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Theatres Trust	Statutory consultee	We remain supportive of this spatial policy, in particular parts G., H. and I and M.	Support	Support noted.

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R19.0162	Strategic and Development Management Policies			Policy SP8: Highbury Corner and Lower Holloway	Theatres Trust	Statutory consultee	We are supportive of this policy and in particular the explicit reference within part E. to protecting the Garage and Union Chapel venues.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	Theatres Trust	Statutory consultee	Support the strong protection of existing facilities and venues through Part L to P. However, paragraph 4.80 conflicts with Policy R3 as the requirement to locate cultural and NTE uses to be within CAZ, Town Centres or Cultural Quarters is not present in Policy R3. Such inflexibility is inappropriate as theatres and other cultural uses can operate successfully outside of town centre locations, particularly at a smaller and community scale without compromising the viability of nearby centres. Text should be removed	Both	Policies R3, R9 and R10 all prioritise cultural uses in Town Centres and the CAZ, which are the boroughs primary commercial areas. The strong locational requirement in R1 and R10 reflects this. Other locations can still be justified by policy R3.
R19.0162	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Theatres Trust	Statutory consultee	Support the policy.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy R9: Meanwhile/temporary uses	Theatres Trust	Statutory consultee	Welcome amendment in line with Regulation 18 comment	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Theatres Trust	Statutory consultee	We previously wrote in support of this policy, this remains the case.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy R9: Meanwhile/temporary uses	Theatres Trust	Statutory consultee	We welcome that this policy has been amended in line with our previous recommendation.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy R11: Public Houses	Theatres Trust	Statutory consultee	We continue to support this policy.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy DH5: Agent-of-change, noise and vibration	Theatres Trust	Statutory consultee	We support this policy, and particularly welcome reference to Deeds of Easement being in place within part C.	Support	Support noted.
R19.0162	Strategic and Development Management Policies			Policy R10: Culture and the Night Time Economy	Theatres Trust	Statutory consultee	Support protections from loss this policy offers but is in conflict with Policies R3 and R9 as it restricts cultural uses to the CAZ and town centres, whereas other policies afford greater flexibility in certain circumstances. Policy should read 'should be located' or 'must be located.... unless the tests set out in Policies R3 or R9 are met', instead of 'must be located'. The policy could also undermine the objectives of policy R9.	Both	See response to policy R1.
R19.0162	Strategic and Development Management Policies			Policy R11: Public Houses	Theatres Trust	Statutory consultee	Support the policy	Support	Support noted.
R19.0163	Site Allocations	BC5: London College of Fashion, Golden Lane	B & C: Central Finsbury		University of the Arts London	Business	Pleased that the London College of Fashion site has been included as a draft allocation but would prefer the ability to promote a variety of uses on the site. Request that the allocation is amended to include residential and hotel uses as acceptable alternative uses to office development. The allocation does not refer to the possibility of increasing the height of the existing building. It should be amended to state that any increase in height or massing would require a thorough assessment to ensure there are no major adverse impacts on surrounding heritage assets.	Both	To meet Islington's need for 400,000sqm business floorspace, business use has to be prioritised in appropriate locations such as this. Residential and hotel uses are not appropriate alternative uses in line with relevant AAP policies and objectives. The site is locally listed and within the setting of a variety of heritage assets; the allocation for refurbishment with sensitive infill development on the undeveloped part of the site is therefore considered appropriate.
R19.0163	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	University of the Arts London	business	Previous representations have been taken into account to the extent that the supporting text has been amended to include higher education institutions in the list of organisations that may seek to justify a loss/reduction in social infrastructure as part of an estates rationalisation programme. UAL do not consider this provides sufficient comfort as they do not fall under the generic public sector definition and request that the wording of policy SC1 Part D(iii) is amended to include specific reference to higher educational/university institutions.	Not stated	It is considered the amendments made to date provide sufficient flexibility.
R19.0164	Site Allocations	VR2: 230-238 York Way	Vale Royal/Brewery Road LSIS		Nexcon Solutions Ltd	Landowner	Consider the strings attached to the site allocations are indicative of an ever more restrictive policy regime which will make future good management of their site more difficult and increase the possibility of 'bad neighbours'. The development considerations in the allocations are not flexible enough in terms of use class or building heights and should be amended.	Object	The loss of industrial floorspace experienced in Islington is significantly above benchmark release figures, as set by the Mayor in the current London Plan and supporting guidance. The Vale Royal / Brewery Road LSIS is under significant development pressure to deliver office floorspace. Such development could seriously harm the area's primary economic function and could lead to the deterioration and gradual loss of industrial uses in this area. The introduction of B1 space is permitted, when provided as part of a hybrid workspace scheme, but it must constitute a small proportion of the overall proposal. The Council recognises the employment potential from B1 development, which is why B1 is strongly encouraged in the CAZ, Priority Employment Locations and Town Centres. The council's approach is supported by the Mayor, and is considered to be in line with the draft London Plan.
R19.0164	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Nexcon Solutions Ltd	Landowner	The area is not "sensitive" from a visual impact or townscape perspective but represents a highly sustainable location to optimise redevelopment opportunities, and so should not be subject to an unjustified and mechanistically-applied blanket policies (including those on height).	Object	<p>The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.</p> <p>The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this.</p> <p>Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits.</p>

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R19.0164	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Nexcon Solutions Ltd	Landowner	The strengthening of policies will fetter their future ability to develop at this location, or indeed to raise secured finance on normal commercial terms. Respondent provides information and context re: the LSIS and industrial uses. It is clear from both the Council's own evidence base and the Mayor's emerging London Plan that protecting appropriate land for industrial and warehouse uses can be justified. However, it is equally clear that a rigid and inflexible preservation of the LSIS for solely industrial and warehouse uses without any flexibility would completely disregard the recommendations of the Council's own evidence base, and would fail to comply with the Mayor's objective to make more efficient use of land through the co-location of industrial activity with other uses. As currently drafted Policy SP3 of the draft Islington Local Plan therefore fails to recognise the fundamental shift which has already taken part in this part of the LSIS, despite the observations of its own Study. In this context, my clients support the recommendation of the Study, (and draft London Plan) that there should be no net loss of industrial floorspace within the LSIS. However, the consequence of draft Policy SP3 (parts C and D), which presume against the introduction of additional office space, would serve to artificially limit potential future growth and prosperity, to no good planning purpose. A more appropriate policy framework (for the southern part of the LSIS) would seek the retention of the existing amount of industrial and storage use (based on quantitative floorspace), but with a flexibility to enable the introduction of B1 business floorspace (including offices), as part of mixed-use developments that would enable the more efficient use of land in accordance with sustainable development objectives. My clients therefore object to Policy SP3 as currently drafted	Object	The Council's Employment Land Study (2016) provides a detailed analysis of the character and function of the Vale Royal / Brewery Road LSIS. It provides commentary on the uses, building typologies, and occupants and notes that much of the LSIS is industrial use. There is B1 accommodation within the LSIS, however, it is evident that the primary economic function is industrial. The Council rejects the idea that there has been a fundamental shift to B1 use in the LSIS. A restrictive approach is needed to safeguard the most significant remaining industrial area in the borough. The GLAs conformity response highlights that this approach is consistent with the draft London Plan.
R19.0165	Site Allocations	VR1: Fayers Site, 202-228 York Way, 22-23 Tileyard Road, 196 200 York Way	Vale Royal/Brewery Road LSIS		Big Yellow Self Storage Company Ltd	Landowner	Support the explicit references in VR1 to the acceptability of class B8 uses within the LSIS. VR1 states that building heights should not exceed five storeys. There is no townscape assessment to evidence this assertion, but even if there were it is unclear how such an assessment could come to the conclusion that an arbitrary height restriction is justifiable.	Both	Support for B8 use noted. The height restriction of five storeys is informed by a detailed urban design study and gives significant opportunity for intensification of uses given the prevailing height is lower. This is a plan led approach operating in conjunction with policy DH3. Development exceeding these heights could create a canyon effect due to narrow street profiles and could weaken the industrial character and negatively impact upon historic buildings.
R19.0165	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Yellow Self Storage Company Ltd	Landowner	The respondent supports the aim of policy SP3 to retain and intensify land for industrial uses (B1c, B2 and B8), particularly the acceptability of B8 uses within this LSIS.	Support	Support for retention and intensification of industrial uses (particularly B8) in the Vale Royal/Brewery Road LSIS noted.
R19.0165	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Yellow Self Storage Company Ltd	Landowner	As a result of the increase in residential schemes on the surrounding area (e.g. Maiden Lane), the respondent has identified a growing demand for both self-storage space and flexible office space within the proximity of the Fayers site. In relation to hybrid space, the respondent states that it has a track record of integrating flexible office space that is distinct but connected to their self-storage facilities, generally speaking of ranges from 10-50sqm.	Not stated	The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. See the employment topic paper for further discussion.
R19.0165	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Yellow Self Storage Company Ltd	Landowner	There is not townscape assessment assertion from the LSIS Height Study to impose a height limit of 20m as per reference in para 3.1.(1). Nonetheless, the respondent recommends to incorporate para 2.36 from the SDM DPD to part E of SP3, to clarify that a subjective townscape analysis will be adopted for the area.	Not stated	The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on a number of factors including a townscape analysis and a review of existing planning sensitivities. The study is a relevant evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.  The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of uses, given that the prevailing heights in the area are generally lower than this. Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell's Road Bridge to the clock tower on Market Road. The council therefore considers that the height restrictions are justified on this basis, as they will ensure design and land use benefits. The suggested amendment to Part E is not considered necessary;
R19.0166	Site Allocations	NH7: Holloway Prison, Parkhurst Road	Nag's Head and Holloway		Department for Education	Statutory consultee	NH7 refers to delivering significant residential capacity, which may generate school place demand. It may be useful to include within the development considerations that where there is a need for school places brought about by a proposed development, the development must contribute towards the provision of those places.	Not stated	School place planning work was carried out in conjunction with the EFA and the Council's education department, to inform the development of the Holloway Prison site; this suggested that there is sufficient capacity within Islington's existing school estate to accommodate any children moving to the area as a result of the development. The IDP provides further detail on education infrastructure.
R19.0166	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards; Policy S4: Minimising greenhouse gas emissions	Department for Education	Statutory consultee	In the context of the need to maximise value for money in education spending and make efficient and effective use of public funds, we question if a requirement for schools to achieve BREEAM 'Excellent' rather than 'Very Good' is justified; and note that elements of S4 may be challenging to meet. The policy should reflect some flexibility in relation to school and community buildings, especially in regard to expansions of existing buildings.	Object	It is important to maximise sustainable design standards, and it is therefore not considered appropriate to create exceptions for certain types of use. Case-specific material considerations (including viability) may justify lesser standard where a new school is proposed.
R19.0166	Strategic and Development Management Policies			Policy G3: New public open space	Department for Education	Statutory consultee	Concern over the requirement for open space as it could apply to new schools. Schools have a number of issues with providing publicly accessible open space.	Object	The policy would apply to schools but issues regarding public accessibility in terms of the impact on safeguarding and security could be a material consideration on individual applications. SC1 Part F could apply in terms of bespoke community use agreements.
R19.0166	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Department for Education	Statutory consultee	The policy should require that new developments which generate additional school place demand have to contribute towards meeting such demand. This includes on-site provision or financial contributions secured through CIL/planning obligations.	Not stated	It is not necessary to amend the policy to refer directly to school places - the existing wording supports the provision of new social and community infrastructure subject to assessment against relevant Local Plan policies. The policy also states that social infrastructure will be funded through CIL and/or planning obligations as appropriate.
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request to add minor amendment which clarifies that developer contributions may be secured retrospectively when it is necessary to forward fund infrastructure projects in advance of housing growth.	Object	The Council will add a sentence to paragraph 9.4 via a modification to the Local Plan.
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request that as a matter of soundness more explicit reference is made to seeking education contributions in case of changing circumstances and a policy requirement for offsite contributions from all sites which do not provide an on site school where there is insufficient school capacity to absorb the demand created by the school is added.	Object	The Council has a CIL charge and this would be the mechanism by which the Council would mitigate impacts of unmet school place demand were to arise.
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request that as a matter of soundness more explicit reference is made to seeking education contributions in case of changing circumstances and that where on site schools are required that the free transfer of land to the council and necessary construction costs is made clear.	Object	The evidence base set out in the Infrastructure Delivery Plan does not support the possibility that a new school will be required in the borough therefore this detail is not considered appropriate or necessary.
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request that as a matter of soundness more explicit reference is made to seeking education contributions in case of changing circumstances and that clear references to the funding mechanism to be applied, either S106 or CIL, is made as well as cross references to the evidence that justifies whichever approach.	Object	Explicit reference will be added in the supporting text via a modification to the Local Plan which will make clear that should future demand for schools exceed supply then infrastructure costs will be sought through CIL contributions



Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0167	Site Allocations	OIS12: 202-210 Fairbridge Road	Other Important Sites		Dominvs Group	Landowner	Consider that the site allocation should be withdrawn as the site has planning permission and development is due to commence. If it is retained the allocation should be amended to ensure maximum flexibility of the floorspace in future so as to avoid unnecessary vacancy periods, and not be restricted to the prioritisation of business floorspace only. The timescales set out in the allocation are inaccurate - the scheme will be delivered by 2020/21.	Object	The site is in a Priority Employment Location so intensification of business floorspace is considered to be an appropriate allocation. Residential use can be delivered as per the extant planning permission but it is appropriate that any revised or new proposals submitted should be subject to updated policy requirements which reflect updated evidence. The timescales given in the DPD reflect the council's expectation that the site will be developed in the first five years of the 15 year plan period, which is supported by the representations.
