Responses to June 2010 Changes to the Core Strategy

(Pre-submission Changes 2)
Consultee ID: 449844
Consultee Name: Nigel Gansell
Organisation: 
Agent ID: 
Agent Name: 
Organisation: 
Core Strategy Section no: 1
Core Strategy Section Name: Introduction
Para/policy/map/table: 1.0.6
Schedule of Changes Ref: Introduction, Core Strategy in context, page 5.
Comments: Core Strategy (page 5): 1.0.6 "one of the Mayors key objectives (London Plan) to address inequality amongst Londoners" Suggested amendment: that - all Londoners benefit from economic growth are engaged in the development process - whatever "democratic process" actually means in the light that the Olympics Delivery Authority, Olympics Legacy Company and London Development Agency (now defunct) are part of a quango. (unelected representatives). Suggested addendum: that -the Olympics Business Plan for the Olympics and post Games to include the following: The re-introduction of the previously demolished Clays Lane Housing Development which would include low cost housing across pan London councils waiting lists in lieu of monies paid in council tax payees (contributions) to the Olympics levy:
That the games stadia and after games usage be set aside/given over to entire community use;
That the Games stadia and environs have direct cycle paths/routes/links to adjacent London boroughs i.e. Newham, Tower Hamlets, Hackney, Waltham Forrest and Islington.
Comments: Add: to page 4 of Core Strategy" the following: Sustainability appraisal of the Draft. Further alteration to London Plan (spatial development strategy for Greater London) September 2006. Page 79 5.10.2 The Games Quoting: "the challenge is to ensure that community interests include the needs of local residents and local public spaces are not limited to professional sports teams, their owners, developers and hotel and leisure industry operators"

Question: In light of the above comments can there be added any meaningful discourse on the comercial interests of Arsenal Football Club and the environs and whether better community use can be made of stadia generally in Islington and other London Boroughs during what is considered the closed season?

Addition: can there be more usage of parks accross LB of Islington and pan London parks for events such as cycle races and five-a-side soccer tournaments, muscial events etc.
Comments: Page 5 - One of the Mayors key objectives within the London Plan to address inequality. Ensuring all Londoners engage in development process. Question - no mention how to address the inequalities. No firm proposals.
Comments: The Core Strategy’s commitment to reduce inequality in the borough is important, although the PCT’s view is that the proposed wording does not adequately reflect the wide-ranging nature or causes of inequality. Wider impacts on health wellbeing include living and working conditions, food supplies and access to essential goods and services. It is suggested that the wording in the last sentence in paragraph 1.0.6 be amended to reflect that it is the Council’s commitment to reduce all inequality, including inequalities in health outcomes reflected in the Core Strategy. Specific reference to inequalities in health outcomes would clearly align the Core Strategy with the Mayor’s London Plan (2009).
Comments: Core Strategy Objectives (page 14). Item 16. Encouraging walking and cycling over public transport and encouraging all of these over car use. Question: how is this to be achieved? Options for consideration - cycle training in the number of parks in LBs of Islington, Hackney, (Victoria Park), Haringey (Finsbury Park) where this is achievable and possible. Further option; exploration for more cycle paths in LB of Islington e.g. no cycle paths along stretch of Caledonian Road. But plenty of car parking meters! are there planned docking stations within Islington as part of the Mayor of London's cycling strategy? Further Option and Consideration: are there plans for more cycle training within secondary and primary schools in the borough. Option: can cycle races be incorporated into the borough plan and pan boroughs plans for increase in cycle usage.

Item 11-14 Environmental Impact. Addendum: more emphasis placed on usage of Electric Cars both within the borough and across other London Boroughs. What is the current take up of electric cars by the boroughs and inter alia the general public. Options: that all council run vehicles are eventually turning green with emphasis on electric card. J Will there be a special green highway (road) to the London Olympics 2012.
We are instructed by Lazari Investments Ltd (‘Lazari’) to submit representations to the ‘Further Changes to the Core Strategy Proposed Submission (June 2010). We previously submitted representations to the Changes to the Core Strategy Proposed Submission document (February 2010). We are disappointed and concerned to see that our comments and proposed changes have not been taken into account and therefore seek to reinforce our comments and to make further representations to this document. This letter of representation should therefore be read in association with our former letter dated 22 March 2010.

Lazari Investments Ltd

Lazari Investments owns a significant amount of land surrounding Archway Underground station, including three separate freehold titles for three properties (Hamlyn House, Hill House and 23 Highgate Hill) that together cover a total of 2.3 acres (0.93 hectares).

Landholdings Hamlyn House

This property comprises a substantial office building, arranged on basement, ground and eight upper floors, originally completed in the early 1960s. The building totals 5,735 square metres and occupies a site of 0.43 acres (0.17 hectares) inclusive of 22 car parking spaces.
Hill House
This property is located adjacent to Hamlyn House on the southern side of Highgate Hill. Arranged on basement, ground and 11 upper floors, the total lettable space amounts to 7,757 square metres and occupies a site area of 1.82 acres (0.74 hectares) inclusive of 165 parking spaces. This site covers an area of 0.05 acres (0.02 hectares). For the purpose of these representations, these properties are referred to collectively as ‘the Site’. The buildings are becoming increasing vacant and obsolete in their current use as offices with no market demand for their existing use as experienced by Lazari Investments in recent years. There is therefore an opportunity to reverse the decline of the site and to create opportunities for the wider benefit of the community and to transform the area.

Development Opportunity
The development of the Lazari Site in isolation could provide a high density residential led mixed use development comprising in the order of 400,000 sq ft of floor space (gross) of which could include: 55 % residential, 25% retail with anchor store and boutique shops, 7% offices, 9% leisure and 4% community uses. This new form of development would facilitate the organic growth of a sustainable mixed use community and would act as a catalyst for the regeneration of the area. This quantum of development could be significantly higher if the Site was to be developed in connection with other landholdings.

Representations
Principally, we maintain our concerns about the content of the revised Core Strategy Submission Document (June 2010) and the ability of the policies to achieve the Council’s stated objectives for regenerating Archway.
Comments: Paragraph 1.0.3 Page 5 and Para. 2.4.5 Page 28
It is intended to remove the following wording:
i) Retail from: ‘Studies on Retail, Employment and Open Space’;
ii) There is continued healthy demand for food retail and comparison goods. It is forecast that by 2026 there will be market capacity for additional floorspace of 9,200 sq m for convenience goods, and 11,450 sq m for comparison goods(8). The size of units mean there are few large shops, so it will be important to look at new ways to accommodate growth ( 8 Retail Study, 2008).
There is no explanation for the removal of the wording from the revised Core Strategy Submission Document which should otherwise be regarded as helpful evidence based information to inform policy making. Planning Policy Statement 12 refers to the importance of using credible evidence to inform policy making and strategy, which is at the heart of the test of demonstrating that the Core Strategy is “Sound” (Paragraph 4.50-4.52). The deletion of this information would therefore remove the transparency behind the formulation of policies in the Plan and underplay the importance which needs to be given to the future provision of retail development within the Borough. This wording should therefore be reinstated for clarity as the information still forms part of the evidence base, as referred to in Appendix 2 of the revised Core Strategy Submission Document (2010).
It is also intended to remove the following wording: ‘The Retail Study (2008) states that the borough's existing foodstores are
heavily overtrading, with strong demand from food retailers for new stores here. There is also strong demand for new floorspace from comparison goods retailers’.

For the reasons set out in the above, this wording should be maintained. The Core Strategy should also identify the level of retail floor space which will be required over the plan period to 2026 and indicate the capacity of retail development which can be accommodated with the Town Centres within the Borough, based on the findings within the Retail Study 2008.

Policy 14 ‘Retail and Services’ of the revised Core Strategy only currently identifies that:

‘B. Islington’s has a hierarchy of town centres with two major town centres at Angel and Nag’s Head, and two district town centres at Archway and Finsbury Park. Town centre boundaries will be defined in the Development Management Policies; and that

C. Any new major retail and leisure development should be located in these town centres in accordance with the sequential assessment set out in Planning Policy Statement 4: Planning for Sustainable Economic Growth. Any increase in retail unit size should be supported by assessments which pass the test (in PPS4) of ‘preserving and enhancing the established character and diversity of the town centre’. At present it is therefore difficult to understand how the retail strategy will be effectively managed and delivered which is not a sound approach and inconsistent with advice provided within PPS12.

In this context, it should be recognised that the role in which Archway can play (and in particular our client’s landholdings) is highly underplayed and undermined by the proposed policy within the revised Core Strategy Submission Document (June 2010) which remains unchanged. Policy 1 still identifies Archway to only have potential for ‘overall expansion in retail provision which complements the existing retail character of the area over the lifetime of the plan’ (section A).

It is our understanding that this approach derived from the Archway Development Framework SPD (September 2007) which reflects a strong local wish to avoid retail development that might undermine existing, or future, small-scale local traders.

However, the current approach is inconsistent with the evidence base within the more recently produced Retail Study 2008, which states that: ‘The key to attracting retailers to the Borough’s principal centres will be the creation of attractive new developments capable of accommodating them, which will be particularly difficult in Angel and Nag’s Head. The 2005 Study advised that a substantial opportunity existed in Archway, and we believe that this opportunity should continue to be pursued. However, being only a District Centre and lacking ‘critical mass’ in retailing terms, we think it somewhat unlikely that Archway will be able to attract many of the retailers and service businesses seeking space in the Borough, unless a development was ‘anchored’ by a large food store’ (Paragraph 4.15).

The provision of an anchor retail store as part of any future development on the Site would have significant benefits for Archway, including:

1. Increasing employment, in particular semiskilled and unskilled jobs
2. complementing existing traders and increasing footfall to their benefit
3. Improving security and safety through public realm enhancements (particularly in relation to lighting) and greater natural surveillance. The approach is also inconsistent with the tests within Planning Policy Statement 4 (PPS4) ‘Planning for Sustainable Economic Growth (2009). Policy EC4 of PPS4 requires local planning authorities to identify sites in the centre that are capable of accommodating larger format developments where a need for such development has been identified. The Retail Study 2008 has identified a need for retail development. Policy EC4 also recognises the benefits of consumer choice and promoting competitive town centres. This strengthens Islington’s ability to plan for a strong retail mix in which smaller shops are recognised as significantly enhancing the character and vibrancy of town centres. As comprehensively set out in our letter of representation dated 22 March 2010, Archway should be promoted for a significant level of new retail development and Policy 1 and section 2.2 should be amended accordingly. Without a significant element of retail development within the future development of the Site the development of the Site is unlikely to be viable and to come forward. This would be a missed opportunity and would prevent other benefits from being delivered through the wider regeneration of the area including, new homes, new employment, environmental improvements and community facilities. Again, we consider the current approach to be unsound and should be changed to reflect our comments.

