

Appendix 1 Strategic and Development Management Policies Main Modifications Schedule

SDMM01

Page in submitted plan: 4

Section paragraph policy: 1.2

Proposed change

The Local Plan provides a clear, bold framework for planning decisions which set out what we expect from development. The Local Plan covers the period 2020/21 to ~~2035/36~~ **2036/37** ("the plan period"). Islington is a borough with significant constraints, and it is not hyperbole to state that each and every development must make the most of every site and development opportunity, in order to ensure that opportunities for using increasingly scarce resources, including a lack of developable land, are not wasted.

SDMM02

Page in submitted plan: 7, 8

Section paragraph policy: Table 1.1

Proposed change

List of Strategic Policies

Policy PLAN1: Site appraisal, design principles and process

Policy SP1: Bunhill and Clerkenwell

Policy SP2: King's Cross and Pentonville Road

Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site

Policy SP4: Angel and Upper Street

Policy SP5: Nag's Head and Holloway

Policy SP6: Finsbury Park

Policy SP7: Archway

Policy SP8: Highbury Corner and Lower Holloway

Policy H1: Thriving communities

Policy H2: New and existing conventional housing

Policy H3: Genuinely affordable housing

Policy H4: Delivering high quality housing

Policy H5: Private outdoor space

Policy H12: Gypsy and Traveller Accommodation

Policy SC1: Social and Community Infrastructure

Policy B1: Delivering business floorspace

Policy B2: New business floorspace

Policy B3: Existing business floorspace

Policy B4: Affordable workspace

Policy R1: Retail, leisure and services, culture and visitor accommodation

Policy R2: Primary Shopping Areas

Policy R3: Islington's Town Centres

Policy R4: Local Shopping Areas

Policy G1: Green infrastructure

Policy G2: Protecting open space

Policy G3: New public open space

Policy ST2: Waste

List of Non-Strategic Policies

~~Policy H5: Private outdoor space~~

Policy H6: Purpose-built Student Accommodation

Policy H7: Meeting the needs of vulnerable older people

Policy H8: Self-build and Custom Housebuilding

Policy H9: Supported Housing

Policy H10: Houses in Multiple Occupation (HMOs)

Policy H11: Purpose Built Private Rented Sector development

~~Policy H12: Gypsy and Traveller Accommodation~~

Policy SC2: Play space

Policy SC3: Health Impact Assessment

Policy SC4: Promoting Social Value

Policy B5: Jobs and training opportunities

Policy R5: Dispersed retail and leisure uses

Policy R6: Maintaining and enhancing Islington's unique retail character

Policy R7: Markets and specialist shopping areas
Policy R8: Location and Concentration of Uses
Policy R9: Meanwhile/temporary uses
Policy R10: Culture and the Night-Time Economy
Policy R11: Public Houses
Policy R12: Visitor accommodation
Policy G5: Green roofs and vertical greening
Policy S2: Sustainable Design and Construction
Policy S6: Managing heat risk
Policy S8: Flood Risk Management
Policy S9: Integrated Water Management and Sustainable Drainage
Policy S10: Circular Economy and Adaptive Design
Policy T2: Sustainable Transport Choices
Policy T4: Public realm

SDMM03

Page in submitted plan: 12

Section paragraph policy: 1.38

Proposed change

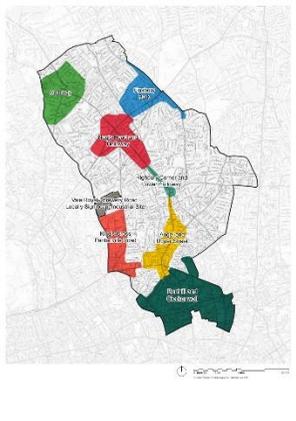
1.38 Provision of affordable workspace and suitable space for a range of businesses, including Small and Medium Enterprises (SMEs), is key to delivering an inclusive economy, as this is a tangible mechanism to open up the local economy to those who would otherwise find it difficult or impossible to access. ~~Provision of student bursaries, funded by new student accommodation, also offer opportunities to tackle the root cause of worklessness and give young people the opportunity to develop skills and learning.~~

SDMM04

Page in submitted plan: 22

Section paragraph policy: figure 2.1: Key Diagram

Proposed change



SDMM05

Page in submitted plan: 24

Section paragraph policy: Policy SP1: Bunhill and Clerkenwell

Proposed change

D. Site Allocations within the Spatial Policy Area are expected to deliver 1,260 homes and 216,900 of office space over the plan period.

SDMM06

Page in submitted plan: 24

Section paragraph policy: Policy SP1: Bunhill and Clerkenwell

Proposed change

A. The King's Cross Spatial Strategy area is partly covered by the CAZ, while the remaining part is a CAZ fringe location, including the King's Cross Priority Employment Location (PEL). Within these locations existing business uses will be safeguarded and proposals for the intensification, renewal and modernisation of existing business floorspace is encouraged. Proposals for new business floorspace are required to maximise the provision of business floorspace.

~~B. The Knowledge Quarter refers to the area around King's Cross where many important institutions spanning research, higher education, science, art, culture and media are based. Maximisation of B1 floorspace in the King's Cross Spatial Strategy area could support the expansion of the 'Knowledge Quarter' in Islington, and advance the development of a commercial corridor along Pentonville Road/City Road.~~

~~B.~~ **B.** A broad range of business floorspace typologies are suitable within the Spatial Strategy area, including Grade A offices, hybrid space, and co-working space.

~~D.~~ **C.** The Local Shopping Areas (LSAs) of Kings Cross, Caledonian Road (Copenhagen Street) and Caledonian Road (Central) are located in the Spatial Strategy area. The existing retail and service function of these areas will be maintained and

enhanced in line with Policy R4. These shopping areas function together collectively to form a 'high street' along Caledonian Road, which should continue to provide important services for local communities, particularly retail and leisure.

~~D.~~ **D.** Opportunities to repair, improve and unify existing frontages on Caledonian Road are encouraged, in particular the stretch between the junctions of Twyford Street and Copenhagen Street.

~~F.~~ **E.** The Council aims to improve the pedestrian, cyclist and bus network and will seek to reduce traffic access on some residential roads. Improvements to public transport capacity are supported. General improvements to the public realm, specifically along York Way and Caledonian Road, will create a safer and better-quality environment for pedestrians and cyclists. Measures to improve bus journey time and bus priority (especially over private vehicles) are supported.

~~G.~~ **F.** The Council will seek to improve connectivity and permeability for pedestrians and cyclists, within and across the Kings Cross area and nearby neighbourhoods, particularly east-west access. Removing barriers to movement and integrating the urban fabric are key priorities for the whole area, but particularly between the area east of York Way and King's Cross Central. All new development proposals, transport and other public realm schemes must contribute towards achieving these priorities.

~~H.~~ **G.** Regent's Canal will continue to be an important multifunctional space, primarily as a wildlife corridor but also as a recreational space for pedestrians and cyclists. Access to the canal should be improved, although increased access must not cause detrimental impacts, particularly for biodiversity.

~~I.~~ **H.** Proposals for **boater facilities and** residential moorings, including those which meet an identified housing need for boat dwellers, will be permitted where:

~~(i)~~ they are located on the south of the canal (off-side);

~~(ii)~~ supporting uses and facilities are in place from the first use of the mooring;

~~(iii)~~ **(i)** public access to and along the towpath is not impeded;

~~(iv)~~ **(ii)** they do not hinder navigation along the waterway;

~~(v)~~ **(iii)** there is no **adverse** impact on leisure provision **that cannot be mitigated**; ~~and~~

~~(vi)~~ **(iv)** there is no detrimental impact on air quality, nature conservation ~~/~~ **and** biodiversity **value or the and the** character **and amenity** of the waterway ~~;~~ **corridor including its function as public open space; and**

(v) they respect the amenity of neighbouring residential properties.

I: In addition to part H above:

(i) To meet the identified need for 7 additional permanent moorings for boat dwellers by 2025 the council will work with the Canal and River Trust to identify opportunities for and convert, where appropriate, existing leisure moorings in the area as well as exploring other opportunities for moorings through a waterspace strategy.

(ii) If the measures in (i) do not result in the delivery of 7 permanent moorings by the end of 2024, the Council will undertake an early focused review of Policy SP2.

(iii) Development of boater facilities will only be acceptable where there is an identified need, which will include being identified in the London Mooring Strategy.

(iv) Development of residential moorings must be located on the south of the canal (off-side) and supporting uses and facilities must be in place before the first use of the mooring.

J. 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.

K. Four sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.

L. Housing development will come forward on sites allocated for housing as well as windfall sites in the area over the plan period.

M. Site Allocations within the Spatial Policy Area are expected to deliver 270 homes and 20,500m² of office space over the plan period.

Remove footnote 5:

~~There is no defined boundary for the Knowledge Quarter within the Local Plan. For avoidance of doubt, the Knowledge Quarter would not encompass land north of the London Overground line which crosses York Way.~~

2.13 The remainder of the Spatial Strategy area – outside of the PELs – may also be appropriate for the development of business floorspace as the 'halo effect' from the King's Cross central development continues. **North of the canal it is recognised that there is a predominantly residential character where the development of business uses will be considered in line with relevant policies including B2 and H2.**

~~2.15 The activities of the Knowledge Quarter could encourage and support development which Camden and Islington Councils could harness for employment opportunities for local residents. This could range from employment opportunities in Knowledge Quarter industries; placements, apprenticeships, training and skills development, to affordable workspace provision. Ensuring an adequate supply of business floorspace in the Spatial Strategy area will support the Knowledge Quarter. The Knowledge Quarter could also support the development and enhancement of a commercial corridor, in particular the provision of additional business space of various typologies, along Pentonville Road/City Road, down to Old Street and the City of London boundary.~~

All subsequent paragraph numbers to change

...

Add new paragraphs:

2.23 Residential Moorings including those which meet an identified housing need for boat dwellers. In order to meet the identified need for 7 additional permanent moorings for boat dwellers during the plan period the Council will work with the Canal and River Trust to identify opportunities for and convert existing leisure moorings in the area where possible. Alongside this the council will explore the potential for the conversion of other types of moorings as well as opportunities for new moorings through the development of a waterspace strategy for the borough. Should the waterspace strategy not identify sufficient moorings by the end of 2024, it will be necessary to undertake an early focused review of policy SP2.

2.24 Boater facilities for the canal corridor includes infrastructure such as mooring points, water and electrical supply, and waste collection and does not include the development of buildings, which in accordance with policy G2 should not be developed on significant open spaces including the canal corridor.

SDMM08

Page in submitted plan: 32, 33

Section paragraph policy: Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site and supporting text

Proposed change

A. The Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS) will be retained and strengthened as the borough's most significant industrial location. The principal objective in this area is to retain industrial land and intensify ~~B1(e)~~ light industrial, B2 general industry and B8 storage and distribution uses, **including Sui Generis uses akin to these industrial uses. Light industrial use is now part of Class E and continues to be sought in the LSIS. For proposals involving light industrial floorspace, the Council will use conditions to limit Class E for this specific purpose (consistent with Policy B2: New business floorspace, Part C) and to protect the primary industrial function of the LSIS.** To ensure an adequate supply of industrial land and floorspace in Islington **industrial uses in the area will be protected in accordance with Policy B3.** ~~proposals that would result in a loss of industrial land or floorspace, either through change of use or redevelopment, will not be permitted. In addition, The~~ encroachment of **some** non-industrial uses ~~(especially office and residential uses) over time, which w~~ould jeopardise long term sustainability, economic function and future economic growth of the LSIS as an industrial area **and** will not be allowed.

B. The provision of 'hybrid workspace', which may incorporate a mix of the industrial-related uses, is encouraged. **Such P**proposals **(including those for refurbishment)** ~~for refurbishment of existing buildings or redevelopment~~ should provide a variety of spaces that can accommodate a range of industrial uses, including spaces which are suitable for SMEs.

C. The LSIS is a successful industrial location which accommodates a wide range of operators, including some existing **office use** ~~non-industrial uses such as offices.~~ **Proposals for the co-location of industrial use with office and/or research development use will be permitted, where there would be an intensification of industrial use on the site (either through new floorspace or the redevelopment/modernisation of existing floorspace) and it can be demonstrated that the continued industrial function of the LSIS would remain.** ~~While these existing operators currently co-exist with the predominant industrial uses, additional non-industrial uses would undermine the industrial function of the area. 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. The encroachment of offices is considered to be the principal threat to the continued industrial function and balance of uses in the LSIS. The development of office use may be permissible as part of a hybrid workspace scheme, but it must only constitute a small proportion of the overall gross floorspace proposed.~~

D. The Council recognises the contribution of businesses related to the music and entertainment industry in the area, including Tileyard Studios, and seeks to support this successful economic cluster, **including through allocation VR3: Tileyard Studios, Tileyard Road, of the Site Allocations DPD.** ~~through protecting existing uses. However, the development of new floorspace related to the music and entertainment industry uses/cluster must be in line with the land use policies set out in Parts A and C of this policy.~~

~~E. Where development is proposed — new build, alterations to existing buildings, extensions and/or demolition and redevelopment — building heights must not exceed five storeys (and in some locations should be less). Taller building elements may be acceptable where identified in relevant site allocations. All proposals which would increase existing heights must fully address criteria in Policy DH3 and other relevant policies.~~

~~F. Development must protect and enhance heritage assets in the area. Any proposals within the viewing corridor from Randell's Road Bridge to the clock tower on Market Road should be limited to three to four commercial storeys.~~

~~G. Development on York Way or Vale Royal, in proximity to the Maiden Lane tower adjacent to the western boundary of the LSIS, must be clearly sub-ordinate in height. Given the narrow street profile of York Way and Vale Royal, proposals should avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene~~

H. E. The LSIS is currently inward facing. Where possible, development should avoid blank frontages and create active frontages towards open spaces, such as Market Road Gardens and the sport pitches on Market Road. The creation of active frontages may also be appropriate along York Way and Caledonian Road, where consistent with the land use policies set out above.

F. Development proposals in the LSIS should, where possible, improve pedestrian and vehicle connections throughout the LSIS and have regard to proposed routes set out on the Spatial Strategy diagram.

G. 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. Proposals for B8 space should consider the potential provision of yard space.

H. Site Allocations within the Spatial Policy Area are expected to deliver 4,800m² of office space over the plan period.

Update supporting text as follows:

2.29 The retention and intensification of industrial uses in the Vale Royal/Brewery Road LSIS is a key priority. The Council considers industrial uses to be those which fall within **B1(e)** light industrial, B2 general industry and B8 storage and distribution, as well as certain Sui Generis uses with a clear industrial function. The LSIS must be protected and nurtured for a range of industrial uses, including the provision of hybrid workspace, which is particularly supported. The Council's evidence also suggests that the LSIS is an appropriate location for providing space for start-up companies and SMEs, in particular older, lower value stock which remains perfectly functional.

Add new paragraph 2.31 after paragraph 2.30

2.31 Islington's economic success relies on the diversity of its business clusters and the Brewery Road/Vale Royal LSIS is an example of this. In recent years, there has been an increase in "clean" industrial activities driven by market demand. Light industrial activities, particularly in the LSIS, have an important function in complementing and supporting general industrial and storage and distribution uses in the area. The LSIS has also an important role in supporting Central London's economy due to its proximity to the CAZ. The Council recognises the important economic function that the LSIS has and the need to safeguard existing and deliver new industrial floorspace in the borough. Existing B2 general industrial and B8 storage and distribution will continue to be protected from change of use to non-industrial. New light industrial floorspace will be secured through the use of conditions to avoid further losses of industrial floorspace to other Class E uses.

~~2.31~~ ~~2 B1(a) e~~ Office space is sought elsewhere in the borough – particularly in the CAZ and other designated employment areas – due to its contribution to jobs growth and employment floorspace. However, in the LSIS specifically, other forms of **industrial** business floorspace are prioritised. ~~and proposals involving additional floorspace must not result in the overall building being in more than 20% office use.~~ **Office and research and development floorspace will only be considered if they are included as part of a scheme where it can be clearly demonstrated that there would be an intensification of industrial floorspace and the continued industrial function of the LSIS would remain. Non-industrial floorspace as part of any proposals will be required to provide affordable workspace in line with policy B4, part B.** ~~The predominant land use must be industrial use (B1(c), B2 and B8, or Sui Generis use akin to an industrial use). Office uses may be acceptable as part of a hybrid workspace scheme where it is clear that it is not the predominant use.~~ **Other non-industrial uses which are not considered ancillary to the development could jeopardise the long term sustainability, economic function and future economic growth of the LSIS as an industrial area and will not be allowed.** ~~The introduction of other uses which could compromise the economic function and future economic growth of the LSIS (especially residential uses) will not be allowed, either stand-alone or as part of mixed use or co-location schemes.~~

~~2.32~~ ~~Notwithstanding this clear priority for industrial uses and the resistance of B1(a) and/or B1(b) and/or general B1 floorspace and/or Sui Generis use floorspace akin to B1(a)/B1(b) within the Vale Royal/Brewery Road LSIS, if such floorspace is permitted within the LSIS, affordable workspace must be provided in line with policy B4 Part B.~~

2.35 All development proposals in the LSIS must maximise the provision of industrial uses, including the delivery of hybrid workspace in the LSIS. Where new **B-industrial** uses are provided, conditions will be attached to the permission to remove any applicable permitted development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that specific industrial use(s) are retained and that any future loss is assessed against Local Plan policies via a planning application. By maximising these appropriate industrial uses, the LSIS can be developed without harming the delicate balance of existing industrial uses (including lower value uses) that are vital in sustaining economic diversity in the borough, and in supporting the wider economy.

~~2.36~~ ~~A detailed 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. Any increase in height will be considered prominent in the prevailing context, and would therefore trigger policy DH3 Part E; this will necessitate assessment against the criteria in policy DH3 Part F. Buildings of over five storeys may have a negative impact upon the scale of the streets within the LSIS and may appear overbearing, due to narrow road widths. It is also considered that five~~

~~storeys is appropriate in terms of responding sensitively to the area's historic setting and heritage assets. Development of up to five storeys can accommodate a range of industrial uses, consistent with the Council's priorities for the area. Building height should step down to 12-16m (three to four commercial storeys) within the viewing corridor to the Market Road Clock Tower, a designated local landmark which can be seen from Randell's Road Bridge, as shown in Figure 2.4. This will ensure that the view of this landmark is preserved and will maintain appropriate building height to street width ratio.~~

Subsequent paragraph numbers to be updated accordingly

SDMM09

Page in submitted plan: 37

Section paragraph policy: Figure 2.4: Vale Royal/Brewery Road Locally Significant Industrial Site Spatial Strategy diagram

Proposed change

Replace Figure 2.4 with the updated map below:

Refer to Appendix 1 for a high resolution version of this map.



SDMM10

Page in submitted plan: 38, 39

Section paragraph policy: Policy SP4: Angel and Upper Street, part E and I and new parts Q and R and supporting text at paragraph 2.52.

Proposed change

- E. Camden Passage is a specialist shopping area with a significant concentration of antique, curio and vintage stores. The unique function of this area will be strongly protected. **In line with protecting this function retail use, including at upper floors, will be strongly protected consistent with policy R7.**
- I. Consistent with the CAZ/CAZ fringe location, business use is a priority land use in Angel Town Centre, and on upper floors in the rest of the Spatial Strategy area. Existing **B1 office, research and development and light industrial** use will be protected and proposals for new business floorspace must maximise the provision of business floorspace, particularly in White Lion Street, Pentonville Road and upper floor locations across the Town Centre. The Sainsbury's site is a key strategic site which could deliver a significant amount of new business floorspace.
- Q. Housing will come forward on sites allocated for housing, on upper floors within the town centre (outside of the Specialist Shopping Area) as well as windfall sites within the wider area.**
- R. Site Allocations within the Spatial Policy Area are expected to deliver 80 homes and 24,600m² of office space over the plan period.**

Update supporting text as follows:

2.52 Crossrail 2 is a proposed ~~North-South~~ **South-West – North East** rail link across London, with a station planned at Angel. **Following the TfL funding settlement in November 2020 the project is ready to be restarted when the time is right. Crossrail 2 will still be needed in the future to support London's growth and TfL has demonstrated the**

case for the scheme. ~~The route is not yet funded and will not be delivered before until the end of the plan period at the earliest.~~ Any associated development must be in-keeping with the character and function of the area and must prioritise public realm improvements in order to positively improve the experience of the centre. A number of sites within Angel Town Centre are safeguarded to protect land needed to build and operate Crossrail 2, including land for the Crossrail 2 station itself. These sites are allocated in the Site Allocations DPD. Crossrail 2 should improve pedestrian permeability in the area and create a 24-hour pedestrian access between Islington High Street and Torrens Street through RBS building (site allocation AUS1).

SDMM11

Page in submitted plan: 42

Section paragraph policy: Figure 2.5: Angel and Upper Street Spatial Strategy diagram

Proposed change

Replace Figure 2.5 with the updated map below:

Refer to Appendix 1 for a high resolution version of this map.



SDMM12

Page in submitted plan: 43 and 45

Section paragraph policy: Policy SP5: Nag's Head and Holloway, part E, part K and new Part O and supporting text at paragraph 2.58.

Proposed change

E. Morrison's supermarket and its adjacent car park is the key opportunity site ~~to~~ **for the maximise-retention** and enhancement **of** retail ~~floorspace-provision~~ in the Town Centre in the longer term, as well as **for the** delivery ~~ing~~ **of** a significant amount of **residential and** office floorspace **on the upper floors, subject to amenity issues being addressed in line with the agent-of-change principle.** Other Town Centre uses may be appropriate as part of redevelopment of the site, including night-time economy uses such as restaurants. ~~Conventional residential accommodation will be acceptable on the upper floors, subject to amenity issues being addressed in line with the agent-of-change principle.~~ Existing site permeability through to Seven Sisters Road and the Nag's Head market must be maintained and retail user amenity should be improved. Enhancements to the covered market are encouraged where they fit with the wider function of the area and do not lead to adverse amenity impacts. Public open space should be provided to act as a focal point for the Town Centre.

I. The London Metropolitan University will continue to play an important role in contributing to the local economy. ~~Increased~~ Space for learning should be **consolidated and improved** ~~the focus for development~~ within the university campus. Additional accommodation for students will ~~not~~ **only** be allowed **where consistent with policy H6** ~~other than on sites allocated for student accommodation in the Spatial Strategy area.~~

K. The Seven Sisters Road, Isledon Road/Tollington Road gyratory system will be removed if feasible in the long term. **Removal of the gyratory system will need to consider and mitigate any significant adverse impacts on existing residents and businesses.** A cycle route linking Camden and Tottenham Hale along Seven Sisters Road will be supported. A junction improvement incorporating a cycle route link between Sussex Way to Hornsey Road will be progressed. Junction

improvements to Seven Sisters Road/Holloway Road, Hornsey Road/Seven Sisters Road and Holloway Road/Tollington Road/Camden Road will be prioritised.

N. Housing will come forward on sites allocated for housing, on upper floors within the town centre as well as windfall sites within the wider area.

O. Site Allocations within the Spatial Policy Area are expected to deliver 1530 homes and 22,000m² of office space over the plan period.

Update supporting text as follows:

2.58 The Nag's Head Shopping Centre is at the heart of the Town Centre and is occupied principally by Morrison's supermarket alongside a number of smaller retail units. The western part of the site fronting Seven Sisters Road includes the Nag's Head covered market, which contains a variety of retail, café and takeaway uses and adds vibrancy to the Town Centres retail and leisure offer. The shopping centre is a key development opportunity in the longer term, which could contribute towards ~~enhancing the~~ **improved** retail provision in the Town Centre **alongside significant residential** and ~~also intensifying~~ office ~~provision~~ **floorspace, pending consistency with relevant Local Plan policies including agent-of-change.** The existing centre could be improved; with reconfiguration to provide a better use of space with additional planting, pop-up stalls and events. The opportunity to create a significant public open space fronting Holloway Road should also be explored. ~~Some residential uses on upper floors of any redevelopment may be acceptable, pending consistency with relevant Local Plan policies including agent-of-change.~~

Proposed change

C. The Specialist Shopping Area at Fonthill Road is a unique agglomeration of specialist clothing stores which adds significant value to the character and vitality of the Town Centre and wider area. This specialist shopping role must be strongly protected and enhanced. **In line with protecting this function retail use, including at upper floors, will be strongly protected consistent with policy R7.**

D. Finsbury Park has potential to develop as an **important CAZ-satellite** location for additional business uses **to supplement the provision in the CAZ**, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In order to realise this potential, diminution of **office, research and development, light industrial B1**, B2 and/or B8 uses will be resisted and further intensification of these uses, particularly units suitable for SME occupation and **light industrial B1(e)** 'maker space', will be strongly encouraged.

~~E. In principle, residential development will only be suitable on upper floors in the Town Centre. Acceptability on upper floors will be judged on a case-by-case basis, factoring in the need to conserve sufficient ancillary space to allow commercial uses to continue to operate successfully as well as other considerations such as amenity impacts.~~ **Housing will come forward on sites allocated for housing, on upper floors within the town centre (outside of the Specialist Shopping Area) as well as windfall sites within the wider area.**

M. The area's key heritage assets include the Grade II* listed former Rainbow Theatre and the Grade II listed Church of St. Mark with St. Anne, which contribute significantly to Finsbury Park's character and townscape and will be protected and enhanced. **Development proposals must also conserve or enhance heritage assets including those in neighbouring boroughs where impacted.**

O. Site Allocations within the Spatial Policy Area are expected to deliver 290 homes and 20,200m² of office space over the plan period.

Update supporting text as follows:

2.66 Finsbury Park is a District Town Centre and its predominant commercial role must be maintained. A diverse range of shops within the area is essential, so that the overall retail offer can cater for the needs of different sections of the community, including the least well off residents in the area. The Primary Shopping Area seeks to secure a vibrant and viable

~~A1-use~~ retailing core. However, the overarching commercial role of the area is changing from traditional retailing to more leisure and experience-based retailing.

2.70 Finsbury Park has significant potential to develop as an **important** ~~unique-satellite~~ location, ~~outside the CAZ~~, for additional business uses **to supplement the provision in the CAZ**, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In developing this potential location, the focus should be on promoting and enhancing the nascent fashion, tech and creative industries through provision of units suitable for SME occupation and **light industrial B1(e)** space, particular 'maker space', as well as affordable workspace where appropriate. Ensuring adequate provision of such spaces in Finsbury Park will enable opportunities for the establishment of a mix of dynamic, sustainable local businesses.

2.71 Residential development will generally be resisted in the Town Centre on ground floors ~~or below~~ in order to retain the predominant **retail** function of the Town Centre. Residential uses on upper floors in the Town Centre may be acceptable **except for Fonthill Road SSA where because of the unique function and character, proposals for the change of use from main town centre uses to residential of any part of the premises, including upper floors or ancillary space will be strongly protected in line with Policy R7.** ~~dependent on the need to conserve sufficient ancillary space to allow for commercial uses to continue to operate successfully.~~ Other impacts, including the impact on the amenity of adjacent occupiers, will also be considered in line with relevant policies.

SDMM15

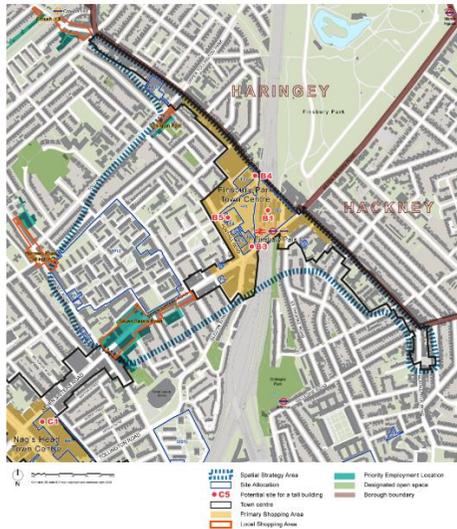
Page in submitted plan: 52

Section paragraph policy: Figure 2.7: Finsbury Park Spatial Strategy diagram

Proposed change

Replace Figure 2.7 with the updated map below:

Refer to Appendix 1 for a high resolution version of this map.



SDMM16

Page in submitted plan: 53, 54

Section paragraph policy: Policy SP7: Archway, parts B, F, I, N and supporting text at paragraph 2.83 and 2.84

Proposed change

~~B. The Council will support Archway Town Centre role as a Cultural Quarter where existing cultural quarter uses will be protected. Opportunities to further develop and enhance the cultural offer in the Town Centre must be investigated as part of all relevant development proposals.~~

Other clause references to be updated

FE. Existing business floorspace will be protected and proposals that result in a net loss of business floorspace in the Town Centre will be resisted. Development proposals for new business floorspace, particularly SMEs and/or **light industrial B1(e)** floorspace which supports the areas cultural offer or other local institutions such as the Whittington Hospital, will be encouraged.

~~**IH.** Residential development is considered acceptable on sites allocated for this purpose. Small scale residential use on upper floors across the Town Centre may be acceptable where it does not adversely impact the commercial function of the centre and where the ability of commercial uses in the area to operate effectively is not compromised.~~ **Housing will come forward on sites allocated for housing, on upper floors within the town centre as well as windfall sites within the wider area.**

N. Site Allocations within the Spatial Policy Area are expected to deliver 580 homes and 8,300m² of office space over the plan period.

Amend supporting text as follows:

~~2.83 There is a growing reputation for culture in Archway, which is a designated Cultural Quarter. The area currently has a diverse cluster of community led arts, culture organisations and music venues, providing a dynamic, inclusive cultural offer; this varies from the annual cultural events such as the Archway with Words Festival, to important art and drama venues such as Kogan Academy and Central Saint Martins.—~~

~~2.84 It is vital that the Town Centre secures cultural facilities that are suitable, attractive and affordable, in order to further enhance Archway's reputation as a cultural destination with a diverse locally inclusive arts scene. The Methodist Hall, adjacent to Navigator Square, could provide a cultural hub for the Town Centre. Similarly, the Archway Tavern could be revitalised to complement other music venues in the area.—~~

2.86 The Primary Shopping Area will remain the focus of **A1** retail use with a range of other uses promoted elsewhere in the Town Centre. Archway is identified as a night-time economy of more than local significance in the London Plan; the area has potential for expansion of night-time economy uses, dependent on mitigation of any adverse impacts, particularly noise and disturbance for residents and businesses.

SDMM17

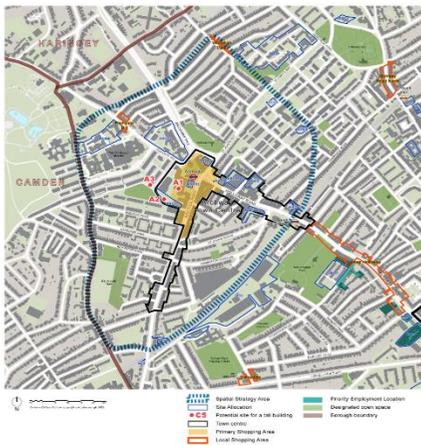
Page in submitted plan: 57

Section paragraph policy: Figure 2.8: Archway Spatial Strategy diagram

Proposed change

Replace Figure 2.8 with the updated map below:

Refer to Appendix 1 for a high resolution version of this map.



SDMM18

Page in submitted plan: 58

Section paragraph policy: Policy SP8: Highbury Corner and Lower Holloway

Proposed change

H. Housing will come forward on sites allocated for housing as well as windfall sites within the spatial strategy area.

I. Site Allocations within the Spatial Policy Area are expected to deliver 50 homes and 4,200m² of office space over the plan period.

SDMM19

Page in submitted plan: 60

Section paragraph policy: Figure 2.9: Highbury Corner and Lower Holloway Spatial Strategy diagram

Proposed change

Replace Figure 2.8 with the updated map below:

Refer to Appendix 1 for a high resolution version of this map.