R19.0167	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Dominvs Group	Landowner	Para 4.41 of policy B3 indicates that proposals for non-business uses should demonstrate that proposed non-business uses are compatible with existing uses and do not impact on the economic function of the wider area. If marketing period criterion is met, as permitted by B3 (B), this will contain residential uses on upper floors. Therefore, the site allocation should not be restricted to the prioritisation of business floorspace only.	Object	The consideration of non-business uses in the area through exceptional circumstances should not define the character or the priority uses of the area. As per described in criterion (ii) of the policy, proposals will need to demonstrate that the loss of business floorspace -either individually or cumulatively- would not compromise the operation of the wider area, and that proposes non-business uses are compatible with existing uses.
R19.0167	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Dominvs Group	Landowner	The policy (B3) wording "other business uses as a potential option" needs to be accompanied by a definition of what other business uses constitute and should be widened to include D1 in locations such as this, where there is a prevailing mix of uses, including residential.	Object	The policy will assess the introduction of other business uses on a case-by-case basis, to ensure that exceptional circumstances for provision of other business floorspace are supported by robust evidence and that the context of the site has been considered. D1 uses would be assessed by policy SC1.
R19.0167	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Dominvs Group	Landowner	Criterion in policy B3 (C ) is too inflexible and restrictive in terms of potential future uses, depending on site specific circumstances. The respondent suggests that the policy should include a pathway to alternative uses other than industrial via vacancy and marketing evidence because industrial space that is not taken up could remain vacant for long periods.	Object	The employment topic paper provides further discussion on the importance of protecting industrial floorspace. It is noted that the Mayor of London suggested the specific addition to protect industrial uses, to ensure consistency with the London Plan.
R19.0167	Strategic and Development Management Policies			Appendix 1: Marketing and vacancy criteria	Dominvs Group	Landowner	Part 4 of Appendix 1 should not include the words "The examples provided are not an exhaustive list." because this means that the policy is not clear and concise in line with NPPF para 16 (2019 version).	Object	The appendix provides very detailed examples, but allows for flexibility and is considered clear.
R19.0168	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets. Overdevelopment will blight residents' physical and mental health, and put much of Burnhill House into fuel poverty.	Object	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent. The impact of any development on residential amenity should be assessed as part of the planning application process.
R19.0169	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.	Object	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
R19.0169	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury		Resident	States that AAP policy BC7F does not comply with NPPF Policies 96 and 97 due to the loss of open space, sport and recreating facilities. Also states that the additional housing is not required in accordance to the Bunhill and Clerkenwell Urban Design Study 2010 page 45.	Object	BC7 reflects the site allocation which requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent. The 2010 study referred to development quantum and targets at the time. There have been significant changes to population and development projections in the intervening decade, which renders this part of the study obsolete, certainly for the purposes of the draft Local Plan which looks ahead to 2036.
R19.0170	Site Allocations	ARCH6: Job Centre, 1 Elthorne Road	Archway		Gladquote Ltd	Landowner	Supportive of the site's inclusion in the allocations but concerned with the allocation for business-led mixed-use development. Archway Town Centre has an over-provision of financial services and above average provision of retail and leisure services as set out in the Islington Retail and Leisure Study (2017). Given this overprovision and the site's location within a predominantly residential area, the allocation should be amended to exclude business uses and require residential-led development. The site ownership details are incorrect. The site should also be considered an appropriate location for a tall building given its high PTAL rating; limited topography constraints; it is not in a conservation area; it is not listed; and it does not fall within protected vistas or strategic views. Suggests that allocations should provide an indicative minimum development capacity.	Both	Amend the ownership details via a modification to the Local Plan.  The site is in existing employment use in a commercial area and given the demand for business floor space, the allocation is appropriate. The potential tall building sites have been informed through a detailed study, which did not identify ARCH6 as suitable for a tall building over 30m. Any taller building less than 30m will be subject to policy DH3. Impact on adjacent properties will be considered. The council's capacity assumptions for each site will be published, but have not been included in the individual allocations as they are not precise figures but rather theoretical assumptions used to inform policy development. Further discussion on the approach to tall buildings is provided in the topic paper.
R19.0170	Strategic and Development Management Policies			Policy SP7: Archway	Gladquote Ltd	Landowner	Gladquote Ltd considers this policy to be restricting and inconsistent with national and regional policies that seek to significantly boost the supply of new homes. Gladquote Ltd request that the policy is amended to allow for increased flexibility when considering sites for residential-led redevelopment. It is requested that a design led approach is employed when considering proposals for residential led schemes. Paragraph 59 of the NPPF sets out the Government's objective of significantly boosting the supply of homes. Paragraph 85 of the NPPF lists housing as a suitable use to aid in promoting the long-term vitality and viability of town centres. Residential uses in town centres is further supported by National Planning Practice Guidance which recognises residential development can play an important role in ensuring the vitality of town centres. Draft London Plan Policy H1 states that boroughs should 'optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites within existing of planned public transport access level 3-6 or which are located within 800m distance of a station or town centre boundary'. It is considered that the site is an appropriate location for a residential/residential-led mixed-use development.	Object	The Council have considered all development needs when formulating the Local Plan and can demonstrate that housing targets will be met without compromising commercial areas. The approach is consistent with the NPPF and the London Plan (the latter having been confirmed by the Mayor in his conformity responses)
R19.0170	Strategic and Development Management Policies			Policy DH3: Building heights	Gladquote Ltd	Landowner	1 Elthorne Road is considered to be an appropriate location for a tall building over 30 metres given the several noted characteristics of the site.	Object	The site is not considered suitable for a 30m+ building. The tall buildings topic paper provides further discussion on the justification for the Local Plan approach to tall buildings.
R19.0170	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Gladquote Ltd	Landowner	Respondent requests 1 Elthorne Road should be removed from the Archway Town Centre boundary as its inclusion is unsound and is inconsistent with para 85b of the NPPF and new London Plan policy SD7 part B. The Employment Land Study 2016 identifies this part of Archway Town Centre retail gives way to other uses, including D1 and C3 uses. The surrounding context of 1 Elthorne Road comprises residential use and other non-retail/commercial uses, as such the site holds limited economic and social value.	Object	1 Elthorne Road that includes existing main town centres uses, is suitable for redevelopment for main town centre uses, and is located in close proximity to a range of main town centre uses on Holloway Road. This would suggest that its continued inclusion within the town centre is justified. Policy R3 is in line with paragraph 85b of the NPPF as the extent of town centres and primary shopping areas has been made clear and represents a positive strategy to providing space for retail, leisure and cultural expansion.
R19.0171	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Hondo Enterprises	Business	Note that policy sets strategic objectives for B & C area and that AAP sets out policies. Further comments provided on these.	Not stated	Comments noted.
R19.0171	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Hondo Enterprises	Business	Support for the main objectives of Policy G1.	Support	Support noted.
R19.0171	Strategic and Development Management Policies			Policy G2: Protecting open space	Hondo Enterprises	Business	Policy G2 should recognise that some development on open space can have an important role in enhancing the use and function of that space.	Not stated	Given the shortage of open space in the borough, the limited opportunities to provide new open space, and the projected population increases, the Council places a high priority on the protection of all open space from any development. Open, green, unbuilt land is in very short supply in the borough and has a very high value to the public.
R19.0171	Strategic and Development Management Policies			Policy G3: New public open space	Hondo Enterprises	Business	Support for the objectives of Policy G3 part C which require new public open spaces to accommodate and encourage physical activity for all, promoting walking, cycling, and social interaction.	Not stated	Support noted.
R19.0171	Strategic and Development Management Policies			Policy G3: New public open space	Hondo Enterprises	Business	Regarding Policy G3 part B should require an assessment of the quality, flexibility, and usability of open spaces so that their use and capacity can be maximised. Spaces should not only cater for limited groups. The SDM policies should favour delivery of multi use open space.	Not stated	Paragraph 5.19 states that: (open space must be) "designed and managed to meet diverse and changing needs for play, recreation and leisure for all ages, and a productive ecology"

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0171	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Hondo Enterprises	Landowner	The prioritisation of office floorspace within this area is supported but it should be acknowledged that other ancillary commercial and community uses are required to support the economy and create a sense of place. The respondent suggests that a flexible approach is applied to supporting uses/multi-use schemes which include office floorspace.	Both	The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional office floorspace up to the year 2036. The development of business floorspace is therefore a key priority. However the Council acknowledges that certain uses support office uses, particularly in the CAZ and a proportion of floorspace is permitted for supporting uses. The supporting uses will often provide services for office workers, like cafes and shops, and will provide active frontages to the ground floors. In addition sites have been allocated for visitor accommodation in the Site Allocations and the draft Local Plan supports the intensification of existing visitor accommodation. The development of retail / leisure uses are to be directed to Town Centres and Local Shopping Centres. Residential development is not a key priority for the CAZ.
R19.0171	Strategic and Development Management Policies			Policy B2: New business floorspace	Hondo Enterprises	Landowner	The respondent supports the flexible workspace typologies introduced by policy B2.	Support	Support noted for the flexible workspace typologies in policy B2.
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Hondo Enterprises	Business	Supportive of policy B2 as it is flexible and allows employment floorspace to respond to market demands.	Support	Support noted.
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Hondo Enterprises	Business	Support element of policy related to Finsbury Square improvements.	Support	Support noted.
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Hondo Enterprises	Business	In line with previous representations part B of BC1 sets and inflexible and prescriptive office space contribution. The policy wording has not changed since the last consultation and is still too prescriptive and does not afford any flexibility for changing market demand. Strongly suggest that BC1 is amended to provide more flexibility. The limited circumstances set out in part D are still too restrictive.	Object	The policy allows a small proportion of other uses on site, 10% in the City Fringe Opportunity Area, and 20% in the rest of the AAP area. This allows a range of uses, particularly on the ground floor, to support the business uses and to support the vitality and viability of the area. The Council believe that this balance of uses is appropriate given the importance of office floorspace to the borough, the employment cluster including Tech City and the strategic function of the CAZ, while still retaining vital and viable urban environments.
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Hondo Enterprises	Business	Part J of BC3 is supportive of the improvement of Finsbury Square subject to no net loss of open space.	Not stated	Correct.
R19.0172	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.	Object	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
R19.0172	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury		Resident	States that AAP policy BC7F does not comply with NPPF Policies 96 and 97 due to the loss of open space, sport and recreating facilities. Also states that the additional housing is not required in accordance to the Bunhill and Clerkenwell Urban Design Study 2010 page 45.	Object	BC7 reflects the site allocation which requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent. The 2010 study referred to development quantum and targets at the time. There have been significant changes to population and development projections in the intervening decade, which renders this part of the study obsolete, certainly for the purposes of the draft Local Plan which looks ahead to 2036.
R19.0173	Site Allocations	OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road	Other Important Sites		JPA Investments	Landowner	Consider the allocation should be amended to allow mixed use development including flexible commercial units (B1/B8) and state that residential use is acceptable where there is no net loss of business floorspace.	Object	Previous unsuccessful permissions are not a valid reason to preclude inclusion within an employment designation. The Employment Land Study has identified a need for 400,000sqm of additional business floor space by 2036 and Islington has a strong track record of delivering its housing target. Therefore, the suggestion is not appropriate.