We reserve our right to attend the Examination in Public to put forward our case and to supplement these representations if required.

In line with these changes, we propose that The Archway SPD be reviewed and updated to take account of the Retail Study (2008) and PPS4 to resolve any conflicting objectives for the future development of our client’s site and the wider Archway area. We also request to be notified of the next consultation stages of the draft Site Allocations and Development Management DPDs.
Comments: We would like to make a few comments, please, on the Archway section of the Core Strategy, which we hope will strengthen it in two particular areas:

1) Healthy recreation in core document. There is no 'open space enhancement opportunity' registered for Dartmouth Park, N19 (marked in green on the CS map). This is the largest open space in Archway; it is also the highest hill in Islington (the southernmost part of the range which includes Parliament Hill, Highgate Hill and Muswell Hill). You can see most of London, including St Pauls, Canary Wharf, Arsenal Stadium, and the London Eye from its summit (this could be added to the CS map). The Council recently renewed an 100 yr lease on the Thames Water reservoir land with the viewing area. It's two playgrounds are at present semi-derelict. It is used by all the private houses around it, and by Camden residents across the road (therefore qualifying for joint consultation). It is also right next to the ....Estate (marked as a priority housing estate on your map). For some reason it is not included in Greenspace's/the Council's list of parks on the Council website (which is maybe why it has been left out?).

2) Leisure development. We were surprised that Archway was given no 'leisure-led mixed use' status, given that one of the central problems in the area is what to do with the large Methodist Hall and adjoining theatre, in the middle of the gyratory. What has happened to the proposal for a youth arts centre? (Youth facilities are desperately needed in north Islington.)
There is also the nearby art college, Byam Shaw, which has been developing arts and performance events in the area. It could form useful connections with a local arts centre.

A recent idea for an Archway cinema club was based on the idea that it would draw people from the surrounding 'villages' of Kentish Town, Tufnell Park, Highgate, Whitehall Park, Crouch End, Hornsey and Upper Holloway. None of these areas have much in the way of arts or leisure provision; and all have good transport links to Archway (ie. Archway is a transport hub). Archway previously had about three cinemas, long since closed.

Previous plans for large retail developments were dropped as being unsuitable, and opposed locally. It is not clear from the CS what the retail strategy is for Archway, other than for small shops. As is now well known, arts development leads directly to retail development, particularly smaller 'high-end' food and clothing shops, markets, bars and cafes. It already has some of these, but they are struggling.

Archway is also on the borders of other leisure (and tourist) areas in Camden such as Highgate, and Hampstead Heath. It could be an alternative 'cultural' destination at the end of 'the leisure day' (or during 'the leisure day').

We hope these comments are helpful, and will be addressed. You have our contact details if necessary. Many thanks for this opportunity to comment (local democracy in action?) We thought the core strategy was in general right; and we definitely support the adoption of sustainability. To that end, we particularly need family-sized housing. Without children, there is no sustainability.
However, there continues to be an outstanding general conformity issue, in relation to the retention and enhancement of bus-standing facilities at Archway, which could result in harm to the implementation of the London Plan. Unless this issue can be appropriately resolved, the Core Strategy will not be in general conformity with the London Plan. The Council's letter of 17 June 2010 sets out that "the site in question is owned by Islington Council but has been used by the TfL as a bus stand for several years". TfL wish to clarify that the site in question has been used by the TfL as a bus stand for 25 years. Furthermore, it is noted that TfL have been in land negotiations with the Council since 1992 in relation to this site, but there has been no resolution to date. As such, TfL believe it to be necessary to ensure the long term operational needs for bus standing at Archway should also be secured through, or not undermined by, the Council's Core Strategy. As set out in previous correspondence the current wording on Policy 1 - Archway in Islington's Core Strategy is not in general conformity with London Plan policy 3C.4 Land for Transport or emerging policy 6.2 Providing public transport capacity and safeguarding land for transport of the draft replacement London Plan. Your attention is also drawn to the Land for Transport Functions, the London Plan Supplementary Planning Guidance (March 2007) as well the Council's own Archway Development Framework (September 2007). Paragraphs 2.1 3 - 2.1 5 of Land for Transport Functions SPG (March 2007) set out detailed guidance relating to bus stops and stands. The SPG clearly states that "development proposals must consider land provision for bus stopping and standing facilities, particularly where:
there are existing bus operations and passenger interchange facilities which are adjacent, or may serve the site" in accordance with Policy 3C.2 and 3C.4 of the London Plan. The Archway Development Framework recognises the strategic importance of Archway and the buses stating in paragraph 4 of section 2 that "Archway is also an important transport hub served by a significant number of London Bus routes, and the London Underground Northern Line. It is also an area of strategic importance for Islington" (p6). On page 14 of the strategy, the Council states that "Archway needs to remain a key public transport interchange. Improving access to public transport facilities, provision of new well located bus stops, improving bus routes and providing for easy interchange between tube to bus and bus to bus modes of transport are some of the improvements required for the area". The Council recognised TfL’s position in the development of the framework and as such the following text, shown in Box 1, was adopted in the document.

Box 7: Archway Development Framework, p74 (September .2007) Vorley Road Bus Layover "TfL has expressed a requirement for the bus stand to be retained without a reduction in its capacity but with the incorporation of improved cafe and restroom facilities. Proposals will be expected to incorporate and or contribute to improved facilities for drivers. The potential for developing over the bus layover in order to mitigate its current impact should be considered although such proposals will need to demonstrate that there has been significant consultation undertaken with TfL in order to ensure that proposals meet their requirements." There has been a clear commitment from the Council throughout Archway Development Framework (September 2007) for the retention of buses, bus standing and the importance of Archway as a transport interchange. TfL would like to see this commitment carried over into the Core Strategy to ensure the future operational needs of buses at this important strategic interchange hub and to be in conformity with the London Plan. TfL suggests that paragraph E of Policy 1 -Archway should be altered to read: "E. Improving the environment for pedestrians and cyclists is a priority in particular the east/west movement (Junction Road to the island and beyond). Pursuing the implementation of the gyratory improvements is an important part of the wider regeneration aspirations for Archway. Any redevelopment should contribute to this as well as maintaining the infrastructure for buses that is vital to Archway's role as a transport hub."

TfL would like to emphasise if the bus standing at Archway were to be compromised it would cause a significant increase in bus operational costs and inhibit the current bus patterns in the area, whilst finding an alternative stand location would be challenging. As such, it is pertinent that a resolution on this issue is found. Furthermore, there are likely to be significantly environmental costs as a result of not having bus standing at Archway. In addition the reliability of operations would be affected by more distant stands. TfL would like work with the Council to resolve the issue of non-conformity of Policy 1 -Archway ahead of the Examination in Public.
I act on behalf of Iceland Foods Limited. I refer to my previous letter of 10th February 2010 submitted on behalf of my client relating to the Council's Strategic Housing Land Availability Assessment (SHLAA) and Site Specific Allocations documents as part of the Local Development Framework (LDF). I indicated at the time my client's interest in the Local Development Framework with regard to their store at 62-64 Chapel Market.

I was grateful to receive notification following the publication of the Council's Core Strategy Submission document. I now wish to submit formal representations in connection with that consultation exercise and request these receive full consideration.

The Council identified the Islington High Street/Chapel MarkedWhite Lion Street area of Islington in the SHLAA. It is also referenced as Angel and Upper Street Site 3. and displayed on Map 2.26 in the Site Specific Allocations Issues and Options Report. The latter document refers to possible redevelopment with "intensification of commercial and retail uses". My client's concerns respond to the potential loss or extinguishment of existing retail uses implied by the reference to the "intensification of commercial uses" through any redevelopment proposals for the area.

The Unitary Development Plan shows that my client's store is located in the town centre. It is also located in a Conservation Area and is designated as Core Retail Frontage under current UDP policy. Iceland is an important retail food store which, contributes to
the retail offer of the Chapel Market area of Islington. My client supports Strategic Policy S.5 (Chapter 8) of the UDP. This policy on Core Retail Frontages does not allow development or change of use resulting in a loss of net retail floor space, and aims to minimise in particular the loss of Class A1 retail use in Islington. My client supports the current policy status quo. Policy 5 of the Core Strategy Submission Document makes reference to the maintaining Chapel Market and the surrounding area as a main shopping area through the encouragement of retail development. My client supports the principle of Policy 5, but considers that there is no case for any radical redevelopment proposals in the setting of its Conservation Area status.

I am concerned that the strength of this policy is diluted by other policies elsewhere in the Core Strategy. For example, the Proposal Map Changes Map 2 referred to as "Policy Designations to Be Added to Proposals Map" shows that my client's store is situated in an area to be designated as a Central Activity Zone (CAZ). The proposed CAZ designation overlaps with the Primary Retail Frontage of Chapel Market, and has the potential to undermine its primary retail function. The Central Activity Zone (CAZ) is discussed in paragraph 2.6.11 of the Core Strategy and promotes office (Bl) and mixed use developments in these areas. My client would not support office (Bl) development in the Primary Retail Frontage area were it to replace existing retail businesses. However, Bl uses outside the Primary Retail Frontage can complement existing retail businesses of the area, and this would be supported.

I also draw to your attention that the Primary Retail Frontage areas can be eroded by the promotion of night time economy uses in the area, which is promoted on page 9 of the Angel Town Centre Strategy (ATCS) adopted in 2004. This SPD is still current. It is referred to in the Core Strategy in paragraph 2.6.4. The ATCS specifically refers to 32-64 Chapel Market and 28 - 94 White Lion Street as a possible retail redevelopment area to meet demand for standard or larger retail shop units. My client does not support this proposal. It should be reviewed and not carried forward as part of the Core Strategy. The ATCS document is now out of date. It was adopted in 2004, at a time of credit expansion. It needs to be revaluated in the setting of the current economic downturn.

To summarise, there is no case for any radical redevelopment proposals in the Chapel Market area. Furthermore, the Council should discourage the incremental erosion of retail units in this area through the promotion of quasi retail or non-retail uses. Any such proposals undermine the Primary Retail Frontage designation of the Chapel Marker area, and should not be supported in the Core Strategy.
Consultee ID: 303700
Consultee Name: Yann Jones
Organisation: Market Road Residents Association
Agent ID:
Agent Name:
Organisation:
Core Strategy Section no: 2.7
Core Strategy Section Name: King's Cross
Para/policy/map/table: 2.7.6
Schedule of Changes Ref:

Comments: 2.7.6 reads 'market road can offer business services ...'. Surely this is a mistake and should read Brewery Road or Blundel Road. Market road is recreational and residential and should remain so. Why hasn't this been changed, as it was pointed out after the last draft.
Consultee ID: 449844
Consultee Name: Nigel Gansell
Agent ID:
Agent Name:
Organisation:
Core Strategy Section no: 2.7
Core Strategy Section Name: King's Cross
Para/policy/map/table: 2.7.6

Comments: Spatial Strategy for Kings Cross 2.7.6 Improvements to Caledonian Road - very welcome. But the road lacks cycle paths linking the borough with Kings Cross. Kings Cross at present is a scatter gun of bars and restaurants. How will the overall development of Kings Cross benefit LB of Islington in economic and environment terms? How many local jobs will be created in the King X area benefiting local people.
Change of land use: from industrial light industry to office led jobs strategy. Is this a wide direction in light of the current empty office use and a planned reduction in office staff generally.

