

Consultation Statement

Local Plan Review

November 2018



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1 Introduction

- 1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“the Regulations”), regulation 22, requires submission of a consultation statement as part of the submission of a Development Plan Document(s) for examination.
- 1.2 Islington Council are currently reviewing the Local Plan. From 20 November 2018 to 14 January 2019, the council is consulting on Regulation 18 drafts of the following documents:
 - Strategic and Development Management policies: the principal document in the Local Plan, which sets out strategic policies to identify where and how change will happen in Islington; and detailed policies to manage development.
 - Site allocations: this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
 - Bunhill and Clerkenwell Area Action Plan (AAP): a plan for the south of the borough where significant change is expected to occur. The plan sets out spatial policies covering different parts of the area with further policies to manage development.
- 1.3 This is the third consultation exercise undertaken for the Local Plan review:
 - The Council consulted on the Local Plan: Scope of the Review document from 28 November 2016 to 27 February 2017. We also undertook a 'Call for Sites' consultation to identify future development sites for a range of uses. This consultation was the first stage in the formal plan production process.
 - From 12 February to 26 March 2018, the Council consulted on a Site Allocations Direction of Travel document, which identified over 150 sites where new housing, workspaces, shops, open spaces, or leisure and community facilities could be provided over the next 15 years.
- 1.4 Responses to these previous rounds of consultation have informed the Local Plan Regulation 18 draft (November 2018) documents.
- 1.5 The council plans to progress with consultation on Regulation 19 submission draft documents in Summer 2019.
- 1.6 This consultation statement has been produced as an iterative ‘living’ document. While it is not a formal requirement at this stage of the review process, the Council considers that it is important to demonstrate how previous comments have been considered and taken into account in the latest draft documents. A further version of this statement will be published as part of any future Regulation 19 consultation, and submitted to the Secretary of State as part of the documents required under regulation 22 of the Regulations.
- 1.7 Future versions of this statement may lead to further changes which affect changes made in response to comments received during previous rounds of consultation.

2 Local Plan: Scope of Review (November 2016)

- 2.1 This section sets out the details of the Regulation 18 consultation on the Local Plan: Scope of Review document. It provides details of when the consultation took place, who was consulted, and the consultation methods undertaken. The main issues that were raised during the consultation are summarised by policy area in Table 2.1. Information on how the draft Local Plan responds to these issues is also set out in this table.
- 2.2 The Regulation 18 consultation on the Scope of the Review document (which included a 'Call for Sites' exercise to inform a review of site allocations) ran for a period of 13 weeks between Monday 28 November 2016 and Monday 27 February 2017.
- 2.3 The consultation included the following:
- Notifications in local media (Islington Gazette and Islington Tribune).
 - Notification on the council's consultation website and on the 'Local Plan review' webpage of the council's website.
 - Over 6,000 letters and emails sent out to:
 - Individuals/organisations registered on the policy consultation database;
 - statutory consultation bodies;
 - the voluntary and community sector including TRAs; and
 - local businesses (identified using business rates information).
 - An online survey.
 - Copies of the Scope of Review document in libraries.
 - Presentations to with different local groups and stakeholders
- 2.4 In total, 36 email / letter responses were received, 60 survey responses (including partial completions) and 24 'call for sites' responses were received. These responses are summarised (by topic/policy area) in table 2.1 below.
- 2.5 All responses received have been considered as part of the plan preparation and have informed the draft Islington Local Plan, which comprises the Strategic and Development Management Policies, the Bunhill and Clerkenwell Area Action Plan and the Site Allocations (November 2018).

Table 2.1: Summary of responses to Scope of the Review consultation (November 2016) by topic/policy area

Topic	Respondents	Summary of Response	Response in Draft Local Plan
Spatial Strategy and Key Areas	GLA, London Borough of Hackney, community groups, Historic England, and various survey respondents.	<p>Continued inclusion of spatial strategies was supported by the GLA, the London Borough of Hackney and community groups.</p> <p>Historic England set out that Area Spatial Strategies should ensure a character-led approach and that evidence should demonstrate an understanding of local and historic character.</p> <p>One survey respondent set out that Clerkenwell Green should be highlighted in the Bunhill and Clerkenwell Area Spatial Strategy. Another survey respondent set out that whilst focusing the most significant growth to the Borough's seven key areas is a useful approach at a strategic level, there remain parts of the borough outside these areas that have the potential to deliver new homes and jobs. Support was set out for the idea that Area Spatial Strategies to address not just the use of buildings but also the spaces between and around buildings.</p> <p>It was suggested that key areas adopt TfL's 'Healthy Streets' standards.</p>	<p>The draft Local Plan continues to include Area Spatial Strategies for key growth areas.</p> <p>Consideration of heritage assets and conversation areas is set out in Area Spatial Strategies and throughout the draft plan.</p> <p>Clerkenwell Green is highlighted in the draft Bunhill and Clerkenwell AAP.</p> <p>Highlighting the specific strategies for the Borough's key growth area does not preclude planning applications being submitted for elsewhere in the Borough. The draft Local Plan sets out a number of policies which will apply borough-wide.</p> <p>The draft Local Plan sets out the Council's commitment to working with TfL to deliver 'Healthy Streets'.</p>
Housing	GLA, Camden and Islington Public Health, commercial property owner, Unite Group, Rentplus, community groups, various survey respondents.	<p>The Council's approach to housing delivery and 50% affordable housing target was supported by the GLA.</p> <p>Historic England set out that new housing development should be contextually appropriate and that heritage assets should be specifically</p>	<p>The draft Local Plan sets out a requirement for a minimum of 50% of total net additional conventional housing built in the Borough to be genuinely affordable.</p> <p>The draft plan sets out that all developments must be designed to be</p>

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		<p>considered in line with National Planning Policy Guidance.</p> <p>It was set out by a commercial landowner that housing policies should be flexible to encourage, rather constrain development, and that there should be an exemption from affordable housing requirements in Farringdon to make commercial development more viable.</p> <p>There was an objection to policies which restrict student housing from student housing provider Unite Group. The response asked that the Council take a more flexible approach and in doing so, consider the projected increases in student numbers.</p> <p>Rentplus requested that the definition of affordable housing be amended to include rent to buy and argued for the removal of the affordable housing tenure split, and the insertion of wording which requires affordable home ownership products, rather than intermediate housing. Other respondents highlighted potential for delivery of other housing tenures (affordable and market).</p> <p>Concern over affordability of housing and housing for middle earners was raised from a community group.</p> <p>A significant number of respondents to the survey cited affordable housing as a key issue, calling for more social rented housing. The target of 50% affordable was supported, and there was also recognition for the need for a mix of homes,</p>	<p>contextual, and must preserve or enhance heritage assets.</p> <p>The draft AAP sets out a clear priority for office space in the south of the borough. However, on sites where housing does come forward, affordable housing will still be required, given its importance to meeting housing need,</p> <p>The Draft Local Plan limits the development of student accommodation to certain locations. Significant student accommodation has been delivered over the 10-15 years and there is a greater need to prioritise conventional housing and employment growth.</p> <p>The draft Local Plan promotes genuinely affordable housing as this is the only type of housing that effectively meets housing need, and which makes best use of scarce land, Other products such as rent-to-buy will be resisted as they are not genuinely affordable.</p> <p>The 70:30 tenure split is proposed to be retained based on updated evidence. The draft plan supports London Living Rent as a suitable intermediate housing tenure, as this is let at rents affordable to those on low to moderate incomes.</p>

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		including for those on middle-incomes or not in a position to buy.	The draft plan sets out the council's approach to various housing tenures. Tenures which support the delivery of the council's objectives, and make the best use of land, are prioritised.
Employment	Co-working space provider, local business, commercial property owners and various survey respondents.	<p>The GLA set out support for the council's approach to the protection of office floorspace across the borough; and industrial uses in the Vale Royal / Brewery Road LSIS. Other respondents suggested there should be more flexibility to permit a wider range of uses within the LSIS</p> <p>Local businesses expressed concern over the ongoing loss of employment premises, particularly those which have been converted to residential use. The impact that this is having on rental values was highlighted. One business talked of having to relocate outside of the Borough, resulting in the loss of local jobs.</p> <p>A workspace provider responded by setting out that upper floors of town centres should be used for office, to support business growth.</p> <p>Several respondents including commercial property owners and workspace providers supported the growth of existing businesses and encouraged policies on flexible / hybrid space. One landowner set out support for live/ work space.</p> <p>Policies to increase provision of affordable workspace were supported.</p>	<p>The draft Local Plan seeks to protect office floorspace across the Borough, unless exceptional circumstances can be demonstrated; and prioritises provision of new space to meet projected demand.</p> <p>Industrial uses within LSIS will be protected due to their importance to the Islington and central London economy; this approach is supported by the council's updated evidence base.</p> <p>The draft Local Plan supports the development of business floorspace on upper floors of Town Centres. The draft plan strengthens the requirement for affordable workspace and also supports a mix of workspace typologies, including co-working space, is also supported</p> <p>Live/work units are not supported as they are generally used for residential purposes and do not generate significant employment.</p> <p>Whilst the Council is seeking to maximise the delivery of business floorspace, this should not be at the expense of other</p>