R19.0173	Strategic and Development Management Policies			Policy B2: New business floorspace	JPA Investments	Landowner	The respondent suggests that residential uses are recognised in PELs and to remove restrictions contained in policy B1 (A), criterion (iii) for residential uses. The respondent considers that employment land outside the CAZ should encourage and capitalise opportunities enabled by residential-led schemes to meet Islington's growing employment needs. The response includes reference to recommendations made by the council on historic planning applications between 2016-2017 on employment designated sites outside the CAZ at Hornsey Road and Fairbridge Road; and makes reference to recommendations contained in the London Plan policy E7 and Islington's ELS (2016) on recognising mixed-use development. In addition, the respondent states that Islington has sufficient employment floorspace capacity according to the London Employment Sites Database which identifies additional 24,100sqm up to 2041.	Object	<p>The ELS (2016) found that in the period 2014 to 2036, employment in Islington is set to grow by 50,500. This employment growth is expected to be in the professional and technical services sectors, which generate demand for office space. To meet this demand, the ELS, identified a target of 400,000sqm of office space, up to the year 2036. The employment topic paper provides an up-to-date picture of supply, but it is noted that the current permitted pipeline does not come close to meeting this quantum.</p> <p>Policy B2 is consistent with both the current and emerging London Plan, including policies E1 and E4 of the draft London Plan.</p> <p>The respondent refers to LESD, which identifies the pipeline of sites for employment. Taking the respondents figures at face value and comparing them against projections would suggest that Islington has, at most, around 6-7% of the necessary floorspace to meet jobs projections. This demonstrates a highly constrained supply / demand balance which is also evident in the council's own evidence, and reinforces the need to retain and intensify existing business sites for business use. For clarification, the London Borough of Islington is not neighboured by the London Borough of Tower Hamlets.</p> <p>In terms of housing delivery, Islington has a strong track record of high levels of housing delivery and will comfortably be able to deliver its housing target without relying on delivery through the release of existing business sites, including this site. The respondent refers to the housing need figure from the 2016 SHMA, but this is not a housing requirement figure (i.e. target). Such figures are arrived at through further assessment of capacity to meet the overall need. In Islington, this exercise has been done as part of the London SHLAA. In terms of meeting future housing projections, demonstrating five year supply, etc, it is the target not the need figure that applies. We note that Islington's housing target has reduced significantly in the draft London Plan, The applicant places great emphasis on a single year of past under-delivery in order to amplify the importance of housing on this site, but we note that Islington have met and exceeded housing targets in all but one year since targets were introduced; we can also demonstrate a healthy five year land supply.</p> <p>Previous unsuccessful permissions are not material in terms of plan-making.</p>
R19.0174	Site Allocations	FP5: 1 Prah Road	Finsbury Park		London Centric Ltd	Landowner	Part A of response concerns allocation FP5. Respondent provides a lot of background information and a novel analysis of small sites in the area which they consider supports the view that commercial allocation has stopped smaller sites coming forward. Although the revised allocation is more streamlined, with less varied uses, it is not practical to deliver. The allocation should state that the existing land uses are sui generis on the ground floor (not 'sui generis main town centre uses') and residential above. Purely commercial, or commercial-led schemes with some residential use, are not viable at this small site. Suggest that a purely residential scheme would be viable, or a large HMO/build-to-rent type scheme could viably provide a small component of SME workspace. Concerned that the inappropriate land use allocation will render the site un-optimised and undeveloped throughout the Plan period.	Object	This site is discussed in detail in the Site Allocations Topic Paper.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	Background info on landowner, site and context.	Not stated	Comments noted.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	We agree with Part A, that Islington needs to be a place that supports a range of different incomes, tenures and backgrounds, as this contributes the London Mayors fulfilment of widening housing choice (Policy, 3.8 of the Adopted London Plan, 2016), however, we feel that this policy is undermined in later policy chapters which seek to prioritise the provision and role of self contained housing over other housing type tenures for all sects of society (in Policy H7: Meeting Needs of Vulnerable People and the restriction placed on Purpose Built Private Rental Sector development as not being allowed or recognised as being a priority over self contained accommodation, Policy H11). Self contained housing caters for some people better than others, and, there are a range of wider housing needs that should be taken into account such as those living alone, wanting flexible lease types or business visitors seeking mid to longer term flexible leased accommodation.	Object	This is discussed in the housing topic paper.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	Under Part B, that the Council is committed to providing conventional housing that meets identified needs, however, there are wider housing needs which remain totally undetected such as those needing interim accommodation (i.e. sofa surfers -a lost generation) and new comers to London who all need spaces that are fit for purpose, affordable and unconventional. This concept of private sector rental accommodation should also be reflected in Part K, as it asserts the need for conventional housing to meet the needs of people throughout its lifetime, but what about the need for non-conventional housing as a product to meet the needs of people throughout their lifetime?	Object	This is discussed in the housing and specialist housing topic papers. We note that the needs of 'sofa surfers' is encompassed within the London SHMA and Islington SHMA, through consideration of concealed and sharing households; therefore it has been considered as part of the process of arriving at the council's proposed housing requirement figure.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	The Council is committed to meeting and exceeding the Borough's minimum housing target as set out in the London Plan; however, we ask that better acknowledgment is taken into account on the role that the Build to Rent or HMO sectors play in helping to tackle the housing problem and going some way to help tackle housing targets.	Object	This is discussed in the housing topic paper.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	The Council support's high density housing development under Part C of the Policy, and to some degree do agree that proposed developments which could result in the reduction of land supply expected to be suitable for conventional housing, would otherwise be refused. However, in the latter scenario we ask that Islington acknowledge that in providing a housing solution that wider notions of housing delivery, other than conventional forms, be officially considered, as they too help to deal to abate the Housing problem	Object	This is discussed in the housing and specialist housing topic papers.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	Part D discusses how new homes should be "made adaptable over their lifetime" to accommodate changing needs, we disagree, as free movement and market choice are also in a position to offer what people need in different moments of time (i.e. extra care accommodation is able to meet the needs of the elderly under a C2 or HMO type uses, and/or, co-living housing for single people wishing to take advantage of the social benefits of living with other singletons, under HMO or build to rent building typologies). Islington need to better acknowledge this fact in this Policy as well as other policies in the plan (namely the role of non-self contained accommodation in meeting housing needs for vulnerable older people under Policy H7, people in need of supported housing under Policy H9 and better prioritising the role of shared and non self contained accommodation may play in the market in delivering purpose built private rental sector development, under Policy H11).	Object	This is discussed in the housing and specialist housing topic papers.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	Whilst we are happy to see Under Part S the retention of social and community infrastructure we would request that Islington fully takes account that private clubs come under a Sui Generis use, which would not render them as being a D2 use (Assembly and Leisure).	Object	Amendment is unnecessary. The role of the plan is not to spell out a variety of use class definitions. That said, private clubs are akin to leisure uses and would be classed as a SG main TC use.
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	London Centric would prefer that the Policy wording in key parts takes into account the following: i) Under Part F (tenure split) London Centric would prefer that Islington better acknowledge that in some instances there should be better leeway to allow for a "private: intermediate" housing tenure splits, where it is not possible to provide social rent on site, if physical site constraints make it almost impossible to deliver all three tenures in one project, due to design restrictions and scheme viability problems. ii) Part E (affordable housing target) be amended and the Policy justification reworded so as to take account of the fact that the affordable housing target of 50% remains a target aspiration, but, that cases will be determined on a case by case basis, where scheme viability will dictate what is actually achievable (as supported by the London Plan, 2016). iii) London Centric are particularly unhappy that Policy N, seeks to resist the prospect of Purpose Built Private Rented accommodation. This is too restrictive and does not allow for a diverse housing supply with adequate choice. This would also restrict smaller developers from helping to contribute to abating the wider housing problem, there is a growing demand for PSR products, which can satisfy an affordable housing element, if agreed with the developer (i.e. below market rent options). iv) We are disappointed to see that under Part Q that largescale HMO's, such as co-living schemes will be refused as they are not considered to make the best use of land and undermine efforts of affordable housing and other land use priorities of the Plan. This is because the Council's view of "best use of land" may be in conflict with the market's ability to provide its "best use of land" at the time. London Centric are keen to promote a Co-Living, HMO scheme in the context of considering an affordable rent for units or rooms and in the form of "cluster flats", high quality accommodation.	Object	The proposed amendments are not considered appropriate. The Council's approach re: tenure split, affordable housing, purpose built PRS and large-scale HMOs are discussed in the housing topic paper. Viability testing of policies is discussed in the viability topic paper.  While market demand/trends is a factor in determining policy, planning is the regulatory system by which sustainable development is sought therefore it is simply not possible to let the market determine the best use of land .
R19.0174	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	London Centric Ltd	Landowner	Whilst London Centric support the need to protect and promote new and existing conventional housing, we do think that Islington are short-sighted in that wider housing products in the form of co-living, Build to Rent or sui generis HMO schemes do help to tackle the housing problem. This is by widening housing choice, fulfilling a specialist need (a specific "time of life" requirement for "economical", small-spaced living), which, if designed to a good standard, can offer the opportunity for an affordable housing product (in a private sector context). More specifically, we support: i) Islington's aim to exceed the housing target of 7,750 units by 2028/2029, which equates to an annualised target of 775 per annum. ii) That Islington promotes the optimisation of sites; however, we ask that building height and scheme viability be used to help justify raising the density of some sites, this is on enabling development grounds especially. This is especially important for town centre or near to town centre sites such as 1 Prah Road, with local heights reaching over 5 storeys should allow for new proposed developments to reach similar heights. London Centric disagree that: i) Under Part C the loss of existing self contained housing will be resisted unless, at least an equivalent floorspace is provided; especially in the light of proposals satisfying wider Local Plan objectives and being seen as widening housing choice and fulfilling a specific need for non-conventional housing, and in offering Londoners alternative affordable residential products. ii) Under Part D, we would ask that the housing mix priorities as referred to in Table 3.2, better appreciate the role that site area, physical site constraints and scheme viability play in the delivery of these aspirations. That Table 3.2 be understood as an aspiration, which should be adopted flexibly on a case by case basis so long as market evidence justifies a departure from the preferred housing mix and scheme deliverability/viability to allow for this departure. iii) Under Part F that Studio or bedsit units be better tolerated if market evidence dictates this is what the market wants, regardless of whether the "exceptional circumstances" apply. Moreover, that Studio or bedsit accommodation be considered as part of helping to tackle the housing problem as previously stated.	Object	These issues are discussed in the housing topic paper. Policy DH3 restricts buildings over 30m to certain locations but has criteria to assess tall buildings below this height; in principle this could allow buildings over 5 storeys.  The council considers that, generally, studios/bedsits are not a sustainable form of accommodation and therefore do not constitute the best use of land. The policy provides reasonable criteria to assess suitability.
R19.0174	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	London Centric Ltd	Landowner	In relation to the need to deliver Genuinely Affordable Housing (Part A of the Policy), we ask that: i) The 50% target be treated as an aspiration, which, if it may be demonstrated this is not deliverable, that the appropriate level of affordable housing be provided.	Object	This is discussed in the housing and viability topic papers.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0174	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	London Centric Ltd	Landowner	<p>London Centric is unhappy to learn that: i) Under Part B that for sites capable of delivering 10 or more conventional housing units/and or look to provide 1,000 sqm (GIA residential floorspace or more)-exception of full or part public ownership) - that a 45% on site provision is desired, without public subsidy; while a 50% provision is required with public subsidy. We would like some acknowledgement that some developers may find it hard to access public funds, and, to better understand the problem site constraints may have in delivering these exceptionally high affordable housing targets, as well as the role scheme viability plays in satisfying these affordable housing thresholds.</p> <p>ii) Under Part F, that any proposal not looking to provide the minimum affordable housing level of housing as listed in part B, will be refused. This is very restrictive and will stifle the speed at which homes will be brought forward. This goes against national guidance which is seeking to speed up housing delivery, adopting policies that are properly justified, and will strangle the prospect of smaller developers trying to grow and reduce the over dependence of house building from major builders. This is unrealistic.</p> <p>iii) London Centric finds it unacceptable to learn that under Part G, that site specific viability information will only be accepted in exceptional circumstances, determined by the Council. How can a council develop blanket policies which are not sensitive to market forces (which are liable to flux) be allowed to dictate the future development patterns on a purely policy driven process? This is not realistic or supported by adopted national or regional planning guidance (NPPF, 2019 and The London Plan, 2016).</p> <p>v) Under Part H, (tenure split) it is evident, Islington have put forward a requirement for a 70:30 affordable housing tenure split (social rent: intermediate). London Centric require that Islington better acknowledge that in some instances there should be better leeway to allow for a purely “private: intermediate” housing tenure splits, where it is not economically viable to provide social rent in particular cases, especially if physical site constraints make it almost impossible to deliver all three tenures in one project, due to design restrictions and market aspirations are wanting separate cores for each tenure.</p> <p>iv) In relation to schemes delivering less than 10 residential units or below 1,000sqm of residential floorspace (GIA), that a commuted sum of £50,000 per net additional unit is applied, that Islington consider the possibility of a lower commuted sum payments for some schemes if scheme viability remains to be a problem.</p>	Object	This is discussed in the housing; viability; and small sites affordable housing topic papers.
R19.0174	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people	London Centric Ltd	Landowner	<p>London Centric disagrees with the view that the need for accommodation for older people must primarily be met via the delivery of conventional housing, as there are other housing models such as non-self contained accommodation (in the form of cluster flats) which have capacity to cater well for elderly people. Many elderly people live alone and in larger housing formats, which from a care and wellbeing perspective can be isolating. Co-living or extra care accommodation should be identified as acceptable wellbeing housing solutions.</p>	Object	This is discussed in the specialist housing topic paper.
R19.0174	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs)	London Centric Ltd	Landowner	<p>in relation to Islington’s Draft Policy on HMO’s, we ask that:</p> <p>Under Part A, that Islington support the loss of larger family housing if the development proposal seeks to satisfy wider policy targets listed in the plan (such as seeking to widen housing choice or satisfying a particular need). In this instance we ask that part A (ii) be re-worded and/or the policy justification be rewritten to reflect this.</p> <p>London Centric contests the wording of Part C which refuses the prospect of large-scale HMO’s coming forward if they limit capacity to deliver conventional housing. On the contrary, the market should dictate what is brought forward, scheme viability as well as an appreciation of wider Londoners needs (of which market evidence suggests that PSR is on the rise, with potential for this to be made affordable, as discussed previously).</p> <p>London Centric are disappointed to see the latter section of Part C (under the previous Regulation 18 consultation), which once discussed the notion of potential of Sites in which the Council would consider appropriate for larger scale HMO development, is now gone. In the fulfilment of sites deemed appropriate for HMO development, London Centric consider that Town Centre sites would be the most appropriate locations sequentially, in line with current adopted Policy (Policy DM4.4, Development Management Policies, 2013) which states that HMO’s larger than 80sqm should be located in Town Centres.</p> <p>Moreover, part C also which also states that large-scale HMOs will generally be refused as they limit capacity for conventional housing should be reconsidered as there are variations of HMO which may be brought forward in the form of “cluster flats”, which offer some self contained format in the provision of typically non-self contained accommodation. Also, while we agree with the need to comply with Draft Policy H4 (design standards), we do not agree with the need to comply with Policy H2 which requires sites be first considered for self contained housing, rather, London Centric would prefer that the market should dictate what is provided, as further supported by scheme viability testing, as well of a better appreciation that non-conventional may help to widen housing choice. We are of the belief this is too short sighted. We part agree with the need to fulfil a genuinely affordable housing product under Part C iii, however, the client team would prefer to see something which takes account of what is feasible and a wider appreciation of what is deemed affordable.</p>	Object	This is discussed in the housing topic paper.