How about a manual trades area situated within the confines of LB of Islington. Concentrating in arts and crafts, glass making, T shirts, especially in readiness of the Olympics.

Option: the future exploration of Information and Communications Technology within the borough. How is this initiative raised recently by the London Assembly being explored. How will this be promoted within the boroughs Core Strategy.
Consultee ID: 463577

Consultee Name: Ian Sandford

Organisation: NHS Islington

Agent ID:

Agent Name:

Organisation:

Core Strategy Section no: 2.8

Core Strategy Section Name: Bunhill and Clerkenwell


Schedule of Changes Ref: Strategic Policy 7 - Bunhill and Clerkenwell, Page 46.

Comments: Thank you for contacting NHS Islington regarding further changes to Core Strategy. The comments in this response relate only to the Further changes to Core Strategy proposed submission (Pre-submission changes 2) document dated June 2010. Overall, NHS Islington believes that the changes to the Core Strategy are likely to have a positive effect on health and health inequalities. For example, the addition of the reference to overcrowded family homes in paragraph 3.3.12 and the focus on a wide range of dwelling types, affordable homes tenures and family sized homes (Strategic Policy 7, page 46) underline the link between housing need and health and wellbeing.
In addition it is recommended that the document is altered to make reference to Secured by Design principles. A new point should be added to Policy 9 to state the following:

• All new development should be constructed in line with Secured by Design principles. Secured by Design principles are recognised by the MPA/MPS as providing good guidance for the development of safe and secure developments, consequently reducing the opportunity for crime and contributing to a safe and secure environment. This would mean the Core Strategy reflects government guidance as required by PPS12, paragraph 4.52 in order to ensure a 'sound' Core Strategy.
Islington has some of London’s most unique historic buildings and conservation areas and as such Berkeley Homes generally support the thrust of Policy 9, however, we hold reservations over aspects of the proposed submission; namely 9(F). Policy 9(F) seeks that new homes provide dual-aspect units. Berkeley Homes on any given London scheme look to consult the Metropolitan Police guidance ‘Designing Out Crime’ which clearly states deck access apartments are considered unsuitable. Access via a central core, in regard apartments, is as such considered best practice. Our first contention is that the policy does not adequately make clear between whether this is something you require on all new homes or if it is merely an aspiration. In practice a 100% dual aspect policy will severely limit density and also result in inefficient costly buildings. Consequently, in order to meet the requisite densities set out in Core Strategy, build heights will have to be maximised - conflicting with townscape and heritage policies. The overall general effect of such a demand would stifle housing delivery considerably. Our view is that a policy that looks to increase dual aspects homes is appropriate subject to site constraints. However such an aspiration is very difficult to deliver in policy terms due to constraints of certain sites especially in central London preventing all but a small provision of dual aspect units. For a policy to be sound it must be ‘deliverable’ and ‘flexible’ as required by PPS12 (para 4.52).
We therefore consider Policy 9(f) should be reworded to express support for dual aspect units where the site characteristics and constraints allow.
Consultee ID: 178744

Consultee Name: Nick Bishop  
Organisation: English Heritage

Agent ID:  
Agent Name:  
Organisation:

Core Strategy Section no: 3.1  
Core Strategy Section Name: Heritage and Urban Design

Para/policy/map/table: Policy 9: Protecting and Enhancing Islington’s Built and Historic Environment

Schedule of Changes Ref: Protecting and enhancing Islington's built and historic environment, page 54.

Comments: Thank you for your letter dated 8 July 2010 seeking our views on the above document. Following our previous input into the development of the Core Strategy we welcome the further changes proposed, particularly regarding policy 8, paragraph G regarding Islington’s built and historic environment
Consultee ID: 449844
Consultee Name: Nigel Gansell
Organisation: Agent Name: 
Agent ID: 
Organisation: 
Core Strategy Section no: 3.1 Core Strategy Section Name: Heritage and Urban Design

Para/policy/map/table: Policy 9: Protecting and Enhancing Islington's Built and Historic Environment

Schedule of Changes Ref:

Comments: Fire safety in tall buildings (re aftermath of fires at high rise estates in Camberwell and more recently in Kingston). Question: are there any plans for all high rise dwellings in LB of Islington to be thoroughly examined and for fire safety measures to be improved or amended when thought necessary? The report Fire Safety in Tall and Timber Framed Buildings in London presented to the Planning and Housing Committee, London Assembly on 8 June 2010 has been noted.

Further noted that recommendations to the Mayor and London Plan (revised) will include suggestions to Local Goverment, housing authorities and social landlords regarding existing building and fire safety regulations. Focus has been placed on the following: Improved fire safety measures and systems; more research on fire spread; better guidance in the risk assessment for residents; a review of fire safety regulations.

Question: can all the above be incorporated into the LB of Islington Core Strategy and has a full fire risks and prevention of fire survey been completed and undertaken by LB of Islington.
Comments: Views of the Greater London Authority - Mayor/s concerns: 3.6. The absence of an explicit policy for Tall Buildings. I share the concerns for tall buildings cropping up all over London without any clear strategic planning policy regarding their situation in particular to the existing character of old buildings. A case in point would be erection of Angel House at the Angel an entirely glass building which does not remotely fit in with the character of the Angel existing buildings i.e. Co-operative bank and building opposite facing east. Another case which does not relate to Islington but the neighbouring borough of Camden relates to the new Central St Giles tall blocks scheme which now over shadows the St Giles Church. 

Question to Planning Inspector: what is the design policy of the Greater London Authority, the London Plan. 

Question to Planning Inspector - who actually are the co-ordinators or Local Plans 

Question: why are local people being left out of the design procedures process. Why has the policy of local plans for local people been dormant for so long?
Consultee ID: 345144

Consultee Name: Jack Widdup

Agent ID:

Agent Name:

Organisation: Berkeley Homes

Core Strategy Section no: 3.2

Core Strategy Section Name: Sustainability

Para/policy/map/table: Policy 10: Looking after the environment and tackling climate change

Schedule of Changes Ref:

Comments: For the third year running, Berkeley Group has been named the country’s top sustainable developer in The NextGeneration league. We were also recently awarded the Queen’s Award for Enterprise for our contributions to Sustainable Development. As such we fully support the Council’s progressive policies in relation to combating climate change. However we have a number of reservations regarding the practical application of your policies.

It is anticipated in October 2010 that the new Part L & SAP will be introduced identifying a need for residential development to reduce carbon emissions by 25% against a 2006 BRE compliant dwelling. As a firm we are concerned, due to the cost implications of such insulation, especially in light of the current state of the economy, that its introduction will have significant ramifications on scheme viability. However Council policy looks for 40% reductions against a 2006 compliant building or 50% if connected to a Decentralised Energy network. Given that the most significant energy efficiencies are within insulation we are unsure whether such a policy, on current technologies, is technically and economically feasible.

Purely on technical grounds the policy is excessive. Measures to help achieve these standards such as smaller windows have implications on outlook, residential amenity, and design and heritage. Other costly measures such as triple glazing have significant
affects on viability. Essentially, to reach the 40% reduction outlined, in our view it is necessary to have a large scale private wire network. Latest legal opinion questions the legality of such networks due to problems associated with consumer choice. The Borough need carefully consider this when imposing a policy that far surpasses the emerging Building Regulations – standards that have been subject to onerous scrutinising. In relation to the soundness of Policy 10 it would seem more justified and effective if the Core Strategy just expressed a commitment to the prevailing national regulations and standards.

Whilst we welcome that the policy is subject to financial viability, it is felt, as suggested in our representations against Policy CS1 of your Issues and Options stage Core Strategy, that in accordance with New Policy 4A.2ii ‘Mitigating Climate Change’ in the Draft Further Alterations to the London Plan, targets should be introduced over a set timeframe and not take immediate effect as outlined in Policy 10.

Within Policy 10 you indicate that s.106 payments will be required to contribute to the development of Decentralised Energy Networks, including those capable of connection to networks in close proximity. We are concerned that such a policy will run foul of the test contained within Annex B of Circular 05/2005. For schemes that are able to connect to an existing DE network we query why a contribution for developing new Networks could be relevant. For those that are not located near a DE network there is real concern that such an obligation would not be relevant to planning. If a proposal offers reduction in carbon reduction of say 40%, it will adhere to your proposed policy. As such any contribution demanded of it in relation to a DE network would not be relevant to its planning or in making it acceptable in planning terms. We would also contend that infrastructure costs such as these are only really relevant to the largest of regeneration projects, as the proposed infrastructure only works on a large scale. Accordingly blanket contributions towards DE networks are unlikely to relate in ‘scale and kind’ to the majority of schemes. Regardless of the legality of such a contribution, the levels are likely to be such as to affect viability substantially. As such if the Council were to progress the policy, it would need to be subject to financial viability whilst taking account all the site specific circumstances.

Within Policy 10 is a requirement that all remaining C02 costs associated with the development are offset through a financial contribution. We would again contend the legality of such a contribution on the basis of Circular 2005/05. It is difficult to envisage how the Council are intending to assign the proceeds of the payments to help mitigate climate change. Without a clear strategy of how such money is intended to be spent it would be difficult to see how such a payment is directly related to development. Furthermore, without the policy being subject to financial viability, the logic of such a payment is questionable. If the site specific circumstances prove that on a financial viability assessment a scheme cannot meet a 40% reduction in Carbon Dioxide emissions,
considering your policy as worded does not allow it to be subject to further viability testing, it would attract a bumper contribution for offsetting its remaining Carbon Dioxide emissions. This is clearly unsatisfactory.

