In Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response

<table>
<thead>
<tr>
<th>Reg ID</th>
<th>Development Policies</th>
<th>Site reference number</th>
<th>Spatial Strategy</th>
<th>Sustainable city living and walkability</th>
<th>Respondent name</th>
<th>Respondent name</th>
<th>Respondent name</th>
<th>Respondent name</th>
<th>Respondent name</th>
<th>Summary of comments</th>
<th>Support/objection</th>
<th>ULI response</th>
</tr>
</thead>
<tbody>
<tr>
<td>0100-001</td>
<td>Site Allocations</td>
<td>BC7: Old Street 12</td>
<td>BC6: City fringe Opportunity Area</td>
<td>Respondent</td>
<td>Propose a site to change the planning character of Old Street and to provide more public space, relating this to the higher quality development character proposed in the retail portion of the site. This makes the character of the area more consistent with the urban furniture character of the area.</td>
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<tr>
<td>0100-002</td>
<td>Site Allocations</td>
<td>BC6: Hoxton Police Centre</td>
<td>BC6: Central Finsbury</td>
<td>Respondent</td>
<td>The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council’s Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the area. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.</td>
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<td>BC6: Central Finsbury</td>
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Note: The table contains summaries of comments and support/objection from respondents, along with the ULI response from the Council.
Propositions to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger proportion of the area to be zoned for housing. This aligns with the Council's desire for more housing in the area, particularly in the Finsbury Park area.

The site should be allocated for B1 office use and/or general town centre uses as there is no evidence of need for its use as a cultural hub. The site is currently earmarked for cultural use in the Long Term Plan. The site is unoccupied and has been under-used for many years.

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Support noted.

Strongly support allocation. The prison is a constant source of anti-social behaviour and is no longer fit for purpose due to its poor state of repair and overcrowding. There is a real need for more housing in the area, particularly for those on low income. New developments should be excepted in-principle here as a priority. The prison is currently unoccupied and has been under-used for many years.

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Support allocation. In-principle here has no more residents in the area than the one-mile buffer. It is a source of anti-social and criminal behaviour and is urgently required.

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Support noted.
Development Area
AUS1: Royal Bank

Landowner
The allocation supports the site's redevelopment but consider it substantially underplays the site's redevelopment potential. Suggest the site has potential for office space.

NH5: 392A
BC4: Finsbury

The allocation specifically refers to the presence of National Grid infrastructure in the development considerations and states that the site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.

Site Allocations
The building (7 Torrens Street) was at one time a multi-story stable block with specially designed stairs so that the horses could be walked on the upper floors. It is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.

Building on sports pitches is counter to Sport England's interests, and they will be lobbied by users of the pitches and leisure centers to ensure that the provision of sufficient pitches is maintained. Any proposals, which show defensive spaces and new development which will be counteractive to this. Universities are financed through significant prescribed impact and revenue streams departments are financially incentivized to control their own estates. Modern leisure centers and public open spaces should not be sacrificed on this basis.

Office floor space is an evidenced need and LBI consider the site's location near King's Cross station and the Central Activities Zone provides a strong focus for business use. The site could act as the anchor of the King's Cross development and form part of an extensive mixed-use area.

Support
The allocation envisages the refurbishment rather than redevelopment of the site with retention of the existing arts spaces.

Object
The site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.

Support
The site is crossed by, or in close proximity to, National Grid high voltage electricity transmission underground cables. On request, National Grid can provide further information to developers and must be consulted on site-specific proposals that could affect their infrastructure.

The council considers that its decision to carry the existing allocation forward into the new Local Plan is reasonable. NPPF paragraph 120 is not applicable when there is no reasonable prospect of an application coming forward. The landowner’s declaration does not preclude the development of the site during the Plan period, nor does the fact that the site has not yet come forward for development. A landlord has a vested interest in not being allocated as it restricts what can be developed on the site. If the landlord has bought the site solely for investment opportunity as claimed, the existence of the allocation places no additional burden on the operation of the site and it would not restrict, in any way, the existing use.

The council does not have a significant development need for new housing and employment. Magway is a Town Centre location and is suitable for a variety of uses. Areas of growth and housing opportunities have been identified by the borough and the site is located within the strategic growth area. There are also opportunities for developing the site and therefore the conclusion that there is no development potential would be incorrect.

The council contends that the inclusion of the site in the Local Plan will not prejudice the submission of a planning application, which will require further examination and consideration for viability.

The objectives of the local plan in relation to the site are met and a detailed site-specific proposal, which can be developed within the area identified in the plan as the Central Activities Zone, has been submitted and has been approved by the council.

The site is located within the Highbury and Holloway Local Plan area, the Local Plan Area Group Limited and Local Plan Task Force need to be consulted on the suitability of the site for development. The site offers leisure facilities and licensed premises that add to the diversity of the area, and specifically the late night economy. It could add to the commercial viability and vitality of the area. There is no need to develop the site for the purposes of development or development of adjacent properties should be protected.

The council contends that the existence of a green belt and the surrounding countryside provides a significant constraint on development. This is a long standing issue and the Unique Site report acknowledges the existing green belt and its significance.

The council contends that the site is unsuitable for multiple pitches due to the existing sports facilities in the area, as the pitches are dense and not available for use by the public. The site is unsuitable for a large park due to its proximity to the railway lines. The council also considers that the site is not suitable for a large park due to the existing sports facilities in the area. The site is unsuitable for a large park due to its proximity to the railway lines.

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Development

Suggest the allocation wording is deleted and replaced with the wording from the 2013 Site Allocation (reference HC4). Removal of The allocation should clearly state that 10 All Saints Street is three buildings - 10a, b and c - all of which are locally listed. Historic England in favour of bringing the existing building back into use but feel the proposals seek to overuse the space available, resulting in cramped, Residents consented to the scheme on the basis that it involved improvement works, not flat out development. The site

BC37: Triangle

NH6: 11-13

Permission status will be updated through modifications. Hotel development can be delivered on the site as per the terms of the extant Site Allocations

The allocation acknowledges the extant planning permission but states that if the site is subject to revised or new proposals the council

ARCH5: Archway

Respondent

The allocation is acceptable in principle. The detailed concerns of the respondent relate to proposals for the site which will be assessed as part of the planning application process. The Local Plan contains policies that protect residential amenity and support living in the borough.

BC13: Car park at

OIS15:

KC7: All Saints

Site Allocations

The representations assert that the amended allocation removes the potential of the site to achieve residential infill development. As the

Resident

The allocation is acceptable in principle. The detailed concerns of the respondent relate to proposals for the site which will be assessed as part of the planning application process. The Local Plan contains policies that protect residential amenity and support living in the borough.