SDMM20

Page in submitted plan: 61, 62

Section paragraph policy: Policy H1: Thriving Communities

Proposed change

- A. Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities which are economically, environmentally and socially healthy and resilient. All new housing development must be fully integrated within, and relate positively to, its immediate neighbours and locality. Gated development is not suitable, as it isolates and compartmentalises communities.
- B. All new housing must contribute to the delivery of the Local Plan vision and objectives, making the borough a fairer place through the delivery of the right type of housing that meets identified needs.
- C. Islington support high density housing development. Proposals which include housing must make the most efficient use of land to ensure that the optimal amount of housing is delivered, while having regard to other Development Plan policies and the specific site context. Proposed developments which result in the reduction of land supply which could

reasonably be expected to be suitable for conventional housing, and would therefore threaten the ability to meet housing targets, will be refused. **Further detail on this policy approach is set out in Policy H2.**

- D. High quality new homes are integral to achieving the aim of making the most efficient use of land and improving quality of life of residents. Homes should be designed as a place of retreat and as such must contribute to improving the health and wellbeing (both physical and mental health) of residents. New homes must be designed to be adaptable over their lifetime to accommodate changing needs. **Further detail on this policy approach is set out in Policy H4.**
- E. Delivery of genuinely affordable housing is a key priority of the Local Plan. The overarching strategic target over the plan period is for 50% of all new housing to be genuinely affordable. **Further detail on this policy approach is set out in Policy H3**
- F. The affordable housing tenure split on all schemes must prioritise forms of affordable housing which is genuinely affordable for those in need, particularly social rented housing. **Further detail on this policy approach is set out in Policy H3.**
- G. Islington will seek affordable housing contributions from small sites (less than 10 net additional units) to fund the development of affordable housing in the borough, including Council-led housing developments. **Further detail on this policy approach is set out in Policy H3.**
- H. Islington is committed to meeting and exceeding the boroughs minimum housing delivery target as set out in the London Plan. **Further detail on this policy approach is set out in Policy H2.**
- I. The Council will maintain a supply of housing land to meet housing targets over the plan period, with a particular focus on demonstrating a five year supply of land. **The Council will produce a housing trajectory, which will be published annually as part of the monitoring framework. Further detail on this policy approach is set out in Policy H2.**
- J. The size mix of new housing must reflect local need, with priority for units suitable for families. **Further detail on this policy approach is set out in Policy H2.**
- K. Conventional residential accommodation must be designed to meet a variety of needs throughout its lifetime. Various forms of specialist housing may be necessary to provide support to specific groups of vulnerable people and those at risk. **Further detail on this policy approach is set out in Policy H7.**

- L. Housing needs for older people will predominantly be met through conventional housing. ~~In exceptional circumstances~~ **Where there is an identified need**, specialist accommodation for vulnerable older people may be required. **Further detail on this policy approach is set out in Policy H7.**
- M. The provision of additional student accommodation will be restricted **to allocated sites or sites in existing use as purpose built student accommodation or where there is a wider master-planned approach to consolidate and reconfigure educational floorspace on a university campus.** Any proposals for student accommodation will be expected to provide ~~funding for bursaries for students as a priority, and~~ affordable student accommodation. **Further detail on this policy approach is set out in Policy H6.**
- N. **Purpose Built Private Rented Sector development will need to provide affordable housing in line with Policy H3 and meet the criteria set out in Policy H11.** ~~Purpose Built Private Rented Sector development will be resisted. The so-called 'Distinct Economics' of Purpose Built Private Rented Sector development is not in itself justification to circumvent policy requirements.~~
- O. Self-build and Custom build housing will be supported on suitable sites, where compliant with other relevant policies. **Further detail on this policy approach is set out in Policy H8.**
- P. The Council will support the provision of new supported housing where there is an identified need, and will resist the loss of existing supported housing. **Further detail on this policy approach is set out in Policy H9.**
- Q. Existing good quality Houses in Multiple Occupation (HMO) will be protected. Large-scale 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 **deliver other the land use** priorities of the Local Plan. Proposals for large scale HMOs will be assessed against the **criteria set out in Policy H10.**
- R. The Council will seek to meet an identified need for Gypsy and Traveller accommodation. ~~This may include provision of a site within the borough following further site finding work, or by securing provision outside the borough in consultation with neighbouring boroughs and the GLA.~~ **Further detail on this policy approach is set out in Policy H12**
- S. Islington will support the retention and development of social and community infrastructure necessary to support the borough's residents, workers and visitors. This infrastructure must be designed to be high quality, appropriate to

specific needs and requirements of the use and users; and located in places that are accessible, safe and convenient for people of all ages that use them. **Further detail on this policy approach is set out in Policy SC1.**

- T. Existing play space will be protected and new play space will be sought as part of development. This should meet the needs of children and young people of all ages and abilities. Provision of incidental play space and the creation of playable environments, as part of building/public realm design, adds a further important element of play. **Further detail on this policy approach is set out in Policy SC2.**
- U. The health of communities is a very important consideration as part of new development. Health Impact Assessments will be required in order to assess how new development will affect the health of local communities. **Further detail on this policy approach is set out in Policy SC3.**
- ~~V. New development in Islington should maximise social value, beyond what the Council would expect as a standard level of social value on a scheme (resulting from compliance with all relevant policy requirements).~~

SDMM21

Page in submitted plan: 65-66 and 68-69

Section paragraph policy: Policy H2: New and existing conventional housing, Parts A, C, F, G and H and supporting text (paragraphs 3.29, 3.34 and 3.35)

Proposed change

A. 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. **The overall housing target for the plan period from 2020/21 to 2036/37 is a minimum of 13,175 homes.**

C. **Loss of Existing housing**

The following applies to proposals resulting in the loss of existing housing:

(i) The loss of existing self-contained housing will be **permitted where** ~~resisted unless~~ the housing is replaced by at least equivalent floorspace and does not involve the net loss of more than one unit.

(ii) The ~~net~~ loss of existing affordable housing units **will only be permitted in exceptional circumstances where there is no net loss of affordable housing floorspace** overall and in terms of social rented **floorspace** ~~housing—will not be permitted~~

(iii) Conversion of two or more units into a single dwelling is considered material and would require planning permission.

...

F. Studio and bedsit units will ~~not~~ be permitted ~~unless where~~ all of the following exceptional circumstances are demonstrated:

- (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;
- (ii) The delivery of additional higher priority unit sizes and/or proposed higher priority units of an increased size is not possible; and
- (iii) Provision of studios/bedsits would result in a high quality dwelling in accordance with Policy H4 and other relevant design policies.

...

G. To maintain a supply of ~~larger~~ family homes, the conversion of ~~a~~ residential units ~~s~~ into a larger number of self-contained units will only be permitted where:

- (i) The total floor area of the existing dwelling is in excess of 125sqm GIA;
- (ii) The total number of new homes resulting from the conversion is optimised in line with the housing size mix priorities; and
- (iii) The dwelling mix does not contain any studio/bedsit units or more than one one-bedroom unit.

~~H. All residential developments of 20 units and over are required to enter into a Section 106 legal agreement to ensure that all residential units will be occupied, to prevent wasted housing supply.~~

Update supporting text as follows:

3.29 Where redevelopment of affordable housing is proposed, ~~there should be no net loss of existing affordable housing units, both overall and in terms of existing social rented units. In exceptional circumstances,~~ **any** net loss of affordable housing units may be acceptable, where:

- ~~• there is no net loss of affordable housing floorspace, both overall and in terms of existing social rented floorspace;~~ **replacement affordable dwellings are of** high quality ~~replacement dwellings are provided in line with the requirements of~~ **with** policy H4 and the replacement units are addressing a specific need in terms of unit size, to be agreed with the Council's Planning and Housing departments.

...

3.34 Studio and bedsit units are not a priority housing size mix across any affordable or market tenures, and **they will only not** be permitted **unless where** specific exceptional circumstances are demonstrated, including demonstrating that studio/bedsit units form a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable element. 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. Applicants will also need to provide evidence clearly showing why higher priority housing sizes cannot be accommodated; this includes either additional higher priority unit sizes; or increased floorspace for higher priority units already proposed, which will be particularly important where such units are at the margins in terms of meeting space standards. Regarding the latter, additional space should not result in a unit/units being over-sized, as this would not be considered to be optimal use of a site/land in line with Part B of the policy.

...

~~3.35 Meeting Islington's housing need is challenging given the context of the borough and the competing development needs that need to be planned for. Where housing is provided, it is of paramount importance that the housing is occupied and contributes toward meeting housing need. To ensure that units are occupied, all new housing developments which propose 20 units or more will be required to enter into a planning obligation which requires the owners of individual dwellings within the development to use and occupy the individual dwellings as a dwelling house (i.e. personal occupation) or to ensure such use and occupation (i.e. through private rental). Further guidance is provided in the Prevented Wasted Housing Supply SPD. The requirement will not be applied to any affordable housing units as these would be bound by other legal requirements which would ensure occupation.~~

Remaining Paragraph numbering to be updated

SDMM22

Page in submitted plan: 70-77

Section paragraph policy: Policy H3: Genuinely affordable housing

And supporting text at paragraphs 3.44, 3.45, 3.46, 3.47, 3.48, 3.49, 3.51, 3.60, 3.61, 3.62 and 3.63.

Proposed change

- A. A minimum of 50% of the total net additional conventional housing built in the borough over the plan period must be genuinely affordable. Affordable housing tenures which are not considered to be genuinely affordable will be resisted and will not be counted towards the level of affordable housing provision on individual schemes.
- B. All sites (except for those which are currently or have been in full or partial public sector ownership) which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more must:
- (i) provide ~~at least~~ 45% on-site affordable housing (by net additional unit) without public subsidy; and
 - (ii) **demonstrate how exhaust** all potential **public subsidy** options for maximising the delivery of on-site affordable housing **to reach 50% (by net additional unit) have been utilised.** ~~to reach and exceed the strategic 50% target particularly through securing public subsidy.~~
- C. Where a site triggers Part B, and proposes a level of on-site affordable housing above 45% but less than 50% (regardless of whether public subsidy is provided or not), the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including ~~an advanced~~ **a late** stage review mechanism. **Any sites which trigger Part B and provide 50% on-site affordable housing (by net additional unit) will not be subject to a review mechanism.** ~~Any sites which trigger Part B and provide at least 50% on-site affordable housing (by net additional unit) will not be subject to an advanced stage review mechanism but will be subject to review mechanism which will be triggered if an agreed level of progress on implementation is not made within a certain period following grant of planning permission; and, in the case of large phased schemes, triggered prior to the implementation of later phases of the development.~~

- D. All sites which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more, and which are currently or have been in public sector ownership (either part or full public ownership) must:
- (i) provide ~~at least~~ 50% on-site affordable housing (by net additional unit) without public subsidy; and
 - (ii) **demonstrate how ~~exhaust~~ all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% (by net additional unit) have been utilised, ~~particularly through securing relevant public subsidy,~~ and demonstrate additionality delivered using any and all forms of public subsidy.**
- E. Where a site triggers Part D, and additional on-site affordable housing does not demonstrate 'additionality' above 50% to the Council's satisfaction, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an ~~late advanced~~ stage review mechanism.
- F. Where a proposal seeks to apply the portfolio approach in line with London Plan policy H5 the following will need to be demonstrated:**
- (i) At least 35% affordable housing is provided on-site (without subsidy);**
 - (ii) Confirmation of the Mayor's agreement to use of the portfolio approach and robust evidence to demonstrate the delivery of 50% affordable housing (without subsidy) across the portfolio and the timescales associated with achieving this; and**
 - (iii) All reasonable steps have been undertaken to maximise delivery of on-site affordable housing through public subsidy to deliver additionality above the level provided on-site under the portfolio approach.**

The Council will employ the use of early stage review mechanisms, as set out in paragraph 3.51, if substantial implementation is not achieved within two years. Where there are future changes to a proposal that result in a reduction of affordable housing provision agreed for the site under the portfolio approach, the proposal will be required to follow the viability tested route as set out in this policy.

If a site falls outside of the portfolio approach due to a change in circumstances then the proposals will be required to comply with H3 parts B, C, D or E as relevant.

G. F. Any proposal which does not provide the minimum required level of affordable housing set out in Part B or D will be refused **unless the Council accepts Part H can be applied.**

H.G. Site-specific viability information will only be accepted in exceptional cases ~~determined by the Council.~~ **This could include circumstances:**

(a) where a significant shift in macro-economic conditions has occurred which has a demonstrable negative impact on the delivery of development.

(b) where a development is proposed which is of a wholly different type and is therefore not reflected by any of the typologies used in the viability assessment that informed the Local Plan.

(c) where a development is proposed which demonstrates a very close alignment to a typology shown to be unviable at full policy compliance in the viability assessment that informed the Local Plan.

(d) where the development in question is an Estate re-development scheme which involves the demolition and replacement of affordable housing.

Where it is accepted that a site-specific financial viability assessment should be considered as part of an application, the Council will determine the weight to be given to the viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms. For schemes where a site-specific financial viability assessment is accepted, the site specific targets set out in Parts B or D must remain the starting point. Site-specific viability assessments will be tested rigorously and undertaken in line with the Council's Development Viability SPD and the maximum viable amount of affordable housing must be delivered. ~~Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence consistent with the Development Viability SPD.~~ Such proposals will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an ~~advanced~~ **late stage review mechanism.**

I. For schemes which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace, in genuinely exceptional circumstances affordable housing may be provided off-site or as a cash in lieu contribution. Cash in lieu contributions will be calculated based on the financial equivalent to on-site provision including an appropriate amount to take into account the value of the land.

~~H.J.~~ Where affordable housing is provided on-site, the Council will require an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should be London Living Rent, and regard will be given to the priorities set out in the Council's Housing Strategy and other agreed evidence of housing need.

~~H.K.~~ Sites delivering fewer than 10 residential units (gross) and/or which propose less than 1,000sqm (GIA) residential floorspace are required to provide a financial contribution to fund the development of affordable housing off-site. The level of contribution required will be £50,000 per net additional unit, except for the area south of Pentonville Road/City Road where the contribution required will be £60,000 per net additional unit.

~~H.L.~~ For proposals which trigger affordable housing requirements in Islington (either onsite or through financial contributions), ~~application of the Vacant Building Credit will not be appropriate. Where an applicant provides exceptional reasons~~ **will be required to justify application of why** the Vacant Building Credit ~~should be applied on a particular development, they must meet~~ **and** all of the following criteria **must be met**:

~~It is clearly demonstrated that the site would otherwise not come forward for any form of redevelopment at any point over the medium to long term;~~

- (i) **It has been demonstrated that the proposal has been considered under Policy H3, part H and the criteria for pursuing the viability tested route are not satisfied.**
- (ii) All buildings within the site boundary must be vacant at the time the application is submitted; **and it should be demonstrated that the buildings have been vacant for 3 years or more (this must meet the requirements set out in appendix 1).**

- (iii) There are no extant or recently expired permissions on the site, for any proposed use class.
- ~~(iv) — The proposal does not involve the loss of any capacity to meet other development needs from a site allocated for non-housing development; and~~
- (v) **It is clearly demonstrated that the site would otherwise not come forward for any form of redevelopment and** ~~The~~ **the** building has not been made vacant for the sole purpose of redevelopment~~7~~. **This should be** evidenced by provision of marketing ~~and vacancy~~ evidence for a continuous period of **24 months** ~~five years~~ (up to the point of submission of an application). Such evidence must meet the marketing ~~and vacancy~~ requirements set out in Appendix 1. **Evidence should also be provided setting out any site specific issues which form a barrier to the redevelopment of the site.**

Update supporting text as follows:

3.44 The London Plan advocates a 'portfolio approach' to delivering affordable housing, whereby public sector landowners must deliver 50% affordable housing in total across a number of sites (which can be in multiple boroughs); individual sites within the portfolio can deliver less than 50% so long as the overall amount is at least 50%. ~~The portfolio approach is not considered acceptable for any schemes in Islington. Where the portfolio approach is used it is important that opportunities for affordable housing are still maximised given the levels of affordable housing need in the borough, this should include exploring opportunities for public subsidy, taking account of the London Plan and borough-wide strategic 50% affordable housing target. 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. Such an approach is detrimental to the achievement of mixed and balanced communities. It will also be important that evidence is provided about the wider portfolio approach, including agreements with the Mayor to demonstrate affordable housing delivery will meet the London Plan strategic 50% target and timescales for this. Portfolio approach sites will be subject to Fast Track Route early viability review mechanisms as set out in London Plan Policy H5 if substantial implementation is not achieved within two years. It is recognised that there may be changes to individual schemes that form part of a portfolio approach. Where there is a proposed reduction in the level of affordable housing the proposal will be required to follow the viability tested route as set out in Policy H3; a site specific financial viability assessment should be undertaken in line with the Council's Development Viability SPD. If a scheme no longer meets portfolio approach requirements it will be required to comply with Parts B, C D or E of Policy H3 as relevant.~~

3.45 On all sites (both public sector and non-public sector), in addition to the respective minimum affordable housing requirements to be funded from development value alone, all potential options to secure **public subsidy** to provide further affordable units (i.e. additionality) must be fully ~~investigated utilised, including seeking public subsidy~~. This should include proactive engagement with Registered Providers at the earliest possible opportunity, ideally at pre-application stage. **Public subsidy includes, but is not limited to, any form of grant and loan from a public body, land received at zero or discounted value, and other funding sources available to Registered Providers such as rent receipts, receipts from sale of land, sale of shared ownership properties or similar products, and other funding a Registered Provider may provide.** Proposals must make clear the level of affordable housing provision with and without subsidy as part of the application process. On non-public sector sites which are required to provide ~~a minimum of~~ 45% affordable housing from development value alone, where the level of affordable housing does not meet ~~at least~~ 50% following any investigation of potential further options, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including ~~an advanced a late~~ stage review mechanism.

3.46 PPG states that review mechanisms are not a tool to protect a return to the developer, but to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project. ~~Advanced stage~~ ~~Review~~ mechanisms are an important tool to bolster affordable housing provision on each and every housing scheme, and thereby assist in meeting the Council's key priority of delivering genuinely affordable housing. **Further detail on review mechanisms is set out in paragraphs 3.51 and 3.52.**

3.47 For avoidance of doubt, any site which is not in public sector ownership **which triggers part B of policy H3** which achieves ~~at least~~ 50% affordable housing on-site **(by net additional unit)**, without public subsidy, will not be subject to ~~an advanced stage a~~ review mechanism. ~~;- however, such sites should still exhaust all potential options for maximising the delivery of genuinely affordable housing in excess of 50%.~~

3.48 Any proposal which does not provide the minimum required amount of affordable housing – in line with relevant policy requirements – will be refused. These levels of affordable housing have been informed by detailed viability evidence which demonstrates that these levels are viable and will not preclude development from coming forward. On a limited number of sites, there may be genuine exceptional circumstances which necessitate provision of site-specific viability information; the Council will consider this on a case-by-case basis. ~~but~~ The expectation is that such circumstances would usually only ~~relate to a significant shift in macro-economic conditions.~~ **include those set out in Part H of Policy H3, but in rare cases could include other factors and it would be for the applicant to demonstrate such exceptional circumstances.** The amount paid for land is not considered to be an exceptional reason to justify provision of site-specific viability, in line with

Government guidance. The Council will not entertain a viability assessment if it is considered that there are no exceptional circumstances which justify doing so.

3.49 Generally, viability information should not normally be required at application stage in order to inform future review mechanisms, and therefore this will generally not be considered appropriate **except in** exceptional circumstances. Values and costs will be assessed in the future, at the point of the viability review, informed by the Council's Development Viability SPD and, where relevant, the use of indices, to assess the change in values and build costs since permission was granted. However, there may be some cases – determined by the Council – where limited site-specific viability information is necessary to enable future review mechanisms to operate effectively. ~~Specific models of housing delivery including purpose built PRS and large scale HMOs would not justify provision of site-specific viability.~~

...

~~3.51 A pre-implementation review mechanism will be applied to all proposals which include affordable housing; this will trigger if a permission has not been substantially implemented within 12 months of permission being granted (and may trigger in other circumstances including where development is substantially implemented then stalled). Mid-point review mechanisms will also be applied to large phased schemes.~~

In line with Part C, Part E and Part H, the Council will employ the use of the following viability review mechanisms:

- (a) Early Stage review mechanism which will be triggered in the event that a planning permission has not been substantially implemented within 24 months of the planning permission being granted.**
- (b) Mid-term review mechanisms on large phased schemes which will be triggered prior to the implementation of phases.**
- (c) Late Stage review mechanisms which will be triggered at the point that 75 per cent of homes are sold, or at a point agreed by the Council.**

...

3.53 Given the acute affordable housing need in the borough and the limited availability of developable land it is essential that major housing developments provide affordable housing on-site. Experience over the past 10 years has shown that this can be achieved even on small/constrained sites. Consistent with the London Plan, affordable housing should be delivered on site. However, it is recognised that in some genuinely exceptional circumstances, this may not be possible and where this is the case off-site provision will be prioritised. Cash in lieu payments should be used in even more limited circumstances where there is detailed evidence that on-site delivery is not practical and off-site options have been explored but are not acceptable.

...

3.60 Contributions for off-site affordable housing for small sites – whether for the full amount or a lesser amount in line with the findings of agreed viability evidence – and the trigger point for payment of the contribution will be secured through a unilateral undertaking (Section 106, Town and Country Planning Act, 1990) which site owners, including mortgagees, will be required to enter into before the planning permission is issued. **In line with part H of policy there may be exceptional circumstances where viability evidence is necessary for small sites in particular where a proposal-demonstrates a very close alignment to a typology shown to be unviable in the Small Sites Viability Study.** The contribution will be payable on commencement of the development, although in exceptional cases the Council may accept alternative payment triggers, such as:

- Payment on practical completion for very small developments (i.e. subdivision of an existing home to create one additional unit).
- Payment on future sale where an additional self-contained unit is being created for a family member (or in similar circumstances) and there will be no immediate sale of the unit.

3.61 The Vacant Building Credit (VBC) is a material consideration in relevant planning determinations ~~but in Islington, it is likely that the acute need for affordable housing will outweigh application of the VBC in all cases.~~ The aim of the VBC is to incentivise development on brownfield sites, **however all of Islington's land supply is brownfield land and Islington has some of the highest development values in the country. In Islington, in situations where a site is vacant and**

particularly where it possesses a low Existing Use Value (EUV), there is an inherent incentive to redevelop the site. This means that even where there have been occasions, where one developer has not been able to bring vacant sites forward for housing because they were unable to deliver it in line with the development plan policies, they have been able to sell the site to another developer who could. Where a site is marketed – this should be for the existing use and other suitable alternative uses, including residential use. ~~–but this is an unnecessary incentive in Islington given that all development sites are brownfield, and the rate of recent and projected housing delivery is strong.~~ Applicants looking to justify application of the VBC will need to demonstrate exceptional circumstances and ensure that they meet **all** the ~~following~~ criteria **in H3, part L**:

~~–Provision of evidence that clearly demonstrates that the site would not come forward for redevelopment without use of the VBC. This should include, but is not limited to, viability evidence.~~

~~☐ Marketing and vacancy evidence to a standard set out in Appendix 1. This must be for a continuous period of at least five years up to the point of submission of an application. Any gaps in marketing or periods of time where marketing activity was less active will not be considered part of a continuous period.~~

~~☐ The proposed site is not allocated for non-housing development, either fully or in part. VBC may exacerbate loss of such sites which will detrimentally affect the ability to meet other development needs. For the purposes of the policy, non-housing development includes mixed-use allocations for housing alongside other uses and is not limited to sites allocated for 100% non-housing uses.~~

~~☐ There should be no extant or recently expired permissions (i.e. expired permissions with lapse date within three years prior to the point of submission of an application). Evidence of extant and/or recently expired permissions demonstrate that development is likely to come forward without additional incentive.~~

3.62 Where an applicant meets the criteria and VBC is applied, **the affordable housing policy will be applied to the uplift in the floorspace.** ~~VBC should be applied to the strategic policy of 50% affordable housing.~~

3.63 It should be noted that if a scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy (CIL) relief through the vacancy test.

SDMM23

Page in submitted plan: 77-84

Section paragraph policy: Policy H4: Delivering high quality housing and supporting text

Proposed change

- A. All new C3 and C4 housing developments (including conversions and changes of use) and specialist housing identified in policies ~~H6-H7 to H9 and to~~ H11 must be designed and built to a high quality for the duration of its lifetime. A high quality dwelling is one which meets the criteria set out in this policy and accords with the Local Plan objectives and other relevant Local Plan policies. Sufficient information, such as detailed dwelling plans showing internal layout, must be provided at the earliest possible stage of an application, to allow for proper assessment of proposals.
- B. Residential development must be functional, useable and comfortable space that has good amenity for occupiers of all ages. Regard must be had to the surrounding local context as part of the holistic consideration of inclusive design. Housing must be built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development, and must provide 90% of dwellings to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to 'Wheelchair **Adaptable Category M4(3)(2)(a) user dwellings**' standard **or, where Islington Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b)** as set out in the Approved Document M of the Building Regulations. ~~Category M4(3) standard dwellings must:-~~
- ~~(i) be provided across all tenures and unit sizes, and integrated within the development;~~
 - ~~(ii) be fitted out appropriately to enable occupation by a range of occupiers with diverse and changing needs; and~~
 - ~~(iii) be single storey, preferably on the ground floor. Where provided above or below entrance level there must be at least two suitable lifts available for use by each unit within a convenient distance from the front door of the units.~~

C. The Council may, in limited circumstances, accept a S106 contribution in lieu of Category M4(3) units on site, where there is definitive local evidence (produced by the Council) of a supply/demand imbalance for wheelchair accessible units. This contribution will be used to finance the development of new and adapted wheelchair accessible units elsewhere in the borough where demand is more acute. Any units where the Council accepts a contribution in lieu must be designed to Category M4(2) standard, instead of M4(3). The process for securing this contribution, and the amount required, will be set out in a revised Inclusive Design SPD.

...

- J. All development proposals which include residential units must fully assess noise and vibration impacts on and between dwellings, in line with policy DH5. Proposals should:
- (i) ensure residential units are sited away from sources of noise and vibration, to prevent impacts occurring; or
 - (ii) Where this is not possible, provide a detailed assessment of noise and vibration impacts. Where noise and/or vibration effects are identified suitable mitigation measures must be put in place to reduce these effects, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. **If Effects will need to be suitably** ~~cannot be~~ mitigated **for**; planning permission ~~will not to~~ be granted.

Update supporting text as follows:

3.71 Approved Document M of the Building Regulations sets out standards for 'Accessible and Adaptable' – known as Category M4(2) – and 'Wheelchair user dwellings' – known as Category M4(3). **Category M4(3) consists of two sub-categories; 'Wheelchair Adaptable' Category M4(3)(a) - which requires the dwelling to be constructed with the potential to be adapted for occupation by a wheelchair user - and 'Wheelchair Accessible' Category M4(3)(b) - which requires the dwelling to be suitable for immediate occupation by a wheelchair user.**

...

~~3.73 Category M4(2) and M4(3) dwellings must be fitted out appropriately to enable occupation by a range of occupiers with diverse and changing needs. This includes consideration of how occupiers use internal space. Further guidance is provided in the Inclusive Design SPD, but generally development should include:~~

~~appropriate internal door opening weights (no more than 30N);
a level entrance with threshold heights not exceeding 15mm;
window controls that are reachable and usable by those with mobility impairments; and
kitchens and bathrooms capable of being adapted easily — e.g. walls capable of taking grab rails, appropriate drainage to facilitate step free shower installation, kitchen tiling and plumbing which supports the operation of flexible height work surfaces and sink.~~

~~3.74 The Council may, in limited circumstances, accept a S106 contribution in lieu of Category M4(3) units on site, where there is definitive local evidence (produced by the Council) of a supply/demand imbalance for wheelchair accessible units. This contribution will be used to finance the development of new and adapted wheelchair accessible units elsewhere in the borough where demand is more acute. Any units where the Council accepts a contribution in lieu must be designed to Category M4(2) standard, instead of M4(3). The process for securing this contribution, and the amount required, will be set out in a revised Inclusive Design SPD.~~

~~3.75 Where the accommodation is provided on two or more floors, an indicative position for a through the floor lift must be shown on plan and a soft spot constructed on site.~~

~~3.76 The provisions of Part M take no account of local context in terms of development type or density, travel and transport facilities, or the infrastructure (utilities and amenities) supporting new or converted residential development, which are important as part of holistic consideration of inclusive design. The following requirements will help ensure the delivery of inclusive environments, rather than just focusing on inclusive design within dwellings. Further information is also provided in the Inclusive Design SPD and the Streetbook SPD:~~

~~Wheelchair housing units must be single storey, as multi storey wheelchair units have significantly increased energy usage due to the need to operate a through the floor lift, which also leads to increased energy costs for occupiers.~~

~~Wheelchair housing units must be provided across all tenures and unit sizes, and integrated within the development, preferably on the ground floor. Where provided above ground floors they must be served by at least two suitable lifts, within the common parts, within a convenient distance.~~

~~The overall travel distance between transport drop-off points (e.g. bus stops, car parking spaces, car club bays, loading bays), the main entrance of a development, and the entrance of each individual dwelling should be kept to a minimum and demonstrably within the reach of ambulant disabled people. There should be a maximum total distance of 75 metres from the drop-off point to the dwelling entrance.~~

~~Gates must be avoided on all entrance routes to buildings. Common entrances should be designed in accordance with standards set out in Islington's Inclusive Design SPD. Revolving doors are not considered acceptable for any entrances; provision of pass doors adjacent to revolving doors will not make revolving doors acceptable, as they create a separation between entrances for different users, which is not consistent with Local Plan inclusive design objectives and policies.~~

~~In all residential development, provision for the storage and charging of mobility scooters should be provided within communal parts, in close proximity to lifts, and no more than 20m from dwelling entrances. Entrances to mobility scooter stores must be step free. All doors must be lightweight yet secure, and sufficient turning space must be provided~~

~~Recycling and refuse stores, bins, post boxes and other communal facilities must be wheelchair accessible and located conveniently within the development, to encourage uptake of recycling.~~

Paragraph numbers to be updated accordingly

...

3.89 3.85 Dual aspect dwellings have multiple 'comfort' benefits, particularly by maximising levels of natural light and enabling cross ventilation (and therefore reducing necessity for mechanical ventilation). All residential dwellings should be dual aspect. There may be legitimate circumstances where dual aspect is impossible or unfavourable, but this must be clearly demonstrated in line with the policy requirements. Provision of a greater quantum of residential units is not

considered adequate justification for provision of single aspect units. **An example of where a dual aspect unit maybe impossible is a highly constrained site where there are issues of unacceptable overlooking/loss of privacy.**

SDMM24

Page in submitted plan: 87-89

Section paragraph policy: Policy H6: Purpose-built student accommodation and supporting text paragraphs 3.99, 3.100 and 3.101, 3.105, 3.106 and 3.107

Proposed change

- A. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will only be permitted on:
 - (i) sites allocated for purpose-built student accommodation; or
 - (ii) sites with existing purpose-built student accommodation, subject to consistency with other Local Plan policies and additional impacts of development being acceptable; **or**
 - (iii) **a university campus where reconfiguration of the educational floorspace as part of a wider master-planned approach to the higher education providers' plans for change result in a consolidation of social infrastructure floorspace that complies with Policy SC1, part D (iii)**
- B. All proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation must ensure a high standard of amenity for future occupiers of the development and residents in the surrounding area and must meet all the following criteria:
 - (i) Provide high quality accommodation in line with **the relevant policy requirements set out in** policy H4, including the provision of good-sized rooms and communal space ~~in line with relevant space standards~~. General needs units must be

designed to be 'visitable' and shared facilities must be accessible. A high level of amenity must be provided, including limiting noise impacts and providing good levels of daylight and sunlight, and natural ventilation;

- (ii) Ensure that ~~10~~ **5%** of bedspaces, their associated bathrooms and all common parts ~~(including a unisex WC on every floor)~~ are **easily adaptable for occupation by wheelchair users** ~~accessible from the outset, consistent with relevant guidance and best practice. Where wheelchair accessible rooms are located above entrance level, at least two lifts must be provided (of which one must be an evacuation lift), in addition to any requirement for a fire fighting lift;~~
- ~~(iii) Provide an ongoing financial contribution (as long as the site is in use as student accommodation) towards the provision of student bursaries for students leaving Council care and/or other Islington students facing hardship who are attending a higher or further education establishment;~~
- ~~(iv)~~ **(iii)** Ensure that the development is subject to an appropriate site management and maintenance plan;
- ~~(v)~~ **(iv)** Demonstrate, through a binding nomination agreement, that the accommodation will only be occupied by students of one or more higher education provider(s). Priority must be given to higher education providers in close proximity to the proposed accommodation in the first instance, then those located elsewhere within the borough;
- ~~(iv)~~ **(v)** ~~Prevent Temporary~~ use of student accommodation **for ancillary uses** ~~as general visitor accommodation will be secured via legal agreements/conditions to ensure —either short term or long term— due to~~ the potential impacts on the safety, security and privacy of **both resident students and wider amenity impacts** ~~long term residents will are be managed, and the . The potential individual and~~ cumulative impact on housing supply **will be considered and any proposal for temporary use which cannot be demonstrated ancillary will be resisted**; and
- ~~(v)~~ **(vi)** Provide at least 35% affordable student accommodation **in line with London Plan policy H15**, ~~unless this level of provision would affect other requirements in policy H6, particularly student bursaries. In such cases, the level of affordable student accommodation must be the maximum viable.~~
- ~~(vi)~~ **(vii)** **Demonstrates that the development contributes to a mixed and inclusive neighbourhood.**

...