For the Core Strategy to be sound, on the basis of PPS12, the policies must be justified and effective. Considering the points that are made above it is our assertion that the Policy 10 has the potential of failing the a test of ‘soundness’ and consequently needs review.
Comments: It is proposed to amend the affordable housing policy on the following basis: V) “delivering an affordable housing tenure split of 60% 70% social housing and 40% 30% intermediate housing’ Whilst we support the principle of securing affordable housing as part of new developments, we object to the current wording of the policy. Instead the policy framework for the provision of affordable housing should be worded to allow for viability testing to be undertaken to determine the actual level and type of affordable housing to be provided on a site by site basis. This in turn would not threaten the viability of development and restrict the ability of sites to come forward in accordance with Circular 05/05.
In relation to Draft Policy 12 'Meeting the housing challenge' it is noted that the Council are now proposing to deliver an affordable housing tenure split of 70% social rent and 30% intermediate housing, rather than the 60%/40% split which was previously proposed. RMG object to this proposed change, which is contrary to Policy 3.12 of the Draft Replacement London Plan. Policy 3.12 seeks an overall provision of 60% social rent and 40% intermediate housing and this approach would provide a more balanced mix of housing tenure. We note that the Council's evidence base for the LDF would support a 60/40% split and it is therefore suggested that the policy should be revised to reflect this approach.
We write in response to your consultation on proposed changes to Islington's Core Strategy, and would be obliged if this note including attachment could be forwarded directly to the Planning Inspector as stated in the email we received 08 July 2010, in addition to any other response the Council might wish to make. Our primary concern is that the issues we raised in your previous consultation have not been addressed, neither have we received an explanation as to why. You will recall our meeting 1st December 2009 to informally discuss concerns we had with the proposed policy wording on student accommodation and other issues. As a result of that meeting we wrote (copy attached for reference) further clarifying why we believe that the policy as worded is unnecessarily restrictive and would undermine the University's ability to provide safe access to good quality student rooms near our core activities at Northampton Square - on land already in that use and in University ownership 5 minutes' walk away. In our meeting it had been suggested that some wording alterations might be possible that would acknowledge this somewhat unique fact without weakening the overall thrust of the emerging policy.

It remains our opinion that the policy wording refers to an arbitrary line drawn around our Northampton Square buildings, which has never been discussed with anyone and which fails to acknowledge the clear fact that our Finsbury Hall site is already in the use which the policy seeks to restrict. Islington Council has in the past expressed in principle support for the redevelopment of this site.
(and has confirmed it will include it as part of the Site Specific Allocations document), which is the last of our residences to be transferred to private operation as part of our strategic aim to focus on our core business of teaching, learning and research. We continue to see strong demand for rooms, have proportionately less provision than other London universities, and consider that the sensible redevelopment of this particular site will address our shortfall.

The implication of the policy as currently worded is that the University would only be allowed to develop student accommodation within the area you have designated, however this is contrary to the Planning Brief worked up in partnership between LB Islington and City University and approved at South Area Committee September 2009. At no point in any of the discussions had we proposed to develop student accommodation on those sites, which are needed for core business activities including an urgent need to create general student study and social space plus other measures necessary to help mitigate some of the impacts of the University on the adjoining residential areas. Constructing new student residences in that location would increase the impact of the University at Northampton Square and inhibit the University's ability to develop and expand our teaching and learning facilities. We have no issue with the Council's overall objective to preserve sites in order to achieve a more well balanced housing delivery programme. Indeed, any proposals to increase the density of accommodation on established student residential sites will assist LB Islington in protecting other sites in the borough for residential use. We feel that our reasonable objections to the proposed policy wording deserve proper consideration and therefore request both a formal response to our stated objections and that our comments are brought to the attention of the Planning Inspector in the lead up to the Examination in Public.
Paragraph 3.3.8 and Policy 12(E) state that the Core Strategy will aim to ensure, in future, that an adequate mix of dwelling sizes are delivered within new development. The policy does not however further elucidate the precise parameters as regards a prescribed dwelling mix, nor as our representation on Policy CS18 of November 2008 suggested indicate whether this will apply to private as well as affordable homes.

Berkeley Homes do not contest that the Council is best placed to provide an opinion on the affordable housing needs within its Borough. However we strongly object to Policy that dictates the required dwelling mix of private homes. The price of a given property type is dictated by supply and demand. Private developers provide a mix of private dwellings according to their own research on localised demand. Intervention and restrictions to a market, such as one that prescribes a dwelling mix on private homes, prevents the efficient allocation of resources and leads to market failure. If imposed such a policy will create false supply levels and in the medium to long term significantly affect price levels and in-turn viability across the Borough.

Your policy indicates that the Borough will demand all new and converted units in Islington adhere with the space standards within the Mayor’s draft Housing Design Guide July 2009. The size and specification of private housing is a function of the market. If a
purchaser regards a property at a given price too small they will not buy it. Equally if a property is overpriced for its bed designation due to onerous size requirements, purchasers will look elsewhere. So the instigation of a policy that prohibits a private enterprise from reacting to the requirements of its customer will cause market failure - preventing the efficient allocation of resources, further exasperating problems of affordability faced by first time buyers.

Much in the same way as described above, Berkeley Homes resist any moves in Policy that dictate the product a developer can provide. Furthermore, it is unlikely that conversions will be able to accord with both this policy and PPS5. For such reasons, it is therefore suggested that the policy position of the Mayor’s draft Housing Design Guide is replicated within your Core Strategy.
Consultee ID: 370177
Consultee Name: Colin Gibbons
Organisation: Development Planning Services
Agent ID:
Agent Name:
Organisation:
Core Strategy Section no: 3.3
Core Strategy Section Name: Housing
Schedule of Changes Ref: Policy 12 - Meeting the housing challenge. Page 78.
Comments: Policy 12 G (V). We consider that the proportion of social to intermediate housing should remain in the ratio of 60/40. There is danger of creating an imbalance by the change to the proposed ratio which would not be constructive for social cohesion.
Comments: As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. As noted in the Mayor's response dated 19 March 2010, it has been confirmed that that most of the policies throughout the Core Strategy (incorporating proposed changes to submission document) are consistent with the London Plan. The main change of relevance to the London Plan concerns the required tenure split for affordable housing. The Core Strategy is proposing a tenure split for all new affordable housing of 70% social rented and 30% intermediate housing. This complies with policy 3A.9 of the London Plan, but it is noted that the emerging guidance within policy 3.12 of the draft replacement London Plan sets a 60:40 target. Islington's approach should therefore be clearly demonstrated by its evidence base and reference is made to Islington Council’s Affordable Housing Viability Study (July 2009) and Housing Needs Study (May 2008). This is acceptable.
Consultee ID: 449844

Consultee Name: Nigel Gansell

Agent ID:

Agent Name:

Organisation:

Core Strategy Section no: 3.3

Core Strategy Section Name: Housing

Para/policy/map/table:

Schedule of Changes Ref:

Comments: Key issues: More affordable housing in the borough. Surely there should also be a cross London pan local authority approach to more affordable housing the capital, especially in the light of the report The Future of Affordable Housing in London circulated to the Panning and Housing Committee of the London Assembly on 22 June 2010. The Homes and Communities Agency says the "outlook for funding affordable housing is deteriorating with a reduction over the next five years of capital investment from £49.5 billion to £23 billion in 2014/15. " If these calculations are correct this would have massive impact of the dreams of LB of Islington to build more affordable housing.
Comments: 2.6.11 page 70 - Affordable homes to be encouraged. Could affordable be better explained within the document/core strategy. Is affordable relating to social housing only or combination of social and private housing? Affordable means many things to many people. Should there not be a separation between public sector affordable and private sector rents and home owners?
Comments: Islington cultural strategy and action plan: Framework of cultural development in the borough (2010-2015), 3.4 Olympics 2012. Providing a variety of training and employment opportunities for local people. How? This is plainly not evident at the present time. The Olympics Delivery Authority (ODA) have their own Business Plan for the Olympics site both during and post Olympics. Announcement of 70,000 volunteers to be used during the games does not explain whether the volunteers will get paid for their efforts or received at least some pocket money.

Both the ODA and the Olympics legacy company have made extremely clear their policy for both land, environment, jobs etc in the report: Investigation of the legacy of the olympic park venues, circulated to the Economic Development, Cultural Sport and Tourism Committee on 8 June 2010.

Ownership of various Olympics venues are orchestrated between the ODA and the Olympic park legacy company and lee valley regional park authority.
Example: the ODA has entered an agreement to sell 50% of the units on the Olympics Village to a company called Triathlon Homes. Why is a quango being involved in selling a vital site. Surely the local authorities and council tax payees of the Olympics levy have some involvement in the post Olympics selling of vital land and assets. Where are the local planning issues here. Where is the public involvement in such a large development site has jobs, employment, leisure, environmental impact etc. Who are the Islington companies, firms, organisations currently involved in the direct marketing of the games?
Comments: Representation to Islington CS, Policy 14. Policy 14 concerns Retail and Services, with the submission document proposing two additional amendments to this policy:
1. Shopping areas that are historic and/or locally important will also be identified in SPDs and their use and character will be protected.
2. the Council will prevent the amalgamation of smaller retail units to make larger single shops
Each is responded to below:
1. Sainsbury’s Supermarkets supports the protection of character in historically and locally important areas. Policy is in place to allow for the Council to assess proposals on their relatively merits and as such to safeguard and enhance the character of existing localities. However where SPD’s are considered necessary Sainsbury’s would like to be consulted on any policy changes. Town Centres uses should comply with guidance in national planning policy, specifically that given in PPS4. Policy 14 and the proposed SPD should not unduly constrain future development in these areas which would support the vitality and viability of the Town Centre.
2. PPS 4 seeks to promote town centres making it clear that retail uses in town centres are appropriate, as long as the scale of development is appropriate to the size of the centre in which it is located. PPS4 seek to promotes competition between retailers and to enhanced consumer choice through the provision of innovative and efficient shopping (PPS4, para 10). The ongoing vitality and viability of town centres is dependent on their ability to respond to changing consumer demand and market conditions. The flexibility and adaptability of retail units is essential to ensure the ongoing vitality and viability of centres. By resisting the resizing of retail units, Policy 14 is seeking to predetermine development proposals and in doing so is restricting innovation and competition to the potential determent of existing Town Centres. Policy EC14 of PPS4 makes clear that impact assessments proposals in a Town Centre are not required for retail and leisure development which does not exceed 2,500 m sq. Furthermore policy EC16 makes clear that impact is not a consideration for retail proposals in existing centres. It is clear therefore that retail units of an appropriate size, which comply with PPS4, will not have an adverse impact on the town centre, and should not be discouraged, including through the amalgamation of units. There is no retail or policy basis to resist the amalgamation of small retail units. Preventing the amalgamation of smaller retail units contradicts Islington’s Core Strategy Policy 14, bullet point ‘C’, which encourages major retail to be located within town centres. A proposal which seeks to amalgamate retail units should be assessed on its individual merits and measured against National and Local Development Management policies having regard to other relevant policies within the LDF, highways; amenity; design for example. Recommendation - Policy relating to the prevention of the amalgamation of smaller retail unit has no policy basis and in fact contradicts Planning Policy Statement 4 which in turn deems this policy ‘unsound’. This proposed policy should be omitted from the final draft of this Core Strategy document.
Please can we submit one comment on the Submission Document on behalf of this Association. Re Policy 14: please can we suggest a rewording along the lines of:-