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		<p>Another landowner suggested that commercial office densities should be increased to meet employment floorspace targets, specifically in Farringdon, and that restrictions with regards to local views should be removed to accommodate business growth.</p> <p>Another landowner requested consideration of alternative uses, namely residential, for the Bush Industrial Estate on Station Road.</p> <p>A local resident highlighted that the mixed use nature of the Bunhill and Clerkenwell area is under threat from residential development, and requested that business uses be retained here.</p> <p>Survey respondents highlighted rising business rates as a key issue, and called for the provision of more space suitable for occupation by SMEs. It was set out that contributions from developers towards affordable workspace should be sought and that the provision of flexible co-working space should be prioritised. To support local job opportunities, respondents expressed that there should be an LBI apprenticeship scheme and the use of planning conditions to secure local jobs.</p>	<p>policy priorities such as local views, which should be protected and enhanced.</p> <p>Designated employment areas serve an important function. The introduction of non-business uses – particularly residential uses - has the potential to harm such areas, which are important in terms of serving the local economy and providing local employment.</p> <p>The Bunhill and Clerkenwell AAP seeks to protect and promote the development of the business floorspace in the area.</p> <p>Business rates is matter outside of control planning. Draft Local Plan policies will continue to secure jobs and training opportunities from new development, in order to secure local jobs.</p>
Retail, Culture and Services	GLA, Camden and Islington Health, Historic England, community groups, and various survey respondents.	<p>There was broad support for the approach set out in the Scope of Review document, in relation to retail, culture and services. The majority of respondents agreed that shops should be protected.</p> <p>The GLA set out that the Local Plan should encourage the intensification of uses within town centres, through higher density, housing-led mixed</p>	<p>The draft Local Plan will continue to protect shops across the Borough.</p> <p>The draft Local Plan identifies town centres as the focal point for commercial, cultural and civic activity. The night time economy is also supported in Town Centres</p>

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		<p>use development. Retail and evening economy uses were supported.</p> <p>Camden and Islington Health supported the ongoing protection of dispersed shops and raised concerns around changing nature of retail, and impact this has on the reduction of social interaction. Support for local shops was also set out by local residents. Other survey respondents set out that shops should meet the needs of local people. There was a preference for independent shops and cafes, rather than high street chains.</p> <p>Historic England highlighted that town centres often contain a wealth of heritage assets and that opportunities here should ensure the heritage interest is capitalised upon, as a contribution towards the vitality and viability of the town centre.</p> <p>One community group argued that the evening economy should be limited as it contributes to anti-social behaviour. Conversely, one local business thought policies should encourage the evening economy, provided it is well managed.</p> <p>One respondent called for the continued protection of Camden Passage – a shopping area specialising in antiques – and restrictions on food and alcohol outlets here.</p> <p>Prioritising improvements to the public realm and pedestrian / cycle networks was a key theme in relation to how the Council can support town</p>	<p>The draft plan seeks to protect shops and cafés/restaurants located outside of designated Town Centres and Local Shopping Areas.</p> <p>The draft Local Plan recognises the heritage value of town centres.</p> <p>Proposals for new night time economy uses (which incorporates evening economy) are supported, subject to ensuring the proposed use complements existing uses and there would not be significant adverse impacts on amenity or function, particularly for residents.</p> <p>Camden Passage specialist shopping area will be strongly protected.</p> <p>Area Spatial Strategies (which cover all of Islington’s Town Centres) identify public realm / transport improvements for Town Centres. Active frontages are promoted.</p> <p>The Council’s Licensing Team and licensing policy is separate to the Planning Department and planning policies. However, the council’s licensing team should be consulted on any planning application which proposes a licensable activity.</p> <p>The Council acknowledges that the nature of retail is changing. To ensure that Town</p>

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		<p>centres. Continued support for active frontages and smaller retail units was expressed.</p> <p>One respondent called for a stricter approach to managing the opening of new licensed premises, particularly in Clerkenwell.</p> <p>In response to a question around the changing the nature of retail, for example, the growth of the online shopping, the majority of respondents called for more delivery collection points in town centres, so as to limit the increased number of delivery vehicles on the road, and their impact on congestion and air quality. Some respondents advised that the town centres should be the focus for a mix of uses that do not operate online, such as bakeries, restaurants, pharmacies etc.</p> <p>Many respondents to the survey highlighted the need to protect pubs and live music venues, and supported the provision of such uses. One respondent expressed that there should be no more bars in Archway, whereas another wanted to see a more peaceful café culture with fewer drinking establishments.</p> <p>One respondent advocated for new hotels in the CAZ.</p>	<p>Centres continue to be viable the Council has taken a more flexible approach to land use here. For example, Primary Shopping Areas will be the focus for A1 uses, whereas the remainder of the Town Centre will be appropriate for a range of uses, including A1-A5, D2 and Sui Generis main Town Centre uses.</p> <p>The draft plan resists the redevelopment, demolition and change of use pubs. The Archway Area Spatial Strategy states that night-time economy uses will only be supported where adverse amenity impacts are prevented/mitigated, particularly in relation to uses which intend to serve alcohol.</p> <p>The draft Plan limits the location of hotels to specifically allocated sites, to protect land for more priority uses, particularly higher density employment uses such as offices.</p>
Social Infrastructure	GLA, Camden and Islington Health, community groups, and London Borough of Hackney and	<p>Respondents were generally supportive of the approach set out in the Scope of Review document.</p> <p>The GLA welcomed recognition of the need for evidence which substantiates the pressure on social</p>	<p>The site of Moorfields Eye Hospital is located within the Central Activities Zone (CAZ) and the City Fringe Opportunity Area. It is also located in close proximity to the cluster of new business</p>

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	various survey respondents.	<p>infrastructure and supported the retention of Moorfields Eye Hospital in Central London. The response set out that if the site was to be redeveloped, it would be appropriate for mixed use redevelopment, including residential.</p> <p>The London Borough of Hackney responded by setting out support for the approach and highlighted that development close to the borough boundary should have regard to the potential impact on community facilities in Hackney.</p> <p>The majority of survey respondents set out that community facilities should be protected, and in some cases consolidated, to make better use of space. Some respondents suggested that new facilities should provide easy access for the disabled and the elderly, and should be designed to promote sustainable transport and active lifestyles / healthy living.</p>	<p>developments in the wider Tech City area. The site represents a unique opportunity to provide a very significant amount of additional business floorspace which would enable the expansion of this internationally important concentration of tech businesses. The development of business uses here will also contribute towards meeting the Borough's requirement for an additional 400,000 sqm of business floorspace, up to 2036.</p> <p>The draft plan will, in some circumstances, require major developments to provide new social infrastructure, in order to mitigate impacts on local services (which are not limited to borough boundaries).</p> <p>The draft plan supports proposals to provide new and/or extended facilities. It seeks to resist the loss of such facilities unless it can be demonstrated it is not required, or is part of a rationalisation programme. All developments are required to promote active means of travel and are to be designed inclusively.</p>
Design	Community groups, Historic England, Camden and Islington Health, Sport England, London Borough of Hackney and	<p>One community group set out that new housing provision should not happen indefinitely and without enormous care</p> <p>There was a mixed response on the topic of tall buildings. Some respondents were supportive of tall buildings, provided they were designed well,</p>	<p>The Council agrees that proposals for new development must be carefully considered.</p> <p>The draft Local Plan identifies specific sites where tall buildings may be appropriate in principle. These locations</p>

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	<p>commercial property owner, workspace provider, Environment agency, and various survey respondents.</p>	<p>whereas others were opposed due to their potential impact on the character of the Borough. Other respondents set out they would be supportive, provided that they provided affordable housing, cycle storage and necessary local services. One community group considered that tall and mid-rise buildings would be inappropriate, whereas a workspace provider supported taller buildings due to the role they could play in meeting the Borough's need for housing and employment space.</p> <p>Historic England supported the contextual approach to delivering good design and a plan-led approach that enables the delivery of high density, without compromising or harming the significance of heritage assets, including through exploring the concept of mid-rise development. It was set out that the Local Plan provides an opportunity to get a better understanding of when tall buildings are necessary, potentially through a sequential approach that looks at alternative forms of building typologies.</p> <p>Camden and Islington Public Health set out that design should not only consider the design of buildings and use of materials but should also be about how development links to the whole environment and addresses complex issues such as pollution and lack of open space.</p> <p>Sport England recommended that the principles of Active Design are specifically incorporated into the Local Plan.</p>	<p>were identified in a detailed Tall Buildings Study, commissioned by the Council. The draft plan requires all tall building proposals in these locations to meet detailed criteria set out in the draft building heights policy.</p> <p>The draft plan requires developments to be designed contextually. The draft policy recognises that although tall buildings can help make the best use of land, by optimising the amount of development on a site, they can also have significant adverse impacts. As such, tall buildings will be restricted to certain locations and will be managed carefully through appropriate design. Mid-rise development highlights that most development is expected to be accommodated in mid-rise development of 8-10 storeys.</p> <p>The draft Local Plan considers development on the whole, not just in relation to specific buildings; developments to be contextual, connected, sustainable, and inclusive.</p> <p>The Draft Local Plan promotes healthy lifestyles through good urban design and promoting active travel.</p> <p>Local views maintain important views of St. Paul's Cathedral and other significant local landmarks. These views are</p>