R19.0174	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London Centric Ltd	Landowner	<p>London Centric disagree with Part A in that Islington considers that purpose built Private Rented Sector (PRS) development models do not have a role in meeting housing need in Islington. This is very short-sighted especially in the understanding that London is a generation of renters, which is only set to increase (according to one forecast, on current trends, the private rented sector could grow to accommodate some 40% of all London households by 2040-upte from Housing in London, GLA ,2017).</p> <p>We believe a wider appreciation of housing products should be entertained in order to let market forces speak for themselves and that viability appraisals allow for PRS on enabling development grounds (if this is the case), otherwise Council’s run the risk of slowing housing delivery, land banking or worse, nothing taking place. At a basic level, regardless of whether more conventional models are preferred by Islington, that purpose built PSR is seen as part of widening housing choice (Policy 3.8 of the Adopted London Plan, 2016).</p>	Object	This is discussed in the housing topic paper.

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R19.0174	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London Centric Ltd	Landowner	<p>Other comments we have in relation to any “accepted” PRS schemes, which, relates to any wider compliance:</p> <p>i) In relation to A (ii) with the request for genuinely affordable housing to be provided on-site, in line with the definitions listed in policy H3, the client team believes this policy to be too restrictive. This is because Policy H3 relates to “conventional”, self contained housing definitions and types of accommodation. The client team therefore asks for a greater degree of flexibility to enable a meaningful discussion with the council to work through a justified methodology of any “affordable” private rent put forward. The Mayor is still trying to regulate an “industry standard” for this type of housing, which includes an understanding of the right application of an affordable rent. At present, our client anticipates the use of average wage data as well as the use of London living rent data, and, although the latter is typically applied for self contained, conventional housing, will be used in the calculation of an appropriate “below market rent” rental value per room.</p> <p>ii) Under A(iii) we ask the requirement for self contained units to include the prospect of cluster flats, which may allow for anything from 2-6 bed occupancies, which will maybe let separately, but that the revenue be reflected the number of occupants inside them (per capita/at a room rent value).</p> <p>iii) We agree under part A (iii) that high quality housing is provided in H4 as much as can be possible, however, please be aware that on occasion site constraints may cause a shortfall in some desired design features. Also, in relation to the requirement that all units be self-contained, again we ask that cluster flats be allowed to act as a “self-contained” unit, with a certain number of occupants residing within this.</p> <p>iv) In relation to part A (iv) we understand the need to covenant to safeguard the retention of the PSR use for a minimum period of 50 years, and the non applicability to sell the units at a market rent for the length of the covenanted period, however we do ask that this need not prevent the owner/developer to apply for an alternative land use at any point, should the market dictate there not to be a need for a PSR scheme. As such, we request that any such covenant run with the planning use and not land. This means it might be better dealt with via a planning condition.</p>	Object	This is discussed in the housing topic paper. Build to rent is self-contained accommodation, as set out in national and regional policy. The suggestion that cluster flats be allowed to act as a self-contained unit, with a certain number of occupants living within it is considered an HMO by the Council.
R19.0174	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London Centric Ltd	Landowner	<p>v) In relation to the clawback mechanism related to part v) which ensures that the maximum amount of affordable housing is provided on site where the covenant is broken (notwithstanding criterion iv), we ask that scheme viability is taken into account and; to quote Paragraph 3.77 of the Mayors Housing Strategy (2018) that the following also be considered:</p> <p>“The draft London Plan, supported by the Affordable Housing and Viability SPG, sets out a new pathway through the planning system for Build to Rent schemes. This pathway is designed to help both applicants and councils guide Build to Rent schemes through the planning system by acknowledging their distinct economics when compared with mainstream build for sale housing schemes. This is normally taken to mean two separate but connected factors: first, Build to Rent relies on a revenue stream secured through rent rather than upfront return on sales; and, second, Build to Rent schemes often cannot therefore compete to buy land on an equal footing with speculative build for sale schemes.”</p> <p>vi) London Centric has no objection in the unified management and ownership of the development is guaranteed through the covenant period, however, we ask for there to be flexibility to allow for best value in the management and delivery of the PSR, this means the need for sub clauses which would allow for “management” reviews in the duration of the covenant.</p> <p>vii) Whilst we agree with part vii) which signifies that longer tenancies (of three years or more) are available to all tenants, we also note the need for shorter/ flexible tenancies in order to meet the needs of the market as well. London Centric ask for shorter tenancies be allowed to co-exist, which may end with a month’s notice or less, if agreed with the PSR provider. In relation to upfront fees during the letting process which states this not be charged, except for security deposits and upfront rent payments, we ask for this to be changed to be in line with industry standards. This would prevent any onerous fees from being purely at the expense of the PSR, which is not acceptable.</p>	Object	This is discussed in the housing topic paper.
R19.0174	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	London Centric Ltd	Landowner	<p>We agree with Part B which states that future business expansion is to be directed be focussed in the CAZ, Bunhill and Clerkenwell AAP, the CAZ Fringe Spatial Strategy Areas of Upper Street, Kings Cross and Pentonville Road, PELs and Locally significant Industrial Sites.</p> <p>We agree with the Council’s strategy which aims to ensure the adequate supply of business space is delivered via no net loss of commercial space in planning permissions and via the use of article 4 directions where necessary. This is already the case.</p> <p>We disagree with Part D which states that the council wish to blindly secure space for start-ups and small businesses, this needs to be validated with appropriate market evidence (must be proof of a need in order to force this).</p>	Object	There is a need for SME space in the borough. The employment topic paper discusses this in more detail.
R19.0174	Strategic and Development Management Policies			Policy B2: New business floorspace	London Centric Ltd	Landowner	<p>While we agree that new business floorspace is to be primarily directed to the CAZ, Bunhill and Clerkenwell AAP, the CAZ Fringe Spatial Strategy Areas of Upper Street, Kings Cross and Pentonville Road, PELs and Locally significant Industrial Sites (Part A, i-iii), with any wider proposals for B1(a) and B1 (c) to be directed in town centre environments. We do ask however, that market demand should form the fundamental basis for any desired B1(a) space in town centre environments, and that any restrictive SME requirement policy, is backed up by the Council with a proper evidence base in order to prove there is a justified demand for this, this is especially in the light of Council driven allocation sites (i.e. sites not chosen by the owners themselves).</p>	Object	There is a need for SME space in the borough. The employment topic paper discusses this in more detail.
R19.0174	Strategic and Development Management Policies			Policy B4: Affordable workspace	London Centric Ltd	Landowner	<p>While London Centric part agree with the requirement to provide 10% affordable workspace on schemes providing in excess of 1,000 sqm of office space for sites in the CAZ, Bunhill and Clerkenwell AAP, the CAZ Fringe Spatial Strategy Areas of Upper Street, Kings Cross and Pentonville Road, PELs and Locally significant Industrial Sites and town centre sites, we believe the fundamental basis of this policy should be based on sound market economics and demand. This means that even for schemes capable of delivering this level quantum, if it may be proven that scheme viability will be compromised and/or if market demand levels for do not dictate for affordable workspace, then this should not be provided.</p> <p>The team believe SME type spaces are better delivered in the context of much larger mixed use schemes, where lower rental yielding uses are counter balanced with more profitable land uses. We support Part C of the policy which looks for a 10% affordable workspace target for schemes proposing in excess of 10,000 sqft.</p>	Object	The viability topic paper provides further discussion on viability testing of Affordable Workspace.
R19.0174	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	London Centric Ltd	Landowner	<p>In relation to Social and Community infrastructure, we would ask that the Council appreciate that private club (Sui Generis use classes) does not denote to be Social Infrastructure (D2 use class).</p>	Not stated	Comment noted.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0174	Strategic and Development Management Policies			Policy SP6: Finsbury Park	London Centric Ltd	Landowner	Respondent supports the role of town centres and stimulating activity and vitality but consider the policy too restrictive by solely requesting commercial, retail and service uses at ground floor, with residential only supported on upper floors. Such land use formats should be applied flexibly to account for site characteristics and scheme viability and assessed on a case by case basis. Paragraph 35b of NPPF 2017 states planning policy needs to be achievable and evidenced. If an applicant can prove the council's allocation is not achievable then wider land uses should be allowed that meets the plans objectives. Respondent disagrees with Part D that Finsbury Park can act as a CAZ satellite location because it is not the CAZ and if there is no existing use to retain or there is no market demand then the policy should be only aspirational. No formal evidence exists to support the theory that Finsbury Park has the capacity to develop as a satellite CAZ location. Finsbury Park is not specifically prioritised as a future hub in any of the formal literature, rather it is the south of the borough as well as other priority business areas. Affordable business space expansion does not yield a viable expansion plan as the CAZ's success is based on high yielding office rents. B1 office space is not in deficit as there has been a net expansion in the last three years.	Object	Town Centres are inherently commercial areas, and it is considered that the introduction of non-commercial uses at ground floor level is likely to be detrimental to the commercial character and function of these areas. Hence ground floor units need to be retained for commercial, retail, service and leisure uses. Ground floor residential also raises issues of amenity impacts for the residential occupiers.  Finsbury Park has excellent transport links to central and north east London as well as services towards Cambridge and Stevenage. Due to this 'hyper-connectivity', local evidence highlights the potential for Finsbury Park to be a satellite CAZ location. SP6 does not argue that Finsbury Park is the equivalent of the CAZ ; it notes potential as a satellite location, which would mean providing new office space to support the CAZ. The Employment Land Study 2016 finds demand for an additional 400,000sqm office space by 2036. This cannot be realised solely through development in the CAZ.  Finsbury park is a viable office location as has been shown through increasing rental values and viability testing.  Islington does not have a surplus of office space. Islington requires 400,000sqm of additional office space by 2036 and at present the pipeline is not sufficient to meet forecast job growth.
R19.0174	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	London Centric Ltd	Landowner	Respondent states the council should acknowledge that there are many town centre sites that are not located in traditional town centre environments and so should allow non main town centre uses at ground floor level. This is supported by para 85f NPPF 2018. If there is no pre-existing town centre use on the site, the landowner should not be forced to provide such a use. Respondent contests use of term 'sui generis town centre use' as sui generis uses may be placed anywhere. Town centre boundaries should be reviewed periodically and 1 Prah Road should not be included in the boundary as it occupies a sui generis use site, on a residential street, largely detached from the wider town centre boundary. Respondent disagrees that residential uses have potential to cause adverse harm to the vitality and viability of town centres and whilst should be located away from core areas they shouldn't be limited to upper floors if the local environment is residential in character.	Object	Further discussion is provided in the retail topic paper. The reference to sui generis main town centre use in policy R3 refers to Sui Generis uses that are akin to main Town Centre uses, e.g. launderettes, nail bars, private clubs, nightclubs.
R19.0175	Site Allocations	BC36: London Metropolitan Archives and Finsbury Business Centre	B & C: Mount Pleasant and Exmouth Market		London Metropolitan Archives	Business	The City of London Corporation support the added text relating to the London Metropolitan Archives (BC36) and its importance in terms of being a heritage asset and visitor attraction.	Support	Support noted.
R19.0175	Bunhill and Clerkenwell Area Action Plan			Policy BC6: Mount Pleasant and Exmouth Market	London Metropolitan Archives	Business	The City of London Corporation is pleased that the significance of the London Metropolitan Archives site (BC36) and its importance in terms of being a heritage asset and visitor attraction (3.45) are acknowledged in the proposed plan, especially in the Bunhill and Clerkenwell Area Action Plan.	Support	Support noted.
R19.0176	Site Allocations	NH13: 166-220 Holloway Road; NH14: 236-250 Holloway Road, N7 6PP and 29 Hornsey Road, N7 7DD	Nag's Head and Holloway		London Metropolitan University	Landowner	Support the site allocations but consider they are unnecessarily restrictive. The allocations should support university related development including refurbishment of existing buildings, infill development and redevelopment of existing buildings. The allocations should also be amended to specifically support the development of student housing.	Object	Sites NH13 and NH14 are discussed in detail in the Site Allocations Topic Paper.
R19.0176	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	London Metropolitan University	Landowner	Background information provided, including details of the Estates Strategy and One Campus One Community project; in particular, they claim there is a need for on-site affordable accommodation for its high number of economically disadvantaged students, and the private student accommodation elsewhere in the area is too expensive to meet these needs. As the Holloway campus has significant surplus space for the reasons described above, this presents an ideal opportunity for the University to incorporate student accommodation as part of its master plan, creating a well-balanced campus that offers students a residential campus experience, where they will have the best access to teaching and support facilities and the best chance to integrate with fellow students and staff. This is the best outcome for students and central to London Mets' mission to transform lives through excellent education.	Not stated	Information noted.