3.99 Islington has consistently had the highest rates of student housing delivery in London over the past 10-15 years. Due to this substantial amount of delivery, as well the need to prioritise conventional housing and employment growth in a borough with severe constraints on land, the development of purpose-built student accommodation is limited to specific locations, either allocated sites, or, in certain circumstances, intensification of existing student accommodation. **It is recognised that higher education providers' estate and expansion plans can change. As university campus plans emerge surplus land may become available which may provide opportunities for other land uses to be considered including an element of purpose built student accommodation. The scale of this opportunity should be determined through a master-planned approach that demonstrates a clear strategy for the wider higher education providers' campus and estate. A piecemeal approach to campus and estate rationalisation will not be supported. Any loss of social infrastructure would also need to comply with Policy SC1.**

3.100 The delivery of student accommodation contributes to overall housing delivery based on the amount of general housing that is (theoretically) freed up from students residing in other forms of accommodation. Previously permitted student accommodation was counted towards the housing target on a 1:1 basis, meaning that one bedspace counted as one housing unit for monitoring purposes. Any student accommodation permitted following the adoption of the Local Plan should be monitored on a **32.5**:1 basis (in line with the London Plan), meaning every **three two and a half** bedspaces will equate to one unit of housing. ~~This makes student accommodation a less optimal use of land than conventional housing, which can manage the same, if not greater delivery levels but with the benefit of meeting a broader range of needs.~~

3.101 It is important that student accommodation is high quality, in line with Local Plan policies which look to secure high quality housing. ~~,including~~ **The following parts of policy H4 are relevant; Part C (ii) and (iii) in relation to provision of recycling and waste facilities and provision of functional rooms for their intended purpose, Part G in relation to intensification of existing PBSA and consideration of impacts (i) to (iv), Part J for noise and vibration and Part K in relation to approach to building entrances.** ~~this includes requirements relating to daylight and sunlight and noise.~~ Bedrooms and separate communal/amenity areas **should consider HMO guidance as a starting point to**

considering good-sized rooms. ~~must reflect relevant space standards.~~ Kitchen, washing and utility facilities should meet environmental health requirements.

...

3.105 Restrictions will be imposed to ensure that the whole scheme is retained as an individual unit of student accommodation. The use of student accommodation **for ancillary uses including providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses may be acceptable where they can be demonstrated to be ancillary. Any ancillary use should be outside term time and should not disrupt the accommodation of resident students during their academic year.** ~~or any part of a scheme as general visitor accommodation at any time (including temporary use outside term time) is considered unsuitable. This could have a significant~~ **The potential** impact on local housing supply by removing units from the housing market for certain periods **will be considered.** There are also potential amenity issues for longer-term student occupants, particularly related to noise, safety and security issues. ~~Use of student accommodation for ancillary purposes—for example conference delegates, interns on university placements, and students on short term education courses—may be acceptable. However, this must be demonstrably linked to a higher education provider with a nomination agreement for the student accommodation in question. a~~Any suggested ancillary use of a scale which is likely to cause such disruption would constitute a material change and therefore would not be classed as ancillary and ~~may~~ require planning permission.

~~3.106 All new student accommodation, including any extension/intensification to existing built or permitted schemes, is required to contribute funding for bursaries. The bursaries will help increase access to higher and further education and tackle worklessness by providing funding for bursaries for students leaving Council care and other Islington students facing hardship who are attending a higher or further education establishment. The funding provided by the development will be an annual payment, equivalent to 2.4%1 of the total annual rental income from a development of student accommodation for thirty years or as long as the site is used for student accommodation, whichever is the shorter period of time.~~

~~3.107 The London Plan requires provision of 35% affordable student accommodation. Islington support this in principle, but the clear priority is for the provision of student bursaries. All new student accommodation, including any extension/intensification to existing built or permitted schemes, should provide both student bursaries and affordable student accommodation, the latter to be provided in line with London Plan policy H17. However, where evidence suggests that full delivery of both requirements is not financially viable, the requirement for student bursaries will take precedence. Given the extreme inequality in Islington related to long term worklessness and other factors, bursaries are much more likely to have a meaningful positive impact by offering education opportunities to local young people.~~

Paragraph numbering to be updated accordingly

SDMM25

Page in submitted plan: 90, 91

Section paragraph policy: Policy H7: Meeting the needs of vulnerable older people, Parts A, C and F. Supporting text, paragraphs 3.108 to 3.109

Proposed change

A. The need for accommodation for older people will be met primarily through delivery of conventional residential accommodation designed to be adaptable to changing needs over time. Different levels of care may be delivered in conventional accommodation which means there is **likely to be a lesser** ~~an~~ need for certain specialist forms of older persons housing, in particular market extra care housing.

...

C. Specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:

- (i) there is ~~an~~ evidence of local unmet need for specialist older people accommodation, **_or it would contribute to meeting the London Plan benchmark figure of 900 dwellings over the plan period;**
- (ii) affordable housing is provided in line with policy H3;
- (iii) it has adequately considered and addressed all design issues in Part D or Part E to ensure the accommodation is suitable for the intended occupiers;

- (iv) it provides the necessary level of supervision, management and care/support, which is secured in a legal agreement;
- (v) it is easily accessible to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and
- (vi) It constitutes a suitable use for the site considering the surrounding neighbourhood, potential for development of other priority land uses and its contribution to mixed and balanced communities.

...

3.108 Islington is expected to experience growth in its older population as part of the long term trend in population growth. However, the proportion of older people in Islington is currently below the London and UK average; this is not projected to change substantially and it will likely remain below the London average for the foreseeable future. Older people's needs vary with the majority expected to remain housed in existing housing stock, with some demand for down-sizing in response to changing lifestyle. Demand for various types of accommodation for vulnerable older people exists and new specialist accommodation may be appropriate in certain circumstances. **Market** extra care accommodation ~~will is~~ not **considered a** ~~be supported as~~ a priority due to its cost, which is often inflated due to provision of 'luxury' communal facilities that are not a necessary component of care.

3.109 Accommodation for older people will be met through conventional housing designed to be adaptable/wheelchair accessible, in line with policy H4. More specialist accommodation (with varying elements of care) may also contribute to meeting some vulnerable older peoples' need where it is affordable. The future accommodation needs for older people are considered in the SHMA which demonstrates varying levels of need depending on the base data. The London Plan contains a benchmark which is intended to help inform a local level assessment. ~~however it is considered that~~ The **preferred only** local solution is to meet most of this need through conventional housing with some exceptions for affordable extra care units to meet defined local need (the quantum of which will be informed by relevant up-to-date evidence produced by the Council). Where affordable extra care units are deemed acceptable (only through engagement with the Council's Adult Social Care service), provision will be offset against affordable housing requirements of a scheme.

SDMM26

Page in submitted plan: 96-98

Section paragraph policy: Policy H10: Houses in Multiple Occupation (HMOs), Parts A and C and supporting text at paragraphs 3.129 and 3.130

Proposed change

A. The Council will support the provision of new small-scale HMOs where they:

~~(i)~~ do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood; **and**

~~(ii) do not result in the loss of existing larger family housing (3-bed units or more); and~~

~~(iii)~~ provide a good quality of accommodation within non-self-contained units, ~~consistent with~~ **in line with the relevant requirements set out in** ~~policy H4 and other~~ HMO best practice standards.

...

C. Proposals for large-scale HMOs ~~will generally be refused as they limit capacity to deliver conventional housing, limit the ability to secure genuinely affordable housing tenures and are not considered to be a sustainable model of residential development in line with Local Plan objectives~~ **are not considered the best approach to meeting housing needs in the borough.** On sites where the Council considers that large-scale HMOs may be an acceptable form of housing in principle, proposals must:

(i) prevent any significant adverse amenity impact(s) on the surrounding neighbourhood. Sufficient evidence – including a detailed management plan – must be provided;

- (ii) be consistent with all relevant parts of policy H2 and H4. With regard to minimum space standards, living space and communal space must be comfortable and functional for the needs of tenants and must include adequate space for storage;
- (iii) Ensure that ~~10~~ **5%** of bedspaces, their associated bathrooms and all common parts (including a unisex WC on every floor) are **easily adaptable for occupation by wheelchair users** ~~accessible from the outset, consistent with relevant guidance and best practice. Where wheelchair accessible rooms are located above entrance level, at least two lifts must be provided (of which one must be an evacuation lift), in addition to any requirement for a fire fighting lift;~~
- (iv) provide **35% (or 50% where on public sector land) on-site affordable housing and provide tenures on-site genuinely affordable housing** in line with policy H3. Cash in lieu payments will ~~not~~ be acceptable **where it can be demonstrated that it is not possible to deliver the affordable housing on-site in accordance with London Plan policy H16. in any circumstances;** and
- (v) provide appropriate and accessible communal facilities and services.

Update supporting text as follows:

3.129 ~~Large-scale HMOs will be refused unless they can demonstrate to the Council that on-site genuinely affordable housing can be secured; and that they are not constraining the delivery of conventional residential uses~~ **London Plan Policy H16 'Large-scale purpose build shared living' is relevant to Policy H10. Given the extent of the overall housing need and the shortage of land, large-scale HMOs are not capable of meeting the range of housing needs in the borough and priority for family housing. Large-scale HMOs will need to demonstrate to the Council that genuinely affordable housing can be secured; and that they are not constraining the delivery of conventional residential uses.** Evidence must also be provided to demonstrate that there is actual demand for what is currently a niche style of accommodation that, while attractive to some limited parts of the population ~~is unlikely to be sustainable model of development in the long term (especially for a range of household types including families); and hence could lead to land in Islington effectively being wasted if demand for such accommodation was to reduce in future.~~

3.130 Where large-scale HMOs meet initial policy requirements and are acceptable in principle, proposals will need to address specific criteria, including provision of ~~on-site~~ genuinely affordable housing ~~in line with policy H3~~. The large-scale HMO format would in such cases be the format for the private/market element of housing; the affordable provision must be

conventional self-contained units **in line with tenures/mix set out in policy H3**. Due to the style and operation of large-scale HMO accommodation, pepper-potting of affordable provision with HMO units will not be appropriate. Affordable housing must therefore be separate to the HMO units, including separate access. Tenure blind principles must be adhered to, alongside other relevant Local Plan policies including policy H4. Sites which cannot provide separate affordable housing (e.g. due to constraints with site size, inability to provide multiple cores) **may provide cash in lieu payments** ~~will not be considered acceptable for large scale HMO use, and will be refused.~~

...

3.132 Living space and communal space must be comfortable and functional for the needs of tenants and must include adequate space for storage. What constitutes comfortable and functional will be determined on a case-by-case basis, but relevant Environmental Health standards and private internal space standards set out in the London Plan will be used as a reference point. Relevant parts of policy H4 will also apply when assessing the standard of proposed applications. **The following parts of policy H4 are relevant; Part C (ii) and (iii) in relation to provision of recycling and waste facilities and provision of functional rooms for their intended purpose, Part G and consideration of impacts (i) to (iv), Part J for noise and vibration and Part K in relation to approach to building entrances.** The Inclusive Design SPD and BS8300:2018 (Part 2) will also be important considerations, alongside other guidance and/or best practice which the Council considers is relevant.

SDMM27

Page in submitted plan: 99-100

Section paragraph policy: Policy H11: Purpose Built Private Rented Sector development, Part A. Supporting text, paragraphs 3.139, 3.141-3.142

Proposed change

- A. ~~The Council considers that the purpose built Private Rented Sector (PRS) development model does not have a role in meeting identified housing need in Islington.~~ Proposals for purpose built (PRS) development will ~~not~~ be permitted ~~unless~~ **where** they comply with all of the following criteria:

- (i) There will be no adverse impacts on local amenity;
- (ii) ~~On-site genuinely affordable housing is provided in line with policy H3. Affordable Private Rent (APR) is not considered to be an acceptable affordable housing tenure;~~
- (iii) High quality housing is provided in line with policy H4. All units must be self-contained and let separately;
- (iv) The PRS units are held under a covenant for the lifetime of the building, generally no less than ~~50~~ **15** years. The covenant will be strictly enforced and must not allow any provision for general market sale of any units (either individually or as a group of units), for the length of the covenant period;
- (v) A clawback mechanism is put in place to ensure that the maximum amount of affordable housing is provided on-site where the covenant is broken (notwithstanding criterion iv);
- (vi) Unified management and unified ownership, **including partnerships**, of the development is guaranteed throughout the covenant period;
- (vii) Longer tenancies (three years or more) are available to all tenants. The tenancy process should give security to the renter, with appropriate break clauses and transparency on rent increases enshrined in the tenancy agreement. **The tenant should be able to end the tenancy with a month's notice any time after the first six months.** Upfront fees during the letting process must not be charged, except for security deposits and upfront rent payments.

...

Update supporting text as follows:

~~3.139 However, there is little evidence to suggest that the reasons which underpin regional and national policy support for purpose built private rent exist in Islington. Therefore, this form of housing would not be the best use of the limited land available in the borough, and is inconsistent with the strategic aims of the Local Plan. There is no evidence of significant medium to long term issues of housing delivery in the borough, nor is there evidence of issues of poor absorption rates.~~

~~Sales values are strong; with no shortage of investors but there is a shortage of land. In other words, the purpose built PRS development model has been invented to solve problems which do not exist in Islington. In addition, the private rented market in Islington is very strong and the borough has a high proportion of private rented accommodation in terms of overall housing stock.~~

Removal of this paragraph will result in renumbering of all subsequent paragraphs in Chapter 3: Thriving Communities

~~3.141~~ **3.140** Purpose built PRS must provide genuinely affordable housing in line with policy H3, including the required tenure mix which prioritises social rented accommodation. The purpose built PRS business model is not an acceptable excuse for not meeting these policy requirements; for example, PRS schemes can be designed with separate cores to allow for delivery of social rented accommodation. Purpose built PRS developments which do not provide the required proportion and tenure split of affordable housing will be refused. **Unified management and unified ownership of the development can include partnerships; these should be guaranteed throughout the covenant period.**

~~3.142~~ **3.141** In addition, developers must enter into a covenant to ensure that PRS schemes commit to provide rental accommodation for the lifetime of the building, during which period no sales out of the covenant will be allowed. ~~In exceptional circumstances,~~ Where it is agreed that sale out of the covenant can take place, this will only be suitable where it involves sale of all PRS units. Such a break in the covenant will trigger a clawback mechanism requiring the maximum reasonable amount of affordable housing, in line with the Local Plan affordable housing requirements. **In the event that the covenant is broken in order to enable the level of clawback to be calculated a valuation of the market and affordable units must be included within the S106 agreement.** The clawback must provide for provision on-site by identifying specific units that will be converted to genuinely affordable housing, which reflects the tenure split set out in policy H3, particularly social rented housing. Provision of clawback through financial contributions is generally not acceptable.

SDMM28

Page in submitted plan: 101-102

Section paragraph policy: Policy H12: Gypsy and Traveller Accommodation

Supporting text, paragraphs 3.139, 3.141-3.142

Proposed change

- A. To meet the identified ~~maximum~~ need for 10 Gypsy and Traveller pitches, the Council will ~~seek to provide a site(s) for Gypsy and Traveller accommodation through~~ **undertake an immediate focused review of this policy following its adoption. If the focused review is not submitted to the SoS for examination within 24 months from the date of adoption of the SDPM, this policy will be considered out-of-date for the purposes of the NPPF.**

~~(i) use of its own sites identified as part the Council's ongoing housebuilding programme; and/or~~

~~(ii) joint working with the GLA and other boroughs to determine scope for accommodating need on a sub-regional basis; and/or~~

~~(iii) a potential review of Site Allocations where need is not met through Part A(i) and/or (ii).~~

- B. In the absence of a particular site allocation(s) to meet defined need, the following criteria will apply to any windfall sites which come forward **before the immediate review is completed** ~~during the plan period, including any sites identified under Part A(i)~~. Any site proposed in order to meet an identified need must:

(i) have suitable access for the type of vehicles that could reasonably be expected to use the site;

(ii) be able to provide basic amenities, including water and sewerage;

(iii) provide a good level of residential amenity **and high quality housing**, in line with relevant policy requirements set out in policy H4;

(iv) not have any relevant pre-existing policy designations that restrict the use of the site, including green infrastructure such as Metropolitan Open Land; and the site is not allocated for other uses, e.g. conventional housing, offices.

Update supporting text as follows:

3.145 The Council's Gypsy and Traveller Accommodation Assessment (2019) (GTAA) considered the need for such provision against several different definitions. Following the judgement Smith v Secretary of State for Levelling Up, Housing and Communities [2022] EWCA Civ 1391, it is considered the need identified under the 'ethnic' definition in the GTAA should be selected. This results in a need for 10 Gypsy and Traveller pitches over the plan period. ~~There is no history of need for Gypsy and Traveller accommodation in Islington, aside from some families in permanent accommodation who consider themselves to be Gypsies/Travellers and may need to return to non-fixed accommodation in the future.~~

3.146 The Council has not been able to identify any sound site allocations to meet the identified need as part of plan preparation or during the examination of the plans. It will therefore undertake an immediate focused review of Policy H12 following the adoption of the SDPM. This will include a review of the need for Gypsy and Traveller accommodation as well as positively meeting the identified need. This must be submitted for examination to the SoS no later than 24 months following the adoption of the SDMP. If this does not occur, then Policy H12 will be considered out-of-date in accordance with Paragraph 11 d) of the NPPF. ~~The definition applied to Gypsies and Travellers makes a significant difference in terms of the assessment of accommodation needs. The definition set out in the Government's Planning Policy for Traveller Sites (PPTS) excludes certain groups of Gypsies and Travellers, for example those who have ceased to travel permanently. However, the London Plan definition includes those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them, by virtue of their cultural preference not to live in bricks and mortar accommodation. The London Plan definition also considers those who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently. The effect of these different definitions has been considered as part of the Council's Gypsy and Traveller Accommodation Assessment (2019).~~

~~3.147 Previously the council has worked with the Greater London Authority on a pan-London study, the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment 2008. The council considers that the assessment of need is best done at the subregional level, which would better reflect the constraints and current level of provision in individual boroughs. The majority of need for Gypsy and Traveller accommodation is focused in Outer London.~~

~~3.148 The London Plan policy H16 states that boroughs should meet the identified need for Gypsy and Traveller accommodation, based on a figure of need identified in a needs assessment. The Council will seek to identify a site(s) to meet the identified need for 10 pitches identified in the 2019 assessment, which is based on the London Plan definition rather than the more restrictive PPTS definition. The need is for 8 pitches by 2025 with a further two pitches required by 2035 (based on newly forming families on existing sites on the assumption that the initial need by 2025 is met and sites are provided).~~

~~3.149 In the first instance, the council will seek to identify a site through its ongoing housebuilding programme. The 2019 assessment sets out factors to consider when identifying sites which are likely to pose particular challenges given the borough's densely developed context, e.g. sites would not be sought between tower blocks, which potentially rules out a number of council-owned sites.~~

~~3.147~~⁵⁰ Depending on the scale of accommodation that can be met through council site(s), there may be further sites needed to meet the full need of 10 pitches, which could be met through a focused review of the Site Allocations document, and/or by working subregionally with other boroughs and the GLA. The policy also sets out assessment criteria for any windfall applications for Gypsy and Traveller accommodation, which would apply to future applications for sites on council owned or privately owned land, **until the focused review is completed. The relevant aspects of policy H4 in relation to amenity includes ensuring a good level of privacy and aspects in relation to high quality housing relate to ensuring provision meets accessibility standards in terms of access to amenity blocks for example. Other aspects of policy H4 may also be relevant.**

~~3.151 The 2019 assessment identifies that the need is entirely from members of the Gypsy and Travellers community who live in permanent 'bricks and mortar' accommodation, including social housing in Islington. Therefore, this theoretical need may not translate to real need in practice. Some of the need identified arises from individuals in social rented accommodation; therefore, the council is, on one hand, already meeting the needs of these individuals. The identified need in the 2019 assessment is not 'new' need; it is need for a different form of accommodation determined by the preference of Gypsies and Travellers living in 'bricks and mortar' accommodation, as stated at the point in time when the interviews which informed the assessment were undertaken.~~

~~3.152 Regardless of these issues, the local needs assessment recognises that, in an Inner London borough such as Islington, the shortage of land and the need to optimise development potential; high land values; and acute need for social rented housing, present significant challenges in meeting this need.~~

SDMM29

Page in submitted plan: 104, 105 and 107

Section paragraph policy: Policy SC1: Social and Community Infrastructure, Part A, new Part C, Part D, Part E and Part H, new supporting paragraph after 3.154 and modifications to supporting paragraph 3.167 (formerly 3.165))

Proposed change

A. The Council will support proposals to provide new and/or extended social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment **of need by the Council and** against all relevant Local Plan policies.

...

C. Where a proposed social and community infrastructure use/facility is deemed necessary to mitigate the impacts of existing or proposed development (e.g. a health centre to serve the residents of a large housing scheme), that specific use will be secured at planning stage.

~~G.~~ **D.** Where new and/or extended social and community infrastructure is provided on-site it must be designed in line with criteria in part ~~G~~**H**.

~~D.~~ **E.** The-Council will not permit any loss of social and community infrastructure uses unless:

Remaining criterion references to be updated accordingly.

....

~~H.~~ **I.** Proposals involving new/redeveloped social and community infrastructure should provide free, publicly available provision of accessible toilet, baby change and drinking water facilities. 'Changing Places' toilets will be required in appropriate social and community facilities **in building types as specified within Approved Document M, Volume 2. Changing Places toilets will be especially encouraged in town centres, and other areas with high footfall.**

Add new supporting paragraph 3.155

3.155 With regards to proposals for new or extended social and community infrastructure facilities that sit within Class E, such as health centres, nurseries and day centres, the Council will use conditions to secure the

specific proposed use (e.g. a GP surgery or a nursery) through the planning process where it is deemed necessary to mitigate the impacts of development and/or meet the needs of the community. Social and community infrastructure uses not falling within Class E will now be classified as either F.1 (learning and non-residential institutions) or F.2 (local community) uses. Applications involving social and community infrastructure uses will be fully assessed against the requirements of policy SC1 and other relevant Local Plan policies.

Existing paragraph 3.155 to be renumbered as 3.156 and subsequent paragraphs re-numbered accordingly.

~~3.165~~ **3.167** Where **specified within Approved Document M, Volume 2 and in other** appropriate **locations**, social and community infrastructure should incorporate Changing Places WCs; this is a toilet for people with profound and multiple learning disabilities which has enough space for disabled people and their carers; and the right equipment, including a height adjustable changing bench and a hoist. Depending on the scale of a proposal, the following infrastructure may be considered appropriate for Changing Places WCs, **in addition to those proposals specified within Approved Document M, Volume 2:**

- sport and leisure facilities.
- cultural centres, such as museums, concert halls and art galleries.
- stadia and large auditoria.
- town halls, civic centres and main public libraries.
- educational establishments.
- health facilities, such as hospitals, health centres and community practices.

SDMM30

Page in submitted plan: 107-108

Section paragraph policy: Policy SC2: Play space, part A, part C

Proposed change

A The Council will strongly resist the loss of existing play spaces across the borough unless replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Any replacement space must be provided on-site or in the immediate vicinity, and access must be unrestricted **which will be secured by section 106 agreement.**

...

C All major residential development must make appropriate on-site provision for free-to-use publicly accessible play space, which is suitable for children and young people of all ages and abilities. Provision must be proportionate to the anticipated increase in child population as a result of development proposals. All proposed provision of new play space within development sites must be designed in partnership with Islington Council, in line with any relevant best practice standards. **Where on-site publicly accessible play space is provided details of ongoing management and maintenance will be secured by condition.**

SDMM31

Page in submitted plan: 109-110

Section paragraph policy: Policy SC3 Health Impact Assessment, part B and supporting paragraph 3.178

Proposed change

B Where the screening assessment identifies that a full HIA is required, this must be prepared as early as possible in the development process so that potential health gains can be maximised and any negative impacts can be mitigated. HIAs, where required, **should be submitted at the planning application stage** and must be proportionate to the scale of the development.

...

Add new part D:

D Where a HIA is carried out and specific measures are identified to mitigate health impact or enhance health benefits, they will be secured through a legal agreement and/or condition as appropriate.

Modify supporting paragraph 3.178 as follows:

The Council have produced guidance on the HIA process - **Islington HIA Guidance**. All relevant proposals must have regard to this guidance when screening for HIA or subsequently preparing an HIA. The scope of any HIA must be agreed with the Council's Public Health department. The HIA must be proportionate to the size of the development and must look at the issue of health in the round, not just focus on access to health services.

SDMM32

Page in submitted plan: 110-111

Section paragraph policy: Policy SC4 Promoting Social Value and supporting text

Proposed change

Delete policy SC4 and associated supporting text as follows:

~~Policy SC4: Promoting Social Value~~

~~A All development in Islington is encouraged to maximise social value in order to deliver as many public benefits as possible~~

~~B Major development proposals must undertake a Social Value self-assessment which clearly sets out the specific social value which would be added through delivery of the proposal~~

~~3.179 The concept of social value relates to the delivery of positive social, economic and environmental impacts, arising from the actions and operations of various organisations. This means that as well as taking into account the direct effects of interventions, the wider effects on other areas must also be considered, particularly the effects on the local economy and the health and wellbeing of local residents. It is important to ensure that potential benefits — including small-scale benefits which together can have major cumulative benefits — are maximised from all possible sources.~~

~~3.180 To date, social value has been utilised fairly narrowly, for example the Public Services (Social Value) Act which focuses on commissioning of services by the public sector. There is considerable potential to broaden the scope of social value to other areas, including planning.~~

~~3.181 In planning terms, maximising social value involves considering the social, environmental and economic costs and benefits. This has a clear synergy with the overarching aim of the planning system — to deliver sustainable development and underpins the Local Plan vision and objectives.~~

~~3.182 Planning can play a key role in ensuring that social value is maximised, by encouraging all development proposals to engage with the concept and consider whether doing things differently can lead to additional benefits; for example, by utilising local supply chains so money spent on developments stays in the local economy; and taking steps to recruit local people for construction of development and in any resulting employment use.~~

~~3.183 All development proposals, including small householder applications, are encouraged to maximise social value throughout the lifetime of the development, by considering at the outset whether the planned development can be approached in a different way which could add additional social value, for example, hiring local tradesman to undertake construction work. Such considerations are unlikely to lead to additional cost implications, especially if they are considered at the earliest possible stage of development; the delivery of these considerations will therefore not impact on scheme viability. Where social value benefits are identified which go beyond what the Council would expect as a standard level of social value on a scheme (resulting from compliance with all relevant policy requirements), this could constitute a material consideration which would add weight to a proposal (although the level of weight would be determined on a case by case basis and may depend on the provision of specific information to demonstrate how any identified social value benefits will be delivered and sustained over the lifetime of the development).~~

~~3.184 All major developments must undertake a Social Value self-assessment form, based on the template provided at Appendix 5. This must be submitted at planning application stage although applicants are encouraged to complete this form at the earliest possible stage of the development (e.g. at initial design stage or preapplication stage), so that the consideration of social value can meaningfully influence proposals.~~

~~3.185 Further guidance on delivering social value may be developed through a SPD.~~

SDMM33

Page in submitted plan: 113-115

Section paragraph policy: Policy B1: Delivering business floorspace, Parts B, C, D and E

Proposed change

Supporting text paragraphs 4.6, 4.8, 4.9 and 4.14

A. In line with the Local Plan objectives, in particular the aim to deliver an inclusive economy, the Council will seek to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types and unit sizes, which are affordable for a range of occupiers, including established and emerging enterprises, and SMEs.

B. New business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ fringe Spatial Strategy areas of Angel and Upper Street and Kings Cross and Pentonville Road, PELs and Locally Significant Industrial Sites. Proposals in these areas must ~~maximise the amount of~~ **make efficient use of land by providing** new business floorspace; proposals which do not ~~demonstrate maximisation~~ will be considered to be an inefficient use of a site and will be refused.

C. **For Islington, evidence estimates that there is an office need of 443,000sqm for the plan period.** The Council is committed to ensuring there is an adequate supply of business space in line with job growth projections and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, at least, no net loss of business floorspace **as per policy B3**, and through the making of Article 4 Directions, where appropriate.

D. The Council will aim to secure space that fosters the development and expansion of businesses, particularly space suitable for start-ups and small businesses. This includes the delivery of affordable workspace **as required in policy B4**; and the provision of small units suitable for SMEs.

E. Islington's Locally Significant Industrial Sites are the focus for new industrial uses, namely ~~B1(e)~~ **light industrial**, **B2 general industrial** and **B8 storage and distribution** uses, **and Sui Generis uses which are akin to industrial uses**. Existing industrial land and floorspace will be safeguarded **and any future proposals will be considered in line with policy B2: New business floorspace, policy B3: Existing business floorspace and policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site as relevant to the proposals.** ~~and the introduction of non-industrial uses will not be permitted~~. The renewal, modernisation and intensification of industrial uses will be encouraged.

F. Development in the borough must provide jobs and training opportunities/support.

Amend supporting text as follows:

4.6 Business floorspace in this chapter is considered to be activities or uses that fall within ~~the B-use class (i.e.~~ offices, **research and development**, industry, or warehousing) and some Sui Generis uses which are akin to business uses, such as building merchants and depots. Employment floorspace is a broader term which refers to activities or uses that generate employment, including offices, industry, warehousing, showrooms, hotels, retail, entertainment, educational, health and leisure uses (regardless of whether the end occupier is private, public or charity sector). **Policy B1 works alongside other policies in providing the framework for other employment uses. This includes sui generis uses akin to industrial use in SP3, and B3, other spatial policies such as those covering the town centres alongside policies such as R3: Islington's Town Centres and R4: Local Shopping Areas and site allocations which also form part of this framework. In the Bunhill and Clerkenwell Area, policies BC1: Prioritising office use and BC2: Culture, retail and leisure uses provide a clear framework for non-business employment floorspace in that part of the borough.**

...

4.8 The Council recognises that although it is unlikely that this need will be fully met, given the significant land constraints in the borough as well as competing needs for development of other uses, policies and their implementation must go as far as possible to meet this need. This means that ~~the maximisation~~ **an efficient use of land for the delivery** of business floorspace ~~delivery~~ is an absolute priority, in addition to housing, whereas the delivery of uses, including other types of commercial floorspace, can be considered as secondary. In achieving ~~maximisation~~ **an efficient use of land which prioritises business floorspace**, a longer term view of viability must be taken, i.e. where there are short terms dips in the market, this does not necessarily negatively impact the delivery of business floorspace in the future.

...

4.9 The success of Islington's economy can be attributed to a number of factors, including being located in the CAZ, which accommodates 70% of the borough's jobs, and several unique economic clusters which are of sub-regional or national significance. These clusters include Tech City around Old Street; the Clerkenwell Design Cluster; the Kings Cross-Moorfields Eye Hospital corridor which links the Kings Cross life sciences cluster/Knowledge Quarter' with Old Street; and the Vale Royal/Brewery Road industrial cluster. There are also a number of smaller scale clusters of business uses and industrial areas which are located across the borough. **Given the concentration of jobs in the CAZ, even a small proportional decrease in office floorspace would have a significant impact on the boroughs economy. Equally business clusters in other locations can be undermined by gradual loses of business floorspace, including to other Class E uses, which could have wider negative impacts on the agglomeration benefits that can be created in these areas with the concentration of business floorspace.**

...

4.14 LSISs are the focus for ~~B1(c)~~, **light industrial**, B2 **general industrial** and B8 **storage and distribution** uses. Existing industrial land will be safeguarded, and its renewal and modernisation will be encouraged. Non-industrial uses will not be allowed in LSISs. **It is recognised, however, that some of the existing premises in the LSISs will be able to utilise the flexibility of the new Class E.** ~~The~~ Vale Royal/Brewery Road LSIS is the largest concentration of industrial uses in the borough. The area is an established cluster of industrial uses. In addition to the more conventional industrial uses expected in an inner London industrial area, the area is also home to a small cluster of creative industries and specialist event companies/music orientated businesses. The unique function of this LSIS must be protected and nurtured to allow for an intensification of industrial uses – see policy SP3 for further detail. ~~In other LSISs, industrial land will be protected and the industrial function of the areas will be safeguarded, with renewal and modernisation of this industrial function encouraged.~~

SDMM34

Page in submitted plan: 115-121

Section paragraph policy: Policy B2: New business floorspace, part A, C, D, E, F and G and supporting text

Proposed change

Amend text as follows:

A. New business floorspace will be directed to the locations identified in (i) to (iii) below (and shown on Figure 4.1) to support the specific role and function of each of the locations. **The Council will use conditions on future proposals to ensure that specific uses such as new office, research and development and light industrial floorspace are secured in these locations.** Proposals must maximise the provision of business floorspace in line with the priorities for each location. ~~Proposals which are not considered to maximise business floorspace will not be permitted.~~ Proposals involving existing business floorspace must prioritise the intensification, renewal and modernisation of this business floorspace throughout the borough and particularly in the locations set out below.