R19.0053

R19.0051

R19.0049

R19.0042

Plan Document

Row

Sutton Street

29-39 Goswell

Whitbread Centre,

11 Shire House, 619-639

Athenaeum Court,

Triangle, Finsbury

B & C: Central

Opportunity Area

B & C: City Fringe

Pentonville Road

Section/policy/parag

Respondent name

Resident

Landowner

Landowner

Business

Resident

Resident

Object

Object

Not stated

Not stated

Both

Object

Object

Not stated

Not stated

Both

Object

Object

Not stated

Not stated

Both

Object

Object

Not stated

Not stated

Both

Object

Not stated

Not stated

Not stated

Not stated

Not stated

Not stated
FFI's primary concern is that the Local Plan refers to making all buildings in Islington net zero carbon by 2050. The Local Plan must reflect the 2050 carbon targets and the commitment to net zero, and therefore the Local Plan must be amended. Further, the net zero carbon target is not stated in the Local Plan as currently drafted, in referring to a 2050 rather than a 2030 net zero target, is clearly inconsistent with the Council's own motion and therefore the Local Plan must be amended. FFI highlight the climate emergency motion passed by Islington Council on 27 June 2019 and note that the Local Plan should be read as a whole; there is no need to repeat the zero carbon target in every relevant section. Paragraph 1.57 of the Local Plan does not contain the zero carbon target, so it should be inserted into the Local Plan to ensure consistency with the Climate Emergency Motion passed by Islington Council on 27 June 2019. Support: development update and support needed.

The Local Plan should be read as a whole; there is no need to repeat the zero carbon target in every relevant section. Paragraph 1.57 of the Local Plan does not contain the zero carbon target, so it should be inserted into the Local Plan to ensure consistency with the Climate Emergency Motion passed by Islington Council on 27 June 2019. Support: development update and support needed.

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The Local Plan should be read as a whole; there is no need to repeat the zero carbon target in every relevant section. Paragraph 1.57 of the Local Plan does not contain the zero carbon target, so it should be inserted into the Local Plan to ensure consistency with the Climate Emergency Motion passed by Islington Council on 27 June 2019. Support: development update and support needed.
To tackle the climate emergency, there must be a proactive rather than reactive planning system. For example, there should be street by street consultation, and it is our view that new developments or extensions of existing developments of this type should be permitted in Islington. While this may be implicitly achieved with the car free policy, we would welcome language making it explicit that new emissions-heavy developments will not be accepted in Islington. There should also be more specific environmental/energy-efﬁciency stipulations such as repair shops and toy libraries, planning is focused on use classes rather than occupiers, although we would expect such uses would beneﬁt circulatory economy principles which may lower the weight given to them as part of a planning determination.

Policy 57 provides strong requirements with regard to balancing air quality.

The Local Plan must recognise the importance of retrofitting and show a strategy for promoting it. Further, the Local Plan should set out the Council’s strategy to promote retrofitting. While we understand there are financial limitations ensuring that existing unused buildings (including homes) be used as a priority over new builds. The Local Plan should be used to fund investments to meet the zero carbon target. If we are truly in a climate emergency then this kind of obligatory carbon accounting in Islington with businesses to be made to pay a carbon tax or similar charge to create an incentive to reduce emissions.

There are currently speciﬁc targets regarding the transition although ultimately this will be driven the evolution of carbon reduction targets through updates to the Local Plan policies and the Building Regulations. For example, the recent announcement regarding the phased out of domestic fossil heating systems in new houses from 2025 will impact on this transition.

We would like to see a commitment to ﬁnding funding through whatever mechanism the Council can to kick off urban solar PV at a small scale. A potential approach is to place ﬁnancial incentives on meeting the zero carbon target to help fund the required installations.

The Local Plan promotes a circular economy approach which promotes re-use of buildings, policy 60/Policy 61 to some extent but in our view, planning is focused on use classes rather than occupiers. For example, there should be a focus on new developments or extensions of existing developments of this type should be permitted in Islington. While this may be implicitly achieved with the car free policy, we would welcome language making it explicit that new emissions-heavy developments will not be accepted in Islington. There should also be more specific environmental/energy-efﬁciency stipulations such as repair shops and toy libraries, planning is focused on use classes rather than occupiers, although we would expect such uses would benefit circulatory economy principles which may lower the weight given to them as part of a planning determination.

The Local Plan will provide any other real obligations or incentives to increase the green spaces we have in the borough or protect existing green spaces. We note Policy G6 but the language is weak. There have been limited opportunities in recent developments to develop green space, e.g. outside rights of way and greenspace stations and Thackeray square which include large expanses of planting. The Local Plan must recognize the need to further increase and protect the amount of green space in the borough. We are in favour of more appropriate requirements for urban greening/hygrothermic factors for new residential developments, the rate of recently published Islington Local Council research showing that Hydro PVT/Green roof/cooling by using green spaces should have a priority in sustainable design and there is no action in the current consultation guidelines to adapt to climate change. It states that they need to change but does not specify how they would adapt to the climate change. Stipulate in line with datastore or clause for new developments.

In summary, all policies are planned. Further information is not set out in the CIL. It is noted that policies DH1 and DH2 speciﬁcally highlight the balance between preserving heritage and maximizing opportunities to mitigate the impacts of climate change.

Policy 61: In planning any extension or change of use, a smaller minor development would be any other minor development.

Further, the Local Plan should be updated to include a carbon tax or similar charge to create an incentive to reduce emissions. The Local Plan should be used to fund investments to meet the zero carbon target. If we are truly in a climate emergency then this kind of obligatory carbon accounting in Islington with businesses to be made to pay a carbon tax or similar charge to create an incentive to reduce emissions.

Whole life carbon assessment for the built environment states that embodied energy typically amounts to between 35% and 51% of the operational energy of buildings falls, the embodied energy becomes dominant; for companies is difﬁcult, but a study for RICS cited in Policy 45 notes that for buildings the embodied energy is a low 3% to 5% of the energy over a 50 year life cycle.

If not stated, the plan does not provide any real obligations or incentives to increase the green spaces we have in the borough or protect existing green spaces. We note Policy G6 but the language is weak. There have been limited opportunities in recent developments to develop green space, e.g. outside rights of way and greenspace stations and Thackeray square which include large expanses of planting. The Local Plan must recognize the need to further increase and protect the amount of green space in the borough. We are in favour of more appropriate requirements for urban greening/hygrothermic factors for new residential developments, the rate of recently published Islington Local Council research showing that Hydro PVT/Green roof/cooling by using green spaces should have a priority in sustainable design and there is no action in the current consultation guidelines to adapt to climate change. It states that they need to change but does not specify how they would adapt to the climate change. Stipulate in line with datastore or clause for new developments.

Whole life carbon assessment for the built environment states that embodied energy typically amounts to between 35% and 51% of the operational energy of buildings falls, the embodied energy becomes dominant; for companies is difﬁcult, but a study for RICS cited in Policy 45 notes that for buildings the embodied energy is a low 3% to 5% of the energy over a 50 year life cycle.

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Development Policy T4B is too weak. In pursuit of the objectives of reducing car transport and hard surfaces there should be a policy expressly intended

Same points as Islington Society - see R19.0072

Object

Strategic and Public realm

Object

Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response

The King's Cross Baptist Church is just outside the King's Cross and Pentonville Road Spatial Strategy Area as the council are expecting the

Strategic and Road

Object

The Local Plan does not address removing parking spaces to make key roads better for cycling, for example on Hornsey Road; worryingly, Fig. 2.3 does describe parking and cycle storage, temporary use of existing under utilized parking spaces. Why are they temporary and what is the long-term plan for these parking spaces?