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		<p>One commercial property owner set out that local views are restrictive and that the Council should identify locations where additional development, at higher densities, could be located.</p> <p>The London Borough of Hackney welcomed joint working on potential cross-boundary implications with regard to tall buildings.</p> <p>One community group raised concern about the impact of new policies on existing conservation areas and how new development may impact the character conservation areas.</p> <p>An approach to basements in line with existing SPD was supported. It was requested that the Local Plan cross-references the Basements SPD. The principles of the SPD were supported and it was set out that in general, basement development should be restricted, particularly in conservation areas.</p> <p>The potential health impacts in relation to tall buildings were raised by Camden and Islington Public Health. The use of sustainable energy sources and materials was highlighted as being important.</p> <p>The Environment Agency set out that design policies should consider requirements for reducing surface water flood risk, adapting to climate change, using water resources efficiently and improving water quality.</p>	<p>important and will be maintained in the draft Local Plan and development should take all reasonable steps to enhance such views.</p> <p>The Council will continue to work the London Borough of Hackney on cross-boundary matters.</p> <p>Throughout the draft Local Plan, the importance of conservation areas is highlighted. Area Spatial Strategies and specific policies require development proposals to preserve and enhance conservation areas.</p> <p>The draft Local Plan includes a specific policy on basement development and sets out that it will only be permitted in certain circumstances, where it can be demonstrated that no harm will be caused. The existing SPD is referred to for further guidance.</p> <p>All major developments are required to consider whether any health impacts may arise from the development. A full Health Impact Assessment may then be required in line with draft Policy SC3. The plan sets out a number of sustainable design policies that would apply to applications for tall buildings.</p>

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		<p>Survey respondents raised the importance of high quality design and inclusive design. A number of respondents raised the issue of the importance of amenity space within residential developments. It was set out that developers should make improvements to the public realm and provide open space as part of their proposals.</p>	<p>The draft Local Plan includes policies which seek to reduce the risk of surface water flooding, minimise the contribution of development in Islington to climate change and adapt an integrated approach to water management.</p> <p>The importance of inclusive design is embedded throughout the draft Local Plan. This is also supplemented by the Inclusive Design SPD. Draft Policy H5 – private outdoor space – requires that all new residential development and conversions will be required to provide private outdoor space. All developments will continue to be required to consider improvements to the public realm.</p>
Transport	GLA, TfL, Camden and Islington Public Health, community groups, and various survey respondents.	<p>The GLA and TfL set out support for the Council's decision to proactively discourage car use and encouraging car-free development. The majority of survey respondents set out support for the continued inclusion of policies which promote walking and cycling, and for car-free development.</p> <p>It was recommended that the Local Plan should have regard to the Mayor's Transport Strategy. Various measures to promote sustainable transport choices were referenced.</p> <p>Camden and Islington Public Health advised that the Council should work closely with TfL to realise opportunities to encourage walking; identify walking and cycling routes; link local cycle routes with London-wide cycle routes.</p>	<p>The Mayor's Transport Strategy has been considered in the development of transport policies. The Council is committed to working in partnership with TfL to deliver the aspirations on healthy streets/liveable neighbourhoods; and borough-level improvements to public transport, the public realm and cycling infrastructure.</p> <p>The Council recognises that motorised road transport generates congestion, pollution, noise and can compromise road safety for other uses, as such the Council is maintaining its current approach to car-free development.</p>

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		<p>There was also support for car-free development from a community group. They also expressed that improvements for cyclists should not be prioritised, particularly with regard to the improvements to Highbury Corner.</p> <p>Another community group set out strong support for policies which encourage both walking and cycling above other modes of transport. It was recommended that policies should set out that developments should be permeable and create walking routes. It was also set out that car parks should be allocated for housing.</p> <p>The London Borough of Hackney set out support for the approach to sustainable transport, including emphasis on car-free development.</p> <p>The Environment Agency set out that given the main source of air pollution is frequently transport, it is expected that relevant Local Plan policies reference and link with the Council's Borough Air Quality Action Plan and the Mayor's Air Quality and Transport Strategies.</p>	<p>All development proposals are required to promote journeys by physically active means, including walking and cycling. The redevelopment of existing car parks for different uses is strongly encouraged.</p> <p>The Council notes support from the London Borough of Hackney.</p> <p>As above, the Council promotes sustainable transport and recognises the links with air quality. The draft Local Plan also includes a specific policy on air quality.</p>
Sustainability	GLA, Environment Agency, Thames Water, Historic England, Camden and Islington Public Health, community groups and various survey respondents.	The GLA set out support for the Council's continued focus on zero carbon. Addressing the urban heat island effect and increasing the amount of green space are two policy areas that are relevant to Islington, the Council's focus on these is supported. Several survey respondents also set out support for this.	<p>The Council notes support from the GLA. The draft Local Plan promotes zero carbon development, with the aim that all buildings in Islington will be zero carbon by 2050.</p> <p>The draft Local Plan sets out a strategic approach to green infrastructure</p>

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		<p>The Environment Agency set out that the key environmental issues for Islington relate to air quality, water quality, and water resources, 'local' flood risk, including surface water flooding, and green infrastructure. It was recommended that the Local Plan has strong flood risk policy and a flood risk or 'water management' policy which requires developments to aim to achieve a reduction of surface water runoff to greenfield runoff rates and maximise the use of Sustainable Drainage Systems (SUDS). It was recommended that the Council brings forward, reviews and strengthens the water efficiency target for non-residential developments.</p> <p>There was recognition that existing Local Plan sustainability standards are quite strong, with regards to adapting to climate change, maximising use of existing building material and re-using on site, reducing waste.</p> <p>Thames Water requested the inclusion of a new policy that sets out that permission will only be granted for developments which increase the demand for off-site service infrastructure where sufficient capacity already exists, or extra capacity can be provided in time. Thames Water set out recognition of the environmental and economic benefits of Sustainable Drainage Systems (SUDS) but set out that SUDS are not appropriate for use in all areas. The inclusion of a paragraph on surface water drainage was requested. In relation to water conservation, Thames Water set out support for the mains water consumption target of 110 litres per</p>	<p>The draft Local Plan positively addresses the key environmental issues highlighted in the response. There are specific policies on air quality, flood risk management, integrated water management and sustainable drainage. Draft Policy S9 requires that all developments must demonstrate that appropriate Sustainable Urban Drainage Systems (SUDS) have been implemented in accordance with the drainage hierarchy to ensure that surface water runoff rates and volumes entering open space are predictable and water at the surface is clean and safe.</p> <p>The draft Local Plan includes a policy on water infrastructure to ensure that sufficient capacity exists to cater for proposed development. The water consumption target is included in policy for residential development. SUDS is promoted in line with criteria and best practice.</p> <p>The draft Local Plan includes various policies relating to sustainability and conservation. The Council will ensure a balanced approach is taken when applying such policies, as detailed in policy DH1.</p>

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		<p>head, per day, as set out in Planning Practice Guidance.</p> <p>Historic England set out that policies on sustainability issues should take a balanced approach so they do not conflict with the objectives on conserving and enhancing the historic environment.</p> <p>Camden and Islington Public Health set out the importance of sustainable growth and highlighted the need to consider renewable energy technologies and decentralised energy to make the transition to low carbon buildings. Several survey respondents also set out support for the Council's approach on encouraging renewable energy.</p> <p>One community group raised concerns about pollution and air quality. Whereas another community group set out that the Council should undertake another round of tree planting to reduce pollution and maximise air quality.</p>	<p>Draft Policy S1 – delivering sustainable design – states that all development proposals must follow the energy hierarchy, which requires maximising energy efficiency measures firstly, but could also include generating, storing and using renewable energy on-site where justified.</p> <p>The draft Local Plan includes a specific policy on air quality which requires that new developments must not cause new exceedances of legal air quality standards. Urban greening is encouraged.</p>
Heath and Open Space		<p>The GLA welcomed the Council's attention to addressing health and health inequalities, and advised that research undertaken by the GLA into the concept of the 'Greenspace Factor' may be useful in formulating policies.</p> <p>The Environment Agency set out that given the Borough has a low proportion of open space and green space, it is important that new developments are required to maximise green space and green infrastructure on site or make suitable provision elsewhere. Protecting and enhancing biodiversity</p>	<p>The Council notes support from the GLA. The urban greening factor is referenced in the strategic green infrastructure policy.</p> <p>New developments are required to maximise green space and green infrastructure. Biodiversity will continue to be protected and enhanced throughout the Borough. The draft Local Plan recognises the importance of connectivity between habitats and highlights the Regent's Canal as an important wildlife</p>