"Shopping areas that are historic and/or locally important will also be identified in SPDs and their use and character will be protected. Through Development Management policies, the Council will prevent the amalgamation of smaller retail units to make larger single shops and also seek to limit the excessive loss of shops to other uses or to dissimilar uses within the same use class."
Consultee ID: 449844

Consultee Name: Nigel Gansell

Agent Name:

Core Strategy Section no: 3.5

Core Strategy Section Name: Retail and Services

Para/policy/map/table: Policy 14 - Retail and Services

Schedule of Changes Ref: Policy 14 - Retail and Services, page 91

Comments: Retail and service sector - page 91. To add: to Fonthill Road, Camden Passage…Caledonian Road and need to publicise this highly desirable shopping zone. Especially stretch of road between Kings Cross and Caledonian and Barnsbury Station.
Consultee ID: 217692
Consultee Name: 
Organisation: Royal Mail Group
Agent ID: 381433
Agent Name: Ruth Beard 
Organisation: DP9
Core Strategy Section no: 3.6 
Core Strategy Section Name: Open space, play and sport.
Para/policy/map/table: Para. 3.6.12.
Comments: In relation to play space for children (p.102) it is proposed to include reference to the Mayor's recommendation of 10sq.m. of play space per child within new developments. This approach is taken from the document entitled 'Open Space Strategies: Best Practice Guidance' by the Mayor of London/CABE. Draft Policy 7.18 of the Replacement London Plan states that this document should be used as '...guidance for developing policies on the proactive creation, enhancement and management of open space'. There is no specific reference to the need to include 10sq.m. of playspace per child and such an approach should, in any event, be applied flexibly on a site by site basis, taking into account site specific constraints and the nature of any development proposals. Also, the guidance recognizes that it may be appropriate to provide some types of playspace (particularly youth provision) off site.
RMG do not object to reference to this best practice document being included within the Core Strategy, however it is considered that detailed reference to the 10sq.m. 'standard' is not necessary or appropriate within the document. We therefore suggest that the text be revised as follows; "... We shall improve access to and quality of existing play space and assess provision within new developments against the guidance provided within 'Open Space Strategies: Best Practice Guidance ' by the Mayor of London/CABE. '
Consultee ID: 463577
Consultee Name: Ian Sandford Organisation: NHS Islington
Agent ID:
Agent Name: Organisation:
Core Strategy Section no: 3.6 Core Strategy Section Name: Open space, play and sport.
Para/policy/map/table: 3.6.12
Comments: Equally welcome is the Council’s commitment to improving access to and quality of children’s play space.
Comments: Add: after "we shall improve access to and quality of existing play space the following: with participation and emphasis on the needs of place space within tower blocks and high rise estates/housing development within LB of Islington."
I write on behalf of our client the Metropolitan Police Authority/Service (MPA/MPS) with regard to the above draft document. CgMs previously submitted representations to the Core Strategy at the Issues and Options stage in October 2008, 'Direction of Travel' stage in July 2009 and Proposed Submission in November 2009 (both letters attached).

The MPA welcome the fact that their previous representations have been well received as reflected in the Submission version of the document. Having reviewed the Core Strategy, some minor alterations are required to ensure the adopted Core Strategy accurately reflects the current MPA estate strategy and will promote a safe and secure borough. The proposed alterations as set out immediately below will not have an impact on the policy direction of the Core Strategy but are proposed to provide more up to date terminology and to ensure developments in the borough are as safe and secure as possible.

It is requested that the following alterations are made to ensure that the terminology used in the adopted Core Strategy reflects that used by the MPA/MPS. It is recommended that reference to Safer Neighbourhood Teams and Safer Neighbourhood Team Bases are replaced with reference to 'neighbourhood policing teams' and 'neighbourhood policing facilities' respectively. These changes apply to sections 4.2.62 and 4.2.70.
Consultee ID: 463577

Consultee Name: Ian Sandford

Organisation: NHS Islington

Agent ID:

Agent Name:

Organisation:

Core Strategy Section no: 4.2

Core Strategy Section Name: Social and Community Infrastructure

Para/policy/map/table: 4.2.27

Schedule of Changes Ref: Children's health, page 120.

Comments: NHS Islington especially welcomes the Council’s strategic commitment to addressing the health impact of hot food takeaways as part of its strategic approach to tackling diet related health problems, including childhood obesity.
Comments: Children's health - page 120. Add - and the council strategic approach will include intensifying the programme of health and healthy foods in all local schools.
As a local resident and business owner I am very disappointed to see that the commercial property consultants for City University have managed to get their ramshackle collection of properties designated a campus. This caused much dissent in the area when raised as part of the local area plan and the responsible officer publicly conceded in the consultation document “It is acknowledged that “campus” may not be the most appropriate term to use when describing the arrangement of City University facilities.”

This creation of a supposed campus is simply a ruse to gain special advantageous planning treatment for future out-of-scale and out-of-character developments on a very sensitive site adjacent to a conservation area and spanning an important protected view, but for local residents and businesses it represents the University overshadowing us even more. They have tried, unsuccessfully, to have their draft planning brief upgraded to Supplementary Planning Document status to short cut the planning process even more and deny local people their fair say. I am completely opposed to any special treatment for City University.
Any area designated as a campus must be bounded by Spencer Street, the back of the houses in Myddleton Street, Gloucester Way, Whiskin Street, St John Street, Wycliff Street, clockwise round the northern section of Northampton Square, Ashby Street and Goswell Road.

It would be criminal to include the residential terrace of Ashby Street and the fine houses at the end of Sebastian Street in Northampton Square within the campus area and would lead to the destruction of those properties. There is huge opposition to any attempt to include Northampton Square as part of their campus. This green space is highly valued and a vital part of the public realm that City University have no right to hijack it for themselves. You will see that at best this is a runt of a campus and you may well wonder how the other half of the university premises at West Smithfield, Bath Street/Moorfields hospital, Gray’s Inn, Bunhill Row and Whitechapel (have I missed any significant sites?) fit in to this picture. The answer is that they do not and are an inconvenient truth. Though it claims it needs more capacity City University is giving up extensive premises all over the place, even literally on its doorstep like the Gloucester Building on Whiskin Street – part of the campus!!! Though it claims it needs special treatment to allow more student accommodation it has sold its halls of residence. This has contributed to the soaring of student rents in Islington in private residences to well over £200 per week.

Why does City University need more student accommodation? The answer is that 50% of students commute from outside the M25. The rest are in digs in London. How many are actually local students? – I know no local people that are students at City University. How many student places are awarded to applicants from EC1 or, broader, the Borough of Islington? How many people that work at City University are locals? I know only one – the resident Head of Security! Higher education is vitally important in the local area but it is not being made available to local people by City University. Employment is vitally important in the local area but it is not being made available to local people by City University. Community resources are vitally important in the local area but they are not being made available to local people by City University. I am aware the City University hosted a go kart programme for difficult teenagers but it strikes me that this is all they have ever done for the local area and it gets trotted out every time they are asked to be more inclusive.

Unlike the situation with other Universities we have the inconvenience of being home to City University without the benefits they imply and which we should reasonably expect for the locality.
The University could permit access through the site and over their land but like a fortress they insist they cannot as they need to maintain their “security” over the needs and desires of the community. This gated community mentality can only get worse with the award of campus status and privileged planning consideration.

Finally if I need to rant further against this sham in its own Estates Strategy 2006 document City University said: “City needs to articulate “what it is about” through its estate. There is a need to define what the estate is not (e.g. CU is an urban, spread out, non-campus University) and we need to define what we mean about creating the ‘wow’ factor in buildings. A master planning exercise will be undertaken once the corporate targets have been revisited to determine options” A few years later for convenience it suddenly becomes a campus University.
Consultee ID: 449844

Consultee Name: Nigel Gansell

Agent ID:

Agent Name:  

Organisation:  

Core Strategy Section no: 0

Core Strategy Section Name: Playing in Islington

Para/policy/map/table: 3.6.12


Question: Why is the criteria set by the London Plan and not the needs of local people only.

Question: how do the future needs of play space for children equate with the recent coalition government announcement/proposals that all planned new open space projects will be put on ice due to the economic climate?
Consultee ID: 179615

Consultee Name: Kate Calvert

Agent ID:

Agent Name:

Organisation: Better Archway Form

Organisation:

Core Strategy Section no: 0

Core Strategy Section Name: Appendix 1: Evidence Base

Para/policy/map/table: 1.0.1

Schedule of Changes Ref: Para. 1.0.3. Page 5, Para. 2.4.5 Page 28, Para 2.6.7 Page 36, Para. 2.6.10 Page 37, Para. 2.6.11 Page 37, Para 3.5.3 Page 90

Comments: We are pleased to note that references in the core strategy to the retail study 2008 have been removed following representation regarding its flaws. However, it remains in the list of evidence in the appendices. As the study was demonstrated to be flawed, it should of course not form part of the evidence base. If it is not removed it may still be referenced.

Development Management Policies.

Looking forward to future consultation on Development Management Policies, p 51 of this document shows the Archway proposed town centre boundaries. The document states that these boundaries have been developed through work with the town centre boards. However, Archway does not at present have such a board so it would be appropriate to indicate how they were drawn up in the case of Archway. We would also suggest that it would be helpful to designate a fringe area around the boundaries.

Again this document makes reference to the retail study with a description which is inconsistent with the core strategy: 6.03.
Research into retail and services in Islington have shown that there is a lack of provision of shops in the borough, particularly food retailers; and due to the compact nature of the borough there are few opportunities to provide new retail floorspace. More information on shopping in the borough can be found in the Islington Retail Study Update 2008. Unless deleted this may also be considered referenceable.
Consultee ID: 449844
Consultee Name: Nigel Gansell
Agent ID:
Agent Name:
Organisation:
Core Strategy Section no: 
Core Strategy Section Name: Policies to be retained and removed.
Para/policy/map/table:
Schedule of Changes Ref:

Comments: 4. Appendix (policies to be removed and/or retained relating th the UDP (Unitary Development Plan). Question: is this open to interpretation or response from the general public. I would express deep concerns on reference points 1,2,3,4 and "removal of local planning enforcement and involving the community". This would be a point to be emphasised to the Planning Inspector at the forthcoming examination in September/October.

Who is planning for what? How local are local plans. Are we to examine the structures of the planning processes at both local and national level. Is this part of the Big Society highlighted by the leader of the newly formed coalition Government. Is it not time to review and/or revamp the whole planning process and make amendments to the Town and Country Planning Act and similar planning structures contained within the planning bible. A bible conceived mostly by middle class planning minds in conjunction with architects of merit and note creating a saraband of glass balletic structures planted/erected at a non stop rate on an ever dispairing public!