R19.0176	Strategic and Development Management Policies			Policy SP5: Nag's Head and Holloway	London Metropolitan University	Landowner	In line with comments on site allocations NH13 and NH14, SP5 should be amended to be much more positive about the University to include specifically supporting student housing at the Holloway Road campus.	Object	See comments on site allocations. The Council's approach to student housing is set out in the specialist housing topic paper.
R19.0176	Strategic and Development Management Policies			Policy DH3: Building heights	London Metropolitan University	Landowner	The University welcomes the new approach that the Council is taking to tall buildings following the Tall Buildings Study and the identification of a range of locations across the borough where buildings of more than 30m are acceptable in principle. It is noted that the LMU Tower site is one such site (C5 – up to 76m) and Site Allocation NH13 also refers to this. 45 Hornsey Road (SA ref. NH10) has also been identified as suitable for a building of up to 37m. It is considered that the part of the LMU campus which immediately adjoins NH10 should also be considered as a site for a tall building as this has very similar locational characteristics as the NH10 site and could form a townscape feature with this site. In addition, other parts of the University's campus that are outside the strategic viewing corridor may also be suitable for taller elements and it is requested that the policy allows for this. The existing context in the immediate area around Holloway Road station and the Emirates stadium sets a precedent for tall buildings. The buildings within NH14 offer potential opportunities for tall buildings. The raised railway viaduct running the length of the site on the north-west edge provides a buffer zone reducing the potential visual impact of any tall building(s) on residential neighbours to the north; and the site further benefits from the orientation with the railway viaduct sited to the north-west reducing potential overshadowing impacts. The depth of the site is sufficient to allow for setbacks and provision of an appropriate scale of buildings to Hornsey Road. The masterplan opportunity to create a new pedestrian route from Holloway Road station to the stadium has the potential for tall building(s) to act as gateway markers. The draft policy identifies 45 Hornsey Road as a suitable site for a tall building and the redevelopment of the adjacent site has the potential to respond to this by creating an enhanced gateway and setting to the approach to the stadium. The University welcomes the opportunity for the local plan to reflect the surrounding context of the LMU sites and campus in identifying further potential for tall buildings. Indeed we consider this necessary to ensure its soundness.	Object	The council considers that this site is not suitable for a tall building, due to the protected view which crosses the site and potential townscape issues especially when considering cumulative impacts. Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper.
R19.0176	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	London Metropolitan University	Landowner	The plan has not been informed by an objective assessment of the development needs of the Higher Education sector (including LMU) and fails to plan positively to meet such needs	Object	The Council has considered LMUs estates strategy and other relevant information which was provided through previous consultation responses. There are also ongoing discussions with Council officers. Higher education 'need' is much more susceptible to various factors, such as available funding and wider political priorities. Ultimately, universities are private entities and LMUs response effectively requests Local Plan policy to be tailored to the needs of a private entity. This would undermine strategic planning. LMUs situation, as discussed in the specialist housing topic paper, is largely due to their own business decisions, such as the sale of land which could have realised their stated ambitions. The Local Plan should not be expected to compensate for business decisions. Regardless of this, the needs of higher education providers could be material to any policy/allocation.

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R19.0176	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	London Metropolitan University	Landowner	Has not been informed by an objective assessment of the needs for PBSA (including specifically for needs associated with LMU) and fails to plan positively to meet such needs	Object	Discussion is provided in the specialist housing topic paper.
R19.0177	Site Allocations	N/A - general comment	N/A		Greater London Authority/Mayor of London	Statutory consultee	It is clear that the proposed allocations within the Vale Royal/Brewery Road LSIS are for the retention and intensification of industrial uses which is supported by the Mayor and is closely aligned with draft new London Plan Policies E4 and E6.	Support	Support noted.
R19.0177	Site Allocations	N/A - general comment	N/A		Greater London Authority/Mayor of London	Statutory consultee	A number of the sites identified in the site allocations are home to industrial uses and an approach to their future intensification should be applied in a consistent and methodical manner and in accordance with the draft new London Plan. It should be noted that between 2001 and 2015 more than 1,300 hectares of industrial land was released to other uses, well in excess of previously established London Plan monitoring benchmarks. In 2015, 36% of industrial land in London was located on non-designated sites which contributes significantly to the effective functioning of London's economy as a whole. While a number of the borough's site allocations have an element of industrial uses the sites that they lie within are not designated as such. Islington's intention to protect the industrial uses on many of these non-designated sites is welcomed and the Mayor would support consideration for their designation as locally significant industrial sites where this was justified and followed a methodical and consistent approach.	Object	Comments and support noted.
R19.0177	Site Allocations	N/A - general comment	N/A		Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes the inclusion of indicative capacity figures for each spatial strategy area in Table 2.2. There is a typo in paragraph 1.30. Suggest it would be useful to include maximum height limits for those allocated sites located within a protected viewing corridor. Welcomes recognition of the borough's cultural assets and the protection of these uses through allocations such as AUS11 and NH9, in line with the approach set out in London Plan policy HC5. Where industrial uses exist on non-designated industrial sites e.g. BC36 London Metropolitan Archives and Finsbury Business Centre, the approach should follow the guidance in London Plan policy E7D	Support	Support noted. Typo in paragraph 1.30 will be amended via a modification to the Local Plan. It is unnecessary for allocations to include maximum height limits for sites within protected viewing corridors as the plan has robust policies ensuring that local and strategic views are maintained and enhanced.
R19.0177	Strategic and Development Management Policies			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes the overall approach to growth and development in Islington's Draft Local Plan and considers that on the whole the plan is positive and, as drafted, is in general conformity with the London Plan. Notes new Londpn Plan and need to reflect the Mayor's intend to publish version of the new London Plan which will be published following receipt of the Examination Panel Report. Welcomes seven principle objectives that underpin the Local Plan, and the strategy to deliver growth over the plan period. Pleased that much of the advice contained in earlier response to the emerging Local Plan has been positively incorporated into this Regulation 19 version. Especially welcomes Islington's ambitious declaration at paragraph 1.57 to become net zero carbon by 2030, which sets the standard for London as a whole and will make a significant contribution in meeting the Mayor's target for London to become a zero carbon city by 2050.	Support	Comments noted and general conformity welcomed. We note that the 2030 net zero carbon reference does not amend the formal 2050 target, for avoidance of doubt.
R19.0177	Strategic and Development Management Policies			Policy DH3: Building heights	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes Islington's approach to tall buildings by setting out a clear definition and through the identification of specific locations where tall buildings, over 30m in height might be suitable, subject to other Local Plan requirements. This approach is aligned with draft new London Plan Policy D8 and is underpinned by Islington's Tall Buildings Study 2018. A single image which combines both Figure 8.2 Strategic and local views and Figure 8.3 Locations suitable (in principle) for tall buildings over 30m would be useful and is recommended to illustrate that locations for tall buildings have been strategically chosen in order to avoid impacts on strategic and local views and that where there are clear overlaps, maximum heights set out in Table 8.1 will ensure that impacts are avoided.	Support	Support welcome. It is noted that the tall building locations do not overlap with protected views. The locations of tall buildings have been informed, in part, by protected views, but there are other considerations. The suggested map would not be particularly useful and could confuse issues by suggesting protected views are the most important consideration. We note that the tall buildings study has some discussion and mapping of views.
R19.0177	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Greater London Authority/Mayor of London	Statutory consultee	Welcome commitment to exceed new London Plan housing target and positive intention to achieve this through optimisation of land and buildings. Note intention to roll forward target beyond 2028/29 if targets have not been updated. Consider this acceptable but draw attention to paragraph 4.1.8D of new London Plan which states that account should be taken of additional capacity that may result from any committed transport infrastructure improvements, with the small sites target rolled forward. Paragraph 3.29 of the draft Local Plan seeks to protect against the loss of existing affordable housing and this is welcome. It should be noted, however, that Policy H10BA of the draft new London Plan makes it a requirement that all schemes involving the demolition and replacement of affordable housing must follow the Viability Tested Route and should seek to provide an uplift in affordable housing. This should be reflected in Islington's Local Plan.	Support	Support noted. Justification for rolling the housing targets forward is set out in the housing topic paper. Policy H2 of the Local Plan provides sufficient protection for existing housing and ensuring that affordable housing is maximised as part of redevelopment. This is also explained in the housing topic paper.
R19.0177	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	Greater London Authority/Mayor of London	Statutory consultee	As noted in our original response to Islington's draft Local Plan, the approach to affordable housing delivery is more rigorous than that set out in Draft New London Plan Policy H6 as it limits the application of the Viability Tested Route to those development proposals where there are exceptional circumstances only. This approach is in line with Draft New London Plan Policy DF1 and the revised National Planning Policy Framework / Planning Practice Guidance which limits site specific viability to exceptional circumstances where there are genuine barriers to delivery. The approach is considered to be consistent and in line with the draft new London Plan. However, Islington should monitor market conditions to ensure the continued delivery of housing and commercial development. On reviewing the draft Local Plan approach to affordable housing the Mayor strongly encourages Islington to base affordable housing requirements on gross residential development as set out in draft new London Plan Policy H6, as opposed to net additional housing as currently worded in the draft Local Plan in Policy H3, in order to optimise affordable housing delivery.	Both	The Council considers it is more appropriate to base affordable housing requirements on net additional development. This is explained in the housing topic paper.
R19.0177	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes Islington's intention at paragraph 3.65 to ensure the integration of affordable housing so that it is tenure-blind and builds on the principles laid out in the Mayor's Good Growth Policy GG1 and paragraph 3.4.5B of the draft new London Plan with the ambition of building stronger and more inclusive communities.	Support	Support noted
R19.0177	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes Islington's requirement that 35% of new student accommodation is to be affordable and that achieving this will ensure the threshold for the fast track route is met in accordance with the latest consolidated version of draft new London Plan Policy H17A4. Boroughs are encouraged to maximise the delivery of affordable student accommodation and Islington should recognise that this might be jeopardised through the prioritisation of bursaries over and above affordable accommodation.	Both	Further discussion is provided in the specialist housing topic paper. The Council considers that bursaries are a higher priority than affordable student accommodation for Islington, so in instances where both cannot be secured, we would prioritise bursaries; however, we note that the Local Plan viability study found that it would be viable to secure both.
R19.0177	Strategic and Development Management Policies			Policy B2: New business floorspace	Greater London Authority/Mayor of London	Statutory consultee	Policy B2 directs office use to the CAZ, Bunhill and Clerkenwell area, Spatial Strategy areas within the CAZ, PELs and Town Centres, not to the borough's industrial areas. This approach is in line with new London Plan policies E1 and SD4 and welcomed by the Mayor.	Support	Support noted for policy objective to direct and promote office uses in the CAZ, BC AAP, CAZ Fringe Spatial Strategy Areas, PELs and Town Centres, and stopping the provision of office uses in the borough's designated industrial location. This approach is in line with London Plan policies E1 and SD4.
R19.0177	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Greater London Authority/Mayor of London	Statutory consultee	The protection of designated industrial land, especially the largest remaining concentration at Vale Royal/Brewery Road, is welcomed and aligns with London Plan policy E4. London Plan policy SD4M recognises the importance of industrial locations strategically positioned near the CAZ such as this one, for the provision of 'last mile' distribution/logistics, 'just in time servicing', waste management and recycling as well as land to support transport functions.	Support	Support noted for the protection of designated industrial land, particularly in the Vale Royal/Brewery Road LSIS which is the largest remaining concentration of industrial land in the borough within strategic proximity to the CAZ.
R19.0177	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Greater London Authority/Mayor of London	Statutory consultee	In addition, the Mayor recommends that B2 and B8 uses are prioritised over B1c, to support these types of essential industrial activity.	Not stated	The Council considers that promoting B1c, B2 and B8 uses offers a broad scope to protect and enhance industrial areas. B2 and B8 uses would be supported in LSISs, and we specifically note the Mayor's strategic evidence which notes the importance of these particular uses, given the scale of losses across London in recent years.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0177	Strategic and Development Management Policies			Policy B2: New business floorspace	Greater London Authority/Mayor of London	Statutory consultee	While the Mayor supports the new LSIS designations (Melody Lane, North Road, Offord Road, Pemberton Gardens and Station Road) and protection assigned to these. It is noted that these were previously EGAs. The council should clearly set out, with supporting evidence, the rational for selecting these sites, as per requirements contained in Local Plan Policy E6.	Support	The protection and intensification of industrial uses continues to be sought in Locally Significant Industrial Sites (LSIS), with some former Employment Growth Areas now being recognised as LSIS. The employment site assessment contained in section 6 of the ELS (2016) recognises these sites as smaller concentrations of industrial activity. The council seeks to intensify the provision of industrial capacity in the borough by recognising smaller concentrations of industrial land, in line with London Plan policy E4. The council's policies define use class requirements that are appropriate for LSIS designations in line with London Plan policy E6. The employment topic paper provides further information.
R19.0177	Strategic and Development Management Policies			Policy B4: Affordable workspace	Greater London Authority/Mayor of London	Statutory consultee	The council should consider extending affordable workspace requirements to B1c uses, to recognise the breadth of businesses and industries across the borough.	Not stated	Policy B4 focuses on those business uses which are uniformly more viable in terms of delivering affordable workspace. B1c uses can viably deliver affordable workspace but results are more mixed. In addition, B1c is an industrial use promoted within industrial areas, hence the Council wanted to remove any additional hurdles that may preclude additional industrial capacity coming forward.