- (i) **CAZ and Bunhill and Clerkenwell AAP area:** office uses are the clear priority in this area, in order to support London's strategic business role. The primary economic function of the CAZ and AAP area depends on maintaining and enhancing office uses. A range of workspace typologies are supported, including Grade A offices, serviced offices, co-working spaces, hybrid workspace and other types of flexible workspace and lower specification office space suitable SMEs and business services. Residential uses are not a key priority in this location. **Policy BC1: Prioritising office use of the Bunhill and Clerkenwell AAP sets out when residential uses may be considered acceptable in this area.**
- (ii) **CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road:** New business floorspace is a priority in these Spatial Strategy areas, particularly on White Lion Street, Pentonville Road and upper floor locations across Angel Town Centre. A variety of business floorspace typologies is encouraged along Pentonville Road and around Kings Cross/York Way, including business space which meets the needs of SMEs. **Spatial policies SP2: King's Cross and Pentonville Road and SP4: Angel and Upper Street set out when residential uses may be considered acceptable in this area.**
- (iii) **Priority Employment Locations (PELs):** Growth and intensification of business uses to provide for the SME sector, as well as meeting local/specialist needs, is the key priority within these areas. Increasing provision of space that is appropriate to meet the diverse needs of the SME economy is supported. **Business floorspace should be prioritised in these areas. The provision of non-business uses will be managed in line with policy B3: Existing business floorspace. Residential use will not be supported in these areas.**

B. The introduction of uses that could undermine the specific economic function of the locations identified in Part A will be resisted.

C. In LSISs shown on Figure 4.1, the overriding priority land uses are industrial uses (~~B1(e)~~**light industrial**, B2 **general industrial**, B8 **storage and distribution** and Sui Generis uses which are akin to industrial uses). The retention and intensification of industrial uses ~~and existing clusters of industrial activity in LSISs~~ will be required as part of any proposal within a LSIS. **The light industrial element of Class E continues to be sought in the LSIS and will be secured through condition.** The provision of hybrid space is supported. The ~~development~~ **co-location of industrial use with office and/or research and development uses** ~~may be permissible as part of a hybrid workspace scheme, but it must only constitute a small proportion of the overall gross floorspace proposed~~ **will be permitted where there would be an intensification of industrial use on the site (either through new floorspace or the redevelopment/modernisation of existing floorspace) and it can be demonstrated that the continued industrial function of the LSIS would**

remain. The introduction of **some** non-industrial uses ~~would could~~ undermine the primary industrial economic function ~~and compromise the future growth~~ of LSISs and will therefore ~~not be permitted unless they are clearly ancillary to a proposal~~ **only be allowed where proposals comply with the co-location criteria as set out above and/or policy B3: Existing business floorspace, Part D, where relevant.**~~Residential use is not acceptable within LSISs.~~

D. All development proposals within LSISs must prevent or mitigate impacts on air quality, in line with policy S7: Improving air quality and promote sustainable transport in line with policies T2: Sustainable transport choices and T5: Delivery, servicing and construction. Proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts.

~~E~~ **E. Proposals for B1(a) office, research and development and B1(c) light industrial** floorspace that meets local and/or wider demand ~~should~~**must** be located on upper floors in the Primary Shopping Area of designated Town Centres **consistent with policy R2**, but are considered suitable on any floor elsewhere in designated Town Centres and in LSAs **subject to the relevant criteria in policies R3 and R4 respectively.** ~~as long as the business use provides an active frontage~~

~~E~~ **F. Outside of the locations mentioned in Parts A, C and E**~~D~~, new business floorspace is acceptable where it would not detract from the character of the local area; and would not detrimentally impact on residential amenity. Proposals for new business floorspace in these locations must be accessible to all in accordance with the priority for sustainable modes of transport set out in policy T1, and must not prejudice the overall aim of reducing the need to travel.

~~F~~ **G. All development proposals involving non-industrial** business floorspace (including affordable workspace provided in line with policy B4) must have regard to the following:

(i) Business floorspace must allow for future flexibility for a range of occupiers, including future subdivision and/or amalgamation, and provide a range of unit types and sizes, including a significant proportion of small units, particularly for SMEs. Full separation of business and residential floorspace is required where business floorspace forms part of a mixed use residential development.

(ii) Provision of a good level of amenity for occupiers of the business floorspace, including adequate levels of daylight and sunlight; and access to communal/ancillary facilities including meeting rooms.

(iii) The development of new business floorspace must incorporate the highest inclusive design standards achievable in context, and meet the travel and transport needs of those for whom public transport remains inaccessible.

(iv) Applicants must clearly demonstrate how the design of proposals individually and cumulatively contribute to providing the range of spaces required to support the primary function/sector of the particular area in which it is located.

G H. Proposals for new industrial and warehousing uses must provide: (i) satisfactory access and servicing, including off-street loading, appropriate delivery arrangements in line with policy T5, and adequate yard space; and (ii) good quality design which provides space that is adaptable to meet the needs of a range of industrial uses and occupiers, including sufficient clear internal ceiling/eaves heights and loads, and adequate goods lifts.

H I. Where proposed, live-work units will be considered to be C3 residential floorspace and will not be considered business or employment floorspace. Such units will not contribute towards the maximisation requirement set out in Part A of this policy. Existing live/work units are classed as business floorspace; proposals involving the change of use/loss of existing live/work units will be assessed against policy B3: **Existing business floorspace**.

Update supporting text as follows:

Add new paragraphs after paragraph 4.17 as follows:

The south of the borough has an important role in supporting Central London's economy including the knowledge economy due to its strategic position within the CAZ. Other areas outside the CAZ such as Priority Employment Locations and Town Centres are important employment hubs that support economic growth in the borough and supply affordable office space suitable for SME occupiers. A supply of offices outside the CAZ is also important and serves different markets. Amongst other things these locations support the establishment of knowledge networks between the CAZ and other areas, including other neighbouring boroughs. These locations suffered significant losses in previous years due to the introduction of Permitted Development Rights. Considering the marked losses of office to residential in past years and the constrained supply, it is important that office floorspace is protected and maximised to ensure that there is a balanced supply to meet demand in key business floorspace locations across the borough.

Whilst recognising the benefits and flexibility of class E in different parts of the borough, the Council will use conditions to ensure that in new proposals the office and research and development floorspace is secured for those specific activities in the CAZ, Bunhill and Clerkenwell AAP area and the CAZ fringe Spatial Strategy areas of Angel and Upper Street and King's Cross and Pentonville Road and PELs. The restriction of other elements of class E in this context is justified and proportionate based on the harmful impacts that changes to business floorspace could have on the wider economy.

Other paragraph numbers to be updated accordingly.

~~4.23~~ **4.25** Industrial floorspace is vitally important as an economic driver in its own right but also to support other economic functions, including servicing both the wider borough and Central London economies. Within LSISs in particular, the principal objective is to retain and intensify ~~B1(c)~~ light industrial, B2 general industry and B8 storage and distribution uses. **Office and research and development floorspace will only be considered if they are included as part of a scheme where it can be clearly demonstrated that there would be an intensification of industrial floorspace and the continued industrial function of the LSIS would remain. Other non-industrial uses which are not considered ancillary to the development could jeopardise the long term sustainability, economic function and future economic growth of the Locally Significant Industrial Sites.** ~~The introduction of non-industrial uses which could compromise the economic function and future growth of LSISs (including offices and residential uses) will not be permitted. Sui Generis industrial uses may be acceptable but care must be taken to ensure that any non-industrial uses which form part of the overarching Sui Generis use are not of a scale that could adversely impact the LSIS. Similarly, non-industrial uses may be suitable ancillary uses, but only where their operation is clearly ancillary, particularly in terms of scale and function.~~

Add new paragraphs after paragraph 4.23 as follows:

4.26 The Council recognises the importance that LSISs have as an economic driver in the borough and Central London economies. Existing B2 general industrial and B8 storage and distribution will continue to be protected from change of use to non-industrial. New light industrial floorspace within LSISs will be secured and protected through the use of conditions in order to protect the primary economic function of the LSISs and avoid further losses of industrial floorspace to other Class E uses. The borough has lost a significant amount of industrial land over recent years. The proportionate use of conditions to secure light industrial uses in the boroughs 6 LSISs is essential to protect the primary industrial function of the last remaining concentrations of industrial land in the borough and their role in supporting Islington's and London's economy.

4.27 Improving air quality is a key aim of the Local Plan, for this reason growth must be managed sensitively. Whilst Islington safeguards, protects and encourages the intensification of industrial uses, these can adapt to the challenges of a 21st century Islington. Policy S7 sets out detailed requirements which development proposals must meet to ensure that adverse impacts on air quality are prevented or mitigated, and that reasonable opportunities to prevent negative impacts on air quality are investigated and implemented. While there are a number of industrial uses that would not cause particular concerns regarding air quality, certain industrial uses could (without specific mitigation) lead to adverse impacts on air quality, due to the specific use or, more likely in the LSIS context, due to associated increases in vehicle movements. The Local Plan transport policies promote sustainable modes of transport and limit car parking; these policies will be important considerations when assessing development proposals, in conjunction with policy S7, T2, T5 and other relevant Local Plan policies. For avoidance of doubt, the policy aim to intensify industrial uses in the LSIS would not outweigh air quality considerations, meaning that any proposed intensification of use which creates unacceptable impacts on air quality will be refused.

Other paragraph numbers to be updated accordingly.

...

4.24-4.28 Where new ~~B-uses are~~ **business floorspace is** provided in the borough, conditions may be attached to the permission to remove any applicable permitted development rights and/or restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). **The Council will also use conditions to ensure that new office, research and development and light industrial floorspace is secured and protected as such longer term.** For example, this may include restricting business floorspace to **B1(a)offices** or **B1(e)light industrial** uses only, within **Class E** ~~the wider B1 useclass which ordinarily would not be classed as development~~. The condition could be worded as follows:

*Operation of Section 55(2)(f) of the Town and Country Planning Act 1990 is precluded with regard to permitted **B1(a)office/B1(e)light industrial** use [DELETE AS APPLICABLE]. The premises shall only be used for **B1(a)office/B1(e)light industrial** use [DELETE AS APPLICABLE] and for no other purpose (including any other purpose within Class **B1E** of the Schedule to the Town and Country Planning (Use Classes) Order 1987 **and subsequent Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020**, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.*

...

~~4.31~~ **4.35** The design of business floorspace should be flexible and **wherever possible** include the following design features:

- A Floor to ceiling heights which allow at least 3 metres of free space, and up to 5 metres in industrial buildings to allow for the introduction of mezzanines;
- Strategic lay-out of entrances, entry cores, lift cores, loading facilities and fire escapes, to allow mixing of uses within the building; grouping of services including plumbing, electrics, cabling, communications infrastructure and circulation;
- Full separation of business and residential floorspace, where forming part of a mixed use residential development. Alternative layouts may be acceptable where it can be demonstrated that sufficient measures are put in place and secured to ensure that the amenity of residents and businesses is protected, particularly with regard to safety, privacy and security;
- Flexible ground floor access systems that can easily be adapted for goods delivery (e.g. through adaptable façade panels); and
- Good standards of insulation to mitigate any overspill from future alternative uses in the building.

SDMM35

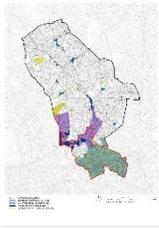
Page in submitted plan: 118

Section paragraph policy: Figure 4.1: Local Plan Business Designations

Proposed change

Replace map.

Refer to Appendix 1 for a high resolution version of this map.



SDMM36

Page in submitted plan: 122-124

Section paragraph policy: Policy B3: Existing business floorspace, parts B, C and D. Supporting text, paragraphs 4.33 and 4.36

Proposed change

A. The Council will protect existing business floorspace throughout the borough.

B. Proposals resulting in the net loss of business floorspace within the CAZ, Bunhill and Clerkenwell AAP area, PELs, LSISs, Town Centres, LSAs, and non-designated locations, either through change of use or redevelopment, will be refused unless there are exceptional circumstances which demonstrate:

- (i) there is no demand for the use of the floorspace, unit, building and/or site for a business use appropriate to the role and function of the area. Evidence must be submitted demonstrating that such space has been continuously marketed for a period of at least 24 months, in line with Appendix 1. **There is no requirement for business**

floorspace to be vacant before the start of the marketing period, however evidence of vacancy will be required at the time of application. For proposals for loss of Class E this must include marketing for the current use as well as other class E uses (where a particular element of Class E has been secured by condition part C applies); and

- (ii) the loss of business floorspace – either individually or cumulatively – would not compromise the operation of the wider area, and that the proposed non-business use is compatible with existing uses (including consideration of amenity impacts on uses in the vicinity). **Or**
- (iii) **where it can be robustly evidenced that the existing building and/or site is no longer suitable for its existing business use and the existing building and/or site cannot reasonably be redeveloped for continued business use.**

C. For proposals where the business floorspace is conditioned to be within a particular Class E use, the property must be marketed for that particular use for at least 6 months to demonstrate that there is no longer demand for that use before being able to utilise full class E flexibility, as set out in Appendix 1.

~~D. C. In addition to Part B which relates to all business floorspace, w~~ Where existing business uses are industrial in nature – i.e. **B1(e) light industrial uses (subject to provisions of Class E), B2 **general industrial** or B8 **storage and distribution uses**, or Sui Generis uses which are akin to industrial uses - **net loss of floorspace will only be allowed where the following marketing requirements have been met**—~~there must be at least no net loss of industrial uses as part of development proposals.†~~**

- (i) ~~M~~**m**arketing requirements for proposals involving the net loss of industrial uses **within the LSIS** must market the floorspace for continued industrial use;

- (ii) where a proposal is outside an LSIS, marketing must be primarily for industrial use but could include marketing for other business uses **(offices and research and development)** as a potential option.

Supporting text updated as follows:

4.33 To meet the identified need of **443,000sqm** ~~400,000sqm~~ of office floorspace up to 2036, the Local Plan aims to promote new business floorspace and ensure that existing business floorspace is strongly protected; this dual approach is integral to policy B1, and both strands must operate together to achieve the overarching objective of meeting employment projections. Intensification, renewal and modernisation of existing space is particularly encouraged. To ensure that short term economic uncertainties do not impact the delivery of business floorspace in the medium term, marketing ~~and vacancy~~ evidence will be required for a period of 24 months. **As stated in Policy B3, part B (i), there is no requirement for business floorspace to be vacant before the start of the marketing period, however evidence of vacancy will be required at the time of application.** Although Islington's economy is strong and is set to grow even further, there may be instances where market demand dips but will likely pick back up in line with medium to long term projections. This approach means that once the market regains strength, business floorspace has not been lost unnecessarily as the marketing period is long enough to allow for market fluctuations.

...

4.36 Industrial uses have seen wholesale losses in recent years. There continues to be significant pressure to redevelop Islington's remaining industrial land for other uses, due to its often perceived lower value. However, as noted in policy B2, a good supply of industrial land is integral to ensuring inclusive economic development in Islington and Central London. Islington's Employment Land Study forecasts further losses of industrial land, some 90,000sqm up to 2036. Given the importance of industrial land, the Local Plan will strongly resist the loss of all industrial uses. ~~The London Plan, policy identifies Islington as a borough which must retain and intensify industrial floorspace capacity and follow a general principle of no net loss across designated LSIS.~~ **The Council will ensure that a sufficient supply of industrial land is**

maintained to meet future demand in the borough, and that the retention, enhancement and provision of additional industrial capacity is adequately managed and monitored, consistent with the London Plan.

...

4.40. Replacing business uses with non-business uses (particularly residential use) could compromise the operation and viability of the wider area/cluster. Where a proposal for a non-business use satisfies the marketing criteria set out in Appendix 1, it must also demonstrate to the Council's satisfaction that the proposal would not compromise the operation and viability of the wider area, and would not negatively impact the primary economic function of the area or the local economy. **There may be genuinely exceptional circumstances where an existing building or site is considered to be no longer suitable for continued business use. Where this can be robustly evidenced, there will be no requirement to complete the full marketing campaign. In such situations it should be demonstrated that the building or site is no longer suitable for its existing business use and cannot be reasonably redeveloped to re-provide a viable replacement/alternative business use on the site in order to justify the loss of business floorspace. In such exceptional situations a detailed site report will be required setting out the justification for this. The detailed site report should consider the market demand for the existing building or site in the form of an appraisal, taking into account the current condition/specification and likely occupational demand. The detailed site report should further consider whether any identified deficiencies limiting market demand can be overcome through refurbishment and/or redevelopment and consider the feasibility of this.**

SDMM37

Page in submitted plan: 124-126

Section paragraph policy: Policy B4: Affordable workspace, parts A, B, C, G and H, Supporting text, paragraphs 4.44 - 4.51

Proposed change

Amend text as follows:

A. Within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road), ~~PELs and Town Centres~~:

~~(i) m~~ Major development proposals involving 1,000sqm or more ~~gross net additional B1(a)-office and/or B1(b)-research and development and/or general B1-use~~ and/or a Sui Generis use akin to ~~B1(a)-office/B1(b)-research and development~~ floorspace must incorporate ~~at least~~ 10% affordable workspace (as a proportion of proposed ~~B1(a)-office and/or research and development-B1(b)-and/or general B1~~ and/or a Sui Generis use akin to ~~office/research and development-B1(a)/B1(b)~~ floorspace GIA) to be leased to the Council at a peppercorn ~~rent rate~~ for a period of ~~at least~~ 20 years. ~~The Council will subsequently lease the space to a Council approved operator.~~

(ii) Major development proposals involving 10,000sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace GIA) to be leased to the Council at a peppercorn rent in perpetuity.

B. Within the Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS) and other LSISs, major development proposals involving 3,000sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace GIA) to be leased to the Council at a peppercorn rent for a period of 20 years.

~~B-A requirement for affordable workspace will also apply to any major development proposals involving 1,000sqm or more gross B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace within a LSIS.~~

C. Within the remaining Town Centres and PELs, major development proposals involving 2,500sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace GIA) to be leased to the Council at a peppercorn rent for a period of 20 years.

~~C For proposals involving 10,000sqm or more gross B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace; or significant office extensions/intensification proposals in high value areas, 10% affordable workspace (as a proportion of proposed B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace GIA) for a peppercorn period longer than 20 years will be sought, including space in perpetuity.~~

~~D Where 1,000sqm or more gross B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace is proposed outside areas identified in parts A and B of this policy, the maximum amount of affordable workspace must be provided, based on site specific viability information.~~

~~E. D~~ All proposals which provide affordable workspace must prepare an Affordable Workspace Statement to be submitted alongside the relevant planning application.

~~F. E~~ Affordable workspace must be built to at least Category A fit out, and must provide a high standard of amenity for occupiers, including access to relevant servicing and facilities.

~~H. F~~ Proposals for major commercial development not covered by Parts A to ~~C D~~ – such as hotels and retail – may be required to provide affordable workspace and/or affordable retail space, subject to viability. Priority will be given to on-site provision.

G. Site-specific viability assessments will only be accepted in exceptional circumstances. This could include:

(a) where a significant shift in macro-economic conditions has occurred which has a demonstrable negative impact on the delivery of development.

(b) where a development is proposed which is of a wholly different type and is therefore not reflected by any of the typologies used in the viability assessment that informed the Local Plan.

(c) where a development is proposed which demonstrates a very close alignment to a typology shown to be unviable at full policy compliance in the viability assessment that informed the Local Plan.

Where site-specific viability assessments are accepted, proposals must provide the maximum viable amount of onsite affordable workspace, informed by detailed viability evidence consistent with the Development Viability SPD. Where the Council accepts a level of affordable workspace that does not comply with policy requirements, the Council will impose a late stage review mechanism which would be triggered three months prior to practical completion and will reassess the construction costs and commercial values of the scheme at that point in time.

H. Off-site financial contributions for affordable workspace may be sought in exceptional circumstances. The following exceptional circumstances may be considered:

(i) Where the affordable workspace to be provided on site does not meet the qualitative criteria, and where it can be demonstrated that the on-site provision of such workspace is inappropriate.

(ii) Where a proposal demonstrates exceptional circumstances outlined in Part G, a site-specific financial viability assessment can also be used to determine the maximum viable off-site affordable workspace financial contribution.

I. On mixed use proposals which deliver on-site affordable housing, in exceptional circumstances, where the provision of affordable workspace will undermine the ability to the scheme to secure affordable housing compliant with the Policy H3: Genuinely affordable housing, the provision of affordable housing will take priority.

Updated supporting text as follows:

4.44 Affordable workspace is business floorspace/workspace which is leased to the Council at a peppercorn ~~rate~~ **rent** for a period of at least 20 years, and managed by a Council approved operator (which could be the Council itself **or a Council-approved operator selected through a commissioning process in return for social value**). Rental values for end occupiers will ultimately depend on the quality of space and its location, and will be considered on a case-by-case basis through the Council's Affordable Workspace Commissioning Process; however, rents (including service charges) must be significantly below the prevailing market rate for the specific sector and/or location, otherwise the workspace would not be affordable. **To ensure there is no conflict of interest, the council runs a competitive procurement process to manage the affordable workspaces that are secured through the planning process, in line with the Council's Procurement Rules. Through this process the council assesses potential organisations to manage the spaces through the following criteria: workspace management (including proposed workspace model and financial due diligence), property management and social value outcomes.** The Council's Inclusive Economy team will lead on the ~~Affordable Workspace Commissioning Process~~ **selection of a Council-approved operator** once affordable workspace is secured. **Operators will be expected to cover business rates and other related building costs.** More information is provided in the Council's Affordable Workspace Strategy.

4.45 For the avoidance of doubt, floorspace which does not meet these requirements will not be considered to be affordable workspace for the purposes of policy B4. This includes stand-alone small business units, although such units may be required in addition to affordable workspace, under policy B2. Proposals for business floorspace (including various different typologies such as individual desk spaces and co-working space) at a discounted market rent let directly to an end occupier will not be considered to be affordable workspace (regardless of the level of discount) if the space is not ~~let through the Council's Affordable Workspace Commissioning Process~~ **managed by a Council-approved operator, or the Council itself** (incorporating requirements for letting the head lease at peppercorn rent, with the space being let and managed by a Council approved operator).

~~4.46 Major development proposals for 1,000sqm or more (gross floorspace) of B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas of Angel and Upper Street and King's Cross and Pentonville Road, PELs and Town Centres, must provide at least 10% of affordable workspace, as a proportion of proposed B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace GIA.~~

~~4.47~~ **4.46 The policy requirements will apply to net additional floorspace brought forward as part of new development, including redevelopment or extension of existing floorspace. For proposals involving redevelopment,**

~~refurbishment (or refurbishment and extension), the requirement would apply to all redeveloped, refurbished and/or extended space, regardless of the fact that there is existing floorspace. For proposals solely involving extension of floorspace with no change to existing floorspace, the requirement can be considered to apply to the new floorspace only. In the event that plans to refurbish existing floorspace were arbitrarily excluded and brought forward in a separate proposal (if it required planning permission), this would be subject to affordable workspace requirement at that time.~~

~~4.48 Where new business floorspace is proposed outside the locations specified in Parts A and B of the policy¹, and where 1,000sqm or more gross B1(a)**office** and/or **research and development** B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)**office**/B1(b)**research and development** floorspace is proposed, affordable workspace will be required. The quantum of affordable workspace to be provided must be the maximum amount that is viable, based on site specific viability information.~~

~~4.49~~ **4.47** A requirement for affordable workspace will also apply to any major development proposals involving ~~3~~**1**,000sqm or more gross ~~B1(a)office~~ and/or **research and development** ~~B1(b) and/or general B1~~ and/or a Sui Generis use akin to **office/research and development**~~B1(a)/B1(b)~~ floorspace within the **Vale Royal/Brewery Road LSIS and other** LSISs. Policies SP3 (with regard to the Vale Royal/Brewery Road LSIS specifically) and B2 are clear that industrial uses within ~~B1(c)light industrial~~, B2 **general industrial** and B8 **storage and distribution** uses ~~classes~~ are the priority uses within the LSISs, ~~and that other business uses, namely B1(a), B1(b) and general B1 floorspace capable of being used for B1(a) or B1(b), will not be permitted except as part of a hybrid workspace scheme where such uses only constitute a small proportion of the overall gross floorspace proposed.~~ Notwithstanding this, in circumstances where ~~B1(a)office, B1(b) and research and development~~ **and/or general B1 and Sui Generis uses akin to office and research and development uses** are ~~is~~ proposed, affordable workspace would be required from any **such proposal as set out above** ~~permitted floorspace~~. There is no general requirement for seeking affordable workspace from industrial/hybrid uses within the LSISs as seeking affordable workspace from non-**office/research and development** ~~B1(a)/B1(b)/general B1~~ uses in this area is more likely to constrain viability of such uses and therefore may preclude them coming forward, contrary to policy aims for the area; however, ~~B1(a)office~~ and **research and development**~~B1(b)~~ floorspace has no such viability concerns, and hence any proposals which would allow for the development of ~~B1(a)office~~ or **research and development**~~B1(b)~~ must provide

affordable workspace. ~~For avoidance of doubt, this requirement must not undermine the clear policy position to resist non-industrial uses in the LSISs.~~

~~4.50~~ **4.49** In exceptional circumstances (based on robust justification including viability information consistent with the requirements of the Development Viability SPD), where the Council accepts a level of affordable workspace that does not comply with the policy requirements, the Council will impose a late stage review mechanism which will reassess the construction costs and commercial values of the scheme at a future date. ~~Any additional value arising over and above the projected position agreed by the Council at the planning application stage would then be utilised to extend the peppercorn period as far as possible.~~ **Where site specific viability assessments are accepted, in circumstances where on-site affordable workspace was provided at the application-stage, any surplus arising from the late stage review will be used to extend the peppercorn rent period. In circumstances where on-site affordable workspace was not provided at the application-stage, any surplus arising from the late stage review will be used to provide off-site financial contribution towards affordable workspace.**

~~4.51~~ **4.50** Viability work undertaken by the Council suggests that **large schemes in certain locations can deliver affordable workspace at peppercorn rent** ~~certain sites can lease the space for a longer peppercorn period, including space~~ in perpetuity. **This applies to schemes of 10,000sqm or more net floorspace within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas as set out in Policy B4 A (ii).** ~~The Council will seek a peppercorn period longer than 20 years, including space in perpetuity where case-by-case viability evidence demonstrates this is possible.~~

Remaining paragraph numbers in the chapter to be updated.

SDMM38

Page in submitted plan: 126

Section paragraph policy: Footnote 25

Proposed change

Amend as follows:

~~Such proposals would need to justify the suitability of the location in line with Policy B2 Part E~~

SDMM39

Page in submitted plan: 126

Section paragraph policy: Footnote 26

Proposed change

Amend as follows:

Sui Generis floorspace akin to **office/research and development B1(a)/B1(b)** is any floorspace where the predominant use is **B1(a)office** and/or **B1(b)research and development** but the overarching lawful use is Sui Generis by virtue of elements of other uses which would not constitute an ancillary use.

SDMM40

Page in submitted plan: 127

Section paragraph policy: Affordable workspace contributions formula

Proposed change

Step 1: calculate projected $B1(a)$ office rental values from subject property or comparables (on a per square metre per annum basis).

Step 2: Identify 10% of floorspace in square metres (NIA)

Step 3: 10% of floorspace (from step 2) x rental value per square metre (from step 1) = rent per annum

Step 4: identify $B1(a)$ office yields from subject property or comparables (All Risks Yield)

Step 5: calculate multiplier as follows: $(1+i)^n - 1) / (i (1+i)^n)$ n = number of years at peppercorn rent (20 years) i = All Risks Yield (calculated as Yield divided by 100)

SDMM41

Page in submitted plan: 128

Section paragraph policy: Policy B5: Jobs and training opportunities, parts A, B and C

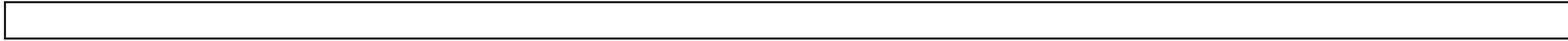
Proposed change

Amend as follows:

A. On-site construction **job and** training opportunities, including apprenticeships, for local residents are required from developments of 10 residential units or above; hotels, student accommodation or hostels with 20 or more rooms; and non-residential developments with an uplift in floorspace of ~~500~~ **1,000**sqm GEA or greater **of employment floorspace**.

~~B. Jobs and training opportunities, including apprenticeships, will be required from developments where there is an uplift of 500sqm GEA of employment floorspace~~

~~(i.e. any employment-generating use).~~



€ B. Financial contributions **from all major developments** to help support initiatives which tackle worklessness will be sought ~~as set out in~~ **having regard to** the Planning Obligations (Section 106) SPD **and its future updates and/or other relevant supplementary documents.**

SDMM42

Page in submitted plan: 130-134

Section paragraph policy: Policy R1: Retail, leisure and services, culture and visitor accommodation
and supporting text

Proposed change

A. Town Centres are a focal point for commercial, cultural and civic activity in the borough. There are four Town Centres in Islington: Angel; Nags Head; Finsbury Park; and Archway. Each Town Centre has its own character and serves different functions, which must be maintained and enhanced. Each Town Centre is covered by a specific Spatial Strategy, set out in chapter 2. The Town Centre boundaries are defined on the Policies Map and shown in Figures 4.2 to 4.5 below.

B. The Council will seek to ensure that all Town Centres develop in a way that supports their continued vitality and viability to meet the needs of local residents and provide a diverse retail and leisure experience for residents, workers and visitors alike.

C. Primary Shopping Areas are where retail ~~(particularly A1 uses)~~ **uses** are concentrated in Islington's Town Centres. The Primary Shopping Area boundaries in each Town Centre are defined on the Policies Map and shown in Figures 4.2 to 4.5

below. **Where possible** ~~R~~retail uses will be ~~subject to stronger protection~~ **maintained** in Primary Shopping Areas. Outside the Primary Shopping Area, a range of main Town Centre uses are considered suitable, in order to promote and encourage diverse shopping and leisure destinations.

D. LSAs provide more local services, particularly essential convenience retail which caters for daily shopping needs. Some LSAs also have a more diverse mix of commercial uses, particularly leisure uses, which can help to sustain the vibrancy of these areas. LSAs are identified on the Policies Map.

E. There are a number of other retail and leisure uses that provide a valuable service to local communities but are not within specifically designated areas. These dispersed uses, particularly within **retail the A1** and **A3-café/restaurant** use **classes**, **will must** be protected **where possible**.

F. Residential uses ~~may be acceptable on upper floors in town centres and local shopping areas where they contribute have significant potential to cause adverse impacts on to~~ the vitality and viability of **the** designated retail area, **and reflect existing character**. ~~s. As such, they must be located outside the Primary Shopping Area (where proposed in a Town Centre) and situated on upper floors (where proposed elsewhere in Town Centres or in LSAs). Residential uses must also fully prevent/mitigate risk of future impacts on operation and amenity through their design, consistent with relevant Local Plan policies including the agent of change principle.~~

G. Small shops/**commercial** units contribute to the unique character of Islington and support local businesses. The Council will protect existing small shops/**commercial units where possible**. **The Council will and** promote new small ~~shop~~ **retail** provision as part of new developments **at ground floor**.

H. Specialist Shopping Areas, such as Fonthill Road and Camden Passage, ~~have a~~ **add to the** unique **selling proposition function** and character **within Angel and Finsbury Park Primary Shopping Areas**, and contribute to the

vitality and viability of the borough. Retail uses in this area will be strongly protected, **including retail use on upper floors.**

I. Retail, service and leisure uses will be resisted where, by virtue of their location and/or concentration, they would have negative impacts on the character, function and amenity of an area or would negatively impact on the health and wellbeing of the borough's residents.

J. Within retail areas, streets will be actively managed to balance the demands on the public realm from businesses, particularly restaurants and cafés, and the need for easy pedestrian movement. Active frontages will be promoted.

K. New retail development must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.

Culture and the Night-Time Economy

L. Cultural uses are an essential part of Islington's social and economic fabric and their loss or diminution will be strongly resisted.

M. Islington has a varied night-time economy which the Council will seek to protect and enhance where appropriate. Concentrations of night-time economy uses exist in the borough including in designated Cultural Quarters. The Council will work with partners to support and manage a thriving and safe night-time economy that is well served by safe, convenient and sustainable night-time transport.