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		<p>should be considered throughout the Local Plan even where there are few designated sites of habitat or conservation value. It was set out that a green buffer zone along the Regents Canal needs to be a policy requirement and will provide a valuable green network for wildlife, contributing to Water Framework Directive objectives.</p> <p>Historic England requested that the heritage interest of open space is recognised and embedded in policy.</p> <p>Camden and Islington Public Health set out that open space, and green walls and roofs, should be promoted. In response to question about how green infrastructure in the Borough can be maximised, numerous survey respondents highlighted green roofs, green walls and tree planting.</p> <p>Sport England raised concerns about the evidence base and advised that policies relating to indoor and outdoor sports provision, such as leisure centres and playing fields, should be based on Sport England's policy of protect, enhance and provide, and should be informed by up-to-date and robust Playing Pitch and Built Facility Strategies.</p> <p>The London Borough of Hackney set out support and advised that they will be taking a similar approach to health and protection of open space.</p> <p>Survey respondents set out that in order to promote good health through the built environment, active travel, social integration, improved access to</p>	<p>corridor. The canal is a designated Site of Importance of Nature Conservation and planning permission will not be granted here for any schemes that adversely affect biodiversity.</p> <p>Draft Policy DH1 identifies the importance of all heritage assets, including historic parks and gardens, and London Squares.</p> <p>Green roofs and green walls are supported within the draft Local Plan.</p> <p>The council is undertaking a sports facilities study to inform the draft Local Plan. The scope of the study has been discussed with Sport England.</p> <p>The Council notes support from the London Borough of Hackney.</p> <p>Active travel and improving quality and access to green space is promoted throughout the draft Plan.</p>

Topic	Respondents	Summary of Response	Response in Draft Local Plan
		<p>greenspace and reducing traffic congestion should be promoted.</p>	
<p>Finsbury Local Plan (now referred to Bunhill and Clerkenwell AAP)</p>		<p>The GLA supported the proposal to keep the Finsbury Local Plan (now Bunhill and Clerkenwell AAP) as a separate document, provided there is appropriate cross-referencing. It was advised that particular attention should be paid to the area around Farringdon, due to the expectation that it will be subject to further development pressure and capacity given Crossrail. It was recommended that the Council works in close cooperation with Camden and the City to maximise potential in the area.</p> <p>Community groups also recognised that the south of the Borough is an important part of the Borough and agreed that the area warrants its own plan. There was consensus from survey respondents on this.</p> <p>One resident raised concern about the loss of business space and the encroachment of residential space in the area.</p> <p>Historic England supported the development of detailed policy for this area and recommended that the Council ensures that evidence and details of the policies produced regarding the historic environment are proportionate.</p> <p>The City of London highlighted that they are developing a cultural hub in the north of the City, adjacent to the Bunhill and Clerkenwell area, and welcomed joint working to address any relevant issues.</p>	<p>The Council notes support for the Bunhill and Clerkenwell area having its own plan. The area around Farringdon is subject to its own Area Spatial Strategy which sets out the key strategic considerations for the area, including Crossrail. The Council will continue to work with the City of London in developing policies for this area.</p> <p>The Council notes support from community groups and survey respondents on this.</p> <p>The Bunhill and Clerkenwell AAP prioritises the delivery of office floorspace in the area. The Council recognises that the area has a large and successful economy and has the potential to accommodate significant business growth.</p> <p>The Council recognises the historical importance of the Bunhill and Clerkenwell area. The requirement to conserve and enhance the area's history and heritage is embedded within the draft AAP.</p> <p>The draft AAP identifies a Cultural Quarter in Clerkenwell / Farringdon and will continue to work with the City of London on such cross-boundary matters.</p>

Topic	Respondents	Summary of Response	Response in Draft Local Plan
		<p>One commercial property owner agreed that the area should have its own plan and that the focus for the area should be commercial growth. It was set out that the policy currently places too much emphasis on local views, heritage and conservation, and that these policies are too restrictive.</p> <p>The Environment Agency set out that if that the AAP area is a part of a Critical Drainage Area, there should be consideration of policy requirements and recommendations to alleviate and reduce the risk of local surface water flooding, sewerage flooding or ground water flooding.</p>	<p>Whilst encouraging business growth in this area is a key priority, the Council considers that this should not be at the expense of local views. Protection of local views is maintained in the draft Local Plan.</p> <p>The draft AAP highlights that two of the Borough's three Critical Drainage Areas are located within the AAP area. Policies set out in the draft Local Plan apply.</p>
Site Allocations (general comments)	Historic England, Queen Mary University, commercial property owner, TfL.	<p>Historic England set out that site allocations should carefully consider and identify any potential heritage issues.</p> <p>A commercial property owner requested that the existing allocation for 50 Farringdon Road be amended to include retail and other active frontages at ground floor and basement, and office and hotel uses above.</p> <p>Further requests to amend existing allocations include Angel Gate, where it was requested that the site be allocated for an intensification of business uses alongside the provision of residential uses.</p> <p>TfL suggested that Crossrail 2 is referenced in relation to any relevant sites in Angel.</p>	<p>Site Allocations now references specific site designations and constraints, including potential heritage issues.</p> <p>Allocated sites in the CAZ which are in existing business use are considered to be appropriate for the intensification of business uses. The Council has taken a restrictive approach to new hotel development and the draft Local Plan sets out that hotel development will only be permitted on allocated sites, or sites with existing visitor accommodation uses – the draft plan no longer proposes a hotel at 50 Farringdon Road.</p> <p>The Council considers that the priority for Angel Gate is to provide office floorspace and some commercial uses with active</p>

Topic	Respondents	Summary of Response	Response in Draft Local Plan
			<p>frontages at ground, due its location within the CAZ.</p> <p>Crossrail 2 is highlighted on relevant allocations in Angel.</p>
Site Allocations ('Call for Sites')	Various landowners	A number of potential site allocations were put forward for inclusion as new allocations, with a number of responses relating to existing allocations.	<p>The majority of the sites (nearly two thirds) subject to specific responses have been taken forward as allocations in the draft Local Plan.</p> <p>Some sites were not taken forward as allocations, as they were unsuitable for development or were not considered to warrant a specific allocation.</p>

3 Site Allocations: Direction of Travel (February 2018)

- 3.1 This section sets out the details of the Regulation 18 consultation on the Site Allocations: Direction of Travel document. It provides details of when the consultation took place, who was consulted, and the consultation methods undertaken. The main issues that were raised during the consultation are summarised by strategic locations in the borough in Table 3.2. Information on how the draft Local Plan responds to these issues is also set out in this table.
- 3.2 The Regulation 18 consultation on the Direction of Travel document ran for a period of 6 weeks between Monday 12 February and Monday 26 March 2018.
- 3.3 The consultation included the following:
- Notifications in local media (Islington Gazette and Islington Tribune).
 - Site notices at allocated sites – for larger sites, more than one notice was erected.
 - Notification on the council’s consultation website and on the ‘Local Plan review’ webpage of the council’s website.
 - Over 21,000 letters and emails sent out to:
 - those registered on the policy consultation database including statutory consultation bodies;
 - landowners (including people with a leasehold interest in sites); and
 - Residents/businesses who are in close proximity to the proposed sites (considered to be within 30 metres).
 - Copies of the Direction of Travel document in libraries.
- 3.4 In total, 375 individuals/organisations responded to the consultation. A total of 527 responses were received from these respondents (as some respondents commented on multiple sites); 500 responses were related to specific sites, whereas 27 responses were related to general matters, including suggestions for new sites, queries on previously deallocated sites, or requests to kept informed of the progress of the plan (NB: the council will ensure that all respondents who have requested to be informed of future progress are notified).
- 3.5 The 500 responses which were related to sites have been broken down by strategic location. Table 3.1 shows the number of sites consulted on and the number of responses received within each location.

Table 3.1 - Responses to Direction of Travel Consultation by Key Area

Strategic location	Number of sites consulted on	Responses received
Angel & Upper Street	17	64
Archway	10	39
Bunhill & Clerkenwell	57	142
Finsbury Park	16	45

Highbury Corner & Holloway Road	9	37
King's Cross and Pentonville Road	4	36
Nag's Head and Holloway Road	12	25
Vale Royal & Brewery Rd	9	64
Other Important Sites	18	48
Total	152	500

- 3.6 The Bunhill & Clerkenwell area, which is largest strategic location and has the most allocations, received the greatest number of responses. The Vale Royal & Brewery area includes just nine sites but received a total of 64 responses, the majority of these in relation to one proposed allocation. King's Cross & Pentonville Road and Highbury Corner & Holloway Road also received a significant number of responses relative to the number of sites consulted on, due to a significant number of responses on particular individual sites in these areas.
- 3.7 All responses received have been considered as part of the plan preparation and have informed the draft allocations in the Bunhill and Clerkenwell Area Action Plan and the Site Allocations (both November 2018).