Policy T5: Delivery, parking and construction

Object

Policy T5: Delivery, parking and construction

Object

It is beyond the remit of the Local Plan to force removal of existing spaces. Parklets are inherently temporary structures and the policy

Strategic and

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Strategic and

Object

There should be a recognition that minor detriments to visible heritage (such as the installation of double glazing where draught proofing

Strategic and

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Object

The waste generation of basement development is not in itself relevant, unless the management/transportation of this waste would cause

Strategic and

Object

The respondent states that policy B5 is vague and doesn't address targets to achieve net zero energy building in accordance to declaration

Strategic and

Object

Represents the self-assessment of social value should be developed to give more priority to low carbon – e.g. no single use plastic, renewable

Strategic and

Object

The Council disagrees with this statement. The Local Plan has strong policies relating to Green Infrastructure and open space, including

Strategic and

Object

The respondent claims there is no mention of ‘our’ area in the plan. Request that some improvements in the area can be included to address

Strategic and

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The sections in the on conservation areas and heritage assets are very weak in relation to sustainability. Policy DH2 B/C says ‘Proposals

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Policies to address sustainability to include climate change emergency, or provide opportunities for BAME group or women.. The respondent proposes amendments to the policy.

Strategic and

Object

Paragraph 8.18 – 8.28 makes some changes in order to achieve ‘sustainability standards’ but it contains very restrictive and severe designed to discourage rather than encourage such action. This section does not mention climate change related adaptations to buildings either. This ought to be prioritised. It supports protecting heritage assets but the Local Plan must reflect the fact that we are in a climate emergency.

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An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the response.

The Council agree with the proposed amendments and will propose changes through minor modifications.

The policy should not be considered a barrier to development – the creation of industrial uses takes precedence over the creation of active frontages.

Increasing road widths would be a matter for Highways to consider.

The inclusion of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the viability topic paper.

The policy should not be considered a barrier to development – the creation of industrial uses takes precedence over the creation of active frontages.

The inclusion of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the viability topic paper.
Strategic and development management policies

Policy DH2: Heritage

The reference to interchange is welcome but in practice the interchange at Archway and Highbury Corner is more difficult and adaptable to changing requirements and circumstances over time than in the Core Strategy approach to interchange for Crossrail 2. This interchange is intended to provide for the delivery of Crossrail 2. It is not the council's position on what the actual life of a building will be.

Strategic and development management policies

Policy S10: Circular Economy and Adaptive Design

The wording change does not change the operation of the policy. It just inverts the emphasis. It still defers suitability of basements to the applicant in consultation with the Islington Society. There should be a presumption against basements. Change "The Local Plan refers to Crossrail 2 but none of its policies are predicated on it. The project does not yet have a business case let alone a funding plan. It will be a consideration for future plans if the project proceeds. The suggested metro scheme would need to be led by TfL, rather than an ever longer distance project as Crossrail 2 that will probably not be funded."

Strategic and development management policies

Policy S1: Delivering Sustainable Design

Council will only permit basement development where it is demonstrated — "For 'The Council will not permit basement development unless it can be demonstrated'..."

Strategic and development management policies

Policy S1: Delivering Sustainable Design

The wording change does not change the operation of the policy. It just inverts the emphasis. It still defers suitability of basements to the applicant in consultation with the Islington Society. There should be a presumption against basements. Recommendation: Change "The Local Plan refers to Crossrail 2 but none of its policies are predicated on it. The project does not yet have a business case let alone a funding plan. It will be a consideration for future plans if the project proceeds. The suggested metro scheme would need to be led by TfL, rather than an ever longer distance project as Crossrail 2 that will probably not be funded."

Strategic and development management policies

Policy S1: Delivering Sustainable Design

Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response

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Support noted.
There is no evidence that 10% of bedspaces in PBSA should be wheelchair accessible and thus this policy is unsound. Requirement should Justification is provided in the specialist housing topic paper. In terms of viability student accommodation was tested as part of the Local Developer Strategic and Discussion is provided in the specialist housing topic paper. The policy is justified by virtue of the amount of purpose built student Developer Strategic and Discussion is provided in the specialist housing topic paper. The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and Developer Strategic and Discussion is provided in the specialist housing topic paper. There are no specific comments on Local Plan policies in the representation. As a general point, some of the issues raised are covered by Developer Strategic and Discussion is provided in the specialist housing topic paper.

The drafted policy requires large scale HMOs to provide on-site affordable housing, with cash in lieu payments not being acceptable in Developer Strategic and Discussion is provided in the specialist housing topic paper. Unite Students is not consistent with the council's evidence. Proposes drafting policy SP3 in accordance to London Plan 65% plot ratio benchmark for Developer Strategic and Discussion is provided in the specialist housing topic paper. Policy should allow delivery of FPA on suitably located sites including allocated housing stock. Developer Strategic and Discussion is provided in the specialist housing topic paper. There is a need to evidence that 15% of BMs should be wheelchair accessible and that the policy is unusual. Requirement should not exceed 6% or not in excess of the floor with BM's experience in London is that only 0.6% of their portfolio is occupied by wheelchair users. Information provided in Appendix A of response to support this. Undertake their commitment to ensuring PBSA is available and inclusive to all, adaptations can be made based on needs of individual user as there is a lead in time prior to developer taking over in order to meet the required space standards this results in greater student bedrooms and architects, thus lower student per bedroom space can be provided. This has the knock on effect of reducing the overall supply of BM number of units and rent levels of existing stock and placing more pressure on the supply of conventional homes. Consider that 15% requirement intended to be target shortfall for older demographics, which has greater proportion of disability. Developer Strategic and Discussion is provided in the specialist housing topic paper. There is no valid planning policy reason for seeking the provision of co-living as part of new BM. There should be a requirement that the Council provides an annual monitoring report and a checklist mechanism if the money is not spent within 5 years. Also suggest that any referable applications should not include bursary requirement as it would affect suitability in combination with the affordable rent requirement. Developer Strategic and Discussion is provided in the specialist housing topic paper. Support criteria and a requirement for occupancy by students but not the restrictions on use of BMs as short term visits and occupation set out in intention. This is not consistent with the London Plan. The use of BM outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply in the property in use as BM throughout the as it is intended for student use. Use of housing in short term accommodation is particularly in situ location through the lack for example where the Council has acknowledged. Criterion of this policy should therefore be deleted. Developer Strategic and Discussion is provided in the specialist housing topic paper. Policy refers to the increase of policy seeking 5% affordable rental as a reserve in consideration to the possibility that this form of provision is not sustainable across London. Further to this the level of provision is providing the maximum viable amount of affordable student accommodation due to the lack of evidence in securing such levels of affordable student accommodation in London. Consider the policy amount and should be deleted. Developer Strategic and Discussion is provided in the specialist housing topic paper. There is no policy aligned with that proposed for the emerging London Plan. The Mayor's regulation 18 response encourages maximisation of affordable student accommodation however, the council's priority is for the provision of student bursaries, where the provision of both affordable rents and bursaries is demonstrated to be viable.