Question: Has now the UDP has been relegated to the dustbin of history and supplemented by the Core Strategy masquerading as New Britain completed with glass domes and tilted windmills of glass and steel.
Comments: 
1. a. Map reading exercise: changes to Islington proposals map makes for interesting reading once the core strategy is adopted. Question: Why has the UDP (Unitary Development Plan) been usurped by the Core Strategy. Was the UDP usurped due to updated boundaries benefiting the Mayors London Plan? I.e. strategic views replace with Mayor protected vistas. The Mayors protected vistas runs North-South through the borough.

Question: whose vision is actually encapsulated within the Core Strategy?

Question: How influential is the Core Strategy in planning terms placed before the Greater London Authority/London Assembly and Minister for the Communities.
I write on behalf of Tesco Stores Limited in relation to the London Borough of Islington Core Strategy Submission June 2010.

Since the publication of the earlier Core Strategy Submission document in December 2009, a number of key pieces of retail text have been removed from the document, specifically relating to the 2008 Retail Study undertaken by DTZ, and in particular reference to demand for additional convenience and comparison floorspace.

You will be aware that Policy EC1.4, of PPS 4 states that, when assessing the need for retail and leisure development, LPA’s should (inter alia);

a. Take account of both qualitative and quantitative need for additional floorspace for different types of retail and leisure developments;

b. When assessing quantitative need, have regard for relevant market information and economic data, including realistic assessment of;

i. Existing and forecast populations;
ii. Forecast expenditure for specific classes of goods to be sold, within the broad categories of comparison and convenience goods and for main leisure sectors (our underlining).

As such all reference to qualitative and quantitative demand has been removed from this latest Core Strategy Submission document and placed in a ‘topic paper’ which forms the evidence base for the Core Strategy. However the topic paper does not fully explain retail demand in the Borough, and merely considers the points raised in relation to Archway, resulting in the removal of all retail figures from the Core Strategy and thus the Development Plan without due consideration of other centres in the Borough.

I therefore do not consider the Core Strategy Submission June 2010 to be sound and consider that it fails to give sufficient guidance to developers and retailers in the Borough.
Comments: On behalf of my client, University College London (UCL), I write to confirm that UCL has no comments on the further proposed changes to the Islington Core Strategy Submission document. UCL submitted representations to the Islington Core Strategy Proposed Submission in December 2009. UCL reserves the right to request to appear at the Core Strategy Examination, which is expected to take place in September/October 2010 and requests to be kept informed with information about this
Consultee ID: 380832
Consultee Name: Organisation: Wm Morrison Supermarkets PLC
Agent ID: 380834
Agent Name: Organisation: Peacock and Smith
Core Strategy Section no: Core Strategy Section Name: General
Para/policy/map/table:

Schedule of Changes Ref: Para. 1.0.3. Page 5, Para. 2.4.5 Page 28, Para 2.6.7 Page 36, Para. 2.6.10 Page 37, Para. 2.6.11 Page 37, Para 3.5.3 Page 90

Comments: With reference to the above, and on behalf of our clients Wm Morrison Supermarkets plc, we write to OBJECT to some of the Further Changes to the Core Strategy (Pre-Submission Changes 2) document, dated June 2010. Further details of our client's objection are provided below. Morrisons are a major food and grocery superstore retailer who operate a store in Nags Head Town Centre.

Background to Objection
Our clients note that PPS12, which provides guidance on Local Spatial Planning, sets out the nature of core strategies at Paragraph 4.1. Paragraph 4.1 states:
“Every local planning authority should produce a core strategy which includes:
1. An overall vision which sets out how the area and places within it should develop;
2. Strategic objectives for the area focussing on the key issues to be addressed;
3. A delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and
4. Clear arrangements for managing and monitoring the delivery of the strategy.”

Paragraph 4.36 of PPS12 states that:
“Core strategies must be justifiable: they must be:
• Founded on a robust and credible evidence base; and
• The most appropriate strategy when considered against reasonable alternatives”

Paragraph 4.37 of PPS12 recognises that Core Strategies have major effects and that it is therefore essential that they are based on thorough evidence. The evidence base should contain two elements relating to participation, and research/fact finding. The latter evidence should confirm that the choices made by the plan are backed up by the background facts.

Paragraph 4.52 of PPS12 refers the tests of soundness and states:
“To be ‘sound’ a core strategy should be justified, effective and consistent with national policy.”

Our clients note that the Council’s Retail Studies (the Islington Retail Study (2005) and the Islington Retail Study (2008)) form “key pieces of technical evidence” as part of the Council’s evidence base which has been used to inform the preparation of the Core Strategy. (Please see attached extract from the Council’s website printed today (18 August 2010) which confirms this).

However, our clients note that the Further Changes to the Core Strategy (Pre-Submission Changes 2) document, dated June 2010 includes a number of Changes which appear to delete all specific references to the Retail Studies from the Submission Core Strategy document (June 2010). They note that there is no explanation or justification for the proposed removal of these references in the Further Changes to the Core Strategy (Pre-Submission Changes 2) document. On this basis, the following Further Changes are considered to be unsound, because the removal of references to documents in the Council’s Submission Core Strategy does not assist in provide a Core Strategy that will include all of the necessary matters as set out in paragraph 4.1 of PPS12. Our clients object to all of the following changes Para. 1.0.3. Page 5, Para. 2.4.5 Page 28, Para 2.6.7 Page 36, Para. 2.6.10 Page 37, Para. 2.6.11 Page 37, Para 3.5.3 Page 90.

Our clients suggest that EITHER the all the changes identified above should be reversed to read as set out in the previous version of the document OR full justification for their removal, (for example, the need to undertake a more up to date Retail Study to inform the details policies and proposals in the LDF which will feature in other LDF documents), is provided.

We trust the above and enclosed are helpful, and would be grateful if you would keep us informed of the progress of the emerging Core Strategy and the provide us with details of the forthcoming Independent Examination of the document by an Independent Planning Inspector in due course.
Comments: I would like to suggest that Core Strategy reflect the recent redesignation of Bunhill Fields as Grade 1 as this has international implications for history, tourism and planning and that due consideration is given in the document to the planning implications.
Bunhill Fields has recently been listed Grade 1 in its own right - in the top 9% of all historic sites and landscapes in the UK - and 76 of the structures individually listed Grade II and above, which must be one of the highest concentrations in the country. Surprisingly, neither fact is referred to in the Council's amended document, but surely ought to be.
Consultee ID: 169659
Consultee Name: Rachel Bust
Organisation: The Coal Authority

Agent ID:
Agent Name:
Organisation:

Core Strategy Section no: 
Core Strategy Section Name: General

Para/policy/map/table:

Schedule of Changes Ref:

Comments: Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.
Comments: Thank you for consulting us on the draft submission Core Strategy. We provided comments on previous drafts of the Strategy and are encouraged to note that these have been incorporated into the document. We note that the Sustainability Appraisal has assessed that some policies (e.g. housing policies) have the potential to adversely effect open space and biodiversity gain. Natural England would welcome the opportunity to input into large-scale developments at an early stage in order to ensure that the appropriate mitigation measures are in place.
Comments: Berkeley Group Plc have a longstanding relationship with the Borough and accordingly appreciate the opportunity to comment upon the policies that will shape the Borough’s future up until 2025. However, having submitted representations on your Core Strategy Submission draft in December 2009, we are dismayed that none of our views have been assimilated into this latest draft. Whilst we have no comments on the minor text changes you propose, we would like to take this opportunity to reiterate our most serious reservations in regards your emerging policy.
Comments: We have no comments to make in regards to the Proposed Submission, Pre-Submission Changes 2. We continue to find the Core Strategy sound and support the policies within the document, in particular
Policy 10 Sustainable Design
Policy 11 Waste
Policy 15 Open Space and Green Infrastructure
In addition, we continue to consider the Core Strategy complies with the necessary legal requirements.
My wife and I have only 2 points to make on the Core Strategy:
1. That Islington Borough Council should reconsider its policy as regard to road "humps". If Islington is moving towards a 20mph speed limit than the "humps" could all go. Even if its not the not, the "humps" should be reconsidered. For example walking up Wharf Road via St Peter's Road to Essex Road there are 16 humps! I am 90 and suffer from a bad back. These "humps" are hell and ridiculously numerous. God help anybody in an ambulance with severe injuries.
2. Your document stresses the need for green spaces in the borough. Why then is it purposed to build on the site of the old primary school on the corner of Bunhill Row and Featherstone Street? This land should be amalgamated with the City of London Burial Ground and Garden. I happen to know that the City of London would be only to glad to co-operate with you in creating a larger, lovelier garden.
I continue to make 2 points (on which I have never yet received an answer). 1. If Islington is going to be made a 20mph area numerous traffic "humps" should be removed. For example between the beginning of Wharf Road and the top of St Peter's St there are 14 humps, many of them quite pointless. I am 91 and have a bad back. Going up and down the roads is painful. God help anyone with severe injuries in an ambulance. Please embark in a programme of removing "humps." 2. I have always contended, given the paucity of open spaces and playgrounds in Islington, that the primary school site one the corner of Bunhill Row and Featherstone St. should be amalgamated with the City of London Bunhill Fields which together would make an ideal recreation ground for the many council flats in the areas. I have reason to believe that the City of London would be ready to enter into negotiations on this amalgamation.
Thank you for your letter of 8 July 2010 and a thoughtful Islington's Core Strategy Plan, a very comprehensive as a future reference document and I wish only to congratulate you with brief comment on two areas.

Land Use Planning and Housing: A strategic plan is a decision about future actions; it is a method by which states, firms and local authorities can make better decisions about these actions. But when we make decisions in advance, we surrender a certain degree of manoeuvrability because the future up to 2025 is uncertain. It means crossing bridges before we come to them, shooting at the enemy before seeing the whites of their eyes. Therefore, just because a five year plan is better than a one year plan, it does not mean that a twenty year plan is better than a five year plan. While the advantages of advance decision-making increase with the period over which it is carried out, the costs also increase, therefore there is an optimum period of advance decision-making which should be taken as the planning strategy. But, the optimum period of advance decision-making, however, varies with each problem that on the horizon.

The integration of housing and planning policies is one of the 'key' elements of the corporate approach to developing housing strategy. The land use planning system interacts with development of housing policies in a number of ways: (a) in the assessment of housing need; (b) by ensuring supply of land for housing; (c) by providing the framework within which planning applications for
housing development are determined: (d) by establishing the housing design and urban environment design, technical issues, scale and location of housing development and (e) by making special provision for the development of 'affordable and social housing etc. The Housing Needs Survey and Land use Planning - in short, this section I emphasise that the Council should make use of what material they, and other housing providers in the borough which is relevant to the assessment of housing needs and stocks condition. But some gathering of new information with present changes in economic and social conditions will be necessary to do over the coming years. Good, careful planning is required to develop reliable sources of data to inform the Council's strategic planning. Over and above this empirical data, the borough planning authority and Greater London Authority (GLA) will wish to take account of their local knowledge and understanding the expectations and aspirations of the entire Londoners. Knowledge of the conditions of the local housing stock is clearly fundamental to an authority in developing its long term housing strategy to the year 2025. So where a stock survey has not been undertaken, the authority should consider setting a 'target date' for doing so. The surveys can draw on the work already in hand in the planning department on the preparation, revision and monitoring of development planning policies.