N. Angel Town Centre, ~~Archway Town Centre~~ and part of the Clerkenwell and Farringdon area are designated Cultural Quarters. ~~All~~ **Development proposals within Cultural Quarters must enhance the Cultural Quarter should be consistent with Policy R10** by providing new/improved cultural uses and/or uses which support the cultural function within the Quarter and the character of the area. **The Cultural Quarter boundaries are defined on the Policies Map.**

O. Pubs are part of Islington's social fabric and they contribute positively to Islington's culture, character and economy. The loss of pubs will be resisted and new pubs encouraged where appropriate.

P. The development of new cultural and night-time economy uses must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.

Visitor Accommodation

Q. To ensure that land is safeguarded for uses which are greater strategic priorities in Islington, development, redevelopment and/or intensification of visitor accommodation will only be supported in specific locations.

R. Visitor accommodation must be well-designed, accessible and sustainable.

Update supporting text as follows:

4.64 **In order to meet identified need, the evidence base identifies need for 6,341sqm of convenience floorspace and 12,247sqm of comparison floorspace to be provided by the end of the plan period [footnote 29].** Islington, on

the whole, has a robust and thriving retailing, leisure and service offer which serves the needs of residents and workers and is part of what attracts visitors to the borough. However, there are significant structural challenges facing the retail sector, from internet shopping to changing retailer and customer requirements and demands. Retail centres in Islington therefore need to adapt and futureproof for these changing circumstances while maintaining a level of retail needed to cater for local communities and workers; the future for Town Centres is as a 'place to be' rather than solely a 'place to buy'. They are also places which encourage social interaction and play an important part in cohesive communities.

4.65 Major Town Centres at Angel and Nag's Head are at the top of the borough's retail hierarchy, followed by District Town Centres at Archway and Finsbury Park. Town Centres are the key focus for new retail and leisure development. **Policy R3 supports a town centre first approach in order to retain the retail hierarchy.**

...

4.68. Each of Islington's Town Centres includes a Primary Shopping Area designation. The Primary Shopping Area (**PSA**) is located in the core of each Town Centre and **is the Council is seeking the PSA to remain** the focal point for **A1 uses retail**. ~~Units within the Town Centre~~ Outside of the Primary Shopping Area ~~conversely have~~ **there is** greater flexibility **both for Class E uses and to change to** other suitable main Town Centre uses ~~which will~~ **to** help increase the diversity and vibrancy of uses.

...

4.70 Development proposals will be resisted where they result in an unacceptable concentration of night-time economy uses, hot food takeaways, betting shops and other gambling facilities, financial and professional services such as payday loan shops or ~~estate agents, or~~ other similar uses. It is important to ensure a mix and balance of complementary day and night-time uses that creates an attractive and vibrant area that co-exists successfully with neighbouring residential areas and does

not significantly compromise wellbeing. Certain types of uses can cause detrimental cumulative impacts as a result of their concentration or location. The Council will therefore resist applications for such uses where they would cause harm.

...

4.73 Retail to residential prior approval applications, currently permitted under Part 3, Class M of the General Permitted Development Order ("the GPDO") will be assessed against relevant Local Plan policies related to prior approval categories; such policies are material to the prior approval determination. The most relevant prior approval category related to land use is condition M.2(1)(D), which requires an assessment of whether it is undesirable for the building to change to residential use because of the impact of the change of use:

- (i) on adequate provision of ~~Use Class A1/A2 retail and professional/financial services~~, but only where there is a reasonable prospect of the building being used to provide such services; or
- (ii) where the building is located in a key shopping area, on the sustainability of that shopping area.

4.74 Applicable policies will be dependent on the location of the building subject to the application, for example policies R2 and R3 will apply to applications in the Primary Shopping Area ~~of~~ **and** Town Centres, while policy R4 will apply to applications in LSAs. In the absence of a definition of the term 'key shopping area' set out in the GPDO, a key shopping area (for the purposes of any prior approval assessment) will be considered to be any Town Centre or LSA designated in the Local Plan.

...

4.80 ~~Cultural and night time economy activities, must be located in the CAZ or Town Centres and will be especially encouraged in Cultural Quarters.~~ **Cultural and night time economy uses in Town Centres and the CAZ** ~~This~~ allows for a

critical mass of these uses to support a vibrant and viable clustering, in areas which are commercially-focused and therefore less likely to lead to adverse amenity impacts, especially for residential uses **as set out in Policy R10 Part A**. There are also benefits in the form of containing adverse impacts such as noise and being able to direct resources for the management of the night-time economy activities. However, encouraging a critical mass does not detract from the importance of balancing needs so that a variety of existing and new uses can thrive.

...

Add new footnote 29 (other footnote numbers to be updated accordingly):

The 6,341sqm figure was identified in the Retail and Leisure Study (RLS) by assuming that new convenience floorspace will be operated by a foodstore retailer. However, the RLS notes that a higher figure of 11,323sqm of convenience retail floorspace will be needed if local/discount supermarket formats transpire to be the preferred format in the borough. The Council will monitor the delivery of town centre uses and delivery of convenience and comparison floorspace.

SDMM43

Page in submitted plan:135-136

Section paragraph policy: Policy R2: Primary Shopping Areas. Supporting text, paragraphs 4.86 – 4.91

Proposed change

A. **In order to meet retail needs and support a retail function** within Primary Shopping Areas (**PSA**), **the Council is seeking a** ~~the percentage of retail~~**A1 uses must be maintained** at a minimum of 60% in Angel and Nag's Head Major Town Centres; 55% in Finsbury Park District Town Centre; and 50% in Archway District Town Centre.

B. **New development at ground floor in the PSA should contribute to the retail function as set out in Part A and will be appropriately conditioned to maintain this.**

BC. Proposals for Class E uses which do not contribute to the retail function at the ground floor within the PSA ~~which result in the percentage of A1 uses in a Primary Shopping Area falling below the percentages in Part A~~ must:

~~(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued A1 use, or other appropriate main Town Centre uses;~~

(ii) prevent/mitigate any individual or cumulative impact on **the objective to maintain** the vitality, viability, character **and** vibrancy **of the** ~~and predominantly A1~~ retail function of the Primary Shopping Area;

(iii) provide an active **main town centre use** frontage at ground floor level, particularly where fronting main transport/pedestrian route(s); and

(iii) ensure there is no harmful break in the continuity of **the active frontage** ~~retail units~~.

D. Where ground floor retail floorspace is conditioned for that use, and a proposal is seeking a change of use to another Class E use or full class E flexibility, the proposal must demonstrate continuous marketing evidence for a period of 6 months, to demonstrate that there is no reasonable prospect of the unit being used for continued retail use.

E. Proposals for change of use on the ground floor from Class E use to other main town centre uses will be required to demonstrate that the premises have been vacant for at least 12 months. Continuous marketing

evidence to cover this period must be provided to demonstrate that there is no reasonable prospect of the unit being used in its current use as well as other main town centre E uses as set out in the Appendix 1, to demonstrate that no main town centre E use is viable.

F. Proposals for change of Class E use on the ground floor of premises in the PSA to residential, outside of the Specialist Shopping Area, will be required to demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for retail, Class E or other appropriate main Town Centre uses.

Update supporting text as follows:

4.86 **The Council seeks to** ~~To ensure support~~ the vitality and viability ~~is maintained, the Primary Shopping Areas of~~ Islington's Town Centres, **meet retail needs and maintain a retail function** ~~will be protected and enhanced~~. Primary Shopping Areas contain the greatest concentration of ~~shops-retail (A1-retail use)~~; are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres, ~~and~~ ensuring their continued vibrancy, vitality and viability. Where proposals within Town Centres fall outside the Primary Shopping Area, Policy R3 will apply.

4.87 To ensure a critical mass of retailing uses is maintained within Primary Shopping Areas, the ~~A1~~ retail function **will be supported through use of conditions to ensure that new proposals contribute to the PSA function.** ~~must remain the principal use; this will be achieved by imposing a specific percentage requirement for A1 uses within Primary Shopping Areas.~~ **Whilst recognising the benefits and flexibility of class E in different parts of the borough, the Council considers use of conditions in the PSA at ground floor is appropriate to ensure that new proposals for retail floorspace is secured for those specific activities.** ~~Proposals which would result in the overall percentage falling below this minimum level must provide marketing and vacancy evidence and meet other criteria to demonstrate that potential~~

~~adverse impacts are prevented. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.~~

4.88 To determine the existing Primary Shopping Areas **retail make-up A1** percentage figure, the number of ~~Use Class A1~~ 'retail' units with a ground floor presence within the Primary Shopping Area should be divided by the total number of units with a ground floor presence within the Primary Shopping Area. A unit with a ground floor presence would include those with additional space below and/or above ground floor level. Other methods to calculate the percentage, for example considering only specific frontages, will not be acceptable for the purposes ~~of meeting monitoring~~ policy R2. **The Camden Passage and Fonthill Road Specialist Shopping Areas provide a unique retail proposition that contributes to the character of Angel and Finsbury Park Town Centres. These are included in the PSA but where development is proposed in these areas, Policy R7 is applicable.**

4.89 Appendix 1 sets out the information to be provided in relation to marketing and vacancy of floorspace.

~~4.89~~ **4.90** While the loss of space below and above ground floor level may not trigger policy R2 where a ground floor use is unaffected, policy R3 Part ~~F~~ **C** may apply. ~~Where the change of use of ancillary space below and/or above ground floor level would necessitate significant changes to the frontage to facilitate separate access, this must be factored into the frontage percentage calculations, e.g. it must be classed as the introduction of a separate use into the frontage, which would affect the percentage calculations.~~

~~4.90~~ **4.91** To ensure the Primary Shopping Areas sustain their vitality and function as **important** ~~the~~ retail hubs of Town Centres **and the borough**, it is important to avoid harmful breaks in ~~retail~~ **active** frontages. What constitutes as a 'harmful break' will be assessed on a case-by-case basis taking into account site specific circumstances, but generally refers to the introduction of a use that ~~does not complement the Primary Shopping Area and~~ detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-**main town centre** ~~commercial~~ uses in the centre

of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.

SDMM44

Page in submitted plan: 136-137 and 143-144

Section paragraph policy: Policy R3: Islington's Town Centres and supporting text.

Proposed change

Policy R3: Islington's ~~Town Centres~~ **Retail hierarchy**

A. The Council will seek to maintain and enhance the retail, service and leisure function of Islington's four Town Centres, which are designated on the Policies Map and shown on Figures 4.2 to 4.5.

B. Proposals for ~~A1-A5, D2 and/or Sui-Generis~~ main Town Centre use floorspace should be located within a designated Town Centre. Proposals for these uses outside a designated Town Centre will only be permitted where they meet relevant criteria under Part C, D, ~~or E~~ **or F**.

Town Centres

CF. Any development proposed within a designated Town Centre must:

~~(i) be of an appropriate scale related to the size and role of the centre;~~

(ii) ensure ~~there are no~~ adverse impacts on vibrancy, vitality, viability **and character** of the centre **are fully mitigated**, ~~including as a result of concentrations of non-A1 uses.~~

(iii) provide a frontage which engages positively with local character and the street scene. Where historic shopfronts and features are present, these must be retained.

(iv) provide a high quality design including meeting policies related to accessibility and sustainability;

(v) provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated;

~~(vi) not involve the loss of ancillary floorspace (e.g. storage, back office functions) which could compromise the future operation of the retail unit and make the unit less desirable for future occupiers.~~

Central Activities Zone

~~CD. Proposals for A1-A5, D2 and/or Sui Generis main Town Centre use floorspace in the CAZ may be acceptable where~~ **The CAZ is the primary office location and offices will be supported and secured in line with Policies BC1 (AAP) and B1. Proposals for other elements of class E including retail and other main Town Centre use floorspace in the CAZ may be acceptable where:**

(i) the scale of the development would not have an adverse individual or

cumulative impact on the character, function, vitality and viability of Islington's Town Centres or LSAs. An impact assessment may be required to fully assess potential impacts;

(ii) the proposal can be accommodated without adverse impact on the amenity of residents and businesses; and

(iii) the proposal does not involve the loss of existing business floorspace **in line with Policy B3**; complements the overarching business floorspace focus within the CAZ; and does not detract from the policy requirement to maximise the amount of business floorspace as part of new development.

Local Shopping Areas

E D. Proposals for **development of** up to 200sqm of ~~A1-A5, D2 and/or Sui-Generis~~ main Town Centre uses in LSAs are not required to meet the sequential test. Proposals in excess of 200sqm must meet the sequential test and actively investigate and consider preferable locations in line with the Council's retail hierarchy. An impact assessment may also be required for proposals in excess of 200sqm, to assess the impact of larger proposals on the existing character and function of the LSA and relevant **neighbouring LSAs and** Town Centres.

Edge of centre/Out of centre

EF. Any proposal for ~~A1-A5, D2 and/or Sui-Generis~~ main Town Centre uses **floorspace** in an edge-of-centre location outside LSAs or in an out-of-centre location must:

- (i) meet the sequential test and actively investigate and consider sequentially preferable locations in line with the Council's retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and
- (ii) provide an **detailed** impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or LSAs.

Residential use in town centres

~~G. Residential uses are not suitable in Town Centres at Ground Floor level or below. Any applications for residential uses in such locations will be strongly resisted.~~ **Additional conventional housing in town centres is acceptable subject to**

compliance with the following criteria and other relevant policies. Applications involving the change of use from existing ~~A1-A5, D2 and/or Sui Generis~~ **Class E and/or** main Town Centre uses, ~~(on any floors)~~ to residential use must:

~~(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use or any other main Town Centre use which could reasonably be assumed to occupy the premises;~~

(ii) follow the 'agent-of-change' principle consistent with policy DH5.

~~(iii) not involve the loss of ancillary floorspace (e.g. storage, back office functions) which could compromise the future operation of the retail unit and make the unit less desirable for future occupiers;~~

(~~iv~~**ii**) ensure that ~~access to~~ the proposed residential use does not affect the operation of any continued ~~A1-A5, D2 and/or Sui Generis~~ main Town Centre use floorspace ~~or impact on the streetscene and the provision of an active frontage, especially where the loss of floorspace is proposed to facilitate access;~~ and

(~~v~~**iii**) provide high quality dwellings with a high standard of residential amenity, consistent with other relevant policies, including those relating to housing standards, design, accessibility and sustainability.

H. ~~Any applications for a~~ **New conventional housing residential uses** in Town Centre locations not involving change of use of existing ~~A1-A5, D2 and/or Sui Generis~~ main Town Centre uses **is supported must. Proposals should** be located on upper floors ~~and: Proposals~~ must address criteria set out in Part G(ii) to (~~viii~~**viii**).

Update supporting text as follows:

4 .92 Islington's Town Centres are the primary focus for retailing in the borough. The core of ~~A1-retailing~~ **retail** in Town Centres is focused in Primary Shopping Areas (see policy R2), with locations outside of this suitable for a range of ~~A1-A5, D2 and/or Sui Generis~~ main Town Centre uses.

4.93 Ensuring that retail and other important services and facilities (such as solicitors, post offices, groceries and newsagents) remain readily accessible is essential to the vitality and viability of Town Centres. Focusing ~~these shops~~retail and services within Town Centres will contribute to the inclusivity and sustainability of local communities and the local economy and reduce the number and length of trips undertaken.

4.94 To promote the economic and cultural function of Town Centres, in line with the National Planning Policy Framework, the Council will apply a sequential approach to assessing applications for retail, services, entertainment, assembly and leisure uses outside of the Town Centres. For the purposes of this policy, the local impact assessment threshold is 0sqm, meaning that any proposal in an edge-of-centre or out-of-centre location may be required to submit an impact assessment. The level of detail provided in the impact assessment must be proportionate to the scale of the proposed development.

4.95 Offices ~~in the B1 use class~~ are also considered a Town Centre use however such applications will be considered in relation to other relevant Local Plan policies and their impact on the predominant retail and leisure function of Town Centres.

4.96 London's CAZ has a unique role in the retail hierarchy. The CAZ function is primarily linked to business floorspace, but retail uses are important supporting uses. The CAZ contains clusters of retail premises, notably at Angel (partly covered by the CAZ), which is a designated Town Centre. There are four LSAs within the CAZ, covered by policy R4 and the Bunhill and Clerkenwell AAP. Given the nature of the CAZ, retail uses are also dispersed in numerous other locations. Proposals for new ~~A1-A5, D2 and/or, Sui-Generis,~~ main Town Centre use floorspace within the CAZ may be appropriate where it would not undermine the overarching business function of the CAZ and would not detrimentally affect the vitality and viability of Town Centres and/or local amenity. An impact assessment may be required where the proposed scale of retail could have adverse impacts on nearby Town Centres, LSAs or other undesignated clusters of retail, service and leisure uses.

4.97 Impact assessments, as defined in the NPPF, will sometimes be required for development outside of town centres depending on the floorspace thresholds set out in policies. The purpose of an impact assessment is to

assess the impact on the viability of neighbouring or linked retail centres as well as the quantitative and qualitative impacts of the proposed use on the function and character of the location. An impact assessment must consider relevant main town centre uses, including Class E uses.

~~4.987 Residential uses on ground floors or below are generally not appropriate in Town Centres, primarily due to the harmful break in shopfront continuity which~~ **in town centres can contribute towards a mix of uses that support healthy town centres. Upper floors are appropriate for residential uses where adverse impacts can be prevented/mitigated. Change of use of upper floors to residential use must not compromise main town centre uses' ability to effectively occupy the ground floor premises. Proposals for residential uses must ensure that the side or rear of a building used for waste, refuse and/or servicing by commercial uses is not unreasonably compromised. Breaks in active frontages** affects the viability, vitality and vibrancy of the centre, and therefore is detrimental to the retail and commercial function of Town Centres. Ground floor and basement levels can often also provide ancillary space for storage or backroom functions ~~and therefore must be preserved for the effective operation of retail and commercial units. Residential development on the ground floor or below also raise issues of amenity for the future residential occupiers, as Town Centre uses create heavy footfall and can create disturbance. The quality of retail shop conversions to residential is generally poor and therefore would not provide high quality housing as required by policy H4.~~

~~4.98 For proposals to change the use of existing ground floor units (or below), continuous marketing evidence will be required demonstrating lack of demand for main Town Centre uses. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.~~

~~4.99~~ **4.99** ~~Residential uses may be suitable on upper floors in Town Centres, outside of Primary Shopping Areas, where they adhere to specified criteria set out in the policy.~~ With regard to facilitating access to upper floor residential units, this must not affect the continued operation of any ~~A1-A5, D2 and/or~~ **E, Sui Generis or F.2** main Town Centre use floorspace, or impact the street scene or the provision of an active frontage. The loss of such floorspace to facilitate access would trigger Part G of policy R3, unless it was of such a small scale that it was considered de minimis. Other policies may also apply, for example policy DH7.

Updated paragraph numbers to be amended throughout rest of the chapter...

Footnote ~~29~~-30 Amend as follows:

~~B1~~ Office uses are also suitable Town Centre uses; however, proposals for ~~B1~~ Office uses in Town Centres will be assessed against policy B2

SDMM45

Page in submitted plan: 144-148

Section paragraph policy: Policy R4: Local Shopping Areas and supporting text

Proposed change

A. All proposals must maintain and enhance the retail and service function of the Local Shopping Areas (shown in Figure 4.6 **and on the Policies Map**).

B. Proposals involving the change of use from **E A1** – including ground floor, basement and first floor ~~operational or ancillary~~ space - to non-**E** main town centre ~~A1-commercial~~ use must demonstrate that:

(i) the premises have been vacant for a continuous period of at least six months and continuous marketing evidence to cover this period has been provided which demonstrates that there is no reasonable prospect of the unit being used in its current **E A1** use **in line with requirements in Appendix 1**;

(ii) there would not be a significant adverse effect on amenity, particularly the surrounding residential amenity; and

(iii) the proposal does not cause any individual or cumulative adverse impact on the vitality, viability, character, vibrancy and function of the area.

C. Development of main town centre uses over 200sqm must meet the requirements in Policy R3 Part E.

~~CD. Residential uses in Local Shopping Areas at Ground Floor level or below will be strongly resisted.~~ Applications for the change of use of ~~A1-A5, D2~~ **Class E** and/or Sui Generis main Town Centre use floorspace to residential use and/or a use other than those specified in Part B must:

- (i) demonstrate that the premises have been vacant for a continuous period of at least two years and continuous marketing evidence to cover this period has been provided, which demonstrates that there is no reasonable prospect of the unit being used in its current use and any other use which could reasonably be assumed to occupy the premises;
- (ii) prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and function of the area;
- (iii) comply with the 'agent-of-change' principle consistent with Policy DH5;
- (iv) not create a harmful break in the **active** frontage of the Local Shopping Area;
- ~~(v) not involve the loss of ancillary floorspace (e.g. storage, back office functions) which could compromise the loss of ancillary space that is integral to the future operation of the retail unit and make the unit less desirable for future occupiers in the future~~
- ~~(vi)~~ ensure that access to the proposed residential use does not affect the operation of any continued ~~A1-A5, D2 and/or Sui Generis~~ main Town Centre use floorspace or impact on the streetscene and the provision of an active frontage, especially where the loss of floorspace is proposed to facilitate access; and
- ~~(vii)~~ provide high quality dwellings with a high standard of residential amenity, consistent with other policies relating to housing standards, design, accessibility and sustainability.

⊖ **E.** Any applications for new residential uses in a Local Shopping Area not involving change of use of existing ~~A1-A5, D2 and/or Sui-Generis~~ main Town Centre uses must be located on upper floors. Proposals must address criteria set out in Part C (ii), (iii), (v), (vi) and (vii) of Policy R4.

Update supporting text as follows:

4.102 The impact of proposals will therefore affect LSAs differently, with the loss of **retail and service A1** uses in smaller LSAs being felt more acutely. The impact on the amenity of local users of a LSA will depend on its size, the current mix of uses, and its proximity to other centres (whether that be LSAs or Town Centres).

4.103 LSAs are not immune from wider changes to the retail environment, and therefore need to be resilient to any future changes, such as increases in online shopping. For LSAs to be resilient they need to be able to change use class more flexibly in response to changing demands and trends in local shopping. **In the context of LSAs** the six-month period of vacancy and marketing evidence for a change of use from **E to non-E main town centre use or conditioned retail A1** to **other E non-A1 commercial** uses reflects this increased flexibility.

4.104 Non-~~retail A1 commercial~~ **main town centre** uses refer to those uses that provide an active frontage and enhance the function of Town Centres through employment or the provision of leisure and retail services. Non-~~retail A1~~ **main town centre uses** ~~commercial~~ uses may include **professional/financial services, cafes/restaurants, offices, research and development, light industrial, indoor recreation, outdoor recreation, assembly and community, pubs, hot food takeaways and some further sui generis uses** ~~A2-A5, B1(a), B1(c), D2 and some Sui-Generis uses.~~ However, non-~~retail A1~~ **main town centre** ~~commercial~~ uses can vary in their impact, therefore proposals of this nature (including what constitutes a suitable non-~~retail A1~~ **main town centre** ~~commercial~~ use) will be assessed on a case-by-case basis.

4.105 An impact assessment may be required for proposals for main town centre uses of more than 200sqm in line with Policy R3 Part E, to assess the impact of larger proposals on the character and function of the LSA and relevant neighbouring LSAs/town centres

4.106 For proposals that are marketed within Class E, Appendix 1 sets out the requirements. Applicants must engage with Appendix 1 closely and submit marketing evidence in line with this. Where a proposal seeks a change from an E to a non- E main town centre use, the premises must be vacant and marketed for 6 months. This ensures that suitable E uses that have the ability to provide key goods and services, and leisure uses like cafes/restaurants are demonstrated not to be in demand before a change of use away from Class E takes place. Where a proposal seeks the change of use from a retail use specifically secured through condition, the premises should be marketed for the specific conditioned use for six months.

4.107 ~~4.105~~ In order to protect the function of LSAs, proposals to change the use of ground floor units (including space below ground floor) ~~from A1-A5, D2 and/or Sui-Generis~~ main Town Centre use floorspace to residential use will be required to provide marketing and vacancy evidence for a period of two years, to demonstrate that there is no continued demand for the existing use and any other use which could reasonably be assumed to occupy the premises.

4.108 ~~4.106~~ Proposals of this nature must also not cause a harmful break in the continuity of ~~commercial~~**active**~~retail~~ frontages. What constitutes as a 'harmful break' will be assessed on a case-by-case basis taking into account site specific circumstances, but generally refers to the introduction of a use that does not complement the LSA and detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-**main town centre**~~commercial~~ uses in the centre of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.

4.110 ~~4.107~~ Residential uses may be suitable on upper floors in LSAs where they adhere to specified criteria set out in the policy. With regard to facilitating access to upper floor residential units, this must not affect the continued operation of any

~~A1-A5, D2 and/or Sui Generis~~ main Town Centre use floorspace ~~or~~, impact the streetscene or the provision of an active frontage. The loss of such floorspace to facilitate access would trigger Part ~~E~~ of policy R4, unless it was of such a small scale that it was considered de minimis. Other policies may also apply, for example policy DH7.

SDMM46

Page in submitted plan: 149-150

Section paragraph policy: Policy R5: Dispersed retail and leisure uses and supporting text

Proposed change

Amend text as follows:

A. The Council will support and protect ~~A1~~**retail** uses located outside designated Town Centres and LSAs. Proposals involving the loss of dispersed ~~shops~~**retail units and cafes/restaurants** – including ground floor, basement and first floor ~~operational or ancillary~~ space **to non-E main town centre use**- must:

(i) demonstrate that the premises have been vacant for a continuous period of at least one year. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use **or any other suitable E use**; and

(ii) provide evidence that there will be accessible provision of essential daily goods (typically convenience retail) within a short walking distance (within 300m).

~~B. The Council will support and protect dispersed A3 uses located outside designated Town Centres and LSAs. Proposals involving the loss of dispersed A3 units—including ground floor, basement and first floor operational or ancillary space—must:~~

~~(i) demonstrate that the premises have been vacant for a continuous period of at least six months. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use; and~~

~~(ii) demonstrate that the loss of the A3 unit will not have an adverse impact on the local community, including through the loss of social value.~~

B. Where a new retail development comes forward in some circumstances where there is a particular local need, the council will seek to condition the unit in retail use to provide essential daily goods.

C. Proposals for the change of use of dispersed ~~A1 or A3~~ **retail or café/restaurant** units to residential use will only be considered acceptable where Part A ~~and B~~ of this policy **are is** satisfied, where high quality dwellings with a high standard of residential amenity will be provided consistent with other policies and standards relating to housing and design, ~~and where the Change of Use would not detrimentally affect the street scene and/or the wider character of an area.~~

Amend supporting text as follows:

4.108 Local shops located outside designated Town Centres and LSAs can provide a valuable service to the local community by providing for essential day-to-day needs. Their accessibility is particularly important for those with mobility difficulties.

4.109 There has been a loss of a number of local shops, particularly to residential use, in recent years. Continuous marketing evidence will be required for proposals for the Change of Use of existing retail units, demonstrating lack of demand for retail

or an appropriate commercial use that provides an essential service to residents. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.

4.110 Protection of **retailA1** units can assist with work to mitigate the prevalence of food deserts in the borough, in line with the overarching plan objective on healthy environments. Food deserts are where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems. Accessible provision of essential goods has multiple benefits including a balanced diet, active travel, reduced transport congestion, and increased social contact.

4.111 Dispersed **café/restaurantA3** leisure units can contribute positively towards the vibrancy and character of places outside of Town Centres and LSAs, especially in residential areas. These units often provide an inclusive meeting place within a community, contributing to community cohesion and can significantly increase the wellbeing and social interaction of those with mobility issues such as the elderly. Facilitating social contact through **café/restaurantA3** premises benefit mental health and promotes civic activity by providing spaces that can be used as informal community hubs. The Council will seek to protect such uses and any change of use must provide evidence that loss of the **café/restaurantA3** unit will not have an adverse impact on the local community. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.

4.112 Proposals for the Change of Use of dispersed **retail or café/restaurantA1/A3** to residential use must demonstrate and ensure a high standard of design and residential amenity for occupants (consistent with policy H4) and must not lead to unacceptable adverse impacts on the street scene and the character of an area.

Page in submitted plan: 150-151

Section paragraph policy: Policy R6: Maintaining and enhancing Islington's unique character, and supporting text

Proposed change

A. The Council views the retention of small shops as a baseline and places great weight on the need to retain any **retail unit shops** which currently or potentially could be utilised by small retailers. In order to encourage new provision of small **retail shop** units, the Council will seek to secure small retail shop units (generally considered to be units of around 80sqm GIA or less) suitable for occupation by small retailers by:

- (i) requiring proposals for new retail development to incorporate small **retail shop** premises, proportionate to the scale of the proposal **and/or**;
- (ii) requiring proposals for the redevelopment of small **retail shop** units to incorporate adequate re-provision of small units to compensate for any loss, particularly for essential services **and/or**;
- (iii) requiring proposals for major housing developments to incorporate small **retail shop** units where there is no accessible provision of essential daily goods available within a short walking distance (within 300m); and
- (iv) where appropriate, attaching conditions to permissions for small **retail shop** units, requiring planning permission to be sought for the future amalgamation of units into larger premises; specifying a certain level of convenience goods in order to protect and promote essential services; and/or making planning consent personal to a specific individual/organisation.

B. In order to maintain Islington's retail character, particularly the prevalence of small **retail shop** units, the Council will resist the amalgamation of individual **E use shop** units ~~incorporating A Use Classes~~. Amalgamation of retail units may be suitable where development proposals demonstrate that the intensification of use would not:

- (i) detrimentally affect the street scene and/or character of the local area; and/or cause unacceptable adverse impacts on the local environment and/or amenity, including impacts from altered/intensified delivery and servicing arrangements.

(ii) cause unacceptable adverse impacts on the local environment and/or amenity, including impacts from altered/intensified delivery and servicing arrangements.

Amend supporting text as follows:

4.113 Islington's many small shops help lend the borough its special character and contribute to the identity of its neighbourhoods. Small shops provide an important role in servicing the day-to-day needs of local residents, workers and visitors, and can provide greater consumer choice and local employment. Certain types of small and independent shops perform an essential service and must be easily accessible to all residents. These essential services can include butchers, bakers, greengrocers, grocers, fishmongers, chemists, post offices, newsagents, cobblers, hardware stores, dry cleaners and laundrettes. The loss of **retail shop** units suitable for such shops, particularly units which contribute to local character, individuality, convenience and the wider commercial success of an area, will be resisted. Applicants for significant retail developments will be encouraged to seek out independent retailers for small units wherever possible

4.114 For the purposes of policy R6, a small **retail shop** is generally considered to be a unit of around 80sqm GIA or less, usually within the **E(A) use A1-use-class**. Retention of units suitable for occupation by small retailers must be the starting point when drafting development proposals. Any proposals which have not explored the possibility of retaining these units will be resisted.

4.115 Proposals for new retail development in the borough must incorporate small **E use shop** premises suitable for occupation by small retailers. Proposals for major residential developments will also be **encouraged required** to provide small **retail units shops** where no suitable retail provision is accessible within a short walking distance (300m or less). Proposals involving the loss of existing small **E use units shops** must re-provide small **E use shop** units. Where new small **E use shop** units are provided, the Council may put in place measures to control their occupation, and guard against future loss through use of relevant planning conditions.

4.116 The amalgamation of individual **retail shop** units can result in material impacts, primarily relating to physical changes and intensification of use. Amalgamation of **retail shop** units will be resisted where they materially and detrimentally affect the character of Islington's shopping areas, including the impact ~~of amended~~ **active frontages shopfronts**. Amalgamated **retail shop** units may also result in different patterns of delivery and servicing; small supermarkets, for example, depend on very fast sales rates, which (where adequate storage is not available) requires 'just in time' deliveries. This can result in more traffic movements by delivery vehicles, which in turn can impact on residential amenity and environmental quality, and cause adverse impacts on the local highway. Where unacceptable adverse impacts arise, the amalgamation of individual **retail shop** units will be resisted. Policy T5 will be used to assess proposed delivery and servicing arrangements.

SDMM48

Page in submitted plan: 151-153

Section paragraph policy: Policy R7: Markets and specialist shopping areas and supporting text

Proposed change

- A. The Council will seek to maintain, and support the enhancement of, existing markets within the borough.

- B. New markets are encouraged in Town Centres and appropriate locations in the CAZ, where they support and enhance the function of a specific locality and do not adversely impact any predominant 'bricks-and-mortar' based uses.

C. The Council will continue to protect and promote the role of Specialist Shopping Areas at Camden Passage and Fonthill Road. Proposals ~~which should not~~ result in the percentage of ~~A1~~ retail uses in the Specialist Shopping Areas falling below 75%. **Proposals for change of use from E use to non-E main town centre uses** must:

(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued retail ~~A1~~ use or other **E class** leisure uses which would complement the specialist shopping function.

Marketing in SSAs must follow the requirements set out in Appendix 1.