Not stated There are no specific comments on affordable housing policies in the representation. As a general point, some of the issues raised are covered by the council's evidence. Proposes drafting policy SP3 in accordance to London Plan 65% plot ratio benchmark for the provision of co-living as part of new BM. There should be a requirement that the Council provides an annual monitoring report and a checklist mechanism if the money is not spent within 5 years. Also suggest that any referable applications should not include bursary requirement as it would affect suitability in combination with the affordable rent requirement. Support criteria and a requirement for occupancy by students but not the restrictions on use of BMs as short term visits and occupation set out in intention. This is not consistent with the London Plan. The use of BM outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply in the property in use as BM throughout the as it is intended for student use. Use of housing in short term accommodation is particularly in situ location through the lack for example where the Council has acknowledged. Criterion of this policy should therefore be deleted. Support criteria and a requirement for occupancy by students but not the restrictions on use of BMs as short term visits and occupation set out in intention. This is not consistent with the London Plan. The use of BM outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply in the property in use as BM throughout the as it is intended for student use. Use of housing in short term accommodation is particularly in situ location through the lack for example where the Council has acknowledged. Criterion of this policy should therefore be deleted. Support criteria and a requirement for occupancy by students but not the restrictions on use of BMs as short term visits and occupation set out in intention. This is not consistent with the London Plan. The use of BM outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply in the property in use as BM throughout the as it is intended for student use. Use of housing in short term accommodation is particularly in situ location through the lack for example where the Council has acknowledged. Criterion of this policy should therefore be deleted. Support criteria and a requirement for occupancy by students but not the restrictions on use of BMs as short term visits and occupation set out in intention. This is not consistent with the London Plan. The use of BM outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply in the property in use as BM throughout the as it is intended for student use. Use of housing in short term accommodation is particularly in situ location through the lack for example where the Council has acknowledged. Criterion of this policy should therefore be deleted. Support criteria and a requirement for occupancy by students but not the restrictions on use of BMs as short term visits and occupation set out in intention. This is not consistent with the London Plan. The use of BM outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply in the property in use as BM throughout the as it is intended for student use. Use of housing in short term accommodation is particularly in situ location through the lack for example where the Council has acknowledged. Criterion of this policy should therefore be deleted.
Consider B1 part E and B3 part C are overly restrictive in terms of promoting no net loss of existing industrial floorspace, which prevents Industrial uses does not mean large vehicles are automatically needed. An LSIS could accommodate light industrial uses normally.

Strategic and The Clocktower is an important local landmark. Views of the clocktower are a key element of the local townscape and add to local.

Consid Developing Secretary that Policy SP5 is inconsistent with policy H6 in respect of the part of the policy which permits redevelopment/intensification of Landowner Protection of industrial floorspace is important to prevent further losses. The approach set out in B1 and B3 is consistent with the London.

Support for the aim to maximise the delivery of new business floorspace noted.

Strategic and Respondent objects to the extension and promotion of industrial uses in this site as these would be in direct conflict with residential uses.

Support is provided in the specialist housing topic paper. The policy is justified by virtue of the amount of purpose built student.

Strategic and Landowner

Strategic and Property is considered justified. It does not set precriptive requirements or reference BRE; What is adequate would therefore depend on the.

Development which exceeds these height parameters could create an adverse canyon effect (due to narrow street profiles) and could weaken the industrial character of the area, which negatively impacting historic buildings and the visual corridor from Randell’s Road to the clock tower on Market Road. The council therefore considers that the height restrictions are justified in this basis, as they will ensure design and land use benefits.

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Development

Strategic and

Respondent objects to the arbitrary five storey building height limit set out in the proposed policy and considers that there is no evidence to support the restriction. The respondent suggests that policy SP3 may be incompatible with the new London Plan policy HC5. The respondent encourages the council to consider removing the five storey limit.

The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives a good balance of uses in the area, given that the prevailing heights in the area are generally lower than this. The development which exceeds these height parameters could create an adverse canyon effect (parallel street profile) and could weaken the industrial character of the area, whilst negatively impacting historic buildings and the viewing corridor from Randell’s Road to the clock tower on Market Road. The council therefore restricts the height restrictions it is to apply on a case-by-case basis, in order to ensure high-quality housing.

Support intensification of existing PBSA sites and provision of accommodation which provides a high standard of amenity for occupiers. The TOMS are considered to meet the requirements of the Social Value Act as they are proportional and relevant to the number of dwellings only. Consider that policy H6 by way of reference to H4 and application of space standards is not applicable because student accommodation is not considered a dwelling house but is considered as a stream to space standards should not apply as building regulations apply to new dwellings only.

Planning legislation is clear that planning applications should be determined for each site by site basis and on their own merits. Respondents believe that it is inappropriate to have a staged approach with height restrictions and consider the policy to be unsound. Also believe that the policy is not in line with London Plan policy 26 relating to optimising density. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.

Support the creation of new B1a office in the Vale Royal/Brewery Road area, and argues that restricting offices in this area would result in an inefficient use of land that is contrary to sustainable development objectives. It also refers to the London Plan’s policy (g)4 and to the council’s evidence base for the draft Local Plan.

Support the change to industrial use. Policy HC5 encourages CEZs in co-operation with the Mayor. The conformity responses received from the Mayor are fully supportive of the spatial policy for the Vale Royal/Brewery Road LSI and do not suggest that this area should be considered a CEZ.

Support the creation of the Vale Royal/Brewery Road LSI. Policy HC5 encourages CEZ (co-operation with the Mayor). The conformity responses received from the Mayor are fully supportive of the spatial policy for the Vale Royal/Brewery Road LSI and do not suggest that this area should be considered a CEZ.

Support for policy H4. Focuses on the need for a consistent, systematic strategy for designation of this area. The TOMS are considered to meet the requirements of the Social Value Act as they are proportional and relevant to the number of dwellings only.

See the employment topic paper for further discussion. Further discussion on the Council’s approach to tall buildings and evidence base is set out in the tall buildings topic paper. No evidence for the policies referred to is set out in the employment topic paper for further discussion.

Support for policy DH1. Focuses on the need for a consistent, systematic strategy for designation of this area. The TOMS are considered to meet the requirements of the Social Value Act as they are proportional and relevant to the number of dwellings only.

The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.

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Support intensification of existing PBSA sites and provision of accommodation which provides a high standard of amenity for occupiers. The TOMS are considered to meet the requirements of the Social Value Act as they are proportional and relevant to the number of dwellings only. Consider that policy H6 by way of reference to H4 and application of space standards is not applicable because student accommodation is not considered a dwelling house but is considered as a stream to space standards should not apply as building regulations apply to new dwellings only.

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The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications.
Development Policy G4, section C, clause x could be expanded to “integration of food growing opportunities, especially community gardens and...”