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
Archway	Historic England, Sport England, TfL Commercial Development, community groups, commercial property owners and individuals.	<p>There were 38 responses to the 10 allocated sites in Archway. Two sites; DOT5 Archway Campus and DOT4 Whittington Hospital ancillary buildings, received the most responses, with 10 and 8 respectively. In relation to DOT5 Archway Campus, a number of responses were related to a detailed proposal which has been produced by a developer.. Some respondents set out support for allocation but objected to the developer’s proposal.</p> <p>One response to DOT4 Whittington Hospital Ancillary Buildings was concerned that the proposal would result in the loss of staff accommodation, whilst another requested that staff accommodation be run by charities as alms houses.</p> <p>Site DOT3 Archway Methodist Hall received 5 responses. One response was not directly related to development principles, rather to proposals drawn up by a developer – this response expressed concern about the height and potential impact on light and views, as well as traffic and car parking. Another respondent supported the allocation, but set out that options for future use should be community use only. Sport England set out an objection to the loss of sites/buildings that fall within the D2 Use Class.</p> <p>Four responses were received in relation to DOT9 724 Holloway Road. Three of the responses were objections based on detailed design, in relation to building height,</p>	<p>The purpose of the site allocations is to allocate sites for a particular use or development and to identify site specific constraints and designations. It is generally not appropriate to outline detailed design issues such as density, bulk and massing, as this will be determined at planning application stage based on relevant Local Plan policies.</p> <p>The allocation for Whittington Hospital includes an element of residential development. It is not possible for the plan to set out the management arrangements of any future housing.</p> <p>The allocation for Archway Methodist Hall requires refurbishment / redevelopment for the provision of a cultural hub, which includes community uses. The Council notes Sport England’s objection. It appears that SE have mistakenly identified the site as a sports facility by virtue of its D2 use; however, this site was not formerly used for sporting activities, therefore there is no basis to require sporting uses as part of the allocation</p> <p>The objections set out for 724 Holloway Road are related to detailed design. They</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>loss of daylight and sunlight, overlooking / loss of privacy, light pollution, noise, and lack of parking.</p> <p>Three responses were received in relation to DOT2 4-10 Junction Road. Support was set out for town centre uses on the basis that this will improve the town centre. One response requested that the options for future use be expanded to include residential use.</p>	<p>do not set out why the site is not unsuitable for development in principle and therefore are not considered valid reasons for removing the site.</p> <p>Support noted for 4-10 Junction Road. The site is deemed suitable for the provision of business and retail use given the commercial function of the location; residential use is not a priority for this site.</p>
Finsbury Park	Sport England, Historic England, commercial property owners and individuals.	<p>There were 45 responses to the 16 allocated sites in the Finsbury Park area. Site DOT24 Andover Estate received the most responses (18). A number of these responses were supportive of the allocation, due to the potential for the delivery of additional housing. Some responses set out suggestions which were related to detailed design, in terms of crime reduction / security, inclusive design, amenity space and quality of internal fixtures. Objections related to loss of light and privacy, however, these were related to a specific block in the estate, rather than in response to the whole allocation. There was some concern over the loss of allotment space and children's playground.</p> <p>Site DOT23 Tesco, 105-119 Stroud Green Road received eight responses. Concern was raised about the potential amenity impacts on neighbouring residential properties, particularly in relation to loss of light and privacy. There was also some support for the allocation. Representatives of Tesco set out that higher density development should be encouraged and that</p>	<p>Support for the Andover Estate allocation noted. The site has planning permission and this is reflected in the allocation.</p> <p>In relation to the Tesco site, the purpose of the Site Allocations is to identify potential uses. Detailed design issues, such as potential amenity impacts and density are addressed during the planning application process. The Council notes supportive responses for the allocation for Tesco, 105-119 Stroud Green Road. The site address has been corrected as requested. The site boundary reflects Tesco freehold as per Land Registry information.</p> <p>The allocation for the CYMA Service Station has been amended to prioritise business use, reflecting wider priorities of</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>building height should be increased. Several respondents asked that the address and boundary be amended to include sites in Tesco's ownership only.</p> <p>One response to DOT16 CYMA Service Station, 201A Seven Sisters Road requested that options for future use were broadened to include a range of uses, whereas another set out broad support for development of the site.</p> <p>Historic England request that DOT22 179 Hornsey Road, should set out the building is of heritage value and should be retained.</p> <p>Sport England objected to sites DOT12, DOT21 and DOT24 as the loss of D2 uses would be contrary to Sport England's Planning Policy and the NPPF, unless the facilities are, at the very least, replaced. Respondent suggested that DOT14 - 129-131 & 133 Fonthill Road & 13 Goodwin Street should maximise residential development as part of a mix of uses.</p> <p>There was a request to not allocate site DOT25 - 216-220 Seven Sisters Road as there are plans for the site which will be done as soon as possible.</p> <p>A respondent considered that DOT26 - Conservative Club, 1 Prah Road should be allocated for solely residential development</p>	<p>the Local Plan. General support for development of the site is noted. Nearby listed buildings have been highlighted.</p> <p>The allocation for 179 Hornsey Road sets out that development proposals should respect and retain the character and interest of the building.</p> <p>The Council notes Sport England's objection. DOT24 has planning permission, which the allocation reflects.</p> <p>DOT12 has an existing D2 yoga studio use. DOT21 is unclear about existing D2, as this refers to description of previous application; even if the site has lawful D2 permission at present, there is clearly no sports facilities currently on site. It appears that SE have mistakenly identified these site as a sports facility by virtue of D2 use; however, the sites are not formerly used for sporting activities, therefore there is no basis to require sporting uses as part of the allocation.</p> <p>DOT14 is located in a specialist commercial area. The allocation for retail-mixed use with complimentary office/workshop uses on upper floors will best align with the council's priorities for this area.</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
			<p>In relation to DOT25, imminent plans for the site are not justification to not allocate.</p> <p>1 Prah Road (formerly ref DOT26) is located in the heart of the Town Centre and is considered most appropriate for commercial uses.</p>
Nag's Head and Holloway Road	Historic England, commercial property owners and individuals.	<p>There were 25 responses relating to 8 of the 12 sites located in the Nag's Head area.</p> <p>One response to Site DOT33 Holloway Prison set out that there should be 50% affordable housing as part of any redevelopment. Another set out support for the allocation, welcoming new open space..</p> <p>Site DOT27 Morrison's Supermarket received four responses. The landowner expressed that the allocation should set out that housing should be optimised and that improvements to the public realm should be referenced; specific "more ambitious" wording was suggested. Nag's Head covered market representative supported the retention of the market with retail and office above. A representative of KFC was opposed the allocation on the grounds that the existing building is relatively modern and well-used. One respondent supported particular types of retail on the site.</p> <p>Respondent to site DOT20 Territorial Army Centre, 65-69 Parkhurst Road set out that the future use of the site should include a mix of council and key worker housing, with cadet use. Similarly, another response set out that</p>	<p>Any subsequent development proposal is required to be in line with the detailed policies as set out in the Local Plan, including in relation to affordable housing. Support for the Holloway Prison allocation is noted. Conservation Areas and heritage assets are now referenced.</p> <p>The Morrison's Supermarket allocation states that residential use may be acceptable on upper floors. Opportunities for improving the public realm and retaining the market are highlighted. It is considered that the site is currently underdeveloped and presents a significant opportunity for the delivery of new and improved floorspace, as well as much needed public realm improvements. The proposed allocation is considered to sufficiently reflect the significant development opportunity that the site presents.</p> <p>The KFC site is included to allow for more comprehensive development and</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>they would like to see a community use on site, such as a gym, nursery, or library.</p> <p>Responses were also received in relation to site DOT29 443-453 Holloway Road. These set out support for retaining the building, highlighting the potential heritage significance of other buildings on site, and support for the proposed mix of uses.</p> <p>Responses to site DOT38 Mamma Roma set out that amenity impacts in relation to privacy and overlooking should be considered. One respondent raised potential issue with site boundary.</p> <p>Response to site DOT31 - 392A and 394 Camden Road asks for changes to ownership information and address, and reference to extant permissions.</p> <p>A response to site DOT34 - 457-463 Holloway Road – supported redevelopment for residential with specific design details requested. Another response suggested employment, leisure and residential uses with a gym at ground floor.</p>	<p>maximising opportunities for permeability through the site. It's continued inclusion in the boundary is considered appropriate.</p> <p>The allocation supports enhancement of the covered market.</p> <p>With regard to specific types of retail, it is not possible to require this through an allocation.</p> <p>The Territorial Army site is allocated for residential and cadet use. It is not possible for the allocation to prescribe the type of housing that should be delivered. The surrounding Conservation Areas and heritage assets are highlighted.</p> <p>The Council notes support for the allocation for 443-445 Holloway Road.</p> <p>Regarding the Mamma Roma site, Land Registry information suggests the boundary is correct. Local Plan policy will ensure amenity of adjacent residents is protected.</p> <p>Changes to DOT31 made following response.</p> <p>Regarding DOT34, allocation promotes employment and residential uses which</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
			<p>would allow for a mix of relevant uses. Specific requested design detail is not appropriate for an allocation but it does support sympathetic development of locally listed building to address current issues.</p>
<p>Highbury Corner and Holloway Road</p>	<p>Community groups, local businesses, Historic England, commercial property owners, High Speed 1, London Metropolitan University.</p>	<p>There were 37 responses to the nine allocated sites in the Highbury Corner & Holloway Road area. The majority of responses (19) were in relation to DOT46 Highbury and Islington Station. A significant number of these responses were objections and / or concerns related to: the potential for ongoing disruption for local residents from construction; noise pollution; impact on the road network; loss of light and privacy from potential development over railway tracks; increased population causing further congestion and road safety issues, impact on character of surrounding Conservation Areas and listed buildings, and impact on wildlife habitats.</p> <p>Some respondents were neither supportive or opposed to the allocation but highlighted issues that should be considered, such as conservation and the historic environment, amendments to the boundary of the allocation, and the development of the wider area. High Speed 1 highlighted that the HS1 tunnels underneath the site may act as a constraint to future development. Historic England requested that the allocation includes wording setting out that development should: conserve and enhance nearby listed buildings; and consider the impact on the nearby Conservation Areas.</p> <p>DOT39 12, 16-18 and 24 Highbury Corner includes the Garage night club, restaurants and a former station</p>	<p>As previously stated, it is not the intention of the Site Allocations to address detailed design issues, but rather to set out potential uses / type of development. Considerations relating to sensitive design, with regard to overlooking, overshadowing and train noise, and HS1 tunnels have been included. Relevant allocations identify heritage assets and conservation areas; the Highbury and Islington Station allocation all development must comply with policies set out in the Local Plan, including in relation to conserving and enhancing heritage assets and impacting Conservation Areas.</p> <p>The allocation for the Garage night club highlights the Conservation Area and adjacent listed building under site designations and constraints. The allocation seeks to protect the existing night club. The potential for a new ticket hall has been highlighted as a possibility</p> <p>The council considers that the railway arches are eminently suitable for B1c</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>entrance. There were seven responses to this site. Two of respondents considered that the existing building is of historic significance, whilst Historic England set out the site is a sensitive site due to the Conservation Area designation and surrounding listed buildings. Other responses raised concern about potential for the existing night club to be lost; and called for the site to be considered in conjunction with surrounding sites; and argued that the focus for the site should be on the re-opening of the station entrance.</p> <p>A response to DOT44 - 45 Hornsey Road notes the site is suitable for high density development and considers that the arches should be identified for A uses. Does not agree that existing use is B8. Puts forward two site in area as potential allocations.</p> <p>London Metropolitan University responded on two sites; DOT41 166-220 Holloway Road and DOT42 236-250 Holloway Road, the responses requested that the allocations be amended to allow for student accommodation and uses that do not conflict with education uses.</p>	<p>use. No evidence has been provided to demonstrate the site is not B8. The two sites put forward are both SINCs and therefore unsuitable in principle.</p> <p>The Local Plan restricts student accommodation in order to ensure delivery of uses which are greater priority. The proposed amended wording put forward by London metropolitan University is not considered acceptable as it would undermine the objectives of the Local Plan.</p>
Angel and Upper Street	Historic England, Canal and River Trust, Crossrail 2, commercial property owners, TfL Spatial Planning, community groups, National Grid and individuals.	<p>There were 65 responses to the 17 allocated sites in the Angel and Upper Street area. All sites received at least one response and there was a fairly equal distribution of responses across all sites.</p> <p>In relation to DOT53 Sainsbury's, 31-41 Liverpool Road, the majority of responses set out suggestions on what should be included in the allocation including detailed design suggestions.</p>	The Sainsbury's site is considered appropriate for retail and business floorspace, due to its town centre location, and the increasing need for additional business space. The comment and recommended consideration from the Canal and River Trust has been incorporated. The allocation highlights the importance of permeability through the site. It is generally not appropriate to