R19.0177	Strategic and Development Management Policies			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	Office floorspace should be directed to Islington's town centres and the CAZ, in line with London Plan policy E1. Islington could consider whether any development pressure in the LSIS merits preparing a masterplan to ensure the retention, intensification and increase in industrial floorspace in line draft new London Plan E7.	Not stated	Office floorspace is directed to these locations. The Council considers that a masterplan is unnecessary at this stage but will keep this under review.
R19.0177	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes that the Council is using the new definition for gypsies and travellers, notes the need identified and encourages the Council to review its own estate and and work with neighbouring boroughs to meet that need. Also notes that Mayoral funding is available through the Homes for Londoners Affordable Homes Programme.	Support	Support welcomed and advice on funding noted.
R19.0177	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	Figure 1.1 is welcome, which sets out clearly, the extent of the AAP boundary and so too is Figure 1.2 which sets the context of the AAP area in relation to the CAZ, City Fringe OA and the Elizabeth Line.	Support	Support noted.
R19.0177	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Greater London Authority/Mayor of London	Statutory consultee	AAP ambition for the provision of office floorspace (policy BC1) is in line with London Plan policy E1.	Support	Support noted.
R19.0177	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Greater London Authority/Mayor of London	Statutory consultee	Culture, retail and leisure uses are Islington's second level priority for the area and as such this is in line with the approach set out in the draft new London Plan Policy SD4 which promotes the unique roles of the CAZ which are listed under paragraph 2.4.4 of the draft new London Plan and includes arts, culture, leisure and entertainment among many others.	Support	Support noted.
R19.0177	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	The AAP responds positively to the opening of the Elizabeth Line station at Farringdon and plans for significantly greater levels of pedestrian movement with measures to facilitate ease of movement and modal interchange are welcome.	Support	Support noted.
R19.0178	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway		Peabody	Landowner	Welcome the allocation which aligns with landowners proposals for a residential-led, mixed-use development. Consider the allocation should not be subject to justification against Policy SC1 and reference to such should be removed from the allocation. Request that the allocation be amended to state that a tall building is potentially acceptable on site subject to justification against policy DH3 and a detailed townscape and heritage assessment.	Support	Any proposals for the site will be assessed against policy SC1 given that the site is currently in social infrastructure use. The site is not identified as suitable for a tall building in the Tall Buildings Study. Any application for a taller building will be assessed on a case by case basis in line with policy DH3.
R19.0178	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Peabody	Landowner	Peabody request that the residential cycle parking standards are in line with those identified in the Draft London Plan. It can lead to prioritisation of quantity over quality, and result in wasted, underused cycle parking facilities. 20% accessible is excessive, will take more space than standard parking, and oversized bike stores. As cycle facilities are often at ground floor level (where there is no basement facility), it will lead to a reduced amount of active frontage with negative impact on the urban realm. They recommend - Long stay: 1 space per studio or 1 person 1-bed, 1.5 spaces per 2-person 1 bed dwelling, 2 spaces per all other dwellings - Short Stay: 5 to 40 : 2 spaces Thereafter: 1 space per 40 dwellings - Accessible Provision: 5% accessible cycle parking spaces must be provided, keeping the 25% - 75% split	Object	There is a confusion around the policy approach. The spatial standard is aimed at delivering quality over quantity whilst aiming to achieve London Plan standards. Islington has reviewed its standard to reduce the quantum of spaces to align it to the London Plan, which is already a compromise. Therefore our standards are already in line with the London Plan. TfL's response to the Regulation 19 draft confirms this.
R19.0178	Strategic and Development Management Policies			Policy DH3: Building heights	Peabody	Landowner	As set out in Peabody's previous representations, it is considered that the strategic search approach detailed in Section 5 of the Tall Building Study has enabled areas that may potentially be suitable for tall buildings to be identified across the Borough. The methodology and approach is generally supported, acknowledging that much of the Borough consists of areas of relatively mid-low rise residential townscape likely to be unsuitable for tall buildings and that areas potentially suitable for tall buildings are typically identified centres, opportunity areas and/or areas with high levels of public transport accessibility with a character that in principle could accommodate tall buildings and meaningfully contribute to a legible townscape (as per London Plan Policy 7.7). However, we consider the assessment and identification of site specific locations potentially suitable for tall buildings to be less robust, overly-restrictive and it could unnecessarily hinder potential development in the Borough and in doing so constitute a hurdle to meeting identified development needs. Since Peabody's representations to the Regulation 18 consultation in January 2018, the forthcoming development proposals on the Archway Campus site have advanced through pre-application discussions with Officers at LBI. The current proposals for the site include the 'Apex' building at 14 and 7 storeys, which exceeds the tall building definition of 30m and above. This proposed 'Apex' building is considered appropriate within the wider context of Archway Town Centre and neighbouring Archway Tower, and the townscape benefits and high-quality design of this building have been demonstrated during pre-application discussions. It is considered that the proposed policy, as it is currently worded, does not recognise that there may be sites other than those specifically stated where tall buildings would be an appropriate response to the surrounding townscape. We therefore suggest that the wording of the part F of this policy is amended to read as follows: "Buildings of more than 30 metres are only acceptable in-principle: (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or (ii) on sites within the Spatial Strategy areas where tall buildings are considered appropriate on a site-by-site basis subject to justification against Policy DH3 and other relevant policies"	Object	The tall buildings topic paper provides further discussion on the Council's approach to tall buildings. Pre-app proposals are not evidence of suitability of a tall building. The amended wording is not considered suitable as it would undermine the approach to tall buildings in the Local Plan.
R19.0178	Strategic and Development Management Policies			Policy SP7: Archway	Peabody	Landowner	Our client is generally supportive of the spatial strategy policy for Archway but having regard to the need to be sufficiently flexible and allow thorough scrutiny of development proposals for tall buildings to be considered on a site-by-site basis within the key area. Since Peabody's representations to the Regulation 18 consultation in January 2018, the forthcoming development proposals on the Archway Campus site have advanced through pre-application discussions with Officers at LBI. The current proposals for the site include the 'Apex' building at 14 and 7 storeys, which exceeds the tall building definition of 30m and above. This proposed 'Apex' building is considered appropriate within the wider context of Archway Town Centre and neighbouring Archway Tower, and the townscape benefits and high-quality design of this building have been demonstrated during pre-application discussions. As currently written, Part M of the policy states "three sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres". This approach is considered restrictive and is not considered to align with the approach taken on a lot of sites within the key area. Whilst we recognise that tall buildings may not appropriate on many sites within Spatial Strategy area, it is considered that this approach is restrictive and could limit future development within the area. Peabody would suggest that a site-specific identification approach be recognised. It is suggested that the wording of Part M is amended to state "tall buildings are only supported within the Archway Spatial Strategy area on a site-by-site basis subject to justification against Policy DH3 and other relevant policies, or where identified within the relevant Site Allocation".	Object	The tall buildings topic paper provides further discussion on the Council's approach to tall buildings. Pre-app proposals are not evidence of suitability of a tall building. The amended wording is not considered suitable as it would undermine the approach to tall buildings in the Local Plan.



Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0178	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	Peabody	Landowner	<p>Peabody support this policy as it aligns with their aspirations to deliver a high-standard of accommodation. In relation to Part H of the policy, it is requested that the explanatory text provides clarity on how the provision of dual aspect can be demonstrated to be impossible or unfavourable. In some cases, it should be recognised that where there are competing policy objectives on constrained sites, a high-quality design may not allow for true dual aspect units. The change of use and restoration of existing buildings often limits opportunities to provide dual aspect units as new residential layouts are required to work within the existing building envelope and block orientation. Site topography and shape are also key considerations that may limit the amount of dual aspect units that can be provided. In some cases, it is considered that a scheme which provides 100% dual aspect will radically alter the character and nature of the site and restrict compliance with policy objectives such as a suitable unit mix, family housing, density, and could ultimately have a negative impact on the urban character of an area. This could limit delivery and the provision of much needed, high-quality housing throughout the borough.</p> <p>Furthermore, it should be recognised within the explanatory text that in some cases the provision of single aspect units will be acceptable where it can be demonstrated that these units will have adequate passive ventilation, daylight and privacy, and avoid overheating, in line with Draft London Plan Policy D4 (Housing quality and standards).</p>	Object	Information to justify that dual aspect is impossible or unfavourable would be case specific, and would depend on details of a specific proposal, site context, etc. General explanatory text would therefore not be useful. The suggestion re: single aspect units is covered by Part H of the policy already; single aspect must meet these criteria after dual aspect units have been proven to be impossible/unfavourable.
R19.0178	Strategic and Development Management Policies			Policy H2: New and existing conventional housing, Part F	Peabody	Landowner	<p>Whilst studios would only constitute a small proportion of the housing mix of any development scheme within the borough, there is demand for studio units. In some circumstances, the provision of smaller private sale units, in particularly studio units, can make private sale units accessible for first time buyers. We therefore welcome recognition that some such units may be acceptable.</p> <p>Peabody would like to see the policy worded more flexibly to allow for the provision of some studios in residential schemes where they are proposed to a high-quality. Peabody consider that an 'or' approach would be more flexible and allow for a small number of high-quality studio units to be provided in scheme, where it is considered appropriate. We therefore request the policy is amended to read as follows:</p> <p>i. "Studios/bedsits would constitute a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable elements; or</p> <p>ii. The delivery of additional higher priority unit sizes and/or proposed higher priority units of an increased size is not possible; and</p> <p>iii. Provision of studios/bedsits would result in a high-quality dwelling in accordance with Policy H4 and other relevant design policies."</p> <p>In the same vein, Peabody request that the following sentence "this is considered to be no more than 5% of units, as a percentage of units overall and as a percentage of each of the affordable and market elements of a proposal" is removed from the explanatory text. An acceptable quantum of studio units is likely to vary on a site-by-site basis. Lastly, Peabody request that more clarity is provided in the explanatory text as to how part F(ii) of policy could be demonstrated to Officers.</p>	Object	The council considers that, generally, studios/bedsits are not a sustainable form of accommodation and therefore do not constitute the best use of land. The policy provides reasonable criteria to assess suitability; it is not considered appropriate to amend as per the respondents suggestion as this could undermine the Council's aim to secure higher quality housing of a size that is actually needed. Information to justify consistency with Part F(ii) would be case specific, and would depend on details of a specific proposal, site context, etc. General explanatory text would therefore not be useful.
R19.0178	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	Peabody	Landowner	<p>As a Registered Provider, Peabody support the delivery high-quality, affordable homes within the Borough. Peabody would like to re-iterate the point made in their previous representations that whilst their priority is to deliver high-quality affordable homes, they must also compete with the rest of the market for land. Peabody must contend with the same development considerations and constraints that any other developer would be expected to address. These can include the site being unsuitable for a certain type of housing i.e. family housing. If this were the case, a second site would be used to deliver the family housing that cannot be delivered. Together, both sites would allow policy aims regarding the mix of dwellings to be satisfied which would be in the interests of achieving mixed and balanced communities. This would allow more family housing to be delivered on the second site than it ordinarily would if delivered on it's own, bringing significant benefits to the local community. Where there are cost-related delivery issues, it may be necessary to justify lower amounts of affordable housing via a viability tested route. It may not be possible to provide at least 50% on-site affordable housing (by net additional unit) without a public subsidy, pursuant to part D(ii) of the proposed policy. For example, the Archway Campus site is highly constrained and complex site where development costs are expected to be high. In order to deliver high-quality affordable housing on this site, a public subsidy is likely to be required to achieve a policy compliant level of affordable housing.</p>	Object	The viability topic paper has further discussion on the level of affordable housing required. The 50% requirement is demonstrably viable. It is also consistent with the London Plan, as noted in the mayor's conformity responses to the Regulation 18 and 19 plans.
R19.0178	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	Peabody	Landowner	<p>At Paragraph 3.44 the draft plan states that "the portfolio approach is not considered acceptable for any schemes in Islington. Each site must deliver affordable housing in line with the relevant part of policy H3. The Council will not accept lesser delivery to compensate for other sites, either elsewhere in the borough or outside the borough." Again, further to our previous representations, Peabody would like to re-iterate that in some cases, due to cost-related delivery issues, there are sites which Peabody will deliver where it is necessary to justify lower amounts of affordable housing subject to viability testing. Large landowners such as Peabody may be able to use assets elsewhere that they may not otherwise prioritise for development in order to deliver an overall package that will meet policy aims. By taking such a portfolio-based approach the overall supply of housing can be further increased and the delivery of affordable housing can be maximised.</p> <p>As a Strategic Partner to the Mayor of London, Peabody aim to deliver at least 60% affordable housing across their portfolio, in accordance with Draft London Plan Policy H5 (Delivering affordable housing). If taken in isolation, many sites Peabody develop, are likely to viably deliver less than the required 60%, requiring a portfolio approach to be utilised in order to achieve this target. Whilst Peabody recognise that in general terms the Council may not wish a portfolio approach to be taken in order to deliver affordable housing, Peabody request that exceptions are made for the Mayor's Strategic Partners. Such a restriction is considered contrary to Draft London Plan policy and in the long-term, could limit the delivery of affordable housing in the borough. We therefore respectfully request that Paragraph 2.44 is amended to allow the Mayor's Strategic Partners to utilise a portfolio approach within the borough where appropriate.</p>	Object	It is vital that each and every site capable of delivering affordable housing (AH) delivers the maximum amount in line with the Local Plan. The portfolio approach undermines the Council's approach to AH. The Mayor has not raised any concern with Islington's approach to the portfolio approach in any previous conformity responses. In fact, the Mayor has been very supportive of our AH policy which will mean schemes providing less than 50% (where a site is in public ownership) will be refused permission; the portfolio approach cannot co-exist with this policy, hence as the Mayor has supported it and not raised issue with the restriction of the portfolio approach, it is reasonable to assume that the Mayor considers that Islington's approach is acceptable. We note that the policy does not preclude the Mayor 'calling in' certain schemes which are considered strategically important, if he considered that instituting the portfolio approach had wider London benefits.