The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and sustainability of the LSIS. 20m is not automatically acceptable and would be dependent on assessment against all relevant policies. A 20m could meet these requirements in principle, as it would likely be no more than two storeys. Suitability would need to be determined on a case-by-case basis. Applications would also need to address any impact on the viewing corridor towards the Market Road Clock Tower.

Policy G4: Protecting open space

In some cases, protection is important for reasons of landscape character and quality, and it should be noted that protecting an area of open land in line with the London Plan is likely to be a contentious issue.

Policy SP3: Vale Royal/Brewery Road

Support for preservation and promotion of industrial uses in the Vale Royal/Brewery Road LSIS noted.

Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper, including justification for the 30m limit and the rationale for limiting development to five storeys.

Support for preservation and promotion of industrial uses in the Vale Royal/Brewery Road LSIS noted. The respondent objects to supporting text in paragraph 2.36 which relates to the building height limit of 20m considered for the Vale Royal/Brewery Road LSIS (supported in policy SP4).

Respondents strongly oppose to the restriction of additional office uses in the Vale Royal/Brewery Road area, if these are not in a mixed-use setting. The London Plan supports the continuous growth and evolution of London's diverse cultural facilities and creative industries through Policy H6. The council does not consider the Vale Royal/Brewery Road LSIS to be suitable for a Creative Enterprise Zone (CEZ) as per the overarching strategy and designation of this area. Policy H6 encourages CEZs in operation within the LSIS. The conformity responses received from the MoU are fully supportive of the spatial policy for the Vale Royal/Brewery Road LSIS and do not suggest that this area should be considered a CEZ. See the employment topic paper for further discussion.

Policy SP3: Vale Royal/Brewery Road

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Policy SP3: Vale Royal/Brewery Road
Islington Local Plan Regulation 10 Consultation response spreadsheet organised by respondent with Council response

Reg 10.0: Development and Development Management Policies
Site reference or address: All three
Spatial strategy or policy: All three
Respondent name or organisation: All three
Response: All three
Summary of comments: All three
Support/object: All three
Response: All three

Reg 10.08
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 46A Victoria Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.09
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.10
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.11
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.12
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.13
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.14
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.15
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.16
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.17
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.18
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.19
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.20
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.21
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.22
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.23
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.24
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.25
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.26
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.

Reg 10.27
Development and Development Management Policies
Policy BL: New Business Industrial/Science
Hippodrome Tech Group
Development Ltd

Support: All respondent objects to the proposed designation of 440A Hornsey Road as being part of a Priority Employment Location. States that the site has already been extensively developed with no potential for further developments.

Response: All three responses are identical. The Council considers that the site has been appropriately assessed in paragraph 60 of the consultation paper. The site is an important part of the local economy and the site has been developed to its full potential.
Development Aspirations to improve levels of employment in this sustainable location are strongly supported, and it is agreed that Pentonville Road represents an excellent opportunity to improve its commercial offer to the benefit of businesses and residents. Support Support noted.

Strategic and Resident I note that some tall buildings are proposed near the tube station despite the conclusion in the appendix to the tall buildings report of an 'unjustified' test of soundness. Support Noted.

The target is ambitious but considered achievable. The Local Plan notes, however, that achievement is dependent on a number of future decisions and initiatives. Support noted. Proposed mapping is not relevant for the Local Plan.

Pedestrian areas need to be kept clear of obstacles such as dockless bikes. Bus stands need to be positioned so as not to obstruct the flow of pedestrians. Support noted. No. In future planning requirements only applies to single aspect studies, and is not necessary to consider future land uses that would make the plans more deliverable.

Increased public toilet accommodation supported, especially to support elderly citizens whose mobility can be constrained by the location and design of toilets. Support noted.

The Council notes the earlier version of the 'justified' test of soundness, which required a plan to be the most appropriate strategy; the February 2019 NPPF paragraph 35b however requires an appropriate strategy, taking into account the reasonable alternatives. Policy B2 also aims to secure a variety of types of employment space, including space for small firms. The Council notes the earlier version of the 'justified' test of soundness, which required a plan to be the most appropriate strategy; the February 2019 NPPF paragraph 35b however requires an appropriate strategy, taking into account the reasonable alternatives. Policy B2 also aims to secure a variety of types of employment space, including space for small firms.

Strategic and This is stated in Policy T4.

Strategic and Strategic and Development proposals for Holloway Prison will be assessed against Local Plan policies and, as set out in the allocation, CIL will be collected as appropriate.

Strategic and Strategic and Strategic and This is stated in Policy T4.

Reg 19 ID Development/ Management Site reference/ address Spatial Strategy Area Sustainability/paying for places Respondent name/ Respondent Role Summary of comments Support/Request U/F response

Policy 87- Cross and Pentonville Road Affordable workspace/Policy 88- Sustainable Design In order to ensure that the housing needs of a range of groups and residents are being met. These policies could benefit from some modification to respond to current pressures on housing. Sarah Whiteoulder is the recognised team leader for the 2017 Housing Study, as published in 2018 identifies locations suitable in principle for tall buildings across the borough, based on a robust methodology. New policies apply to any tall building, which would include consideration of the impact on social infrastructure.

Policy 66- Delivering high quality housing Delivering high quality housing/Policy 67- Delivering sustainable design residents. Partial support. Not fully satisfying requirement only applies to single aspect studies, and is not necessary to consider future use.

Policy 65- Delivering sustainable design Sustainable transport/Policy 66- Delivering high quality housing Consider future use only applies to single aspect studies, and is not necessary to consider future use.

Policy 64- Delivering high quality housing Thriving communities/Policy 65- Delivering sustainable design New initiatives are needed to keep clear of obstacles such as dockless bikes. bus stands need to be positioned so as not to obstruct the movement.

Policy 63- Delivering sustainable design Sustainability/paying for places/Policy 64- Delivering high quality housing Central public toilet accommodation supported, especially to support elderly citizens whose mobility can be constrained by the availability of toilets. Maps should be readily available showing the location of toilets.

Policy 62- Delivering sustainable design Site reference/ address Spatial Strategy Area Sustainability/paying for places Respondent name/ Respondent Role Summary of comments Support/Request U/F response

Policy 61- Delivering sustainable design Site reference/ address Spatial Strategy Area Sustainability/paying for places Respondent name/ Respondent Role Summary of comments Support/Request U/F response

Policy 60- Delivering sustainable design Site reference/ address Spatial Strategy Area Sustainability/paying for places Respondent name/ Respondent Role Summary of comments Support/Request U/F response

Policy 59- Delivering sustainable design Site reference/ address Spatial Strategy Area Sustainability/paying for places Respondent name/ Respondent Role Summary of comments Support/Request U/F response

Policy 58- Delivering sustainable design Site reference/ address Spatial Strategy Area Sustainability/paying for places Respondent name/ Respondent Role Summary of comments Support/Request U/F response

Policy 57- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 56- Holloway Prison The thrust of this policy is supported; however, we recommend that in order to comply with the 2017 Housing Needs Study and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 55- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 54- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 53- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 52- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 51- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 50- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 49- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.