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>One response retaining the route from Cloudesley Road to White Conduit Street and locating car parking underground to make way for landscaping.</p> <p>One response noted the suitability of retail, business and residential uses on the site and expressed concern at an allocation which favours one use over others, then subsequently set out preferred wording which favours residential use over other uses.</p> <p>The Canal and River Trust set out that allocation DOT53 should continue to include a reference setting out that any development of the site would need to consider the impact of foundations on the zone of influence around the Islington Tunnel.</p> <p>In relation to site DOT63 Angel Square, response set out support for the allocation and highlighted potential for improvement to the current building façade and significant intensification of business use. Another response called for the options for future use to be expanded to include residential.</p> <p>There was support for site DOT58 Collins Theatre, with one objection from a resident. One response noted a minor error with boundary, which includes adjacent residential properties..</p> <p>DOT54 1-7 Torrens Street, received a mix of responses were received. These included responses from Historic England, stating the building is of heritage value and</p>	<p>outline detailed design issues as this will be determined at planning application stage based on relevant Local Plan policies</p> <p>Support for the allocation for Angel Square is noted. The allocation now sets out the potential to improve the existing building façade. The site is considered suitable for the intensification of business use, rather than residential use, due to its existing business use and location in the CAZ.</p> <p>The Council notes support for the retention of the theatre use on the Collins Theatre site. Regarding the objection, the site already has permission for a theatre, which the allocation seeks to implement. The boundary has been changed based on the comment received.</p> <p>In relation to the allocation for 1-7 Torrens Street, it is considered that the site is suitable for retail, offices, cultural and community uses. Proposed uses correspond with the sites existing use and location within Angel Town Centre and the CAZ. The allocation does not claim that the existing use is a community use, but it is considered that the arts use has important benefits for the local</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>encouraging its retention; TfL Commercial Development, stating that options for future use should include residential, and from a developer stating that a variety of town centre uses should be highlighted, including retail, business, hotel and residential.</p> <p>The latter response also considered that the existing use is not a community use and that the retention of the existing buildings is unlikely; considering the site without the limitations of refurbishment will provide the maximum flexibility in terms of delivering a comprehensive scheme.</p> <p>National Grid noted that sites DOT56 - 10-14 White Lion Street, DOT57 - 1-9 White Lion Street and DOT60 - N1 Centre, Parkfield Street are in close proximity to National Grid infrastructure. National Grid prefers that buildings are not built directly above underground cables and wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.</p> <p>A response to site DOT59 - Public Carriage Office, 15 Penton Street supported intensification of employment use and limiting residential use. TfL Commercial Development considered that the allocation should allow a more substantial element of residential.</p> <p>One respondent opposes the inclusion of site DOT64 - Windsor Street Car Park.</p>	<p>community and Islington's cultural offer. Retention and refurbishment of the existing building is considered to be a priority.</p> <p>Reference to National Grid infrastructure has been included in relevant allocations.</p> <p>Site DOT59 is currently in business use and is considered to be an appropriate commercial-led site.</p> <p>The response to DOT64 offers no reasons why the site is unsuitable in principle for supported housing. Moreover, the site has planning permission.</p> <p>Sites DOT49 and DOT50 are considered eminently suitable for intensification of business floorspace, given the context of the area.</p> <p>DOT55 is considered suitable for D2 use with supporting A1/A3, due to the site history and the location in the town centre. D1 use is not a priority for this site.</p> <p>Reference to Crossrail 2 safeguarding has been included where appropriate, as well as a recommendation to engage with the Canal and River Trust.</p>

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>A response to DOT49 - Pride Court, 80-82 White Lion Street suggested that the site is suitable for a range of town centre uses and residential use.</p> <p>A response to DOT50 - Electricity substation, 84-89 White Lion St considered that suitable uses for the site include retail at ground floor level, with either residential, hotel, or student accommodation above.</p> <p>A response to DOT55 - 161-169 Essex Road suggested retaining the integrity of the existing building and improving the façade. A response from the landowner is far too restrictive in terms of the future use and should allow for D1 and D2 use with residential development in the car park to provide funding for a restoration of high quality.</p> <p>A number of the sites included responses from TfL Spatial Planning, requesting that Crossrail 2 safeguarding be highlighted, or from the Canal River Trust noting future consultation requirements and recommending early engagement.</p>	
Vale Royal/Brewery Road Locally Significant Industrial Site	Local businesses, commercial property owners and individuals.	There were 64 responses to the nine sites allocated in the Vale Royal / Brewery Road area. A significant number of these responses (57) were in relation to DOT67 Tileyard Studios. A significant proportion of these responses were from businesses who are located at Tileyard Studios. The majority were objections to the allocation on the grounds that the allocation will negatively impact the growth of existing business community. The majority of responses were not directly related to development principles, but were setting out support for Tileyard Studios as an organisation, or	It is not considered that the proposed allocation will negatively impact the growth of the existing business community. The site is located in an industrial area. Industrial uses within this area will be promoted and existing uses protected due to their importance to the Islington and central London economy; this approach is supported by the council's updated evidence base. B1c