R19.0178	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Peabody	Landowner	<p>Peabody consider that future land uses at their Archway Campus site should not be subject to justification against this policy. The site's previous D1 occupier vacated in 2013, and the services previously provided on site were relocated. Policy SC1 part D, or its explanatory text, should make it clear that the policy will not apply to sites where the council has allocated land for alternative uses. Application of this policy has the potential to limit delivery of housing and other infrastructure secured through site allocations.</p>	Object	All relevant applications will be required to justify loss of social infrastructure, regardless of an allocation.
R19.0179	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	<p>Overdevelopment will blight residents' physical and mental health, and put much of Burnhill House into fuel poverty. The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.</p>	Object	The impact of any development on residential amenity should be assessed as part of the planning application process. The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0180	Site Allocations	HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner; HC3: Highbury and Islington Station, Holloway Road, N5 1RA	Highbury Corner and Lower Holloway		The Canonbury Society	Local society	Support the allocations and proposed uses for HC1 and HC3. Would be best for the community and passengers if these allocations could be looked at holistically. Unconvinced the Highbury gyratory works represent an improvement and consider the works should have been delayed until a comprehensive scheme including HC1 and HC3 could be delivered. Hope this lost opportunity can be recovered in time so the station and its environs are redesigned and reconfigured for the benefit of residents and visitors.	Support	Support noted. HC1 and HC3 will come forward in the medium/ long term however consideration of cumulative impacts has been had. Transport changes taking place are controlled by TfL so not influenced by these site allocations.
R19.0180	Site Allocations	HC4: Dixon Clark Court, Canonbury Road	Highbury Corner and Lower Holloway		The Canonbury Society	Local society	Have followed the planning application for the site and look forward to works commencing.	Not stated	Noted.
R19.0180	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	The Canonbury Society	Local society	Agree with car free, although note that the increase in vehicular trips supplants the reduction in car ownership. They think that cyclists should not be prioritised over public transport users	Both	The Council's policies support a modal shift from private motorised vehicles to active travel and public transport. T1 does not have a movement hierarchy, however it should be noted that people who cycle are vulnerable to collisions, therefore infrastructure should protect them.
R19.0180	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	The Canonbury Society	Local society	Agree with policy to extend congestion charge zone to the North circular	Support	Support noted.
R19.0180	Strategic and Development Management Policies			Policy T3: Car-free development	The Canonbury Society	Local society	The Council should embrace 'smart technology', setting out a more ambitious objective and policy. This should refer to driverless cars. EVCH could also be made redundant if cars in the future are charged differently	Not stated	The Council's approach to transport is to encourage active travel and public transport. Driverless cars present the same challenges as standard cars in terms of congestion, air pollution and externalities they have on people's health, and supporting inactive lifestyles. Evidence also suggests that this technology is not going to be widely available anytime soon. Walking, cycling and public transport are the transport modes the Council is actively encouraging.
R19.0180	Strategic and Development Management Policies			Integrated Impact Assessment	The Canonbury Society	Local society	Broad support with comments on the IIA objectives, baseline information, and assessment of likely effects of Local Plan objectives and GI policies.	Support	Noted.
R19.0180	Strategic and Development Management Policies			Policy DH2: Heritage assets	The Canonbury Society	Local society	We support the council's proposed policies and its commitment "to conserve and enhance the significance of heritage assets and their settings and the wider historic and cultural environment". As a group dedicated to preserving the Canonbury Conservation Area, we are concerned at the impact of any new policies which seek to limit the current protection afforded to conservation areas (CAs). We are also concerned at the encroachment any new development which will negatively impact on the local character of a CA. We appreciate that different CAs have different local characteristics which is why the Islington Council Conservation Area Design Guidelines dated in 2002 are so useful. We urge the Conservation Department of the Council to update these local guides to be read in conjunction with the more general but comprehensive SPD Urban Design Guide issued in 2016. We are pleased to see that throughout the draft Local Plan, the importance of conservation areas is highlighted.	Support	Support noted. The Council intends to update CADGs in future, as noted in the LDS.
R19.0180	Strategic and Development Management Policies			Policy DH4: Basement development	The Canonbury Society	Local society	We are encouraged by the council's determination that any developments involving basements will be strictly controlled. Policy DH4, which regulates the development of basements, is vital in this regard.	Support	Support noted.
R19.0180	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design	The Canonbury Society	Local society	We support the council's proposed policies S1 to S10. To reduce pollution and maximise air quality, we think the borough should undertake another round of tree-planting and encourage other owners to do the same. The council should also maintain its policy of actively managing Tree Preservation Orders.	Support	Support noted. Green infrastructure policies provide strong protection for trees. Tree planting would be supported under GI and public realm policies, pending assessment of impacts such as limiting pedestrian movement.
R19.0181	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway		The Upper Street Association	Local society	The suggested timescale of 2031/32-2035/36 is far away, but the Association would like to be kept informed of any proposals for a new station. At present the station is overloaded with no lifts to the underground to help the disabled. This should be stressed in dealings with TfL.	Not stated	Consultation with the local community will be required as part of any development proposals for the site.
R19.0181	Strategic and Development Management Policies			Appendix 1: Marketing and vacancy criteria	The Upper Street Association	Local society	We note controls proposed in advertising property Marketing and Vacancy criteria. We would like to see a wider new general Policy requiring estate agents to rely primarily on advertising by internet, as is the real case today. In our view estate agents' signage on properties is disfiguring and unnecessary. We believe that in certain London Boroughs- and indeed in some Scottish cities- agents' hoardings are banned, restricted or time- limited.	Object	Advertising boards are an appropriate form of marketing but the appendix does also promote online marketing.
R19.0181	Strategic and Development Management Policies			Islington in context, paragraph 1.6	The Upper Street Association	Local society	We particularly welcome this introduction as a sensitive description of the importance of the Borough.	Support	Support noted.
R19.0181	Strategic and Development Management Policies			Islington in context, paragraph 1.19	The Upper Street Association	Local society	We ask that there is an express reference to density of population in the beginning of the Draft Plan, to inform the whole. The Office for National Statistics estimated that in 2018 the density of population per square kilometre for Islington was 15817, ahead that is of Tower Hamlets and others. In our view that fact, an unchanged ranking, should inform basic policy decisions, and should be clearly stated early on in the proposed submission.	Not stated	The densely populated nature of the borough is evident from the plan introduction and other evidence base. It does not matter whether or not there is specific reference as suggested.
R19.0181	Strategic and Development Management Policies			Policy SP8: Highbury Corner and Lower Holloway	The Upper Street Association	Local society	We ask that there is express reference to the need, in our view, to monitor the effects of the reconfiguration of Highbury Corner, and the effects in rat-running in surrounding local roads.  Second, we ask that there should be express reference to the need around Highbury Corner for a) public lavatories, where provision was removed some years ago. A sign in the station says that there are no facilities there, and points to the lavatories at the top of Highbury Fields, a long distance away. b) restoration of Post boxes at Highbury & Islington station to serve the many thousands who pass the hub each week. These were removed in 2014.	Not stated	These are not relevant to the Local Plan, although we note that policy T4 supports public toilets. The transport strategy proposes a range of measures to alleviate the impact of vehicular traffic.
R19.0181	Strategic and Development Management Policies			Policy H1: Thriving communities	The Upper Street Association	Local society	Para 3.1. 'Islington's residential population is expected to increase significantly over the plan period.' Again we believe that the Draft Plan should refer to the fact that the Borough is the most densely populated in the UK. Para 3.4 Strategic Housing Land Assessment Process (SHLAA) has highlighted that there is dwindling capacity for new residential development in Islington, insufficient to meet local housing need. The Plan needs to make reference to the needs of long term future residents.	Not stated	See response to paragraph 1.19
R19.0181	Strategic and Development Management Policies			Policy S7: Improving Air Quality	The Upper Street Association	Local society	We particularly support the Draft Plan in reference to the environment. We note that Para 6.93 stresses that 'the whole of Islington is covered by an Air Quality Management Area (AQMA), where national air quality objectives in relation to NO2, PM10 and PM2.5 are not likely to be achieved.' We recognise that Islington and Camden were among the first London Boroughs to accept the need to improve air quality.	Support	Support noted.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0181	Strategic and Development Management Policies			Policy DH3: Building heights	The Upper Street Association	Local society	Para 8.45. Islington is historically a low-rise but densely built area. We note and accept that policy should optimise development while providing a form of development at a human scale. 'There are significant opportunities to optimise development while providing a form of development at a human scale which is responsive to the surrounding contextual heights across much of the borough.'	Support	Support noted.
R19.0181	Strategic and Development Management Policies			Policy DH4: Basement development	The Upper Street Association	Local society	We welcome this Policy entirely.	Support	Support noted.
R19.0181	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	The Upper Street Association	Local society	Respondent welcomes strong protection of Chapel Market and that the night time economy should demonstrate that there will be no significant adverse effect on local amenity. However, additional pedestrian crossing provision on Liverpool Road is unnecessary and it should be stated there is no provision to close off Liverpool Road or to divert traffic elsewhere.	Both	Support is noted. Policy SP4 makes no reference to increasing pedestrian crossings for Liverpool Road in particular.
R19.0181	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	The Upper Street Association	Local society	Increased footfall as the result of promoting the night time economy and pubs requires more adequate provision of public toilets. Future licensing of pubs and bars should be expressly linked to adequate provision of in-house facilities.	Object	Policy T4 requires any enhanced public realm where users are encouraged to dwell to provide free, publicly available provision of unisex accessible toilets. Community toilet schemes are also promoted.
R19.0181	Strategic and Development Management Policies			Integrated Impact Assessment	The Upper Street Association	Local society	Comments on the IIA and welcome the baseline comments on townscape and cultural heritage, notes the deprivation, however notes that some of the environmental and pollution data may need updating.	Object	Comments noted and data will be reviewed and updated if necessary as part of future iterations of the IIA.
R19.0181	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	The Upper Street Association	Local society	Prioritisation of pedestrians and public transport is welcome	Support	Support noted.
R19.0182	Site Allocations	BC50: Queen Mary University, Charterhouse Square Campus	B & C: Historic Clerkenwell		Queen Mary University of London	Landowner	Welcome the allocation in principle and are supportive of the proposed uses. Given the constraints on the site it is considered that allowing the expansion of research activity at the campus is more important than retaining student accommodation on site. QMUL feel that the creation of a pedestrian link through the campus is not deliverable, mainly due to safety concerns for their staff, and request that this is removed from the development considerations.	Support	Permeability of any site is important. The council considers the potential for a route through the site should be explored as part of any development proposals.
R19.0182	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Queen Mary University of London	Landowner	The Charterhouse Square Campus is located within the Bunhill and Clerkenwell area for which a separate Area Action Plan ('AAP') is currently being consulted on. Further detailed comments on the overall strategy for the Bunhill and Clerkenwell Area are set out in these representations.	Not stated	Comments noted.
R19.0182	Strategic and Development Management Policies			Policy B2: New business floorspace	Queen Mary University of London	Landowner	QMUL supports the principle of the uses outlined in part A (i) of policy B2, and requests clarity that medical research uses (B1b) are captured within this policy and explicitly referenced.	Both	Policy B2 covers B1b uses where justified. We do not consider an amendment is necessary to B2
R19.0182	Strategic and Development Management Policies			Policy B4: Affordable workspace	Queen Mary University of London	Landowner	QMUL would seek to ensure that the requirement to provide 10% affordable workspace is limited to developments comprising B1a office floorspace only. The requirement to provide affordable workspace may impact on the overall delivery of wider schemes and this industry does not necessitate provision of workspace as it is already supporting critical functions of the local plan. QMUL states that there are clear differences in the viability of delivering workspace between b-class categories and that policy should consider these.	Not stated	Affordable workspace is required from major development proposals involving 1,000sqm or more of B-use floorspace. Limiting affordable workspace to B1a development only is not considered appropriate as the Council considers other uses could provide AW and not seeking this could mean foregoing vital AW.
R19.0182	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	Queen Mary University of London	Landowner	Have queried that the policy is contrary to London Plan policy on 'meanwhile use'.	Object	The policy is justified on grounds that by removing units from the housing market for certain periods will have a significant impact on local housing supply; there are also potential security and privacy issues. We note that the GLA conformity response considered the draft plan to be in general conformity with the London Plan and made no comment on policy H6.
R19.0182	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	Queen Mary University of London	Landowner	Supportive of the requirement for affordable student accommodation but would like to ensure that this is only sought on the 38 weeks of the year when the accommodation is open to students, which would be in line with the London Plan definition of affordable student accommodation.	Object	The Local Plan defers to the London Plan re: affordable student accommodation. The London Plan states: "The definition of affordable student accommodation is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year."