Policy 48- Holloway Prison Holloway Prison is the borough's largest housing site and the council must follow a logical and consistent method of assessing the site in part A of the housing strategy. Support Noted.
The Council’s approach to meeting older persons need is discussed in the specialist housing topic paper. It will principally be through small householder developers of say one or two units may find the affordable housing unit contribution a deterrent to redevelopment. Where the Local Plan refers to the actual size of residence as being two-bed units are considered the most suitable in general terms as they can accommodate a broad range of need including families. The Strategic and Management Plan should have a clear role in setting out the desired mix of provision and any local guidance. It’s also worth noting that the NPIF does not require that the minimum size of unit be less than 40 sqm. The housing quality is extremely important, and any policy which undermines this would not be acceptable. Policy H2 has flexibility to allow for a range of housing sizes, but any units delivered must be high quality in line with policy H4. The housing policies are consistent with the Line Planning and support the council’s ambition to meet community needs, Part V.

**H1. L and H7** We recommend a modification to this wording. We suggest it could be phrased differently e.g. Housing for older people will be predominantly met through conventional and supported housing. These will include models that support the independence of older people including co-housing, and forms of sheltered housing. Extra care home provision should be justified in the context of ‘need’ as indicated by demographic, health care, and social services data. Co-housing is not a form of housing, it is an approach to designing communities. Co-housing will not be adequate to meet need.

**H2**

Policy H2: New and Existing communities, Part V

Policy H2 should include a more detailed explanation of what is meant by ‘family sized units’ and how these should be assessed. This is important because the definition of a family can vary depending on context. The Council should not confuse the terminologies: co-housing with co-living. Does co-living need to be removed from the H Policies? We support this subject to a caveat for a clarification of text on achieving housing quality. The risk is that the mix of provision is dominated by 2b4p units. This may create units with very limited space e.g. Choice, comfort and greater permanence is what families want in general terms. Families should also be able to have space to store things they don’t need but may want to keep e.g. furniture. 3 beds are needed for a family to upscale to 3/4 bed units. 2b4p will not meet the needs of growing families who need to have the right number of bedrooms, storage and study areas for education/work. The Council should not use this as an excuse to reduce the size of units delivered. The NPIF does not require that the minimum size of unit be less than 40 sqm. The housing quality is extremely important, and any policy which undermines this would not be acceptable. Policy H2 has flexibility to allow for a range of housing sizes, but any units delivered must be high quality in line with policy H4. The housing policies are consistent with the Line Planning and support the council’s ambition to meet community needs, Part V.

**H4**

Policy H4: New and Existing communities, Part V

This paragraph 114: ‘The risk is that the mix of provision is dominated by 2b4p units. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue. Overcrowding is defined by the Housing Act and alleviation of overcrowding is principally a housing management issue.

**H10**

Policy H10: The London Plan and London Plan Management Plan

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The small householder affordable housing topics paper provides further discussion. We note that the NPIF does encourage bringing to market satisfactory contributions.

The NPIF does not require that the minimum size of unit be less than 40 sqm. The housing quality is extremely important, and any policy which undermines this would not be acceptable. Policy H10 has flexibility to allow for a range of housing sizes, but any units delivered must be high quality in line with policy H4. The housing policies are consistent with the Line Planning and support the council’s ambition to meet community needs, Part V. The Line Planning and London Plan Management Plan need to be clear on the desired mix of provision and any local guidance. It’s also worth noting that the NPIF does not require that the minimum size of unit be less than 40 sqm. The housing quality is extremely important, and any policy which undermines this would not be acceptable. Policy H2 has flexibility to allow for a range of housing sizes, but any units delivered must be high quality in line with policy H4. The housing policies are consistent with the Line Planning and support the council’s ambition to meet community needs, Part V.

We support this subject to a caveat for a clarification of text on achieving housing quality.
H2 text on conventional housing is therefore a policy which must be assessed against the correct data, recommendations and guidance.

The Council needs to mitigate risk by ensuring that there is housing variety in all locations. It should focus on keeping the size mix as varied as possible.

The Council considers that all sites should optimise housing delivery, to make best use of land. Optimising does not mean quality is under consideration.

Two-bed units are not prioritised on the basis of viability. The housing topic paper discusses the justification for the housing size mix.

The driver behind Policy H2 is presumably the NPPG standard test. But there is scope for nuance. H2B is a policy proposal to address the need to include a funding element for the above.

Table 3.2 balances a number of factors to determine size standards. The size mix does not exist in isolation and there needs to be some recognition of affordability and other issues. Three-bed shared ownership units are unlikely to be affordable in Islington.

Policy H2: New and existing conventional housing

Policy H2 is a conventional way of addressing this aspect of need but restricts policy solutions in finer detail. The distinct needs of the various categories of people caught by homelessness or inadequate homes for different reasons? Grouping them together in the same group makes it more difficult to address their needs.

An increase of 208 families (29%). And also a very old piece of data. The number of sharing households increased from 1,078 to 1,624 over the plan period. See response to policy H9 re: suggestion for obligation.

The life cycle of a family home needs to be looked at over a number of years, not just the short term. Families need to stay close to schools and their registered GP Practice. Seemingly these ties can be lost if families move to other communities.

Council is unclear what the applicant means by the ‘NPPG standard test’.

Policy H2 requires high quality housing, which is available for a broad range of occupants, funding an environmentally sound housing stock. Minimum space standards are set out in the London Plan and do not factor in space for domestic accommodation.

Policy H2: New and existing conventional housing.

Policy H2 recognises that the NPPG standard method only leads to indicative trajectories. It is important to decide on size standards and other aspects of design quality. This is relevant to decision making and could be referred to in justification text. The 2.74m2 test from the NPPG? The standard method only needs to indicate trajectories and it would be helpful to clarify that in text. More could be done to explain the policy approach to decision making.

The need to include a funding element for the above. Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response. During the plan period. See response to policy H9 re: suggestion for obligation.
Support noted.

The Council considers that the approach taken which prioritises the provision of conventional affordable housing is the best way to deal with social issues created by the levels of affordable housing in the borough. Seeking further contributions to this and address housing for vulnerable people may jeopardise the overall output of affordable housing which may affect housing for vulnerable people. Policy is still supports new supported housing in the borough.

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Support noted.

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The policy is fully flexible and will also allow change in PSA where evidence is provided.

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Support is noted and commitment to ongoing engagement welcomed.

Respondent understands the aims of the policy but feels it is not appropriate to resist concentrations of food, drink and night time culture and visitor uses such as hotels, limiting their suitability to specific locations. Furthermore, A1-A5, D2, Sui generis uses cover all the uses defined in the NPPF. Page 143 states how B1 uses are also suitable town centre uses, however, proposals for B1 uses in town centres will be assessed against policy R17. The local plan also restricts other Town Centre uses such as hotels, limiting their suitability to specific locations.

There is strong support for Site Allocation FP3: Finsbury Park Station and Island. Strong support for Site Allocation FP3: Finsbury Park Station and Island, and the allocation for improved underground and railway infrastructure and public realm, which will help support growth on the horticulture sale of Finsbury Park.