In assessing the housing needs of their area, an authority will wish to take account of the balance of different tenures, so as to meet the aspirations of those living in the area. Assessments should be appropriately disaggregated, for example by household size, ethnicity or by area. It may also be appropriate to take account of the needs of a wider area than the local authority (e.g. as reflected in mobility pressures) and the extent to which these may be met outside the authorities' own area. In making such assessment, the authority may wish to consult with representatives of the Housing Corporation, private house-builders and those engaged in the provision of accommodation in the private rented sector, and also with voluntary sector service providers. Each special needs group has distinct characteristics and there are forms of housing provision, such as sheltered housing for the elderly people, or forms of housing for people with mental health problems and students accommodation, that are supplied almost exclusively to meet their needs. Each group also needs to be carefully defined in advance of carrying a survey, to ensure that there is no overlap, e.g. between elderly disabled and the non-disabled, and to make certain that those with specific housing needs can be identified from amongst all those claiming to be part of special needs group. For example, there is no regularly used definition of disability so, in order to be as comprehensive as possible, reference is often made to Census data on all those with limiting long-standing illnesses or disabilities. This data, however, it has been found may include those who no housing special needs. Implementing an Empty Property Strategy - the Council should have mechanisms for coordination and enhancement from owners of empty homes. The authority should 'target' to bring empty properties back into use promptly. Targets might vary for different types of stock, and distinguish between properties kept empty as part of an improvement or renovation scheme or for demolition on
one hand, and 'management vacant' (which can be re-let quickly) on the other. In consultation with housing associations, authority should set time limits for responding to requests for nominations.

Allocation policy for Homelessness - under part 11 of the Housing Act 1985, authorities must provide accommodation for people under slum clearance, qualified Asylum seekers and Immigration Appeals. Great importance was attached on the importance prevention of homelessness. In thinking about how to develop policies and programmes to meet their obligations towards people who are to likely to be homeless, local authorities should consider: (a) how they can prevent homelessness, (b) how they deal with homeless applications, (c) their approach to the Homelessness Code of Guidance and (d) how their approach to their statutory duties interacts with their housing allocation policy.

Funding available to support housing programme - new proposed government 'cuts in the local authority expenditure' it is going to be difficult for all economically. As part of strategic approach, Islington should identify all likely sources of finance available, whether public or private, and other non-financial assets. The Borough should look widely and consider all other resource available on the development of planning policies and programmes for investment in local authority housing plan. Islington Borough remains a significant landlord, responsible for millions dwelling housing. In developing its housing policy programme and writing its housing strategy statements, Islington should consider the strategic framework within which investment in capital work to its own stock will take place. The strategy should take account of the most significant features of its housing stock which provide the basis of its programmes, including environment changes, location, age, manner of construction, the design of estates, past investment patterns and any other relevant features to the year 2025.

Finally the authority, in drawing its strategy should consider also associated factors which relate to investment strategies, including the inter-relationship between capital investment and revenue maintenance programmes, and how these are planned and executed in a coherent manner. The authority should also explain how their capital works programmes are related to other policies and programmes. including those for promoting home ownership. More detailed analysis underlying the authority's capital programme should be included in the programme.
Consultee ID: 378772

Consultee Name: 

Agent ID: 

Agent Name: 

Organisation: CABE

Organisation: 

Core Strategy Section no: General

Core Strategy Section Name: 

Para/policy/map/table: 

Schedule of Changes Ref: 

Comments: Thank you for consulting the Commission for Architecture and the Built Environment (CABE). Unfortunately due to limited resources, we are unable to comment on this document.
I am writing on behalf of the CTC, the national cyclists’ organisation, in Islington. Together with other cycling interest groups, we are a significant local stakeholder representing the interests cycle users in the borough. We welcome the opportunity to become involved in the preparation of the borough’s Local Development Framework and would like to be kept informed of progress. We would be grateful if you could include us on your list of targeted stakeholders to enable us to achieve more detailed involvement in the process. Please use this email address as a contact.

You may be aware that the Mayor’s Transport Strategy calls for an increase in cycle use of 400% between 2000 and 2026 in order to meet the transport needs of London’s growing population. London Cycling Campaign supports this objective although we believe it to be modest given the potential of cycling as a major future contributor to the capacity of London’s transport network.

Can you please let us know if the LDF and Core Strategy that you are developing includes:

* An overarching policy for cycling, which recognises the potential of the pedal cycle to become a major mode of transport in London. Reason: Cycling will become increasingly valuable in making a contribution to the management and modal distribution of travel demand in a city with a rapidly expanding population and limited transport resource. We understand that businesses in
London are increasingly supporting cycling as a mode that provides for reliable journeys, improved accessibility and a healthier, happier and more productive workforce.

* Cycle parking standards in line with the Mayor’s London Plan with a statement of support for exceedence of the standard, seeking to accommodate a cycling mode share of 10% in Outer London and 20% in Inner London. Reason: To comply with and recommend exceedence of the standards set out in the London Plan and to recognise the potential for growth in cycling in the Capital if sufficient resources are directed towards it and other modes reach capacity.
* A map of the borough’s streets establishing classifications of streets by social and movement function rather than movement alone, in preparation for the development of progressive associated public realm guidance. Reason: to address an objective of creating ‘successful places’ and to recognise that streets have a much wider range of functions than simply movement alone. The opportunity to invest in cycling is also an opportunity to invest in an improved public realm for all street users and to address the domination of spaces by motor traffic.
* A map showing the network of formal cycle routes including the London Cycle Network+. Reason: to direct s.106 investment towards completing a network of signposted routes with targeted facilities to assist cyclists. The map should also show other potential links including greenways, paths through parks, and so on that do not form part of the formal network.
* An overall strategy that seeks to promote hubs of cycle activity around town centres and popular destinations as recommended in the Mayor’s Transport Strategy. Reason: to integrate planning and transport policies.

On behalf of CTC I would like to respond to the LDF consultation. I have examined some parts of the core strategy and note that most regrettably, the main point under Walking and Cycling is that funding will be cut:

> “An increase in walking and cycling can be shown to have a significant impact on reducing the number of car trips made in the borough. Therefore, improvements to pedestrian and cycle routes and increasing the promotion of travel awareness will be essential for alleviating pressure on highway, rail and bus networks. However, funding for walking and cycling improvements may be reduced in 2010/11 due to TfL’s new approach to allocating funding. This appears to negate all the statements in the LDF about promoting cycle use. Investment in cycling is estimated, by Cycling England, to pay off at a rate of £3 per £1 spent so it needs to be prioritised during a time of austerity. It is also the most affordable form of transport and therefore widely accessible.

I note that the only cycling and walking project mentioned in the LDF is the Connect2 link from Finsbury to Highbury. I did not find anything about LCN+ completion, permeability (cycle access), cycle training, or cycle parking on estates – all these measures can offer exceptional value for money, as you know.
I note that policy T50 from the UDP is not mentioned or retained. This set targets for cycling of a doubling in cycle use from 1996 to 2012 and a modal share of 10%. Since Islington has undoubtedly surpassed the first target, and possibly the second, new targets should be set.

The LDF refers to the Islington Cycling Strategy which, as you know, was written several years ago and needs to be fully updated in the light of new Mayoral commitments and the continued growth of cycle use.

I note references in the LDF to cycle parking standards but have been unable to find these on the council website. I’d be grateful if you could send them to me. We would like to recommend that the LDF is linked to parking standards that provide for 15% of staff to have access to secure parking and 25% of students to have access to secure parking. We note that the standards included in the Mayor’s London Plan are six years old and we understand that they are being revised. The Mayor now has an aspiration to a 20% modal share for cycle use.
Consultee ID: 221084

Consultee Name: Jane Riches

Agent Name:

Core Strategy Section no: General

Para/policy/map/table: Protecting and enhancing Islington's built and historic environment, p70.

Schedule of Changes Ref: Protecting and enhancing Islington's built and historic environment, p70.

Comments: Please make sure that the built historic character is protected, very pleased to see it stated. Keep conservation and do not demolish (very eco unfriendly and pollution); shops, schools, industries, pubs, etc can all be kept and their character restored, even if made residential. I am delighted by the Holloway Rd upgrade of residential terrace housing next to Odeon Cinema, very well done. But I do not like the newly designed Islington schools at all, happier to retain the old ones.

I am slightly concerned with the statement 'high quality design'. Islington is full of architects and designers and they should all do conservation and quietly connect with what exists, not their desire to 'over-design'. Unfortunately they only care about showing themselves and doing 'stand-out' buildings, with self-regard. Designers should not be 'completely me', seeing themselves as leaders and designing upfront, but instead take on the influence of community, where virtually 100% want calm, same materials linking buildings, and everything visually historic.

At a recent talk I attended, about pro and anti the tower block, when tower blocks were voted about for and against, only 3 people out of c.200 in the audience voted for them, of course like all the others I am agains. This relates to an unbelievable planning system happening in a decent road at Finsbury Park of two 21 storey towers which will ruin the park and all of us who will see them. I cannot believe the quality of this design seen in p.2 Islington Tribune 9 April 10. I know that Hackney and Haringey are spoiling...
their borough edge parts of that area, but please Islington do not do it. High Victorian buildings do exist, eg; off the Strand, why not copy them, not tower blocks.

A few other things:
- The great Islington Arts Factory, known for years, is in a beautiful church and uses it well. Obviously they could not do it, but it would be terrific if the top part of the church tower could one day be upgraded by Islington since one sees and notes the building from all over the place.
- The victorian residential street Windsor Road, N7 was so improved by the Car Parking Permit but now has a huge amount of cars and heavy lorries and vans passing through even at night. Please make sure that a residential street is not for public traffic except for necessary delivery and Islington vans.
- Please make sure that London Metropolitan is instructed to give students a lesson on how to behave where they live. They are a real nuisance to many residents and do not seem to have any idea about thinking of neighbours.
- It has been stated that in Britain there are un-lawful colleges bringing in people who should not come. There are two (private?)colleges I have seen nearby, one of Seven Sisters and one on Holloway Rd, I have no idea about those in particular. But can Islington check all its non state ones to make sure they are allowed?
- Please keep as many dogs out of Islington as possible, could certainly be not allowed in your council housing. I am happy with your criticisms of dog noise and mess, and indeed all noise minimisation - very necessary.
- Make sure that no-one cycles on the pedestrian pathways, indeed upgrade everything for pedestrians, and cut down on car pollution, there seem to be more and more cars, not less - it is buses and public transport which people should use.
- If the flower baskets on Holloway road have to go due to finance, I would have to support that. Of course they are pretty and an interesting development, but over costing should not happen at present.
- More public toilets please; for instance the one near Morrisons off Holloway Rd is very useful and the only one I know. Long ago we used to have many more, and I would welcome them for the walking public.
- Yes, to have more control over the signage of shops - keep them all the same.
- No, to modernising Holloway Road tube - it is currently very well preserved and a joy to use.
Comments: The HA has reviewed the Core Strategy and has no comments on the document at this time. However, thank you for the opportunity to comment.
Comments: There are a number of extremely salient points I would wish to emphasise in the preparation of my document which I felt may be of use to you and the Planning Department of LB of Islington when preparing similar documents for summarisation and public consultation, they are as follows:

1: "Influence is the key word in your opening statement. But there are a lot of influences at work in the preparation of Local Plans. The London Plan and the Government's own influences especially in the area of Local Authority cutbacks planned for the future which will obviously influence any changes in planning expectations.