R19.0182	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Queen Mary University of London	Landowner	Seeks support for the re-purposing of Dawson Hall student accommodation to postgraduate teaching and research with the student accommodation moving elsewhere in their portfolio.	Object	There is no explicit policy protection for student accommodation but we note that a key objective of the Local Plan is to meet and exceed housing targets, and that any loss of NSC accommodation could undermine this aim. Other Local Plan policies will determine suitability of other uses on site.
R19.0182	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Queen Mary University of London	Business	Support BC1 part D which sets out exceptions for uses that are publicly funded or serve a public purpose including education and research uses. They are concerned that the Policy BC1, if applied to the QMUL site would compromise the ability to provide education and research facilities. QMUL request an amendment to state that other medical and research uses (B1(b)) be including within the policy wording of BC1 part Dii on the basis that medical research is a key employer in the area and plays a vital role in the operation of the Charterhouse Square campus.	Both	This was changed in the site allocation for the site following the comments made at the Regulation 18 stage; further amendments are not considered necessary. The revised allocation states: "Higher education and medical and research uses, alongside improvements to increase permeability through the site. Development on the site may include some B1(a) office space and B1(b) research space linked to overarching higher education, medical, and/or research uses. The Council will resist development of additional student accommodation on the site; however, development which rearranges the existing quantum of provision of student accommodation may be acceptable."
R19.0182	Bunhill and Clerkenwell Area Action Plan			Policy BC8: Historic Clerkenwell	Queen Mary University of London	Business	As with previous representations QMUL object to the potential north south pedestrian route through the Charterhouse Square campus. They state the proposed route would materially impact the operation of the WHRI and create a public thoroughfare through a closed research centre. The site needs to be able to be locked down due to the nature of the research that takes place there.	Both	The council considers that increased permeability through the site is an important aspect of any proposed redevelopment. The route indicated on figure 3.7 is considered indicative, therefore an alternative route may be appropriate. We note that proposed improvements which also entail restrictions could be suitable, dependent on appropriate justification. The allocation is worded broadly to reflect the principle of permeability, and doesn't, for example, prescribe a 24hr publicly accessible through route.
R19.0183	Site Allocations	N/A - general comment	N/A		TfL City Planning	Statutory consultee	TfL City Planning have confirmed that the queries they raised regarding a number of site allocations in response to the Regulation 18 consultation have been resolved in the Regulation 19 draft documents.	Not stated	Response noted.
R19.0183	Strategic and Development Management Policies			N/A - general comment	TfL City Planning	Statutory consultee	TfL City Planning have provided a table with their Regulation 18 comments on SDM and Sites, with an additional row which elaborates further on these comments or confirms where they have no further comments. The row below relate to those comments which elaborate further where TfL have outstanding comments/objections.	Not stated	See detailed LBI responses to relevant comments.
R19.0183	Strategic and Development Management Policies			Appendix 3: Transport Assessments and Travel Plans	TfL City Planning	Statutory Consultee	Travel Plans - please use this URL in Appendix 3 footnotes: <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants">https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants</a> . TfL request contact details of an officer to attend travel plan guidance working group.	Not stated	URLs will be updated via a modification to the Local Plan. Relevant officer will be informed of forthcoming meeting.
R19.0183	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	TfL City Planning	Statutory Consultee	Innovative spatial approach is welcome, but would welcome further discussions on how this is calculated and related to the LCDS. Request to change GIA to GEA, which would increase the provision. Strongly support accessible parking standard	Both	The standard will be changed to GEA via a modification to the Local Plan. The transport topic paper provides further detail on how the standards were derived.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0183	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport, Part D	TfL City Planning	Statutory Consultee	The Mayor's Transport Strategy (MTS) targets should be included up front and referenced. The Mayor recognises Islington's potential to achieve higher mode share targets. Islington will need 83 per cent mode of residents' journeys to be on foot, cycle and public transport mode in 2021 and 89 per cent in 2041. This could be referenced in section 7.1 or 7.6. It is difficult to see how citing the exact numbers as recommended above would worsen the policy document given that the qualitative principles expressed throughout it elsewhere clearly target very similar outcomes for Islington. We therefore again request for the MTS targets to be added to the T1 supporting text.	Not stated	The issue is more relevant to the Transport Strategy. Quoting different targets from different sources just risks confusion. We have cited our own targets as they best reflect the local context.
R19.0183	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	TfL City Planning	Statutory Consultee	Please use a capital 'A' for approach and cross-reference the Healthy Streets wheel diagram as previously requested.	Not stated	The Healthy Streets approach will be explained in our emerging Transport Strategy and is referenced in the Local Plan. The wheel at Appendix 3, by itself, does not offer clarity on the Healthy Streets approach.
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part B	TfL City Planning	Statutory Consultee	It would be appreciated if TfL could be explicitly referenced in the policy wording so: 'relevant guidance and/or best practice standards, especially by TfL' or 'relevant TfL guidance and/or best practice standards'	Not stated	Policies T1 and T2 have sufficient reference to signpost to more substantive guidance in the London Plan and Mayor's Transport Strategy.
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part C	TfL City Planning	Statutory Consultee	It seems that the section on Shared space in supporting text has been removed	Not stated	It is at paragraph 7.12. We have kept a strong line to seek the installation of kerbs for streets, or the delineation of pedestrians and cyclists on shared footways.
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part C	TfL City Planning	Statutory Consultee	Happy with the new shared space policy. However would like to add 'uniformly flat' for the single surface, as 'where it involves a single uniformly flat surface'.	Not stated	The additional wording is unnecessary as such a requirement is already clear from the policy. It would preclude surfaces such as cobbles for example.
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part E	TfL City Planning	Statutory Consultee	Please add that cycle stores and parking must be highly visible	Not stated	T1 and T2, in conjunction with other design policies, would ensure entrances are not hidden away, e.g. down an alley behind the bin store.
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part E	TfL City Planning	Statutory Consultee	Please add E. (v) supporting the maintenance and expansion of the TfL Cycle Hire network, at a level proportionate to the size of the development' This would align with the critique of dockless bikes sometimes causing street clutter at Paragraph 7.20.	Not stated	Paragraph 7.4 was amended to refer to cycle hire infrastructure, in response to TfL regulation 18 comments. Further amendment is not considered necessary.
R19.0183	Strategic and Development Management Policies			Policy T3: Car-free development, Part G	TfL City Planning	Statutory Consultee	Disabled parking bays outlined in Islington's plan comply with the standards set out in the Planning Obligations SPD and Inclusive Design SPD. These should be amended to reflect the residential parking standards in Policy T6.1 G (3% available from the outset, the remaining 7% provided in the future via a Parking Design and Management Plan) and non-residential disabled persons parking standards (5-6%) in Table 10.6. The temporary use of bays as parklets or cycle storage is supported.	Both	The Council considers the Local Plan standards are more appropriate re: residential use as they are based on local need. However, we will amend the non-residential element of the policy via a Local Plan modification as per TfL request.
R19.0183	Strategic and Development Management Policies			Policy T3: Car-free development, Part H	TfL City Planning	Statutory Consultee	TfL does not support car clubs in the CAZ, which have impacts in terms of road danger and congestion, and number of trips. Car clubs should only be acceptable in area of low PTAL (less than 4). Any car club spaces should have active charging facilities.	Object	Car clubs reduce levels of private car ownership. In 2016/17 each car club car provided in London resulted in members selling or disposing of 10.5 private cars. Islington has the second lowest level of car ownership by population in the country. Using Car club cars is usually less costly and easier than running a private car. Car clubs tend to use the latest and least polluting cars on the market. Car club members tend to use the cars when the roads are least congested and when not using car club vehicles they are also more likely to participate in active travel, like walking and cycling. Car club cars are better used than most privately owned cars, so they spend less time occupying kerbside parking spaces. We do not agree with the proposed restrictions in the CAZ and high PTAL areas. All vehicle parking including car clubs must provide EVCP.
R19.0183	Strategic and Development Management Policies			Policy T3: Car-free development, Part J	TfL City Planning	Statutory Consultee	Clarify that on street charging points for existing on street parking should be located on the main carriageway and not on the footway, in a safe and convenient place that does not impede pedestrian or cycle movements and desire lines as demonstrated in section 7.28. Please add that 'charging points should ideally be located off the main footway, in safe convenient places that do not impede pedestrian or cycle movements or desire lines.'	Not stated	Para 7.31 clarifies that EVCP must be provided within the parking space to minimise street clutter. Policies T1 and T2 will ensure impacts on pedestrian and cycle movement are mitigated.
R19.0183	Strategic and Development Management Policies			N/A - general comment	TfL City Planning	Statutory Consultee	Paragraph 2.4, now on page 23, remains negatively worded despite now acknowledging the need for joint working with Hackney in relation to Dalston town centre and other areas. Specifically, TfL requests this amendment: <i>'Some parts of Islington, particularly those areas adjacent to the borough boundary, may experience change by virtue of significant development in other boroughs. Islington is committed to working with other boroughs and relevant stakeholders to deliver such development while preventing/mitigating impacts for both Islington residents and businesses and other Londoners and the rest of London. Of particular relevance is joint working with the London Boroughs of Hackney (with regard to Dalston Town Centre, Finsbury Park Town Centre and the City Fringe/Shoreditch area), Camden (with regard to King's Cross) and Haringey (with regard to Finsbury Park Town Centre).'</i>	Object	The paragraph is not worded negatively. The Local Plan fundamentally concerns Islington but the paragraph (amended in response to TfLs previous comments) acknowledges the need to work with other boroughs and stakeholders, which would ensure impacts elsewhere are also mitigated. Relevant Local Plans and guidance would apply to other boroughs where development spans a borough boundary.
R19.0183	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	TfL City Planning	Statutory Consultee	Paragraph 2.52 still states that Crossrail 2 'will not be delivered until the end of the plan period at the earliest'. We therefore again suggest this is rephrased, as: 'Crossrail 2 is due to open in the 2030s'.	Object	Crossrail 2 is not yet funded and it is not clear that it will open in the 2030s. The current wording is considered sufficient.
R19.0183	Strategic and Development Management Policies			Policy ST3: Telecommunications, communications and utilities equipment	TfL City Planning	Statutory Consultee	Can the following text please be added to ST3 sub-section C: 'Applications for mobile phone network development must demonstrate that they have followed and are in accordance with the Code of Best Practice on Mobile Network Development in England or subsequent similar guidance, and the latest TfL Streets toolkit guidance.'	Object	Text will be added via modification to the Local Plan.
R19.0183	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Lion Portfolio Ltd	Developer	Our client remains generally supportive of the policy, which encourages proposals for the redevelopment/intensification of sites with existing business floorspace to look to maximise business floorspace provision as far as possible in line with the council's priority for the City Fringe Opportunity Area. The Spatial Strategy diagram (Figure 3.2) identifies five sites where tall buildings (30 metres and above) may be appropriate in the City Fringe Opportunity Area Spatial Strategy area. The Castle House and Fitzroy House (BC48) allocation site is not included. This approach and the map identifying the five specific sites potentially suitable for tall buildings is not supported by our client. We suggest that the sitespecific identification approach is reconsidered and that the scope for the Castle House and Fitzroy House (BC48) allocation site to potentially accommodate a tall building is reconsidered, having regard to detailed site appraisal and analysis.. Amended wording suggested.	Both	Support noted. See responses to DH3 re: objections to tall buildings policy.
R19.0184	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Resident	Business	<p>The respondent has been a long term homeowner in Islington and set up two businesses in the borough. Now lives in Camden, within near proximity to the Vale Royal/Brewery Road LSI.</p> <p>The respondent supports the council's decision to protect the area against Tileyard who are seeking to exploit this space by claiming to be a creative industry and not putting back very much in hope of taking out.</p>	Support	Support noted for the protection of Vale Royal/Brewery Road against encroachment of office.

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object	LBI response
R19.0185	Site Allocations	AUS8: 161-169 Essex Road	Angel and Upper Street		Resurrection Manifestations	Landowner	Landowner welcomes some of the amendments to the allocation, which allow more flexibility in terms of acceptable land uses, but objects to the priority given to business, and particularly office, uses on the rear part of the site. State the site sits outside of any of the areas prioritised for business uses in SDMP policy B1, and that residential use would be more in keeping with the surrounding context. Consider D1 uses should be included alongside D2 uses in the allocation, and that the commercial reality is that residential use is necessary to make the refurbishment of the listed building viable. Allocating the site as employment land will significantly constrain the development potential of the site.	Object	The site's existing use is D2 in a predominantly commercial area. It sits within Angel Town Centre, which the draft Local Plan designates a cultural quarter where existing cultural uses will be protected and new cultural uses promoted. In addition, the site is part of the CAZ fringe spatial strategy area of Angel and Upper Street, where proposals are expected to maximise the amount of new business floorspace. The policy for the spatial strategy area (SP4) is clear that business use is a priority land use in Angel Town Centre. However, it is recognised that a more flexible approach to the land use for the rear part of the site may be acceptable given the range of considerations on this site, including the location of buildings within the site context, as well as the need to support the restoration of the heritage asset and bring it back into use fully. A modification to the allocation in relation to the provision of residential and business use will be considered.