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The encroachment of offices and other non-business uses is considered to be the principal threat to the continued industrial function and viability. Some landlords are retaining some retailers temporarily on rates only deals while they market the premises, however, the policy should be updated such that it takes account of all main town centre uses as defined by the NPPF.

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It is welcomed that Policy ST2: Waste, safeguards the Hornsey Street Re-Use and Recycling centre, and Haringey will continue to work with Islington and the five other North London Boroughs in progressing the North London Waste Plan through to adoption. Support is noted for Site Allocation ST2: Hornsey Road and Angel, and the allocation for improved underground and railway infrastructure and public realm, which will help support growth on the horticulture sale of Angel.

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There is strong support for Site Allocation FP3: Finsbury Park Station and Island, and the allocation for improved underground and railway infrastructure and public realm, which will help support growth on the horticulture sale of Finsbury Park.
The Council disagrees with the view set out in paragraphs 4.71 and 4.73 of the Camden Local Plan that, whenever the term of occupation is uncertain, there is an irreducible minimum three years’ notice on residential users. The Council argues that the NPPF encourages the local planning system to think more flexibly about the terms on which sites are released for development.

The Council does not agree that the NPPF encourages the local planning system to think more flexibly about the terms on which sites are released for development. The Council argues that the NPPF encourages the local planning system to think more flexibly about the terms on which sites are released for development.

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These issues are discussed in the viability topic paper.

The term genuinely affordable could be misleading as the general public may think this refers to affordable home ownership. The policy H2 sets out required tenure split. Genuinely affordable is defined in the glossary. The 70/30 split has been viability tested and it supports this approach.

The Council's key concern is meeting housing needs based on actual evidence - not a stated preference - and promoting home ownership is not determined solely on the basis of housing land supply. We note that there are a number of evidence documents, notably covering housing, employment and retail, which project needs up to 2035, 2036 and 2036 respectively.

The HBF are right to highlight scepticism that ownership aspirations may not be realised. Evidence from the SHMA clearly identifies issues regarding the affordability of various 'affordable' home ownership products. The scale of need for social rented accommodation is vast, so deferring to aspirational need is unlikely to be realised by those experiencing the aspiration.

Reg 19 ID

Development and site management policies

Context
Viability

Evidence base, viability

Support/objections

Uk response

Draft local plan

Evaluation of plan, Part D

Evidence base, viability

Support/objections

Uk response

Plan Document and address

Site reference or address

Spatial strategy area

Respondent name

Respondent group

Summary of comments

Support/objections

Uk response

Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response
The London Plan inspector’s report has recommended a reduced overall housing target but Islington’s figure for small sites remains the same. The policy is unclear about what is being required and how decision-makers can take the policy into account. It is the responsibility of the Strategic and Local Plan Team to make policies that will have the effect of ‘showcasing social value’. These policy requirements should be specific and definitional. Policies should be part of the GLA SHLAA.

Para. 3.22 of the Local Plan and table 3.1 suggests that the Council is relying on the GLA SHLAA 2017 for the identification of the housing land supply. This is a fundamental error as from 1 January 2018, the GLA SHLAA 2017 can no longer allocate sites (para 1.5), but it is for each local planning authority to determine which sites in the SHLAA should be formally identified and allocated through their development plan (para 1.4).

Paragraph 4.1.8 of the GLA SHLAA states that “boroughs should identify as many sites, including small sites, as possible in their development plan documents”. The GLA SHLAA cannot be relied upon by the Council to satisfy the requirement of para. 47 of the Framework. The Council needs to set out which large sites it is relying on for the first ten years of the Plan to deliver the 50,000 year draft Council Plan requirement and wants to identify more specific small sites to address para. 4.14 of the NPPF. Para. 4.14 of the NPPF states that a number of allocations have been made by the Plan but there will be only six large sites benchmark.

Note that they have been unable to locate an up-to-date housing strategy which would be helpful to interrogate whether the housing objectives of the Plan are deliverable.

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### Reg | 10.2 Development plans and key policy documents

| Leg 10A.4 | Change of control and management responsibilities

- **Policy**: Part C requires applicants to ‘meet or exceed’ the Nationally Described Space Standards adopted as policy through the London Plan. Supporting para. 2.64 should be deleted. It should also include additional words recognising there may be circumstances where it is appropriate to provide affordable housing as part of the affordable housing contribution. This would require the applicant to engage early with the Council to discuss the circumstances.

- **Policy**: Part D refers to Islington’s carbon offset fund. The Council will need to make sure that contributions to carbon offsetting are not sought interfered with, the work of the Building Regulations through planning. The WMS of March 2015 states that LPAs may also need to review the WMS of March 2015. In terms of decision-taking, what is implied by the use of the word ‘exceed’ is unclear and is consequently contrary to para. 16 of the London Plan. Could I be advised if it is not the standard approach. The word ‘exceed’ should be removed.

- **Policy**: Part H3: Genuinely Affordable Rent (GAR) provides for London Living Rent cannot be treated as the same thing as an affordable home ownership product. This would require the applicant to engage early with the Council to discuss the circumstances. London Living Rent is short/medium term rental product but the clear intent is for LLC homes to be sold within 10 years. As shared ownership, it is explicit in the Mayor’s Responsible Home Owner Programme 2015-21 Funding Guidance, paragraph 17. Given that LLC units are not treated as rented tenancies in this paragraph, it is reasonable to classify them as an affordable ownership product. Paragraph 2.7 of the London Plan supports this approach.

| Leg 10A.4 | Change of control and management responsibilities

- **Policy**: In terms of decision-taking, what is implied by the use of the word ‘exceed’ is unclear and is consequently contrary to para. 16 of the London Plan. Could I be advised if it is not the standard approach. The word ‘exceed’ should be removed.

- **Policy**: Part J should be deleted. It is perverse that it is suspended this element of national policy. Part J and paragraph 3.61 should be deleted. The Mayor’s regulation 18 response noted that H7 comprehensively follows and builds on the guidance set out in Policy H15 of the Draft London Plan but this does not preclude individual boroughs developing their own policies relating to meeting the purposes of strategic plan-making and which makes the best use of sites. It also aligns with the design and local identification in the London Plan and which is being advocated in new national guidelines.

- **Policy**: The Council disagree with this view. Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response

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- **Policy**: Part D states that the Council will seek to maximise the positive effects on the environment and quality of life while minimising or avoiding any potential disadvantage to the manufacturer and suppliers of specific products. Part B and paragraphs 3.73-3.76 are inconsistent with national policy and guidance as it introduces additional information requirements that are unnecessary for the development of the site. These additional requirements should be removed.

- **Policy**: Part B and paragraphs 3.73-3.76 are inconsistent with national policy and guidance as it introduces additional information requirement or obligation for the developer to have to exceed this. The word ‘exceed’ should be removed.