~~(ii) ensure that the proposal would not result in a break in continuity of retail frontage of more than one non-A1 unit in any linear stretch of three units.~~

~~(iii) prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and predominantly A1 retail function of the Specialist Shopping Area; and (iv) provide an active frontage at ground floor level fronting main transport/pedestrian route(s).~~

D. In order to not diminish their unique function and character, proposals for the change of use from main town centre uses to residential of any part of the premises, including upper floors or ancillary space, will be required to demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for retail use, Class E or other appropriate supporting main Town Centre uses, in line with Appendix 1.

~~D~~**E**. Regardless of the resulting percentage of ~~A1-retail~~ uses, proposals that result in the partial loss of ~~retail-A1~~ floorspace (including ancillary floorspace) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the ~~A1-retail~~ unit and/or collectively undermine the function of the Specialist Shopping Area.

F. Any individual or cumulative impacts on the vitality, viability, character, vibrancy and predominantly **A1** retail function of the Specialist Shopping Area **should be prevented and/or mitigated.**

...

Update supporting text at paragraphs 4.125 and 4.126 as follows:

4.125~~±~~ To determine the percentage of **retail A1** uses in Specialist Shopping Areas, the total number of **retail A1** units within the Specialist Shopping Area should be divided by the total number of units within the Specialist Shopping Area. The Fonthill Road Specialist Shopping Area incorporates some units on Wells Terrace as well as those on Fonthill Road. The Camden Passage Specialist Shopping Area includes units on Camden Passage, **Camden Walk, Charlton Place** and Pierrepont Row.

4.126 The addresses included in the Specialist Shopping Areas are as follows:

Fonthill Road

- **86-164 (even) Fonthill Road**
- **93-149 (odd) Fonthill Road**
- **2-3 Wells Terrace**

Camden Passage

- **1-53 (all) Camden Passage**
- **2-10 (even) Charlton Place**
- **17 Charlton Place**
- **1-6 (all) Camden Walk**

- **Pierrepoint Row (all)**

Other paragraph numbers to be updated

SDMM49

Page in submitted plan: 153-155

Section paragraph policy: Policy R8: Location and concentration of uses and supporting text

Proposed change

A. Proposals will be resisted where they result in an unacceptable concentration of uses, such as night-time economy uses, hot food takeaways, betting shops and other gambling facilities, **and** payday loan shops, ~~estate agents~~. **The wide range of Class E uses also allows for overconcentration of certain uses, such as but not limited to café/restaurants, which have potential to cumulatively cause heightened adverse amenity impacts.** Concentration of uses will be assessed based on the number of units within a 500m radius of the proposed development. Proposals must be accompanied by sufficient information to allow for assessment of concentration and potential impacts, including information on how these uses will be managed and operated.

B. In addition to the general assessment of overconcentration in Part A:

(i) proposals for hot food takeaways (**Sui Generis** Use ~~Class A5~~) will be resisted within 200m of primary and secondary schools.

(ii) proposals for hot food takeaways (**Sui Generis** Use ~~Class A5~~) will be resisted where:

- a. they would result in 4% or more of total units being in **hot food takeaway**~~A5~~ use, in LSAs of 26 units or more; or

b. they would result in two or more **hot food takeaway A5** units, in LSAs with 25 units or less.

(iii) proposals for betting shops and adult gaming centres will be resisted where:

- a. they would result in 4% or more of total units being in betting shop/adult gaming centre use, in LSAs of 26 units or more; or
- b. they would result in two or more betting shop/adult gaming centre units, in LSAs with 25 units or less.

(iv) proposals for betting shops or adult gaming centres in Town Centres will not be permitted where there is an existing betting shop or adult gaming centre within 200m walking distance; or where the resulting amount of betting shops and adult gaming centres would exceed 1.5% of the total units in the Town Centre

C. Where proposals for uses serving food and drink are permitted – particularly ~~A3 and A5~~ **café/restaurant and hot food takeaway** uses, and ~~A1~~ **retail** uses such as coffee shops and sandwich bars – a condition will be attached to require the operator to achieve, and operate in compliance with, the **Healthier** Catering Commitment standard.

D. Where proposals for betting shops, adult gaming centre, payday loan shops, high interest 'rent-to-own' retail stores, pawnbrokers and other similar uses are permitted, conditions may be attached (where relevant) to:

- (i) require the display of information about local credit unions, debt advice services and/or gambling addiction charities;
- (ii) require the operator to sign up to, and operate in compliance with, any scheme(s) which promotes community safety and/or other good practice; and
- (iii) require the display of information about any applicable interest rates, fees and charges.

Update supporting text at paragraphs 4.129, 4.131, 4.132 and 4.133 as follows:

4.1249 The policy has restrictions (percentage and/or quantum of units) for hot food takeaways (~~Use Class Sui Generis A5~~) and betting shops and adult gaming centres (Sui Generis). These restrictions are necessary due to the adverse impacts on health and wellbeing and vitality and viability of retail centres that these uses can cause. These restrictions are part of a wider comprehensive approach to tackle the causes of ill health, in co-operation with other Council departments including Public Health. The restrictions, either the percentage or the quantum, may be updated in future through an SPD.

...

4.12631 All applications for **Sui Generis A5** Hot Food Takeaway's or Betting Shops must provide a Management and Operating Strategy which includes all the standard information needed when the operator applies for a premises licence. Management and Operating Strategies must also consider any other potential impacts on vitality, viability, character, amenity, function and health and wellbeing.

4.12732 **Hot food takeaway A5** uses are often associated with unhealthy food, but they are not the only type of premises to serve unhealthy food; **retail** and **cafe/restaurant A3** uses such as newsagents, coffee shops and cafes also often sell/serve unhealthy food. Applications for relevant **retail A1**, **café/restaurant A3** and **hot food takeaway A5** uses will therefore be conditioned to achieve, and operate in compliance with, the Healthier Catering Commitment standard. This will help provide easier access to healthier food across the borough.

4.12833 Islington has a relatively high number of betting shops, compared with other boroughs in London and across the country. Betting shops can have a variety of adverse impacts on communities including worsening mental health (particularly with incidences of problem gambling) and exacerbating incidences of anti-social behaviour and crime. There is evidence of betting shops clustering in deprived areas, and this will be a key consideration as part of any assessment of overconcentration. Tools and evidence such as the gambling-related harm risk index ~~work~~ produced by Geofutures may be utilised to inform this assessment.

Other paragraph numbering to be updated accordingly

SDMM50

Page in submitted plan: 155-157

Section paragraph policy: R9: Meanwhile/temporary uses and supporting text

Proposed change

A. Applications for meanwhile/temporary use of individual vacant ~~A1-A5, D2~~ **E, F.2** or Sui Generis uses in Town Centre locations and in the CAZ will be appropriate where:

(i) the temporary use sought is ~~within A use class, B1 or D2~~ **a retail, professional/financial service, café/restaurant, office, entertainment - such as cinema, bingo, music halls, indoor recreation, or outdoor recreation** use or is ~~in~~ **the Council's view**, a suitable community and/or cultural use;

(ii) the period of meanwhile/temporary permission is less than 6 months, and no more than one previous temporary permission have been granted since the last permanent occupation of the unit/building/site;

(iii) potential adverse amenity impacts are prevented or mitigated; and (iv) the meanwhile/temporary use does not preclude permanent use of the site for appropriate main Town Centre uses, which includes consideration of the amount of previous temporary permissions.

...

Update supporting text as follows:

4.1314 Vacant premises can detrimentally affect the vibrancy, vitality and viability of places. The efficient use of land is crucial to sustain a vibrant and engaging built environment and vacant premises can provide opportunities for businesses to establish themselves. This is especially applicable to start-ups and businesses within the creative industries. **Despite the flexibility introduced by Class E which combines a large range of activities into one use class there are still circumstances where meanwhile use may be beneficial.**

4.1325 The Council will encourage meanwhile/temporary use of **retail, professional/financial service, café/restaurant, office, entertainment such as cinema, bingo, music halls, indoor recreation, or, outdoor recreation and pubs** ~~A-use, D2 and Sui Generis~~ main Town Centre use units/building/sites in the CAZ and Town Centres, where potential adverse impacts are prevented/mitigated. Temporary use must not preclude permanent occupation of units/buildings/sites, and the Council expect marketing exercises for permanent occupation for an appropriate use to continue throughout the temporary occupation (pending consistency with relevant policies). **Meanwhile/temporary permissions sought for cultural or community uses should refer to the Plan's glossary definitions in Appendix 9.**

...

4.14037 To encourage meanwhile/temporary use of vacant **retail, professional/financial service, café/restaurant, office, entertainment – such as cinema, bingo, music halls, indoor recreation, or, outdoor recreation, pub or hot food takeaway** ~~A-use, D2 and Sui Generis~~ units, the Council will explore the potential to implement a meanwhile/temporary Use Local Development Order (LDO) which permits temporary uses in specific locations, where certain conditions are met.

SDMM51

Page in submitted plan: 157-160

Section paragraph policy: Policy R10: Culture and the Night-time economy and supporting text

Proposed change

A. New cultural uses ~~must~~ **should** be located in the CAZ or Town Centres, particularly in Cultural Quarters. Such uses ~~must~~ **should** :

(i) complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation, of these uses, in line with the 'agent-of-change' principle;

(ii) be accessible by a range of sustainable transport modes, including walking, cycling and public transport; and

(iii) provide high quality buildings that are designed to be inclusive, accessible and flexible.

B. Proposals involving the redevelopment, ~~and~~ re-provision of cultural uses, ~~or~~ intensification of existing cultural uses (except for public houses), **or the provision of new cultural uses, including in locations outside of the CAZ and Town Centres** ~~will only be acceptable on sites within the CAZ or Town Centres, and~~ must:

(i) ensure that the function and role of the existing cultural use is not diminished or put at risk by any proposed changes, particularly where proposals involve development of other uses (including sensitive uses such as residential) as part of mixed use redevelopment;

(ii) provide high quality buildings that are designed to be inclusive, accessible and flexible, and in the case of proposals for intensification, explore opportunities to improve design standards in existing buildings;

(iii) be conditioned to ensure retention of the specific cultural use; and

(iv) where there is a significant intensification of the cultural use, incorporate appropriate measures to limit effects of sound, vibration and other effects of the re-provided/intensified cultural use on existing and potential future land uses in the area, in line with the 'agent-of-change' principle.

(v) where use is only intended to operate during evening/night-time hours, investigate potential for allowing daytime uses to activate the space, including on a meanwhile basis.

C. The loss and/or change of use of cultural facilities in the borough will be strongly resisted. Any proposals for the loss and/or change of use of such facilities must:

(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued cultural use or other suitable cultural **uses. Marketing should also be considered for ~~or~~ main town centre commercial** uses consistent with the character and function of the area **where relevant**. Such evidence must meet the marketing and vacancy requirements set out in Appendix 1;

(ii) ensure that the character of an area and/or any wider cultural function is not adversely impacted by the loss; and

(iii) ensure that the proposed use is appropriate for the area, including through assessment against the agent-of-change policy DH5.

D. Proposals for new night-time economy uses (including redevelopment/intensification of existing night-time economy uses) will only be acceptable within the CAZ or in Town Centres. Where proposed, night-time economy uses must:

(i) complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation, of these uses, in line with the 'agent-of-change' principle;

~~(ii) demonstrate that there would not be a significant adverse effect on amenity or function, particularly impacts on residential uses;~~

(iii) promote access via sustainable modes of transport and avoid reliance on private vehicular transport, including private hire vehicles; and

~~(iii)~~ investigate potential for allowing daytime uses to activate the space, including on a meanwhile basis, where the use is only intended to operate during evening/night-time hours.

Update supporting text as follows:

4.143 A Cultural Quarter designation ~~can reflect~~ **s** an ~~aspiration to expand cultural provision in an area, or can cover~~ area where there is already a broader level of cultural activity which must be retained and enhanced. Renewal and enhancement of heritage or otherwise distinct townscape can support the function and role of Cultural Quarters. Residential use is particularly sensitive to noise and other potential impacts of cultural uses, therefore new residential uses (both conventional and non-self-contained) within Cultural Quarters **should seek to mitigate negative impacts on the Cultural Quarter in line with the agent of change principle.** ~~will generally only be permitted on sites allocated for residential development, where they accord with other relevant Local Plan policies. This strikes a balance between allowing the cultural role of the designated quarters to develop and prosper while providing targeted opportunities for new residential development to meet the borough's housing targets.~~

4.144 Islington has designated ~~three~~ **two** Cultural Quarters:

- Angel Town Centre is designated as a Cultural Quarter to reflect its role as the principal cultural destination in Islington and the contribution that this confluence of cultural uses makes to the wider Islington and London economy.
- Part of the area around Clerkenwell and Farringdon is designated as a Cultural Quarter to protect and promote the unique concentration of cultural uses and heritage assets in this area, and reflect the concentration of related creative industries.
- ~~Archway Town Centre is designated as a Cultural Quarter to encourage the increasing cultural offer in the centre, including a variety of creative enterprises and independent retailers.~~

...

4.14**79** Music venues in particular – including pubs which have a frequent live music offer-- highlight the potential dual economic and social role of a cultural use. They are frequented by people from all walks of life, which fosters inclusivity; and can contribute significantly to the local economy both in their own right and as a destination which encourages supporting activities. Across London, music venues are in decline due largely to development pressures and an increase in residential

uses located in close proximity to existing venues. Falling within the definition of a cultural use and also part of the night-time economy, music venues usually **F.2 D2** or Sui Generis use will be afforded strong protection in future. The Council supports development of new music venues where appropriate.

4.14850 The daytime use (including meanwhile/temporary use) of cultural venues that operate solely or predominantly at night can greatly enhance the cultural offer and economy of Town Centres and the CAZ. This can increase employment and add to the vibrancy of an area. **Retail, professional/financial services, cafes/restaurants, pubs, and offices A-class uses-and-office, research and development, light industrialB1** uses are considered particularly suitable uses in this context.

...

4.1502 The Council's strategic employment policy notes the importance of the 24-hour economy, which ensures that a variety of economic activities – both activities which drive and support economic growth – can take place across the borough to help achieve the Council's economic ambitions. The specific night-time economy plays an important role in realising these ambitions. There is crossover between night-time economy uses and cultural uses but the latter holds a wider definition. For the purposes of this policy, night-time economy uses generally fall within the **café/restaurantA3, pub A4, hot food takeaway A5, entertainment and recreationD2** and **further** sui generis uses-classes, although this is not considered exhaustive and could include other uses – for example some **F.1D1** uses such as art galleries.

SDMM52

Page in submitted plan: 161-162

Section paragraph policy: Policy R11

Proposed change

A. The Council will resist the redevelopment, demolition and Change of Use of any Public House which:

- (i) has demonstrable community/social value **and/or**;
- (ii) contributes to the cultural fabric of the borough, including consideration of any historic/heritage features; and/or
- (iii) contributes to the economy of the borough, particularly the night-time economy.

B. Applications for the Change of Use, redevelopment and/or demolition of a Public House which meets any of the criterion in Part A must demonstrate that:

- (i) the Public House has been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no realistic prospect of the unit being used as a Public House in the foreseeable future. **Such evidence must meet the marketing and vacancy requirements set out in Appendix 1;**
- (ii) the proposed alternative use will not detrimentally affect the character, vitality and viability of the area; or the amenity or future operation of land uses in the immediate area (including ongoing operation of the Public House where a partial change of use is proposed, e.g. on upper floors);
- (iii) appropriate, documented measures have been undertaken to improve the viable operation of the public house, which have proven unsuccessful;
- (iv) the condition of the pub is conducive to occupation; and
- (v) significant features of historic or character value are retained.

C. Visitor accommodation which is proposed on any non-operational upper floors of a Public House, and which is clearly subservient to the Public House function, may be appropriate where:

- (i) any adverse impacts on the operation of the Public House, particularly relating to issues of security, are prevented through design;
- (ii) the visitor accommodation does not lead to any intensive additional delivery and servicing requirements;

- (iii) visitor accommodation achieves the highest possible inclusive design standards;
- (iv) proposals comply with design requirements set out policy R12 Part D; and
- (v) visitor accommodation is designed, leased and operated as a hotel for temporary occupation. Where necessary, conditions will be used to ensure that visitor accommodation is not permanently occupied.

Step 6: rent per annum x multiplier = level of Affordable Workspace Contribution required

SDMM53

Page in submitted plan: 167-168

Section paragraph policy: Policy G1: Green Infrastructure and supporting text

Proposed change

Amend policy G1, Part E as follows:

Major developments are required to conduct an Urban Greening Factor (UGF) assessment in accordance with the methodology in the London Plan. Schemes must achieve an UGF score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (**excluding B2 general industry and B8 storage and distribution uses**).

...

Amend paragraph 5.5 as follows:

The London Plan includes an interim London wide UGF model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. Islington Council will use the London wide model in the determination of planning applications, but may in time develop a local model through further supplementary guidance.

Consistent with the London Plan B2 general industry and B8 storage and distribution uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is.

SDMM54

Page in submitted plan: 169-172

Section paragraph policy: Policy G2: Protecting Open Space and supporting text

Proposed change

~~A. —Development is not permitted on any public open space and significant private open spaces.~~

A: All public open space identified on the Policies Map and significant private open spaces are protected from development. The exception to this is where development associated with the use of the canal is proposed, including changes to existing canal facilities. Relevant criteria are set out in policy SP2: King's Cross and Pentonville Road and Bunhill and Clerkenwell AAP Policy BC4: City Road. Such development may be acceptable where it meets the relevant criteria in these policies and does not unacceptably impact the quality and function of the open space.

B. Development within the immediate vicinity of public open space must not impact negatively on the amenity, ecological value and functionality of the space. All impacts must be prevented/mitigated through the design of the scheme.

C. The Council will protect open space on housing estates. Where development is proposed on open spaces on housing estates, on-site re-provision of the same quantum of space of an improved quality is encouraged. Full loss of open space on

housing estates will be resisted. Proposals which will lead to a net loss but which will re-provide a quantum of on-site open space which is both functional and useable may be acceptable where:

- (i) the lesser amount of space is of a higher quality;
- (ii) multi-functional use of the space is encouraged, for example use as play space and/or climate change mitigation (as appropriate);
- (iii) permeability and connectivity within and between spaces is improved, ensuring that the space remains substantially undeveloped and open, and that accessibility to the general public is improved;
- (iv) rationalisation of estate car parking has been fully explored, in order to offset the loss of open space as far as possible and in accordance with the Council's car-free policy. Where the existing estate car parking has not been rationalised as part of the proposal, robust justification must be provided to explain why; and
- (v) improvements to alternative open space provision in the immediate area are investigated **and secured**, to offset the loss of open space as part of the proposal.

D. Development of private open spaces ~~will not be~~ **will be** permitted ~~where~~ **unless**, individually or cumulatively:

- (i) the site makes a valuable contribution to the character and appearance of the surrounding area, including its open aspect;
- (ii) the site is of biodiversity value, including consideration of ecological connectivity in the wider area;
- (iii) the site is of social or community value, for example, areas that provide access to green space and nature;
- (iv) the site makes, or has the potential to make, a contribution to mitigating the impacts of climate change, including urban cooling and reducing flood risk; or
- (v) the development would have a harmful impact on the amenity of future or neighbouring occupiers through its future development.

Update supporting text as paragraphs 5.10, 5.13 and 5.14 as follows:

5.10 The Council will protect all **public** open spaces, **and significant including** private open spaces not designated on the Policies Map where such spaces are identified during the plan period, for example during the assessment of a planning application. Designated public open spaces are identified on the Policies Map and listed in Appendix 7. For reference, Figure 5.1 also shows the location of these spaces: ...

...

Create new paragraph 5.13:

5.13 All significant private open spaces are protected from development under Policy G2 part A. These are larger scale open spaces (generally greater than 1000m²) which make a significant contribution to open space in the borough. Significant private open spaces include Charterhouse Square, the Honourable Artillery Company Grounds and a number of churchyards in the borough. These spaces are not identified on the Policies Map and further significant private open spaces may be identified due to their size or significance in Islington.

~~5.13~~ **5.14** Private open spaces, **including private gardens, are** an integral part of the boroughs green infrastructure. **Private open spaces are protected under Policy G2 part D, unless they are significant private open spaces, which are protected under Policy G2 Part A. It can include small private open spaces such as gardens and also larger private open spaces such as Charterhouse Square, the Honourable Artillery Company Grounds and a number of churchyards in the borough.** Existing green roofs are considered to be private open spaces for the purposes of this policy. These undesignated open spaces are essential to the character and appearance of the borough and can also help improve amenity, air quality, drainage, cooling, biodiversity, ecological connectivity, and access to nature, as well as health and wellbeing (although a private open space may not perform all these functions). Their protection is particularly important in Islington due to the high density of development and open space deficiency.

Subsequent paragraphs in section 5 to be renumbered one forward.

SDMM55

Page in submitted plan: 174-176 and 179

Section paragraph policy: Policy G4: Biodiversity, landscape design and trees, parts B and H and supporting text

Proposed change

Amend policy text as follows:

B. Development should protect ~~Islington's~~ Sites of Importance for Nature Conservation (SINCs) ~~are.~~ **SINCs are** areas designated for their importance for wildlife, biodiversity and access to nature and ~~SINC boundaries~~ are shown on the Policies Map. ~~Planning permission will not be granted for any schemes which adversely affect designated SINCs of Metropolitan or Borough Grade 1 Importance. SINCs of Borough Grade 2 and Local Importance, and any other site of significant biodiversity value, will also be strongly protected.~~

The level of protection will be commensurate with the status of a SINC and the contribution it makes to the wider ecological network (refer to paragraph 5.27). Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- 1) avoid damaging the significant ecological features of the site**
- 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site**
- 3) deliver off-site compensation of better biodiversity value.**

Refer to paragraph 5.30 for further detail.

...

H. Any loss of or damage to trees or other significant planting, or adverse effects on their growing conditions or survival, will only be permitted where it is demonstrably unavoidable in order to meet other relevant Local Plan policy requirements (as agreed with the Council). In such circumstances, ~~suitable high quality re-provision of equal value must be provided on-site. Where on-site re-provision is demonstrably not possible (as agreed with the Council), a financial contribution of the full cost of appropriate re-provision will be required.~~ **the developer must following the following hierarchy, with each step down justified by evidence and agreed with the Council:**

- 1. Replace tree provision on site,**
- 2. Replace tree provision directly adjacent to the site on land owned by the developer,**
- 3. Pay a financial contribution to the Council to provide appropriate re-provision**

...

Update supporting text at paragraph 5.34 as follows:

Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions are required to submit a Landscape Design Strategy as part of the SDCS. Large extensions will generally be those of 100sqm and over, ~~but could be smaller dependent on the site context.~~ The level of detail provided in the SDCS must be proportionate to the scale of proposed development and allow the Council to fully assess the proposals against relevant planning policies. Further details regarding the Landscape Design Strategy are outlined in the Environmental Design SPD.

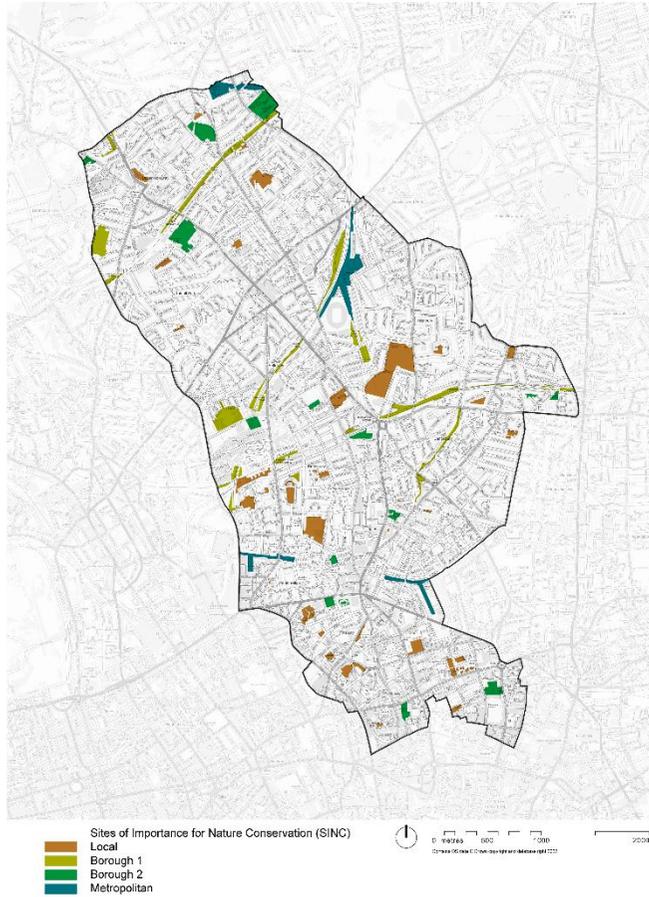
SDMM56

Page in submitted plan: 177

Section paragraph policy: Figure 5.2: Sites of Importance to Nature Conservation (SINC) designation

Proposed change

Map to be updated to reflect amended boundary to the SINC at 351 Caledonian Road and show Skinner Street Open Space as SINC.



SDMM57

Page in submitted plan: 183

Section paragraph policy: Policy G5: Green Roofs and vertical greening, supporting text, paragraphs 5.51 and 5.52

Proposed change

Amend text as follows:

5.51 Development proposals must prioritise biodiversity-based extensive green roofs in favour of intensive and semi-intensive green roofs, unless it can be demonstrated that an intensive or semi-intensive green roof **will enhance the biodiversity, sustainable drainage and cooling functions of the green roof. Accessible intensive or semi-intensive green roofs with areas of amenity space will not be allowed unless it can be demonstrated this** is necessary to meet other policy requirements, including those relating to the provision of private open space. Clear and convincing evidence must be provided to demonstrate that provision of alternative on-site amenity space is not possible in order to justify why an extensive roof cannot be installed.

5.52 'Intensive' and 'semi-intensive' green roofs **require higher levels of design and maintenance and can** provide different degrees of accessible amenity space, such as rooftop gardens and food growing areas ~~and require higher levels of design and maintenance~~. These types of roofs must be installed on a stronger structure in order to support the additional weight requirements of deeper soils or substrate and features such as paths. As a result, they can ~~also~~**often** support a greater diversity of planting and richer ecology including shrubs and tree planting, in addition to wildflowers found on extensive green roofs. Intensive green roofs can provide very effective sustainable drainage as they can support the weight requirements of blue roof storage, which can also be used to irrigate the planting and trees.

SDMM58

Page in submitted plan: 188 – 189

Section paragraph policy: Policy S1: Delivering Sustainable Design, supporting text, Paragraphs 6.9, 6.10, 6.11

Proposed change

Amend text as follows:

6.9 Islington's existing heat networks have developed around gas engine combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of National Grid electricity decarbonisation, and there is increasing evidence of adverse air quality impacts related to their use. ~~Despite this, Islington's gas CHP powered heat networks are still considered to be an effective and low carbon means of supplying heat when compared to other heat sources, particularly as heat networks offer opportunities to transition to zero carbon heat sources faster than individual building approaches.~~ In order to minimise negative impacts on air quality, CHP technologies used to develop heat networks will only be acceptable where they do not emit significant levels of Nitrogen Oxides (NOx).

6.10 The expansion of Islington's heat networks is a priority for the Council, **particularly because heat networks offer opportunities to transition to zero carbon heat sources faster than individual building approaches.** ~~Proven low-carbon and~~ Low-emission CHP technology using natural gas **will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network** ~~will continue to be used, where appropriate, to develop new networks~~ in Islington, with planned future transition to cost-effective secondary sources, including low-grade waste heat. The Council is committed to transition to the use of secondary sources to power heat networks in the long term; however practical limitations relating to the use of these sources (such as government direction, available technology and funding requirements) mean that ~~low-carbon~~ natural gas CHP ~~is the~~ **may be most an** appropriate heat source to develop the borough's heat networks in the interim. The transition to heat networks powered by secondary sources will ultimately be driven by central government and the evolution of carbon reduction targets through updates to the Building Regulations.

6.11 The energy mapping undertaken by Buro Happold suggests that there are a number of sources of low grade heat in the Borough, including London Underground ventilation, data centres and substations. Identifying and capturing such sources of low carbon heat will be key to moving beyond natural gas CHP in the future when heating systems will be required to specify a lower annual carbon content of heat, ~~and natural gas CHP will no longer be a low carbon option.~~

SDMM59

Page in submitted plan: 191

Section paragraph policy: Policy S2: Sustainable Design and Construction Part D (iii) and new supporting text after paragraph 6.19

Proposed change

Amend policy text as follows:

D. Developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement, including through the Green Performance Plan (where relevant) and other submitted sustainable design details, by:

- i) ~~vii)~~ allowing Council officers access to the development;
- ii) ~~viii)~~ submitting information to the Council when requested; and
- iii) ~~ix)~~ where necessary, through payment of a reasonable monitoring fee set by the Council. **Where it is established that a fee is required payment will be secured through a legal agreement.**

Add new paragraphs to supporting text as follows:

6.20 As set out in Part D of this policy, developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement. Monitoring is expected to be carried out by the developer or building operator, primarily in relation to operational emissions through the submission of a Green Performance Plan (GPP). Monitoring of other elements of the SDCS, such as air quality, may also be required in order to ensure policy objectives are being achieved.

6.21 In cases where an acceptable GPP cannot be agreed, or where effective performance monitoring of the SDCS cannot be carried out, the policy makes provision for the payment of a fee to enable the council to undertake additional monitoring responsibilities. The level of the fee will depend on the type and amount of monitoring required and will therefore need to be agreed on a case by case basis.

** Remaining paragraph numbers in Chapter 6 will be updated accordingly following the addition of new paragraphs.*

SDMM60

Page in submitted plan: 202-208

Section paragraph policy: Policy S5: Energy Infrastructure, Parts A, C and D and supporting text

Proposed change

Amend policy text as follows:

A. All major developments are required to have a communal low-temperature heating system. Heating systems must have a maximum annual carbon content of heat of less than 280 gCO₂/kWh, calculated using the carbon emissions factor for grid electricity from the most recently available ~~Digest of UK Energy Statistics (DUKES)~~ **BEIS energy projections (UEPs) for the first 25 years of operation of the building**. The heat source for the communal heating system must be selected in accordance with the following heating hierarchy:

1. connect to local existing or planned heat networks (subject to parts F and G below)
2. use zero-emission or local secondary heat sources (in conjunction with heat pump, if required).
3. use low-emission CHP (only where there is a case for CHP to enable the delivery of an area-wide heat network).
4. use ultra-low NO_x gas boilers.

Add new Part C (remaining parts and references to them to be updated accordingly):

C. Larger minor new-build developments should have a communal heating system where feasible and select the heat source for the system in accordance with the heating hierarchy in Part A of this policy.

Amend Part D (formerly part C):

~~C.D. Minor new-build residential developments with an individual heating system are required to prioritise low carbon heating systems. use ultra-low NO_x gas boilers as the system heat source. The use of individual air source heat pumps (ASHPs) as the heat source for minor new-build residential developments is not acceptable unless the development is located in an area which is not connected to the gas network; or where the development will achieve minimal heat demands through Passivhaus standards or similar. The use of individual ASHPs may be appropriate for some minor new-build non-residential~~

~~developments. Larger minor new-build developments should have a communal heating system where feasible and should be designed to connect to a current or planned heat network where Part F of this policy is applicable. Where network connection is not possible, a communal gas boiler or ASHP system may be appropriate.~~

Amend supporting text as follows and add new paragraphs 6.67, 6.69, 6.70, 6.78 and 6.84 (remaining paragraph numbers and references to them to be updated accordingly):

6.60. The selection of heat sources for major developments **and larger minor developments** in line with the heating hierarchy will ensure that developments prioritise low and zero carbon heating options in order to contribute to the decarbonisation of heat, and therefore, the reduction of carbon emissions. The use of low and zero carbon heating options, particularly heat networks and secondary heat sources will also help to reduce fuel poverty and increase energy resilience. Examples of secondary heat sources include recovering waste heat from London Underground ventilation shafts, recovering energy from the cooling requirements of datacentres, and using canal water for heating. Waterways such as canals can be an important local energy resource that can be used for both heating and cooling.

6.61. The use of existing or planned heat networks must be prioritised. Developments must connect to a heat network if they are located within the specified distance of an existing or future network in accordance with Parts **GF** and **HG**. Larger minor new-build developments are defined as developments involving five units or more, or 500sqm of floorspace or more. Such developments must have a communal heating system where feasible.

6.62. Where connection to a heat network is not possible (due to distance or feasibility), all developments must consider alternative low and zero carbon heat options in accordance with policy S5.