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>detailing personal success stories from being located in the area.</p> <p>DOT65 Fayers Site received two responses which highlighted the existing poor frontage on York Way and opportunities for improved streetscape; and also considered that the site allocation should encourage the intensification of B1 use.</p> <p>DOT69 4 Brandon Road also received two responses, again citing opportunities for improved streetscape and environmental improvements, and secondly calling for the allocation to be made appropriate of a mix of uses, including residential and hotel. The second response also set out support for compact development of up to five storeys.</p> <p>DOT66 230-238 York Way, DOT71 43-45 Brewery Road and DOT72 55-61 Brewery Road each received one response highlighting opportunities for improved streetscape and environmental improvements.</p>	<p>uses offer significant scope for further expansion of Tileyard Studios</p> <p>In relation to 4 Brandon Road and the Fayers site, the intensification of B1 uses, or the introduction of non-industrial uses, such as residential and hotel uses, could compromise the economic function and future growth of the Locally Significant Industrial Location.</p> <p>In line with existing and proposed Local Plan policies, all development should consider opportunities for improving streetscape and making environmental improvements. It is not necessary to specifically highlight these requirements in the allocation.</p>
King's Cross and Pentonville Road	Historic England, individuals, Canal and River Trust, High Speed 1, community groups and individuals.	There were 36 responses to the four allocated sites in the King's Cross area. The majority of responses (25) were in relation to DOT76 Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street. Of these, 22 were objections to the allocation on the grounds that proposed development of the site would impact neighbouring residential amenity, in terms of loss of privacy / overlooking, loss of light / overshadowing, noise pollution and light pollution. A number of responses request that the council produce an urban design framework for the area. Other concerns raised were in relation to impact on the canal's heritage	The purpose of the Site Allocations is not to set the parameters for detailed design. Potential amenity impacts will be assessed at application stage. None of the objections raise issues which demonstrate that the site is unsuitable in principle. The development considerations for Regent's Wharf highlights the need for development to respect the amenity of neighbouring residential amenity. An urban design framework is not considered necessary

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
		<p>character and the biodiversity and ecology of the canal. There was one response that supported the allocation.</p> <p>Statutory consultees responses were received from the Canal and River Trust, who requested that the allocation clearly set out that early engagement with them is required, and Historic England, who requested that the Conservation Area designation is highlighted in the allocation.</p> <p>Nine responses were received in relation to DOT77 Pentonville Prison; of these, 6 were in support of the allocation, noting the opportunity for the creation of new housing and public open space. One response in support of the allocation suggested future development should incorporate community / cultural uses. Historic England welcomed the reference to a 'heritage-led redevelopment scheme and noted that specific reference should be made to the Grade II listing. The Ministry of Justice's response suggested the inclusion of other uses such as community and business.</p> <p>High Speed 1 responded to DOT74 setting out that development on the northern part of this site is unlikely in the foreseeable future, due to its function as operational railway land.</p>	<p>as the Local Plan and its supplementary guidance already has detailed design requirements. Support for the allocation noted. A requirement for early engagement with the Canal and River Trust is specified in the allocation.</p> <p>The Council notes support for the Pentonville Prison allocation. The provision of community and business uses is now required. The Council notes support for the 'heritage-led' approach; allocation now refers to Grade II listing,</p> <p>The allocation for the King's Cross Triangle site recognises that the northern part of the site is unlikely to come forward for development in the near future, but highlights that the allocation will apply, should this portion of the site be deemed surplus to requirements.</p>
Bunhill and Clerkenwell	Historic England, community groups, individuals, commercial property owners, Canal and River Trust and TfL	There were 142 responses to the sites allocated in the Bunhill & Clerkenwell area. A significant proportion of responses were received in relation to two allocations; DOT81 Finsbury Leisure Centre, which received 29 responses; and DOT127 Braithwaite House & Quaker	The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. In terms of comments in relation to detailed design, these potential issues will be addressed as part of the

Strategic Location	Respondents	Summary of Response	Response in Draft Local Plan
	Commercial Development.	<p>Court, which received 21 responses. 48 other sites received at least one response.</p> <p>A significant number of the responses to DOT81 Finsbury Leisure Centre were objections to the allocation. The main concern was related to the potential redevelopment of the sport courts, which is not formally designated as open space / open land. Other concerns raised were related to potential amenity impacts on nearby residential properties, in terms of loss of light, privacy, increased footfall, impact on views of local landmarks, and impacts on mature trees and the nearby Conservation Areas.</p> <p>The majority of responses to DOT127 Braithwaite House were objections. Respondents were concerned about the loss of amenity space, loss of car parking, increased traffic and congestion and disruption from potential construction work. There were also questions / concerns about the detailed design of any proposed development, for example fire safety and evacuation and the number and type of dwellings proposed.</p> <p>One response to DOT132 Queen Mary University, objected to the allocation in relation to the potential impact on the character of the Conservation Area, open space provision, and wildlife habitats; specific concern was expressed about increased building heights. Queen Mary University responded requesting that student accommodation be included under the options for future use, to allow for effective management of existing student accommodation on site.</p>	<p>planning application process. The nearby Conservation Area and heritage assets are highlighted as constraints and will be an important factor in any future determination. The objections raise no in principle issue that would prevent allocation of the site for the proposed uses.</p> <p>Regarding responses to the Braithwaite House allocation, , the Site Allocations cannot address the specifics of any development proposal. Its purpose is to establish potential uses and the type of development. The objections raise no in principle issue that would prevent allocation of the site for the proposed uses.</p> <p>In relation to the Queen Mary University Allocation, any subsequent planning application for the site must be in line with the Council's planning policies, including in relation to building heights, Conservation Areas, open space and wildlife / habitats. The draft plan does allow for student accommodation on sites with existing student accommodation, subject to specific criteria.</p> <p>The allocation for the Finsbury Health Centre requires the refurbishment of the existing building for healthcare purposes.</p>

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		<p>Site DOT106 Finsbury Health Centre received 5 responses. A response from the Catherine Griffiths Clerkenwell Community Tenants and Residents Association set out the importance of the health centre to the local community and requested that any future of the site preserves the building, as well as the Conservation Area. Historic England set out support the continued healthcare use of the Grade I listed building, given its history. NHS Property Services set out that the existing allocation is not sufficiently flexible and that any loss of healthcare facilities should be considered as part of a wider estate reorganisation programme.</p> <p>In response to DOT85 198-208 Old Street (petrol station), there were two responses which were not related to development principles, but rather the legal issue of 'right to light'. The landowner, Shell UK Limited, set out the proposed land uses are too prescriptive, and noted their objection to the allocation and fact that they have no plans for redevelopment.</p> <p>In response to DOT129 building adjacent to railway line and opposite 18-Farringdon Lane, TfL Commercial Development welcomed the inclusion of the site and requested the options for future use be amended to include residential.</p> <p>There was support for the retention of D1 use, more specifically as a centre for performing arts, in relation to site DOT131 Italia Conti School, 23 Goswell Road.</p> <p>DOT105 - 68-86 Farringdon Road (NCP carpark) attracted two objections related to potential impacts on</p>	<p>The Council notes support from Historic England in relation to the continued health use of the site. Proposed policies in the Draft Local Plan detail that the loss of certain community uses may be acceptable where this is part of a wider estate consolidation programmes, although the prominence of this particular use at this site warrants particular heightened protection.</p> <p>The allocation for 198-208 Old Street now references the nearby Conservation Area. 'Right to light' is a legal issue outside the planning system. Other impacts on amenity would be taken into account as part of any planning determination. The proposed uses are considered suitable and take into consideration the sites location within the CAZ.</p> <p>DOT129 has been allocated for business use, in consideration of the sites existing use and location within the CAZ. Residential use is considered unsuitable.</p> <p>The Council notes support for the inclusion of community use at the Italia Conti School site.</p> <p>Regarding DOT105, the site has planning permission, which is now reflected in the</p>

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		<p>amenity and the local community. A response from the landowner requested that the recent planning permission is reflected in the allocation.</p> <p>The Canal and River Trust, in response to sites DOT79 - City Forum and DOT121 - Central Foundation School, highlighted future consultation requirements and recommended early engagement with the trust.</p> <p>The London Fire & Emergency Planning Authority noted that the boundary for site DOT103 - Clerkenwell Fire Station was incorrect.</p> <p>DOT90 - Cass Business School received three responses, requesting an amendment to site boundary to reflect actual business school; that wording from existing allocation is reinstated; and expressing concern about potential height increases.</p> <p>A response to DOT104 - Mount Pleasant Post Office requested an amendment to the site boundary and reference that scheme has been implemented.</p> <p>Responses to DOT113 - Oliver House, 51-53 City Road noted the poor current condition of the building and expressed support for office or affordable housing on the site.</p> <p>Responses to DOT112 - Monmouth House noted error in boundary and expressed concern about negative amenity impacts of approved development on adjacent properties.</p>	<p>allocation. Any further amendments or new applications will need to accord with policies which protect local amenity.</p> <p>Recommendation to engage with the Canal and River Trust has been added to requested sites.</p> <p>Boundary for Clerkenwell Fire Station has been amended as requested.</p> <p>DOT90 boundary has been amended as per request. The original allocation has not been reinstated as the wording is already considered sufficient. Building heights will be subject to assessment against policy as part of any planning application.</p> <p>Changes to DOT104 boundary made, and reference to implementation added.</p> <p>DOT113 is considered appropriate for business use.</p> <p>DOT112 boundary has been amended. The site has planning permission; this allocation (and other plan policies) would apply to any new applications or amendments to existing scheme.</p> <p>Any applications for the Angel Gate site will need to demonstrate that impacts on</p>