2: How "independent" will the Secretary of State for Independent Examination (Independent Planning Inspector) be in his/her adjudications? In my experience of attending a vast number of planning inquiries local interests are in general ignored or waved aside.

3. Changes to the Core Strategy Plan - copies of 1-6 I am afraid were not available for inspection at the West Area Branch Library (Bridgeman Street). Only item 2 The Core Strategy was available for inspection. It meant going to the main Central Library to carry out research on all seven documents.
4. I have raised this issue many times before on the availability of Committe Reports from LB Islington ie Housing, Social Services (even Area Planning Committees are not available) Surely this must be rectified in future.
5. From my visit to the Central Library there appeared to be no up to date version of the London Plan. I also pose the question as to whether other organisations such as Town and Country Planning, RIBA and other interested parties have produced similar documents which might help and assist the general public in deciphering the complex wordings of planning documents.
6. Interesting that your consultation period up to 19 August 2010 coincides with the Summer Holidays with schools breaking up today and the emphasis surely on parents and interested parties to concentrate on holidays, day trips at the expense of responding to planning issues.
7. Surely within this time frame it would have been possible or conceivable to hold just one public meeting at a convenient place (Town Hall, Community Centre, Branch Library) to discuss and explain the Core Strategy in more detail to the general public.
8. Planning Aid for London have been helpful in the completion of my response and perhaps in future your planning team in conjunction with PAFL could organise some sort of planning meeting or exhibition in the borough to highlight future planning aims and objectives.

In conclusion, again emphasised in previous correspondence to you, there is a drastic need for more public meetings and debates on planning issues of a local flavour. Whilst cogniscent of the drastic cuts in local authority spending I feel monies spent on the dreadful Islington Now/Life magazine would be better spent on decent planning news letters of regular content itemising the planning processes to the general public.
My response has been hindered by the sheer volume of words in the documents and tracing the latest decision making of the Greater London Authority/London Assembly on planning issues that greatly affect borough like Islington.
Consultee ID: 449844
Consultee Name: Nigel Gansell
Agent ID:
Agent Name: 
Core Strategy Section no: 
Core Strategy Section Name: General
Para/policy/map/table: 
Schedule of Changes Ref: 
Comments: Further questions to the Planning Inspector:
1. Who makes up the representation on Islington Strategic Partnership 
2. Will planned coalition Government cutbacks in local authority spending and finances impinge on Core Strategies (in planning terms).
<table>
<thead>
<tr>
<th>Consultee ID: 449844</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultee Name: Nigel Gansell</td>
</tr>
<tr>
<td>Agent ID:</td>
</tr>
<tr>
<td>Agent Name:</td>
</tr>
<tr>
<td>Core Strategy Section no:</td>
</tr>
<tr>
<td>Core Strategy Section Name: General</td>
</tr>
<tr>
<td>Para/policy/map/table:</td>
</tr>
<tr>
<td>Schedule of Changes Ref:</td>
</tr>
</tbody>
</table>

**Comments:** Screening report/draft further alterations to London Plan early 2008. Land disturbance at Olympics site - increased recreational use of certain European sites could theoretically have potential adverse impacts through erosion or disturbance. Does this have any knock on affects to possible sites being earmarked for development in LB of Islington.
Comments: Summary conclusions:
It is noted by this author that the new coalition Government will undertake radical reforms of the planning system with further changes to housing priorities. Are the plans to give more planning powers to local communities, neighbourhoods achievable. I very much doubt this within restrictions being placed on both local authorities and the communities themselves. Creating new trusts for communities and to build more homes for local people is admirable but market forces pervail at almost every level. Land and building costs equate with a scarcity of land. Much of the land across pan London Boroughs is in private hands.

The Olympics setup - totally undemocratic to local peoples needs and aspirations has shown a complete lack of foresight in the total vision post games.

The Local Development Framework is a flawed philosophy and the Planning Inspector needs to be made aware of this (he probably is already) aware of the market forces at work preventing very little/scant regard for local resources and local people. Emphasis needs to be placed on more local planning initiatives spearheaded by neighbourhood in conjunction with local councillors
and trade unionists and community activists. The time is ripe for a peoples plan for London. Spearheaded by local community
groups with views and comments from planners, architects, as an adjunct. The time is right for communities to regain much of the
powers lost to town halls, and professional classes.
Apropos my previous letter to you on 22 July 2010 I have been overtaken by events and additions I wish to make in my original response document. The additions are on separate page. Incidentally I do not remember any guidelines laid down by your department how such a response should be compiled. Should it be one proposal and amendment on the Core Strategy plan can there be additional introduction and conclusions to the planning document.

Secondly where was the real Public Participation in planning terms? I raise this vital question in relation to two planning seminars/work-shops organised by the Nottingham base charity Care and Repair (enclosed). These two seminars concentrated on the Mayors London Plan, also open for consultation and which of course impacts on any boroughs Core Strategy proposals. Again I ask the question why no such public meetings to discussion alterations to the Core Strategy up until the final conclusions submitted to the Planning Directorate/Inspector?

There have been a number of national press/media articles questioning the whole planning process - the best appearing in The Guardian recently (enclosed) which concludes provocatively maybe even apocalyptically: planning is likely to challenge the limits of localism.
From my research into both the London Plan and local planning development frameworks one aspect is clear: how dominant will the London Plan be over ny local proposals taking into consideration the Communities and Decentralisation Bill and on going changes to the planning system envisaged by the coalition Government. I had intended to produce a much wider response to Islington’s Core Strategy in special report form and as a major critique to what I consider a totally obsolete planning and consultation system! Maybe another time.

Interestingly enough the secretariat at Royal Town Planning Association recommended to me that I should not adopt this approach and merely respond to the Core Strategy. To conclude I see that the Greater London Council/London Assembly in their program for 2011 intend to organise a Planning and Community session at City Hall which I hope gets more publicity locally.

I hope my comments and enclosed further response are of interest. Perhaps you could inform me whether the report placed before the Planning Inspectorate is open to the public or held in closed session.
Consultee ID: 449844

Consultee Name: Nigel Gansell

Agent ID:

Agent Name:

Organisation:

Core Strategy Section no: Core Strategy Section Name: General

Para/policy/map/table:

Schedule of Changes Ref:

Comments: Statement of consultation - quoting from the plan "the updating of consultation in the consultation period - (July-August 2010).

Question - priority: that this type of consultation and the means of consultation was considered by this author to be poor. Based on the recent seminars organised by the Nottingham Based charity Care and Repair to ask Planning Inspector why no such public meetings were held in LB of Islington.

Question: Would it have been feasible for LB of Islington to have conceived just one public meeting on the final submission of the Core Strategy Plan. I ask this in relation to the London Plan which appears to have a much higher profile across other London Boroughs.
Consultee ID: 214724
Consultee Name: 
Organisation: Clerkenwell Green Preservation Society
Agent ID: 
Agent Name: Alan Wipperman
Organisation: Alan Wipperman and Co
Core Strategy Section no: 
Core Strategy Section Name: General
Para/policy/map/table: 
Schedule of Changes Ref: 
Comments: I refer to your letter 8 July 2010 and the Focused Changes to the Core Strategy which do not appear to reflect any of the amendments sought by the Clerkenwell Green Preservation Society Limited. Therefore the representations as previously submitted still stand and I trust will be forwarded to the Inspector as requested.
The Theatres Trust is The National Advisory Public Body for Theatres. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include ‘development involving any land on which there is a theatre.’ It was established by The Theatres Trust Act 1976 ‘to promote the better protection of theatres’. This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused.

Due to the specific nature of the Trust’s remit we are concerned with the protection and promotion of theatres and expect therefore to see policies dealing with cultural facilities.

We have no comment to make on the additional ‘focussed changes’ but object to the lack of a policy for arts, culture and entertainment as the substantial UDP Policies of R21, 22 and 23 will cease to exist when the Core Strategy is adopted and their essence has not been absorbed into the Core Strategy. There will then be no adequate guidance for cultural facilities in the Borough other than the added imperfect one line in Policy 14.
As a member of Islington Disability Network I am concerned that there is planning in all areas for good access to all homes and services for everyone in the community.

I have been asked to comment wherever I can about the health impact of the huge number of outlets selling alcohol - along the length of the Caledonian Road I have done a rough count of 14 off licences to which can be added the pubs and restaurants. Addictions of all kinds are damaging people, properties and communities.

I have been asked by young members of the community to comment on the lack of activities for young people and places where they can safely develop their own positive activities. Older people also want to be able to carry on using the centres that provide them with an escape from isolation, friends and support in times of need.

I have been asked to express concern about very poor redevelopment of older properties and their use as ‘rooms for rent’ or shared flats. There is often poor on-going management of these properties- their waste management causing health hazards to neighbours. I am concerned at the management of food waste- there is research from Germany showing that the airborne moulds...
have serious health implications for operatives and people living in the vicinity. I have been asked to comment on the dangerously uneven pavements and potholes in roads as well as lack of wheelchair access to many Tube Stations in the Borough. The buses are often so crowded that anyone not just people with disabilities cannot travel in safety. We often cannot walk in safety as people are still cycling on pavements. As a member of the Islington NHS Health Checks Steering Group I am aware that Islington and the area I live in (N7) have many health inequalities. There are also many other inequalities. Without good homes, good schools, safe places to exercise and socialize the inequalities will become greater and the cost to us all will rise. Please will you add to my previous comment
* that there have been requests for more places- allotments for use by disabled people and others with no garden so that they can grow their own vegetables.
* Children need spaces and guidance on how to grow plants.
* Because of transport problems many people will not go to local sports and exercise facilities-
  * their walking is already uncomfortable because of the lack of podiatry services and poor surfaces to walk on make many afraid to go far
* A lot of people will not travel from Angel to Archway or vice versa let alone Stratford unless an organization sets up a group which has its' own transport