~~6.63. The use of ASHPs may be suitable where it can be demonstrated that other heat network connections or other appropriate heating systems are not suitable. The appropriateness of using individual and communal Air Source Heat Pump (ASHP) systems will be considered by the council on a case-by-case basis and will depend on the heat loads associated with the development as~~ ASHPs perform better where heat can be delivered using lower flow/return temperatures., ~~and as a result are less suitable in residential buildings which tend to have high heat demands or high hot water demands. There are also operational, control and fuel poverty issues linked to the use of individual air source heat pump systems, which mean that their use is often not suitable in residential developments. Where the use of an ASHP system is considered to be appropriate for use in a residential development, the council will prefer a communal system to an individual system. The use of individual or communal ASHPs may be acceptable in major and minor non-residential developments, depending on the heat loads involved.~~

6.64. Where the use of ASHPs is considered appropriate, a high specification of **fabric** energy efficiency will be expected to ensure the system operates efficiently and to reduce peak electricity demand. Where feasible, it must be demonstrated that **an** ASHP system provides one external point of connection enabling heat and hot water supply from a future heat network system. ~~The appropriateness of individual and communal ASHPs will be considered by the council on a case-by-case basis.~~ The use of ASHPs will continue to be reviewed as Building Regulation carbon factors are updated, and as domestic fossil fuel heating system are gradually phased out. Islington's Environmental Design SPD contains further information on the use of ASHPs.

6.65. Development proposals incorporating variable refrigerant flow (VRF) heat pump systems will be treated in the same way as any other ASHP-based systems, and must also ensure they comply with the overheating and cooling requirements in Policy S6. VRF systems use a refrigerant as the cooling and heating medium and are generally specified to provide both cooling and heating.

6.66. Proposals for the use of low-emission CHP systems to support area-wide heat networks will continue to be considered on a case by case basis and will only be acceptable where there is a strategic case for low-emission CHP systems to support the delivery of area-wide heat networks **as part of the transition to the use of secondary sources to power heat**

networks in the long term. Low-emission CHP in this policy refers to those technologies which inherently emit very low levels of NOx.

6.67. The use of use ultra-low NOx gas boilers as the heat source for the communal heating system of major and larger minor developments will be considered by the council on a case-by-case basis and will only be acceptable where it can be demonstrated that heat network connection and zero-emission or local secondary heat sources are not feasible. Gas will only be considered as the heat source for communally heated developments as part of a hybrid system involving heat pumps. This may be particularly relevant in refurbishments where less can be achieved with the building fabric, and higher heating flow temperatures are therefore needed. The use of direct electric heating as the heat source for a communal heating system will only be acceptable in very exceptional circumstances and is unlikely to be suitable as part of a modern building design.

6.68. ~~6.67~~ A key consideration when selecting heat sources that use natural gas is their impact on air quality due to the resulting NOx emissions, with Nitrogen Dioxide (NO₂) in particular having a major impact on air pollution. This policy adopts an integrated approach to energy supply to ensure that the selection of heat sources will result in low or zero emissions of both carbon dioxide and NOx. In order to avoid further deterioration of existing poor air quality, all development proposals using CHP in Islington must provide evidence to demonstrate that emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler. CHP and ultra-low NOx gas boiler communal or heat network systems must be designed to ensure that they have no significant impact on local air quality.

6.69. The most appropriate low carbon heating systems for use in minor new-build developments with an individual heating system will be Air Source Heat Pumps (ASHPs). A high standard of fabric energy efficiency is particularly important where the use of an individual ASHP is proposed. The use of individual ASHPs as the heat source for minor new-build residential developments will only be acceptable where the development will achieve minimal heat demands. Passivhaus standards or similar are strongly encouraged. The council must be satisfied that operational, control and fuel poverty issues have been minimised. The use of smart energy systems and tariffs should be used to help reduce energy bills.

6.70 The use of direct electric heating as the heat source for the individual heating system of a minor development will only be acceptable in exceptional circumstances where it can be demonstrated that an ASHP is not feasible. Due to the high running costs associated with direct electric heating, such systems will only be acceptable where the building has been designed to have a very high standard of fabric energy efficiency (Passivhaus standards or similar) and heat demand has been reduced to a very low level. The use of ultra-low NOx gas boilers as the heat source for the individual heating system of a minor development will only be acceptable in exceptional circumstances where it can be demonstrated that an ASHP or direct electric heating is not feasible.

...

6.73 ~~6.71~~ In order to enable better informed decisions to be made when selecting heating systems, applicants are required to calculate the carbon content of heat using the carbon emissions factor for grid electricity from the most recently available ~~DUKES which is published each year by the Department for Business, Energy and Industrial Strategy,~~ **BEIS energy projections (UEPs) for the first 25 years of operation of the building**, in addition to Building Regulation Part L calculations. The use of more accurate emissions factors to calculate the carbon content of heat will contribute to the decarbonisation of heat and help the borough to meet future carbon reduction targets.

...

6.77 ~~6.75~~ The Council will assess whether a development can reasonably connect to an existing heat network or can be designed to connect to a planned heat network based on a feasibility assessment, which must be submitted (as part of the

SDCS) at the earliest possible stage of the planning process, ideally at pre-application stage. The feasibility assessment will assess the technical feasibility of a development's heat demand being supplied in part or wholly through connection to a heat network, and the financial reasonableness of the proposed connection charges. The Council, or relevant Energy Service Company, will provide relevant information to inform the feasibility assessment, including an assessment of the approximate cost of connection.

Feasibility assessments must consider a range of factors, including:

- the size and use class of the development, and the associated heat load and energy demands;
- the capability of the network to supply part or all of the heat demand;
- the location of the development and the distance to network pipes;
- physical barriers e.g. roads and railways;
- other developments in the vicinity that may also be required to connect to the network; and
- an assessment of the financial implications of connection, using a Whole Life-cycle assessment Costing methodology.

6.78 The feasibility assessment will be carried out using a whole life-cycle assessment methodology, including maintenance requirements, to be outlined by the council. Assessing the feasibility of heat network connection using a whole life-cycle assessment methodology will capture a building's operational emissions from energy consumption as well as its embodied emissions. This will enable the council to make a fair comparison between the whole life-cycle carbon emissions from developments connected to a heat networks and those using other heat source options. Further guidance on what will be expected as part of a whole-cycle assessment methodology will be provided in a revision of the Environmental Design SPD and/or Net Zero Carbon SPD.

6.79 ~~6.76~~ Where connection of a development to an existing or future planned heat network is required in accordance with parts **GF** and **HG** of this policy, and is deemed to be feasible, developers are required to commit to connection prior to occupation via a Section 106 agreement for major developments, and a Unilateral Undertaking for minor developments. The

legal agreement will include provision for a reasonable financial contribution to the Council to enable connection and the submission of an updated energy strategy prior to implementation. Major developments located within 500 metres of a planned future heat network are required to be designed to be able to connect to that network in the future, in accordance with Part **HG** of this policy. Within the legal agreement, a cut-off point will be defined **in accordance with Part G of this policy**, which will be the latest point at which a decision can be made in relation to connection to a planned network. If at this time it is not possible to agree connection to a network due to the network being **unlikely to be complete within the 3 years after the grant of planning permission**, the alternative energy strategy will be enacted.

6.80 ~~6.77~~ Each of Islington's planned future heat networks is included on Islington's CIL Regulation 123 Infrastructure List (CIL 123 List) as infrastructure that may be funded by CIL. The CIL funding is intended to increase the size of the overall network to bring more sites within a reasonable connection distance. **Developments required to be designed to connect to an existing or future heat network in line with Parts F and G of this policy must contribute to the cost of connection via a legal agreement. This financial contribution towards specifically relates to the cost of connection of a site to a heat network. secured via a legal agreement It** is not covered by CIL and is a separate cost **to the funding required for the development of heat network infrastructure**. The CIL 123 List excludes works that will be funded through Section 106 obligations in accordance with the tests set out in Regulation 122 of the CIL Regulations 2010 (as amended)

...

** Remaining paragraph numbers in Chapter 6 will be updated accordingly following the addition of new paragraphs.*

SDMM61

Page in submitted plan: 211

Section paragraph policy: Policy S7: Improving Air Quality Parts D and F and supporting text 6.92 and new paragraph 6.102

Proposed change

Amend policy text as follows:

D. Developments in excess of **150** ~~200~~ net additional residential units or 10,000sqm net additional gross external floorspace must be Air Quality Positive and implement measures on-site to actively reduce air pollution as far as possible.

...

F. Where it can be demonstrated that on-site measures are impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that at least equivalent air quality benefits can be demonstrated. **Where off-site measures cannot be provided to a sufficient standard, a financial off-setting contribution secured through a legal agreement may also be acceptable.**

Amend supporting text as follows:

6.92 It may not always be possible in practice for developments to minimise impacts sufficiently using on-site measures alone. Where a development can provide evidence to demonstrate that on-site measures are impractical or inappropriate, for example due to a particularly constrained site or the limited scope of the development works, off-site measures to improve local air quality may be acceptable. It must be demonstrated that off-site measures will provide at least equivalent air quality benefits to those required on-site. In cases where off-site measures cannot be provided to a sufficient standard, a financial off-setting contribution secured through **a Section S106 agreement** may also be acceptable. **The level of the**

contribution will be considered by the council on a case-by-case basis and will be based on the air quality benefits that would have been required on-site.

...

6.102 New development in the vicinity of canals can lead to the overshadowing of solar panels on canal boats, leading to the use of energy generators which have adverse impacts on air quality. Where a proposed development is likely to cause detrimental overshadowing of solar panels, including those on canal boats, the council will expect the development design to be modified where possible, in line with Policy PLAN1, supporting text paragraph 1.67.

Remaining paragraph numbers in Chapter 6 will be updated accordingly following the addition of new paragraphs.

SDMM62

Page in submitted plan: 214 and 222

Section paragraph policy: Policy S8: Flood Risk Management Part D and supporting text paragraph 6.118

Proposed change

Amend policy text as follows:

D. As part of the site-specific FRA, development proposals must:

(i) carry out a Sequential Test in order to ensure that the vulnerability classification of the proposed development is appropriate to the level of flood risk; ~~and~~

ii) carry out an Exception Test (parts a and b) to ensure the proposed development will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall; and

~~(ii)~~ **(iii)** demonstrate a sequential approach to development layout within the development site, in order to ensure that the most vulnerable elements or land uses within a development are located in the lowest risk parts of the site.

E. The site-specific FRA must demonstrate how flood risk will be managed and mitigated to ensure the development is safe from flooding and the impacts of climate change for its lifetime. This must include assessment of appropriate flood proof design and construction methods, and SUDS.

Amend supporting text as follows:

6.118. The constrained nature of the borough and development pressure mean that it is unlikely that there will be alternative locations where developments could be located. As a result, vulnerable development types will likely be permissible in areas of medium or high surface water flood risk (based on the Environment Agency's RoFSW mapping) on the condition that they achieve the drainage requirements set out in Policy S9; incorporate sufficient flood resilient/resistant measures where required; and apply the sequential approach to development layout. This means that in the majority of cases **Part (a) of the Exception Test** ~~will not be required as it can be demonstrated that~~ **met when** any potential flood risk will be outweighed by other sustainability factors; ~~and the fact.~~ **A site specific flood risk assessment can help determine whether part (b) of the Exceptions Test can be met. Part (b) of the Exceptions Test will be met when it can be demonstrated** that the development will be safe during its lifetime, considering climate change, **without increasing flood risk elsewhere and where possible reduce flood risk overall. This can be achieved** through the use of mitigation and adaptation measures.

SDMM63

Page in submitted plan: 217-219 and 222

Section paragraph policy: Policy S8: Flood Risk Management supporting text paragraph 6.110, Table 6.4 (including footnote 39) and paragraph 6.116

Proposed change

6.110 The flood risk vulnerability classifications for different development uses referred to in Part A of this policy are defined in **Annex 3 of the NPPF**~~national PPG~~ and repeated in Table 6.4 below. Where a new development is classified as 'More Vulnerable' or 'Highly Vulnerable', or where a change of use will result in an increase in the vulnerability classification, the FRA must demonstrate how the flood risks to the development will be managed so that it remains safe through its lifetime, including provision of safe access and egress.

Table 6.4: Flood Risk Vulnerability Classification:

ESSENTIAL INFRASTRUCTURE

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.
- **Solar farms**

HIGHLY VULNERABLE

- Police ~~stations~~, and ambulance stations; ~~and~~ fire stations and command centres; ~~and~~ telecommunications installations required to be operational during flooding.
- Emergency dispersal points.

- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”).

MORE VULNERABLE

- Hospitals.
- Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

LESS VULNERABLE

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, ~~and~~ cafes, **and** hot food takeaways, offices; general industry, storage and distribution; non-residential institutions not included in **the** “more vulnerable” **class**; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, (if adequate measures to control pollution and manage sewage during flooding events are in place).
- **Car parks.**

WATER-COMPATIBLE DEVELOPMENT

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.

- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- ~~MOD-defence~~**Ministry of Defence** installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

*** Landfill is as defined in Schedule 10 of the Environmental Permitting (England and Wales) Regulations 2010**

Footnote 39:

Available from: ~~<https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>~~
National Planning Policy Framework (publishing.service.gov.uk)

...

6.116 The NPPF requires all plans to apply a sequential, risk-based approach to the location of development, taking into account **all sources of flood risk and** the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. The sequential approach must be used in areas known to be at risk now or in the future from any form of flooding. The aim of the sequential test is to steer new development away from areas at risk of flooding to areas with the lowest risk of flooding **from any source**, and to ensure that areas at little or no risk of flooding from any

source are developed in preference to areas at higher risk. As a result, the application of the sequential test will help to ensure that development can be delivered safely and sustainably, avoiding proposals that are inappropriate on flood risk grounds.

SDMM64

Page in submitted plan: 224-226 and 229

Section paragraph policy: Policy S9: Integrated Water Management and Sustainable Drainage, Parts, C, G, O and supporting text paragraph 6.147

Proposed change

Amend policy text as follows:

C. Development proposals for impermeable paving will be resisted, including on small surfaces such as front gardens and driveways, unless they can demonstrate that the level of run-off will not exacerbate flood risk in the area, ~~either~~**both** direct and cumulative risk.

...

G. Major developments involving works to an existing building ~~are encouraged to~~**should** reduce run-off rates for the site as a whole, rather than focusing solely on new buildings.

...

O. The development of land affected by contamination must not create unacceptable risks to human health and the wider environment, including local water resources. Assessment and ~~adequate treatment~~**remediation** of any contaminated land must be carried out before any development commences on site.

Amend supporting text as follows:

6.147. ~~Full~~ **Preliminary** details of the proposed decontamination will be required as part of any planning application before it is considered.

SDMM65

Page in submitted plan: 233

Section paragraph policy: Policy T1: Enhancing the public realm and sustainable transport, Parts B and D and supporting text

Proposed change

Amend Parts B and D as follows:

B. The design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, must prioritise practical, safe and convenient access and use by sustainable transport modes,

namely walking, cycling and public transport **and must include accessible parking provision**. Private vehicle use, **other than that required by Blue Badge Holders**, will be restricted in Islington as far as possible, as it is not sustainable and is a key cause of emissions and congestion.

...

D. All new development will be car-free, which will contribute to the strategic aim for a modal shift to sustainable transport modes. Private motor vehicles, including electric vehicles, **and** motorcycles ~~and taxis~~, will not be accommodated as part of new development in the borough and are not a priority form of transport.

Add the following paragraph after 7.1 and renumber following paragraphs accordingly:

The Islington Transport Strategy was adopted on 26 November 2020. It sets the Council's vision for a fairer, healthier, safer, greener transport environment in the borough by 2041. Its overarching themes are the delivery of People Friendly Streets, Vision Zero and a borough wide programme of Low Traffic Neighbourhoods. The Low traffic neighbourhoods are a long term initiative that restrict through traffic to create more space for people walking and cycling on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area.

SDMM66

Page in submitted plan: 235 and 237-238

Section paragraph policy: Policy T2: Sustainable Transport Choices, part A and supporting text former 7.11 (now 7.12), 7.15 (now 7.16) and 7.17 (now 7.18)

Proposed change

Amend Part A as follows:

A. Development proposals must demonstrate that negative impacts on the safe and efficient operation of **existing and planned improvements of** sustainable transport infrastructure –e.g. the public realm, cycle lanes (**including the TfL Strategic Cycle network or lanes feeding into this network**), bus routes/stops -are mitigated/prevented

Amend text as follows:

~~7.11~~**7.12** The Local Plan promotes sustainable transport choices in order to mitigate the impact of developments on the environment, improve air quality, reduce health impacts, respond to congestion affecting roads and public transport, and promote healthier lifestyles. Walking is a priority mode of transport; development proposals must be designed from the outset to facilitate walking to and from the development, in line with the Council’s Inclusive Landscape Design and Streetbook SPDs, **as well as the Mayor’s Transport Strategy and TfL’s Healthy Streets Indicators.**

...

~~7.15~~**7.16** The Council supports cycling infrastructure improvements that adhere to guiding principles and achieve the good design outcomes set out in the **London Cycling Design Standards**. TfL’s Strategic Cycling Analysis 2017 identified Kentish Town to Wood Green via Archway going up Junction Road, and Camden Town to Tottenham Hale via Nag’s Head on Seven Sisters Road as two of their top priority cycling connection routes with the greatest potential to serve people who

currently cycle, and to enable more people to cycle in the borough. In January 2018, the Mayor of London announced the development of the Camden to Tottenham Hale cycle route. Islington will continue to collaborate with TfL to design and deliver this new route, and to progress the Kentish Town to Wood Green route. New developments must not preclude the delivery of cycle infrastructure improvements, particularly along corridors identified as part of TfL's Strategic Cycle Network or which have the potential to feed this network.

..

~~7.17~~**7.18** The lack of secure and accessible cycle parking is commonly recognised as one of the main barriers to cycling. Cycle parking – including accessible cycle parking spaces for mobility bicycles and tricycles, for cyclists with disabilities, as well cycles for parents with children - must be provided as part of development proposals, including, but not limited to, uses within the **E(a) and F2(a) A1 (shops), E(c) A2 (financial and professional services), E(b) A3 (restaurants and cafés), E(c) B1 (offices), D1 (non-residential institutions), D2 F2(b) and E(d) (assembly and leisure) and Sui Generis Use Classes**. Cycle parking provision (including accessible parking and visitor parking) must be provided in line with Appendix 4.

SDMM67

Page in submitted plan: 238-239 and 241

Section paragraph policy: Policy T3: Car-free development, Parts B, C, F and G and supporting text at paragraph 7.27 (now 7.28)

Proposed change

Amend Parts B, C, F and G as follows:

B. Vehicle parking or waiting **for essential drop-off and accessible parking** will ~~not~~ be permitted for new homes, ~~except for essential drop-off and accessible parking~~. This **does not** includes applications for vehicle parking within a site, the planning unit and/or within the curtilage of existing residential properties, including any undercroft or basement parking. Unless exceptional circumstances can be demonstrated, no parking permits will be issued to occupiers of these new homes.

C. Parking will **only** be allowed for non-residential developments where this is essential for operational requirements and therefore integral to the nature of the business or service (e.g. Use Class B8 storage and distribution uses). In such cases, parking will **only** be permitted where an essential need has been demonstrated to the satisfaction of the Council and where the provision of parking would not conflict with other Council policies. Normal staff parking will not be considered essential and will not be permitted.

...

F. Planning applications for uses that require coach parking ~~ancillary to another use~~ will ~~not~~ **only** be permitted where the coach parking would **not** give rise to adverse impacts on road safety and congestion. Coach parking must be provided on-site, unless the applicant can identify an alternative location which satisfies the Council in terms of road safety and congestion and other relevant planning matters. Such locations must not be directly outside the main entrance of developments and must not be at the expense of space provided to facilitate other sustainable modes of transport including buses.

...

G. Accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed (for residential proposals); or one accessible parking space per 33 employees (for employment development). For other uses, the number of accessible spaces must be proportionate to the number of building users. Spaces will only be made available for Blue Badge holders who live or work in the development linked to the parking space. The Council will require accessible parking spaces to be located on-street and identified on plan. The cost of provision of parking spaces will be secured by a Section 106 legal agreement to enable the Council to install the accessible parking spaces as and when demand materialises from Blue Badge occupiers/employees. Spaces will generally not be required to be physically provided where this demand has not materialised. **Where it is not possible to deliver designated spaces on street, for example due to insufficient space or issues with amending Traffic Management Orders, a financial contribution should be made towards investment in other accessible or sustainable transport initiatives where appropriate.**

Amend supporting text at paragraph 7.27 as follows:

~~7.27~~ **7.28** In conjunction with the Council's Highways team, the developer must identify suitable locations for accessible bays (which must be within 75m of the entrance(s) of the proposed development) and pay for the conversion of suitable bays. The amount payable will be determined based on a standard cost of conversion. ~~Where it is not possible to deliver designated spaces on street, for example due to insufficient space or issues with amending Traffic Management Orders, a financial contribution should be made towards investment in other accessible or sustainable transport initiatives where appropriate, for~~ **An** example **of** contributions **where it is not possible to deliver designated spaces on the street would be** to fund a Taxi card scheme for transport users with mobility and/or sight impairments. Further information is set out in the Planning Obligations (Section 106) SPD.

SDMM68

Page in submitted plan: 245

Section paragraph policy: Policy T5: Delivery, servicing and construction, part A

Proposed change

Amend text as follows:

A. Delivery and Servicing Plans will be required for developments that may impact on the operation of the public highway, private roads, the public realm and/or the amenity of residents and businesses, by virtue of likely vehicle movements. These plans must demonstrate how **safe, clean and efficient deliveries and servicing has been facilitated and** any potential impacts will be mitigated and Delivery and Servicing Plans will be required to assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system.

SDMM69

Page in submitted plan: 248-249

Section paragraph policy: Policy DH1: Fostering Innovation and conserving and enhancing the historic environment, part C and supporting text at paragraph 8.5

Proposed change

C. Development should protect or enhance the London View Management Framework views and Local Views (identified on the Policies Map).

~~C.D. Development should protect or enhance the settings of Local Landmarks (identified on the Policies Map). All views—the Mayor’s strategic views, local views and views of local landmarks—must be protected and enhanced.~~

D.E. The Council will conserve or enhance Islington's heritage assets – both designated and non-designated - and their settings in a manner appropriate to their significance, including listed buildings, conservation areas, scheduled monuments, Archaeological Priority Areas, historic green spaces, locally listed buildings and locally significant shopfronts.

E.F. Site potential for development and site density levels must be fully optimised, in order to make the best use of the scarce land resource in the borough. High density does not automatically mean buildings need to be tall. The design of development must create a human scale and massing.

F.G. Tall buildings can help make best use of land by optimising the amount of development on a site, but they can also have significant adverse impacts due to their scale, massing and various associated impacts. Tall building locations must be carefully managed and restricted to specific sites where their impacts can be managed through appropriate design.

G.H. Basement development can contribute to accommodating needs, for instance growing families, but they can also have significant adverse impacts. Any development involving basements will be strictly controlled.

H.I. The agent-of-change principle ensures that the individual/organisation proposing change is responsible for ensuring that existing uses in the area are not adversely impacted, including through noise and vibration impacts. This principle will apply to all development proposals in the borough, and can include consideration of a wide range of planning issues, including compatibility of land uses and design.

Remove the following supporting text:

~~8.5 In order to successfully deliver new development which fosters innovation and enhances the historic environment, development proposals must, inter alia:~~

- ~~☐ be high quality and contextual, reflecting the valued aspects of local character, while allowing considered, appropriate increases in density and height (in line with policy DH2);~~
- ~~☐ reinforce, and where possible positively contribute to, Islington's local character and distinctiveness. Applicants must work positively and proactively with all relevant stakeholders to understand the potential scope for maximising the potential positive contribution, including benefits from an improved public realm; and~~
- ~~☐ preserve or enhance the borough's heritage assets in a manner appropriate to their significance.~~

Following paragraphs renumbered accordingly

SDMM70

Page in submitted plan: 251-252 and 258-260

Section paragraph policy: Policy DH2: Heritage Assets, Parts B and J and supporting text

Proposed change

Amend text as follows:

- B. Development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve **and or** enhance the significance of the area, and must be of a high quality contextual design. Proposals that harm the significance of a conservation area must provide clear and convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted.

...

J.

There are a number of strategic views, local views and views of local landmarks within and across Islington. These give important views toward St. Paul's Cathedral, while some offer a unique panoramic view of Islington and other parts of London or a view of St. Paul's or a local landmark as part of the broader townscape (particularly street level views).

Development must protect or enhance the London View Management Framework views and Local Views. ~~All views—strategic, local and local landmarks—must be protected and enhanced.~~ Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view. Development proposals must provide appropriate supporting material – including 3D modelling - to verify the visual impact of proposed development on protected views.

...

New part K:

Local Landmarks

K. Development in the vicinity of a Local Landmark should protect or enhance their settings. Heritage assessments for development affecting Local Landmarks should identify impacts on the building's role within the townscape.

Update supporting text as follows:

~~8.34 There are two scheduled monuments in the borough — St. John's Gate and the Nunnery of St. Mary de Fonte. These are identified on the Policies Map.~~

8.33 There is one scheduled monument in the borough – the Benedictine nunnery of St Mary, Clerkenwell, which is identified on the Policies Map.

~~8.35~~ **8.34** All planning applications likely to affect important archaeological remains are required to include an Archaeological Assessment and may require trial excavations to establish the significance and vulnerability of surviving remains. **Historic England 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*.**

...

~~8.37~~ **8.36** Protected views policies are intended to operate over the long term, to preserve and enhance important public views now and for generations to come. The long term nature of the policies enables the policy to seek to enhance these public views where they have been adversely impacted by buildings. Over time when redevelopment of a building that has an adverse impact on a view (e.g. if blocks part of the view) occurs, the policy aim is for the new development to enhance the view and not to continue to adversely impact on the view. Islington is home to **protected views comprising London View Management Framework views and Local Views** ~~a number of protected views and landmarks including strategic views protected by the London Plan and a number of locally protected views~~. These are shown on the Policies Map and on Figure 8.2 below:

~~8.42 Islington benefits from having many fine buildings, some of which are local landmarks providing a focus of interesting views and skylines. These buildings are key elements within Islington's townscape and help create its local distinctiveness. A number of these landmarks are listed below, although this is not necessarily a comprehensive list and further landmarks could be identified during the decision-making process and/or through further guidance. Each landmark may feature within a number of important views from different locations. The impact of development on these various views needs to be considered when development is proposed in the vicinity of a landmark.~~

8.41 Islington's 18 Local Landmarks are fine historic buildings which have been protected for their contribution to local character and identity, wayfinding, and the historic environment. These buildings are key elements within Islington's townscape and help create its local distinctiveness. All Local Landmarks are listed buildings. Local Landmarks protected by this policy are set out below. As Local Landmarks are listed buildings development affecting them will require a heritage assessment in accordance with Policy DH2, part A. Heritage assessments for development affecting Local Landmarks should identify key impacts on the townscape which could include consideration of views from different locations.

Add footnote:

***Refer to GLAAS consultation guidelines at <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>**

SDMM71

Page in submitted plan: 262-263 and 266-267

Section paragraph policy: Policy DH3: Building Heights and supporting text

Proposed change

Tall buildings

A. Buildings of more than 30 metres, ~~or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) will be~~ **are** considered to be tall buildings.

B. 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 a Spatial Strategy area.

~~C. Each relevant allocation and/or Spatial Strategy area policy identifies the maximum permissible heights (in metres) suitable on the respective sites/locations. Any buildings proposed on these sites which exceed the identified maximum heights will be refused.~~ **On sites identified as potentially suitable for tall buildings under this policy, development must not exceed the maximum building heights for that specific tall building location, as set out in the site allocation and in Table 8.1, below.**

~~C.D.~~ Proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part E.

~~D. Proposals for buildings which are more than twice the contextual reference height of surrounding buildings, but less than 30 metres, must fully satisfy criteria identified in Part F.~~

~~E. Buildings that do not meet the criteria in Part A but which are still considered prominent in their surrounding context must respond appropriately to local contextual building heights, the character of the area and other relevant policies, and may be subject to Part F of this policy.~~

~~F.E. All proposals for tall buildings must mitigate the individual and cumulative visual, functional and environmental impacts on the surrounding and wider context, and fully satisfy all the following criteria.~~

Tall buildings must be high quality in accordance with policy PLAN1. The designs of tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. The following criteria must be fully satisfied:

Visual Impact

- (i) Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place;
- (ii) Protect ~~and~~ **or** enhance strategic and local views, ~~and views to local landmarks~~;
- (iii) Conserve and seek to enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance **(including in neighbouring boroughs where impacted)**;
- (iv) Be proportionate and compatible to their surroundings and the character of the area;
- (v) Promote exceptional design, through high quality design details and material, positively contribute to the skyline and to the immediate locality, and having regard to any site-specific design principles set out in the relevant site allocations and/or Spatial Strategy area policy, and other relevant design policies
- (vi) Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;
- (vi) Protect or enhance the settings of local landmarks.**

Functional Impact

- (vii) Not prejudice the ongoing functionality, amenity, ~~or~~ operation **and/or development potential** of sites in the local area **including in neighbouring boroughs**; ~~and/or the development potential of sites in the local area~~, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area (all development not just tall buildings);
- (viii) Ensure that impacts on the levels of daylight and sunlight – both into and between proposed buildings and for adjoining land or properties - are fully assessed and found to be acceptable; and that unacceptable overshadowing is prevented;

(ix) Demonstrate how the building will operate and function to provide good levels of amenity for all building users, through provision of a detailed building management plan which details how the proposed building will operate in various circumstances, including emergency procedures. Plans must include information on peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services;

Environmental impact

(x) Promote exceptional sustainable design standards;

(xi) Demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site. This may require submission of detailed assessments and/or modelling work; and

(xii) Demonstrate that development does not have any adverse individual or cumulative impacts on biodiversity, including watercourses and water bodies and their hydrology.

Building heights

F: Buildings that do not meet the tall building criteria in Part A but which are still considered prominent in their surrounding context, for example twice the contextual reference height, must respond appropriately to local contextual building heights and be compatible to their surroundings and the character of the area consistent with other relevant policies.

Update supporting text as follows:

~~8.45~~**8.44** Islington has relatively little available land for development – given the size and built-up nature of the borough - but faces intense pressure for development, particularly for residential and office uses. 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.

~~8.46~~**8.45** Tall buildings ~~are substantially taller than their neighbours and~~ can significantly change the skyline; they are often seen as an option to optimise development potential on a site. However, due to their scale and visibility, they can have a significant impact on a place, and as such must be subject to detailed scrutiny. They are not uniformly appropriate across the borough.

~~8.47~~ **8.46** For the purposes of this policy, tall buildings ~~are split into two classifications:~~

- ~~• Buildings of more than 30 metres in height; or~~
- ~~• 8.46 Buildings which are more than twice the contextual reference height of surrounding buildings.~~

~~8.48~~**8.46** Buildings of more than 30 metres in height may be suitable:

- On sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or
- Within specific sites identified in relevant Spatial Strategy policies.

~~8.49~~**8.47** These sites have been informed by a detailed local urban design assessment which took into account a variety of considerations including public transport accessibility, topography, conservation areas, listed buildings, protected vistas and strategic views, to sieve out areas unsuitable for buildings of more than 30 metres in height.

~~8.50~~**8.48** Figure 8.3 shows all locations which are suitable, in-principle, for buildings of more than 30 metres.

Footnotes:

~~57 For both classifications, height should be measured to the tallest point of the building including any structures on the roof, e.g. telecommunications equipment, lift overruns, plant machinery.~~

~~58 For avoidance of doubt, a building which is less than 30m but more than twice the contextual reference height of surrounding buildings would be classed as a tall building.~~

~~8.51~~ **8.49** Maximum permissible heights for each location, as well as some site specific design principles, including guidance on siting of height within the context of the site/area boundary (where relevant), are set out in the relevant site allocation and/or Spatial Strategy policy . They are repeated in Table 8.1 below, for reference:

~~8.52~~ **8.50** **Proposals that do not meet the definition of tall buildings under this policy must still be of an appropriate scale for their context, and will be assessed against all relevant policies including PLAN1, DH1, DH2, and DH3 part E. Proposals will be considered in relation to their impacts and should not undermine the quality of existing development and streetscape. Part E of DH3 is important in this regard to ensure such proposals are considered in and appropriately respond to their context to create a human scale and massing consistent with DH1.** ~~Buildings that are below the 30m threshold and less than twice of the height of the surrounding context but which can still be considered prominent may be classed as tall buildings and, as a result, they may be subject to Part F of policy DH3 dependent on site specific circumstances.~~

~~8.53~~ **8.51** Where policy DH3 Parts ~~D and~~ E refers to the surrounding context height, this is not informed solely by the highest existing height in the surrounding built environment. Surrounding context height will be determined on a case-by-case basis which includes consideration of the broad surrounding heights evident in an area.