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		<p>Responses to DOT107 - Angel Gate noted potential scope to intensify use of site but highlighted potential impacts on existing small businesses. The landowner supported amending the allocation to allow for significant office and residential development.</p> <p>The landowner of site DOT133 - Travis Perkins, 7 Garrett Street requested change to current use in allocation and noted aspirations for continued builders' merchant use alongside residential use.</p> <p>Objection to continued inclusion of DOT111 - 2, 4-10 Clerkenwell Road, 29-39 Goswell Rd, as respondent considers development has commenced and should be exempt from allocation.</p> <p>Comments received on site DOT117 - Triangle Estate supported delivery of some housing but objected to large-scale redevelopment. Issue with site boundary raised.</p> <p>Support for DOT116 - Finsbury Business Centre but request for amendment to boundary.</p> <p>Response from Moorfields Eye Hospital NHS Foundation Trust and University College London in relation to DOT118 - Moorfields Eye Hospital noted that the scale of the City Road site could lend itself to a variety of uses, a residential component should not be discounted given that housing is the most acute pan-London need.</p>	<p>existing businesses are mitigated/prevented. The allocation no longer proposes residential use to reflect the existing need for business uses and the emerging policy context for the area.</p> <p>Regarding DOT133, there is no evidence of SG use, therefore no change has been made. Residential use is not considered suitable. Allocation proposes intensification of business uses which would allow continued operation/expansion of current operation as well as potential additional business floorspace such as offices.</p> <p>In relation to DOT111, existing implemented permissions are not in themselves reason for not allocating a site. The council's survey information suggests permission on this site has lapsed.</p> <p>DOT117 reflects permitted application. Site boundary has been amended to reflect this permission.</p> <p>DOT116 has been amended.</p> <p>The Moorfields site is considered to be a commercial site given its location near Old Street Roundabout.</p>

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		<p>Response to DOT120 - The Pentagon, 48 Chiswell Street noted that site plan does not show correct building and supported intensification of office use, noting potential for a couple of extra storeys.</p> <p>easyHotel object to inclusion of allocation DOT123 - 80-86 Old Street (EasyHotel), but considered that any allocation should highlight suitability for intensification of commercial land uses; refurbishment of the building to support such uses, and noted that any full scale redevelopment should be for hotel or a combination of office and hotel, or office.</p> <p>Response to DOT82 - 1 Pear Tree Street requests that allocation reference existing permission with potential for intensification of business uses.</p> <p>Concern raised about DOT93 - Peabody Whitecross Estate.</p> <p>Support for DOT98 - Farringdon Place, 20 Farringdon Road; response notes possibility of improvements to façade. Respondent noted issue with identified ownership.</p> <p>Response to DOT99 - Lincoln Place, 50 Farringdon Road considers that allocation does not optimise the development potential of the site; there is a significant opportunity for new commercial office development which could be sensitively developed whilst respecting local views. The advent of Crossrail in December 2018 will provide this area with growth opportunities that should be maximised. Potential to bridge over the</p>	<p>DOT120 map has been corrected. Allocation notes suitability for intensification. Scale of any proposal would be assessed against relevant policies; it is not appropriate to identify suitability of additional storeys in allocation.</p> <p>DOT123 is conserved to be a priority office site and should be office-led. The allocation notes potential for refurbishment of hotel. Emerging hotel policy allows for intensification of existing hotels where certain criteria are met.</p> <p>DOT82 references permission and notes suitability of further intensification for business use.</p> <p>Response to DOT93 concerns permitted application, which allocation reflects.</p> <p>Support for DOT98 noted. Allocation references potential for improvements to frontage. Land Registry information suggests freehold ownership information is correct, so no change has been made.</p> <p>Regarding DOT99, the scope for development is context. Impact on local views would be assessed as part of planning application; an allocation should not set out suitability of design. Feasibility</p>

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		<p>railway and create a new public square set around new commercial development.</p>	<p>of bridging over railway not proven, hence not appropriate to include in allocation. Allocation would not preclude coming forward in future where further work undertaken and it can be demonstrated that adverse impacts were prevented/mitigated.</p>
Other Important Sites	<p>Historic England, individuals, TfL Spatial Planning, commercial property owners, local businesses, Sport England and community groups.</p>	<p>Eighteen 'other important sites' (located outside of key areas) were consulted on, of these, 16 of the sites received a total of 48 responses.</p> <p>Two of the responses to site DOT141 Highbury Delivery Office expressed that the site should be suitable for either housing and business use, or wholly housing. Another response opposed residential use and supported business use.</p> <p>There were four responses to DOT142 Legard Works, three of which supported the allocation for continued business use. One response set out opposition to any further development of the site, for either for business or residential use.</p> <p>Three responses to DOT144 500-502 Hornsey Road and Grenville Works were received. Respondents expressed concern over the potential impact on existing residential amenity and on the impact of the potential intensification of business use. Responses suggested including 500-502 Hornsey Road in boundary. One respondent suggested that suitability for residential be included where no loss of business floorspace.</p>	<p>It is considered that the Highbury Sorting Office is an employment use and therefore allocated uses should reflect this. The allocation permits an element of residential use. A wholly residential development would be inappropriate and would result in the loss of business space.</p> <p>The Council notes support for the Legard Works allocation. In response to the objection around further development, the site has been subject to a planning application, and is considered to be a suitable development site in principle.</p> <p>In response to the allocation for 500-502 Hornsey Road and Grenville Works, detailed issues around the potential impact on residential amenity will be addressed through the planning application process. Boundary change has been made. Site is considered to be an employment site; therefore, the</p>

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		<p>Support for continued business use was set out for Site DOT135 Leroy House, 436 Essex Road; DOT136 The Ivories, 6-8 Northampton Street; DOT137 Belgravia Workshops, 157-163 Marlborough Road; and DOT138, 1 Kingsland Passage. Minor rewording was suggested to remove reference to valuable employment space.</p> <p>One response to DOT139 Bush Industrial set out that the site should be allocated for a mix of uses, including business and residential.</p> <p>Responses to DOT150 Harvist Estate Car Park raised concern about the availability of car parking, property values and service charges, whereas another was concerned about the potential for increased levels of antisocial behaviour, from increased population.</p> <p>DOT149 Athenaeum Court received one objection, due to the potential amenity impact on neighbouring residential properties. Another response was supportive of the allocation, given the potential for the delivery of new homes, provided the community was fully engaged.</p> <p>Responses to DOT151 Hathersage and Besant Court and DOT152 Wedmore Estate Car Park were mixed, with some support and some objection. Support was related to the potential for new / improved open space, whereas objections were mainly related to amenity impact on neighbouring residential properties, potential disruption during construction and loss of car parking.</p>	<p>allocation does not reference residential use.</p> <p>The Council notes support for the following allocations: Leroy House, 436 Essex Road; The Ivories, 6-8 Northampton Street; Belgravia Workshops, 157-163 Marlborough Road; and 1 Kingsland Passage. Allocation wording has been amended.</p> <p>In relation to the Bush Industrial site, the introduction of non-industrial uses – particularly residential uses - has the potential to harm such areas, which are important in terms of serving the local economy and providing local employment.</p> <p>The issues raised in relation to the Harvist Estate Car park are not planning issues. Impacts on amenity will be assessed as part of any planning application.</p> <p>The Council notes support for the Athenaeum Court allocation. Potential amenity issues will be assessed through the planning application process, not through the Site Allocations plan.</p> <p>The Council notes support for the Hathersage and Besant Court and</p>

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		<p>Objection and concern raised about DOT145 - Parkview Estate, Collins Road, in relation to potential impacts on amenity and impact of construction works. One response requested amendment to boundary to exclude privately owned properties at 120-126 Highbury New Park</p> <p>Support for DOT138 - 1 Kingsland Passage. Request to include reference to suitability for D1 floorspace.</p>	<p>Wedmore Estate Car Park allocations. Regarding the objections, amenity impacts will be assessed through the planning application process. The Local Plan supports car-free development so re-provision of parking spaces is not a priority, except for disabled parking</p> <p>In relation to DOT145, site has planning permission. Boundary amendment has been made.</p> <p>Support for DOT138 noted. D1 uses are not considered a priority for DOT138.</p>
N/A – general comments; comments relating to multiple sites	Sport England, Historic England	<p>Sport England set out that additional residential development will increase demand for sports facilities which may cause a deficiency, and that new sports provision should be provided.</p> <p>Historic England requested that Conservation Areas and relevant heritage designations within and near sites are identified for relevant sites.</p>	<p>Sport England’s response is noted. The Council is undertaking a sports facilities study to inform need. The scope of the study has been discussed with Sport England and will address need across the Borough.</p> <p>Conservation Areas and heritage assets have been highlighted under site designations and constraints where relevant.</p>