Further paragraphs renumbered accordingly.

SDMM72

Page in submitted plan: 272

Section paragraph policy: Policy DH5: Agent-of-change, noise and vibration Part D

Proposed change

D. All development proposals which have the potential to cause or exacerbate unacceptable noise and vibration impacts on land uses and occupiers in the locality must fully assess such impacts, with reference to relevant noise thresholds set out in Appendix 2. All proposals must:

- (i) in the first instance, aim to prevent noise and vibration impacts occurring by siting uses which could cause or exacerbate impacts away from potentially affected uses; or, vice versa, siting sensitive uses away from uses which could cause noise and vibration impacts. An Acoustic Design Statement, in line with Appendix 2, must be provided to demonstrate satisfactory solutions; or
- (ii) where this is not possible, provide a detailed assessment of noise and vibration impacts in line with Appendix 2. Where noise and/or vibration impacts are identified suitable mitigation measures must be put in place to reduce these impacts, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. **If Impacts will need to be suitably** ~~impacts cannot be~~ mitigated **for**, planning permission ~~will to~~ be **granted refused**.

SDMM73

Page in submitted plan: 280

Section paragraph policy: Paragraph 9.6

Proposed change

9.6 In most cases, the Islington CIL has replaced the use of planning obligations to secure contributions towards infrastructure from development. S106 agreements are used to secure affordable housing; to mitigate site-specific issues; and/or to address other policy requirements that cannot be dealt with through CIL. The Council **is required by regulations to produce an Infrastructure Funding Statement annually which outlines developer contributions collected by LBI through the Community Infrastructure Levy (CIL) and Section 106 Agreements. The first Infrastructure Funding Statement is available on the Council's website.** ~~maintains a 'Regulation 123' Infrastructure List, which sets out the items and types of infrastructure that may be fully or partially funded by CIL. Infrastructure included in the list cannot be funded through a S106 agreement.~~ **Should future demand for school places exceed supply, infrastructure costs will be sought through CIL.**

SDMM74

Page in submitted plan: 281

Section paragraph policy: Policy ST2

Proposed change

C The Hornsey Street Re-use and Recycling Centre will be safeguarded in order for Islington to continue to contribute to meeting aggregated waste planning requirements. **The safeguarded Hornsey Street Re-use and Recycling Centre is identified on the Policies Map.** Where development is proposed within close proximity to this facility, it must ensure that

the ability of the Hornsey Street facility to operate effectively is not threatened, via the design/layout of a scheme and/or the incorporation of appropriate measures to limit effects of sound, vehicle movements and other effects, in line with the 'agent-of-change' principle.

SDMM75

Page in submitted plan: 282

Section paragraph policy: Policy ST3: Telecommunications, communications and utilities equipment, Part C and supporting text

Proposed change

Amend ST3, Part C as follows:

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.**

Update supporting text as paragraph 9.12 as follows:

9.12 In general, it is not acceptable to locate satellite dishes and other telecommunications and utilities equipment on the front of buildings and other locations where they are visible from the public realm. On-street location of telecommunications boxes and other utilities equipment should be avoided. Where this is not possible, equipment must be designed and located to prevent street clutter and conflict with pedestrian **and cycle** movement, and street furniture.

SDMM76

Page in submitted plan: 284

Section paragraph policy: Monitoring

Proposed change

Whilst the AMR will report on a broad range of indicators that will be updated over time and reflect on new and changing sources of data, some of the key indicators that cover a range of policies within the plan and that will be used to help with monitoring are set out below. Further information on monitoring is also set out in the Site Allocations document and Bunhill and Clerkenwell Area Action Plan.

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
SDM1	Number of homes and amount of business and retail floorspace completed in spatial strategy areas (cumulative totals)		SP1-SP8
SDM2	Housing completions and net change	Progress in meeting the 10 year housing target set out in the London Plan (775 per year and 7750 overall)	H2: New and existing conventional housing
SDM3	Mix of dwelling sizes in completed developments	Development to be in line with housing mix priorities set out in table 3.2	

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
SDM4	1. Gross and net affordable housing completions for major developments	1. 50% of total net additional homes to be genuinely affordable over the plan period.	H3: Genuinely affordable housing
SDM5	2. Affordable housing contributions secured for minor schemes (permitted)	2. Contributions secured in the monitoring year.	
SDM6	Non-self-contained units completed by type: (i) within sites identified for student accommodation development; and (ii) outside sites identified for student accommodation	New purpose built student accommodation should be developed in line with Policy H6 Part A	H6: Purpose-built Student Accommodation
SDM7	Progress in meeting identified needs for Gypsy and Traveller Accommodation	Written update to provide annually on progress against policy objectives.	H12: Gypsy & Traveller Accommodation
SDM8	Business floorspace completed (and net change) in major developments within (i) CAZ and Bunhill and Clerkenwell AAP (ii) CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King’s Cross and Pentonville Road		B1: Delivering business floorspace

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
	(iii) Priority Employment Locations (PELs)		
SDM9	Town centre uses completed within Town Centres, and within the Bunhill and Clerkenwell AAP area		Policy R1: Retail, leisure and services, culture and visitor accommodation
SDM10	Proportion of units within each Town Centre that are: Vacant In retail use in Primary Shopping Areas In retail use in Specialist Shopping Areas	Trend in vacant units over time Retail in Primary Shopping Areas: • 60% Angel and Nag's Head • 55% Finsbury Park • 50% Archway 75% retail in Specialist Shopping Areas	Policy R3: Islington's Town Centres
SDM11	Proportion of units within each Local Shopping Area that: (i) are in class E use; (ii) are vacant;	(i) Percentage change from previous year (ii) No target (iii) Zero	Policy R4: Local Shopping Areas

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
	(iii) have changed to C3 use within the monitoring year.		
SDM12	Public houses gained and lost (completions)		Policy R11: Public Houses
SDM13	Visitor accommodation change (completions) in schemes and bed spaces in identified locations and outside of identified locations		Policy R12: Visitor accommodation
SDM14	Proportion of completed new hotel rooms that are wheelchair accessible		
SDM15	Open space gains and losses (sqm) (completions) <ul style="list-style-type: none"> • Designated public open space (identified on the Policies Map) • Significant private open space 	<ul style="list-style-type: none"> • Designated public open space (identified on the Policies Map) - no loss • Significant private open space - no loss 	G2: Protecting open space
SDM16	On-site carbon reduction achieved for major development	To achieve minimum target for on-site reduction on average.	S4: Minimising greenhouse gas emissions
SDM17	Offsetting contributions from completed new developments	Overall amount of offset contributions in a monitoring year.	
SDM18	Major developments (completions) that have:		S5: Energy infrastructure

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
	<p>1. Connected to a heat network.</p> <p>2. Where there is a Commitment to connect to a future network</p>		
SDM19	Annual mean air pollution levels for nitrogen dioxide and PM10	Reduction	S7: Improving Air Quality
SDM20	Circular Economy Statements for referable applications (permissions)	Performance against metrics and targets set out in GLA circular economy statement guidance.	S10: Circular Economy and Adaptive Design
SDM21	Change in mode share	Increase in mode share of sustainable transport modes over time.	T1: Enhancing the public realm and sustainable transport
SDM22	S106 contributions for accessible parking bays		T3: Car-free development
SDM23	Additions and removals from the Historic England Buildings at Risk Register	No target	DH2: Heritage assets
SDM24	Tall buildings completed in identified locations and outside of identified locations	All new tall buildings to developed in locations identified in DH3	DH3: Building heights
SDM25	Review the Infrastructure Delivery Plan on a regular basis		ST1: Infrastructure Planning and

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
			Smarter City Approach

SDMM77

Page in submitted plan: 284

Section paragraph policy: Monitoring

Add additional text after paragraph 10.7 as follows:

Whilst the AMR will report on a broad range of indicators that will be updated over time and reflect on new and changing sources of data, some of the key indicators that cover a range of policies within the plan and that will be used to help with monitoring are set out below. Further information on monitoring is also set out in the Site Allocations document and Bunhill and Clerkenwell Area Action Plan.

SDMM78

Page in submitted plan: 285

Section paragraph policy: Appendix 1: Marketing and Vacancy Criteria

Proposed change

Add new Table A1.1

Table A1.1 summarises the marketing and vacancy requirements in policies that require marketing and/or vacancy for a change of use. Information and explanation provided in policies and their supporting text should be viewed in conjunction with Table A1.1 and the other requirements in Appendix 1. Table A1.1 should be read using the 'existing use' as the starting point and then the relevant 'proposed use' identifies the marketing and/or vacancy requirements for that change of use.

Policy	Designation/Applicability	Existing use	Proposed use	Marketing period	Vacancy
R2	Primary Shopping Area	Conditioned retail E use	Other E use	6 months	N/A
		E use	Non E main town centre use	12 months	12 months
		E use	Residential	24 months	24 months
R4	Local Shopping Area	Conditioned retail E use	Other E use	N/A	N/A
		E use	Non E main town centre use	6 months	6 months
		All main town centre uses	Residential	24 months	24 months
R5	Dispersed location (edge/out of centre)	Retail or Café/Restaurant Class E use	Other E use	N/A	N/A
			Non E main town centre use	12 months	12 months
			Residential	12 months	12 months
R7	Specialist Shopping Area	Conditioned retail E use	Other E use	6 months	N/A
		E use	Non E main town centre use	24 months	24 months

		All main town centre uses	Residential	24 months	24 months
R10	Borough wide	Cultural use	Non cultural E use	24 months	24 months
			Non cultural main town centre use	24 months	24 months
			Residential	24 months	24 months
R11	Public Houses	Public house (sui generis)	E use	24 months	24 months
			Non E main town centre use	24 months	24 months
			Residential	24 months	24 months
B3	Borough wide	Conditioned business E use	Other E use	6 months	N/A
			Non-business use	24 months	Demonstrated to be vacant at time of application
		Non-conditioned business E use	Residential	24 months	

SC1	Borough wide	Social and community infrastructure use	Non-social and community infrastructure use	12 months	12 months
			Residential	12 months	12 months

1. Where policies require marketing information to be submitted, the following details will be used to assess the acceptability, or otherwise, of the information submitted and any marketing undertaken.
2. Marketing evidence requires demonstration of an active marketing campaign for a continuous period, ~~whilst the premises were vacant~~ which has shown to be unsuccessful. **Where vacancy is also required by policy, marketing must take place whilst the premises are vacant unless otherwise stated.**
3. The minimum period of vacancy/marketing is identified within relevant policies **and summarised in the table above.** It must be shown to the Council's satisfaction that marketing has been unsuccessful for all relevant floorspace.
4. **Marketing and vacancy criteria will be kept under review and may need to be changed over time – this will be done through guidance.**
5. **Additional considerations in relation to Class E**
 - **For proposals that are marketed within class E it will be important that the existing use plus all uses within class E are specified in order to robustly demonstrate there is no demand for the floorspace. A log should be provided evidencing the range of uses advertised, prices advertised and all offers received, this should be accompanied by a signed declaration. Where specific Class E uses are not marketed or are**

excluded from marketing due to site specific or local circumstances this should be robustly justified.

- **Where a property is vacant and is being marketed, if a new occupier is found the council encourages properties to be brought back into commercial use as soon as possible to avoid unnecessary vacancy.**
- **Where a specific use or uses is conditioned within Class E and a proposal seeks to change to another Class E use(s), six months of marketing for the specific use will be required to demonstrate that there is no longer demand for the use(s) it was secured for in line with relevant policies. In this instance there is no requirement for the premises to be vacant.**

4.6. A detailed marketing report must be submitted to the Council and must include appropriate evidence of all of the following. Examples of the type of evidence that could be used to demonstrate that each criterion has been met is also set out below. The examples provided are not an exhaustive list.

... (no amendments made to list a) to k))

SDMM79

Page in submitted plan: 291

Section paragraph policy: Appendix 2: Noise and vibration

Proposed change

Amend text as follows:

22. Any development which includes residential floorspace adjacent to non-residential uses must submit an assessment of the internal sound transfer, including for any development which may increase noise impacts in existing multi-use buildings. Some examples of where an assessment would be required are:

- a new development incorporating ~~an~~ **A4 a bar (Sui Generis)** on the ground floor and residential flats above;
- conversion of an existing ground floor **premises A1 shop** to an **A3** restaurant where there is an existing residential flat above; or
- conversion of an office sharing a party wall with a light industrial use into a residential dwelling
- **conversion of an existing ground floor shop to a gym or nursery where there is an existing residential flat above**

23. In some cases, an airborne sound insulation standard will be specified rather than requiring compliance with a noise rating criterion.

24. Party walls, floors and ceilings between the non-residential premises and residential floorspace should be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:

- For ~~A4 premises~~ **drinking establishments, D1\B2-Sui Generis/F.2-** premises such as places of worship, concert halls, community space for hire or B2\B8 industrial premises, standards will be judged on a case by case basis depending on the exact nature of the use. Greater than 60dB DnT,w + Ctr is likely to be necessary
- For cafes and restaurants **A3** or ~~A5~~ **Take away** premises or large ~~A1 cafes,~~ shops and supermarkets: At least 55dB DnT,w + Ctr

25. Where non-residential uses are placed above residential floorspace or high impact generating uses such as gyms are placed on the ground floor and residential above there are likely to be impact noise issues. An impact sound insulation limit will be specified. These will be determined on a case by case basis and in such cases specialist advice and assessment will be necessary.

SDMM80

Page in submitted plan: 293

Section paragraph policy: Appendix 3: Transport Assessments and Travel Plans – Table A3.1

Proposed change

Amend table as follows:

Table A3.1: Thresholds for Transport Assessments and Full Travel Plans

Use	Threshold
A1 E(a) Retail	Equal or more than 1,000sqm
A2 E(c)i Financial Services	Equal or more than 1,000sqm
A3/A4/A5 E(b)/Sui Generis hot food takeaway	Equal or more than 750sqm
B1 B2/B8/E(c) / E(g)	Equal or more than 2,500sqm
C1 Hotels	Equal or more than 50 beds
C3 Residential	Equal or more than 50 residents
D1 E(e) Hospitals/medical centres*	Equal or more than 50 staff
D1 F1(a) Schools	All developments to have a school travel plan
D1 F1(a) Higher and further education	Equal or more than 2,500sqm
D1 F1(c) and F1(e) Museum/gallery	Equal or more than 100,000 visitors annually
D1 F1(f) Places of worship	Equal or more than 200 members/regular attendees
D2 E(d), F(c-d) and Sui Generis Assembly and Leisure	Equal or more than 1,000sqm

Table A3.1: Thresholds for Transport Assessments and Full Travel Plans

General Class E (unspecified activity)	Equal or more than 750sqm
<i>*It is mandatory for NHS trusts to have travel plans, required by separate Department of Health and Social Care guidance.</i>	

SDMM81

Page in submitted plan: 293

Section paragraph policy: Appendix 3: Transport Assessments and Travel Plans

Proposed change

Insert the following paragraph after paragraph 3:

- 4. Unspecified Class E activities need a transport assessment for premises larger than 750sqm. This new threshold is designed to ensure that the flexibility of Class E does not result in unintended negative transport impacts. When Class E activities are specified, specific thresholds apply.**

SDMM82

Page in submitted plan: 296

Section paragraph policy: Appendix 4: Cycle parking standards

Proposed change

Insert the following paragraphs after paragraph 2:

- 3. The table below describes minimum cycle parking standards. The nature and amount of cycle parking required varies by use. For instance, within Class E, the needs for long or short stay cycle parking, as well as the amount will vary depending on whether a development caters for an office or a retail use. An office would be expected to provide more long stay parking, while retail should provide more short stay cycle parking.**
- 4. These differing requirements within Class E or Class F mean that cycle parking needs to be delivered in a way which can easily be adapted to respond to the different activities within the same land use category. The Council therefore expects provision of cycle parking to be mainly located at ground floor, in a way that provides flexibility between short and long stay, and support the flexibility of activities sought by Class E.**
- 5. Where unspecified Class E activities are proposed developers should provide cycle parking in line with the requirement below and in a way which facilitates switching from long stay to short stay cycle parking based on changing activity needs. Flexibility is essential to ensure different uses can be adequately provided for and to adapt to different uses over time.**

SDMM83

Page in submitted plan: 296

Section paragraph policy: Appendix 4: Cycle parking standards Table A4.1,

Proposed change

Amend table as follows:

Table A4.1: Minimum cycle parking standards (excluding circulation space)

Use class	Use	Spaces per member of staff or resident (GIA GEA) of which 20% accessible	Spaces per visitors or customers (GIA GEA) of which 20% accessible	Spatial equivalent – standard cycle	Spatial equivalent – accessible cycle
A1E(a) / E(b)	Retail - food	from a threshold of 100sqm developments above 100sqm: 1 per 175sqm	developments above 100sqm: - first 750sqm, from a threshold of 100sqm: 1 space per 20sqm. - Thereafter Beyond 750sqm, 1 space per 150sqm	1sqm	2sqm

Table A4.1: Minimum cycle parking standards (excluding circulation space)

	Retail – non food	from a threshold of 100sqm developments above 100sqm - first 1000sqm: : 1 per 250sqm. Thereafter: Beyond 1000sqm 1 space per 1000sqm	developments above 100sqm from a threshold of 100sqm: - first 1000sqm: 1 space per 60sqm - Thereafter: Beyond 1000sqm 1 space per 500sqm	1sqm	2sqm
A2E(c)	Financial and professional services	from a threshold of 100sqm developments above 100sqm: 1 per 175sqm	developments above 100sqm from a threshold of 100sqm: 1 space per 20sqm	1sqm	2sqm
A3E(b)	Restaurants and cafés	1 per 175sqm	developments above 100sqm from a threshold of 100sqm:	1sqm	2sqm

Table A4.1: Minimum cycle parking standards (excluding circulation space)

			1 space per 20sqm		
A4Sui Generis	Drinking establishments	1 per 175sqm	developments above 100sqm from a threshold of 100sqm: 1 space per 20sqm	1sqm	2sqm
A5Sui Generis	Hot food takeaways	1 per 175sqm	developments above 100sqm from a threshold of 100sqm: : 1 space per 20sqm	1sqm	2sqm
B1(a) / E(c) / E(g)	Offices	1 per 75sqm	First 5000sqm: 1 space per 500sqm. Thereafter: 1 space per 5000sqm	1sqm	2sqm
E(c) / E(g)	Other	1 per 250sqm	1 space per 1000sqm	1sqm	2sqm

Table A4.1: Minimum cycle parking standards (excluding circulation space)

B2	General industry	1 per 500sqm	1 space per 1000sqm	1sqm	2sqm
B8	Storage and distribution	1 per 500sqm	1 space per 1000sqm	1sqm	2sqm
C1	Hotels	1 per 20 bedrooms	1 space per 50 bedrooms	1sqm	2sqm
C1	Hostels (Sui Generis)	1 per 20 bedrooms	1 space per 50 bedrooms	1sqm	2sqm
C1 C2	Hospitals	1 space per 5 FTE staff	1 space per 30 FTE staff	1sqm	2sqm
C1 C2	Care homes / secure accommodation	1 space per 5 FTE staff	1 space per 20 bedrooms	1sqm	2sqm
C3- C4	Housing	1 per studio or 1 person dwelling, 1.5 per 2 persons 1 bedroom dwelling, 2	5 space per 40 dwellings, thereafter: 1 space per 40 dwellings	1sqm	2sqm

Table A4.1: Minimum cycle parking standards (excluding circulation space)

		spaces per all other dwellings			
	Specialist older people housing	1 per 10 bedrooms	1 space per 40 bedrooms	1sqm	2sqm
€	Student accommodation	0.75 spaces per bedroom	1 space per 40 bedrooms	1sqm	2sqm
D E(e-f) / F1	Nurseries	1 space per 8 staff and 1 per 8 pupils	X	1sqm	2sqm
	Schools	1 per 8 staff plus 1 per 8 students	1 space per 100 students	1sqm	2sqm
	Higher education	1 per 4 staff plus 1 per 20 peak time students	1 space per 7 students	1sqm	2sqm

Table A4.1: Minimum cycle parking standards (excluding circulation space)

	Libraries or churches (for staff and visitors)	1 per 8 staff	1 space per 100sqm	1sqm	2sqm
	Health facilities/clinics (for staff and visitors)	1 per 5 staff	1 space per 3 staff	1sqm	2sqm
	Community centres (for staff and visitors)	1 per 3 staff	1 space per 100sqm	1sqm	2sqm
D2E(d) / F(c-d)	Theatres and cinemas	1 per 8 staff	1 space per 30 seats	1sqm	2sqm
	Leisure and sports	1 per 8 staff	1 space per 100sqm	1sqm	2sqm
General Class E	Unspecified activity	Provision to be delivered at ground floor to ensure flexibility.		1sqm	2sqm
		first 1,000sqm: 1 space per 20sqm			

Table A4.1: Minimum cycle parking standards (excluding circulation space)

		thereafter : 1 space per 65sqm		
Sui Generis	As per most relevant other standard.			
Stations	To be considered on a case by case basis in liaison with TfL.			

SDMM84

Page in submitted plan: 300-302

Section paragraph policy: Appendix 5: Social Value self-assessment

Proposed change

Delete appendix 5:

~~1. Policy SC4 requires major development proposals to undertake a social value selfassessment which clearly sets out the specific social value which would be added through delivery of the proposal. The self-assessment form is provided in Table A5.1 below. It sets out a number of potential social value benefits that could be provided by a proposal, but it is not an~~

exhaustive list; the Council would welcome inclusion of additional benefits and other innovative approaches to optimising Social Value outcomes through planned developments. These should be discussed with the Council as early as possible in the planning application process, ideally at pre-application stage.

2. Applicants can contribute social value:

- as an employer and contractor;
- as a stakeholder in the local community;
- as a contributor to the local/sub-regional economy; and/or
- as a steward of the environment.

3. When completing the self-assessment form, it may be helpful for applicants to consider these 'roles' when determining what social value can be added by the proposal.

4. As part of the self-assessment, applicants must indicate how the social value will be delivered and sustained throughout the lifetime of the development; for example, this may be secured through leasehold and tenancy agreements for the development.

Table A5.1: Social Value self-assessment form

Ref	Social Value benefit	Will benefit be delivered by proposal (Y/N)	How will benefit be delivered and sustained?
1	All employees, apprentices and sub-contractors engaged in the		

	development are paid an hourly wage (or equivalent of an hourly wage) in line with the Living Wage Foundation guidelines.		
2	No policy or practice which 'blacklists' employees or contractors engaged in trade union or employee representation activities or political disputes		
3	Diversity and inclusion policies are put in place to promote an inclusive workplace, particularly proactive inclusion of under-represented groups.		
4	Develop and implement environmental policies and practices to protect the local environment and address the wider challenges of climate change, by preventing or minimising direct and indirect impacts of the development throughout its lifecycle.		
5	Promote a range of health and wellbeing policies for employees, including flexible working, mental wellbeing and parental/caring responsibilities leave.		
6	Enable and support a diverse supply chain through proactive		

	engagement with micro, small and medium businesses, by offering business development support and pre-procurement mentoring.		
7	Facilitate skills and employability programmes to enable local residents to benefit from employment opportunities provided by the development over its lifecycle.		
8	Promote and implement flexible and accessible work placements and schemes to help people who might find it difficult to keep a job or return to work; this includes people with mental health issues or learning difficulties, care leavers or ex-offenders.		
9	Support voluntary/community organisations with specialist support, mentoring, skill-sharing and by running practical workshops or enterprise clubs.		
10	Promote ethical financial and investment practices, including prompt payment for small and medium enterprises.		
11	Provide career tasters, work placements and other contributions which help meet		

	the target for every school pupil to receive 100 hours experience of the world of work by the age of 16.		
12	Support employee engagement to continually improve the workplace environment.		
13	Prioritise the development's supply chain expenditure within the sub-regional economy, to retain as much supply chain benefit as possible within the local area.		
14	Carry out environmental improvement works to design out crime and reduce the likelihood of ASB and fear of crime, and take an active part in relevant Environmental Visual Audits to inform improvements.		

Other appendix numbers/references to be updated accordingly.

SDMM85

Page in submitted plan: 314 and 321

Section paragraph policy: Appendix 7:

Proposed change

Public open spaces; SINCs, historic green spaces and adventure playgrounds

Update Figure A7.1: Location of public open spaces; SINCs, historic green spaces and adventure playgrounds with high resolution map which includes the amendment to the SINC for 351 Caledonian Road and showing Skinner Street Open Space as SINC.



Amend Table A7.2: Designated Sites of Importance for Nature Conservation (SINCs):

Reference	SINC name	SINC grade
SINC57	Spa Fields Gardens and Skinner Street Open Space	Local

SDMM86

Page in submitted plan: 335

Section paragraph policy: Appendix 9: Glossary and abbreviations

Proposed change

Term: Business floorspace/buildings/development/uses

Amend text as follows:

Amend text as follows: **Office, research and development and light industrial activities as well as industrial uses B2 general industrial and B8 storage and distribution, and Sui Generis industrial uses.** ~~or uses that fall within the B-use class.~~ Sui ~~generis~~ Generis uses which are akin to business floorspace, such as depots or builders merchants, can be classed as business floorspace for the purposes of the Local Plan.

SDMM87

Page in submitted plan: 348

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Hybrid space

Proposed change

Amend text as follows:

The main feature of hybrid space is that it straddles different ~~B-use~~**business floorspace-classes** ~~uses~~.

SDMM88

Page in submitted plan: 348

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Industrial floorspace/buildings/development/uses/land

Proposed change

Amend text as follows:

Activities or uses that fall within light industrial ~~(B1e)~~, general industry (B2) and storage and distribution (B8) uses, **Sui Generis industrial uses**, and some ~~sui-Generis~~ **Sui generis-Generis** akin to industrial uses such as depots and builder's merchants.

SDMM89

Page in submitted plan: 351

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Locally Significant Industrial Sites

Proposed change

Amend text as follows:

Designated areas where light industrial ~~(B1e)~~, general industry (B2) and storage and distribution (B8) are the priority land uses.

SDMM90

Page in submitted plan: 354

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Office-led development

Proposed change

Amend text as follows:

Development where the majority of floorspace/uses is office. ~~within use class B1(a)~~

SDMM91

Page in submitted plan: 355

Section paragraph policy: Appendix 9: Glossary and abbreviations; Term: Peppercorn rent

Proposed change

Peppercorn rent: is considered a nominal rent at which affordable workspace is secured under the terms established in policy B4, parts A, C and F. The peppercorn rent is generally not inclusive of business rates,

service charge and/or other insurance costs. In exchange for the right to lease the affordable workspaces at a peppercorn rent, the operators will be required to provide a range of social value benefits. These social value benefits can include delivering vocational training to residents, supporting residents into work and supporting local businesses and developing local supply chains (this list is not exhaustive).

SDMM92

Page in submitted plan: 356

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Primary Shopping Area

Proposed change

Amend text as follows:

Spatial designations that contain the greatest concentration of ~~A1-shops~~ **retail** within a Town Centre; are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres, ensuring their continued vibrancy, vitality and viability

SDMM93

Page in submitted plan: 357

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Retail floorspace/buildings/development/uses

Proposed change

Amend text as follows:

~~Activities or uses that fall within the A1-use class.~~ **Uses for the display or retail sale of goods, other than hot food, principally to visiting members of the public - as defined in Class E(A). This includes shops, retail warehouses,**

hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes.

SDMM94

Page in submitted plan: N/A

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Significant private open space

Proposed change

Add following definition

Larger scale open spaces (generally greater than 1000m²) with private or limited access which make a significant contribution to open space in the borough. These spaces include Charterhouse Square, the Honourable Artillery Company Grounds and a number of churchyards in the borough. These spaces are not identified on the Policies Map and further significant private open spaces may be identified due to their size or significance in Islington. These spaces are protected from development by Policy G2 Part A.

SDMM95

Page in submitted plan: N/A

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Leisure uses

Proposed change

Add following definition:

Activities or uses including food and drink uses as defined within Class E(b), some indoor recreational activities falling within E(d) and some Sui Generis uses including drinking establishments including pubs and wine bars, hot food take aways, live music venues, cinemas, concert halls, nightclubs and theatres.

SDMM96

Page in submitted plan: N/A

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Low Traffic Neighbourhoods

Proposed change

Add following definition:

Low Traffic Neighbourhoods: Low Traffic Neighbourhoods restrict through traffic to create more space for pedestrians and cyclists on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area. However, Low Traffic Neighbourhoods maintain access for local residents, their visitors, the emergency services, and local shops and businesses. A reduction in through traffic will improve air quality and allow more space for local people to travel safely around their local streets on foot and by bicycle

SDMM97

Page in submitted plan: N/A

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Shop

Proposed change

Add following definition:

Shop: refers to the function of uses that operate as shops. However, in relation to planning applications that involve the loss or development of a 'shop' the encompassing definition of 'retail' will be used in determining applications.

SDMM98

Page in submitted plan: 360

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Social and community infrastructure

Proposed change

Amend text as follows:

Infrastructure that is available to, and serves the needs of, local communities and others, which is often funded in some way by a grant or investment from a government department, public body and/or the voluntary sector. Social and community facilities comprises a wide variety of facilities/buildings including those which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres; education and training facilities including early years providers, nurseries, schools, colleges and universities; children and young peoples' play facilities; health facilities; youth centres; libraries; community meeting facilities; community halls; places of worship; sport, leisure and recreation facilities; and policing facilities. Social and community infrastructure generally falls within Use Classes **E, F.1 or F.2**, ~~C2, D1 or D2~~, and possibly some Sui Generis uses. This list is not intended to be exhaustive and other facilities can be included as social and community infrastructure.

SDMM99

Page in submitted plan: N/A

Section paragraph policy: Appendix 9: Glossary and Abbreviations; Term: Non-motorised forms of transport

Proposed change

Add following definition:

This refers to active travel and human powered transportation, including walking and cycling, and variants such as small-wheeled transport (cycle rickshaws, cargo cycles, skateboards, push scooters and hand carts, and hybrid electric cycles) and wheelchair travel. The Council also considers mobility scooters form part of that category.

SDMM100

Page in submitted plan: N/A

Section paragraph policy: Add new appendix 10

Proposed change

Updated to include changes in phasing to Vorley Road/Archway Bus Station to complete in 2025/26, Drakeley and Aubert Court to complete in 2024/25 and Highbury Quadrant Congregational Church to complete in 2026/27. Table also updated to reflect amended plan period

SDMM101

Page in submitted plan: N/A

Section paragraph policy: Appendix 9 Glossary and Abbreviations : Tall Buildings

Proposed change

Buildings of more than 30 metres, ~~or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser)~~

Appendix 10: Housing Trajectory:

	Past 5 years					Reporting year	Current year	Five year supply					Years 6-10					Year 11 onwards					
	2014/15	2015/16	2016/17	2017/18	2018/19			2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
Vacancies Returning to Use Projected						0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total vacancies returned to use	62	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non self-contained																							
Past completions (adjusted to self contained equivalent)	287	484	885	-3	192		34																
Projected completions (adjusted to self-contained equivalent)							19	0	11	0	200	0	0	0	0	0	0	0	0	0	0	0	0
Total non-self-contained	287	484	885	-3	192	0	19	0	6	0	80	0	0	0	0	0	0	0	0	0	0	0	0
Conventional																							
Past Completions	969	1,156	808	470	768	747	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected large sites							382	572	627	414	772	810	292	772	295	0	300	289	415	-168	183	0	0
Projected windfall large sites												64	64	64	64	64	64	64	64	64	64	64	64
Projected total large sites							382	572	627	414	772	874	356	836	359	64	364	353	479	-104	247	64	64
Projected (permitted) small sites							193	136	98	88	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected windfall small sites							0	0	0	396	484	484	484	484	484	484	484	484	484	484	484	484	484
Projected total small sites							193	136	98	484	484	484	484	484	484	484	484	484	484	484	484	484	484
Projected total							575	708	725	898	1,256	1,358	840	1,320	843	548	848	837	963	380	731	548	548
Total conventional dwellings	969	1,156	808	470	768	747	575	708	725	898	1,256	1,358	840	1,320	843	548	848	837	963	380	731	548	548
Total Past completions	1,318	1,672	1,693	467	960	747	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Projected Completions							594	708	731	898	1,336	1,358	840	1,320	843	548	848	837	963	380	731	548	548
Cumulative total projected completions							594	1,302	2,033	2,931	4,267	5,625	6,465	7,785	8,628	9,176	10,024	10,860	11,823	12,203	12,934	13,482	14,029
Annual housing target							775	775	775	775	775	775	775	775	775	775	775	775	775	775	775	775	775
Total completions	1,318	1,672	1,693	467	960	747	594	708	731	898	1,336	1,358	840	1,320	843	548	848	837	963	380	731	548	548