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- **Policy**: Part J should be deleted. It is perverse that it is suspended this element of national policy. Part J and paragraph 3.61 should be deleted.
The principle of providing play space is well established and supported by the London Plan. The inspectors report supports the London Plan's approach and states that "The requirement for HIAs is well established and is also sought by the London Plan." An HIA is an important tool to ensure that proposals protect the health of individuals. Policy SC3 is unsound as it is: positively prepared and is not based on objective assessment of the existing or required nutritional intake on health. The policy is superfluous and should be deleted.

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The requirement is considered appropriate, and is consistent with the NPPF in this regard. High levels of heat generation can often contribute to congestion and urban heat islands. The WMS of March 2015, reflected the work of the Housing Standards Review, introduced a streamlined system of Building Control for housebuilders. Housebuilders are required to comply with the Building Regulations and the optional technical standards (if the latter are adopted by the Council through an update to its local plan, or in the case of London, through an update to the London Plan). From this it is apparent that the only standards that now relate to residential development comprise the Building Regulations plus the three optional technical standards. It is also noted that the WMS of March 2015 did not cover the matters that should be taken into account in fulfilling the duty-to-cooperate requirements.

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The respondent comments that the retail sector is experiencing a significantly challenging market with rapidly evolving requirements. This is set out in the Local Plan section 10, the AMR monitoring indicators are not fixed and may change over different iterations of the AMR.

The respondent states that the requirement for the proportion of affordable workspace to be within the development building could lead to concerns over the development potential of adjoining sites, including sites within adjoining boroughs. This will ensure that guidance of relevant neighbouring authorities and the Council’s planning policies, Arms Action Plan, and other guidance will be taken into consideration.

Further discussion on Islington’s approach is provided in the tall buildings topic paper. The policy would include cross boundary considerations but the Council will make the explicit through modifications to the local Plan’s policy description.

An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the viability chapter. If service charges were significant then this could be compensated in the commissioning process. If service charges were significant then this could be compensated in the commissioning process. If service charges were significant then this could be compensated in the commissioning process. If service charges were significant then this could be compensated in the commissioning process.
The Local Plan makes clear that the assessment of need would be done at a sub-regional level, and that the evidence of need for different areas of the borough needs to be demonstrated by the local council. The process identified in the Local Plan is consistent with the London Plan’s evidence base, with the London Plan inspectors report recommending a more sub-regional assessment. For Islington, this is consistent with its senior officers’ recommendations for a sub-regional approach.

The London Plan also suggested that the council has used the evidence base to help identify the need for different types of housing, rather than any regional need. This is consistent with the London Plan’s evidence base, which also suggested that this was the appropriate process to follow.

The council has set out a process for meeting need which recognises that the need identified is not new accommodation need but a need to deliver new dwellings. This is consistent with the London Plan’s evidence base, which also suggested that the council should consider the need for different types of housing, rather than any regional need.

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose

Policy H11: Purpose
As far as the council is aware there are no sports facilities on site. Nevertheless, the draft Local Plan has strong policies to protect sports facilities as far as practicable. The council believes that these measures will ensure that the allocation aligns with national policy. It is proposed that the development can be undertaken in any order that maximises capacity. The council strongly believes that this will provide opportunity for future development. The council believes that this will provide opportunity for future development. The council strongly believes that this will provide opportunity for future development.

Support

Reg 19 ID

Support/objection

response

Site Allocations

Archway

The council believes that the allocation replaces the lost sports facilities as part of any development in line with national policy. The council believes that this allocation would not impact on the level/standard of provision.

Support

Site Allocations

Archway

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Site Allocations

Archway

The council believes that the allocation replaces the lost sports facilities as part of any development in line with national policy. The council believes that this allocation would not impact on the level/standard of provision.

Support

Clifton House

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Support
The respondent considers that there is ample opportunity to enhance views, whilst also providing new development opportunities (see detailed representations in relation to 50 Farringdon Road). Such proposals should be entertained if applicants can demonstrate that they are viable, will generate employment and can support the office function of an area.

Sport England recommends that this is reflected in both Policy BC2: Culture, leisure and sports uses, and the Town Centre Sports, Equity and Fairplay Guidance of the Islington Local Plan, particularly in relation to encouraging healthy communities. Sport England recommends that the Council should consider D2 sports uses; fitness clubs, sports halls, sports pitches, which can also support the office function of an area. Sport England supports the policy intention to enhance the green infrastructure network which will provide physical and mental wellbeing benefits. Support noted on the general aim for maximisation of office space in Islington and the need to provide high quality streets & spaces.

Support noted. Sport England welcomes the policy intention of protecting all open spaces including those open spaces not designated in Figure 5.1 which displays the public space designation. However, it should be noted that the green spaces designations includes some school sports fields, which should be taken into account when a school is developed on site or there are other concerns requiring replacement provision in line with NPPF (2019). Considerations should be made to starting such provision.

Support noted. Sport England supports the policy promoting active physical activity by ensuring that every development proposal must take account of active travel and ensuring that the design of development prioritises walking and cycling and access and use by sustainable transport modes, namely walking, cycling and public transport.

Support noted. Supportive of the policy promoting active travel and the provision of appropriate infrastructure to support cycling, which is supported within paragraph 6.19 of the Islington Active Design guidance.

Support noted.

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The respondent recommends that part F(ii) of policy B2 is deleted because it restricts innovative design and efficient use of vacant car parks of other lower floor floors which house little or no access to daylight and could be used for meeting rooms. Office development does not generally require to have adequate levels of daylight according to BRE guidance.

Support

The Council does not object to the principle of decking over railway lines. While we support the ongoing discussion into this concept, the local authority believes that roof terraces in this area could provide new office space (e.g. as a retail unit) and wish to ensure that the development is not restricted to a particular sector. They also consider the 80% requirement to be high, and suggest changing the requirement to 50%. Amended wording suggested.

Support noted.

The location of Bunhill and Clerkenwell is particularly suited to development of business uses. The area has easy access to the major centres of business and employment and comprises the majority of Islington's CAZ. Localised recent evidence is clear that the area has the potential for significant growth in business and office use. Conversely, a shortage of business space in the major threat to business and job growth in Bunhill and Clerkenwell, Islington and London as a whole. Therefore new office development is essential to the priority to house offices and promote other strategic functions to be given greater weight relative to new residential development in all other areas of the CAZ.

Support not noted.

This issue is discussed in Bunhill and Clerkenwell AAP topic paper.

The respondent recommends that the affordable workspace requirement/policy B4 is removed, because the need for affordable business floorspace in the Bunhill and Clerkenwell area is essential to maintaining and developing business and office growth. Conversely, a shortage of business space in the major threat to business and job growth in Bunhill and Clerkenwell, Islington and London as a whole. Therefore new office development is essential to the priority to house offices and promote other strategic functions to be given greater weight relative to new residential development in all other areas of the CAZ.

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Support

Generally supportive of the aims of this policy. Support noted.

The Council considers that it is important to ensure that business floorspace of a high quality and will be conducive to acceptable income for the future. The policy is not considered excessive and does not, for example, set prescriptive standards. It would still allow scope for innovative design.

Support noted.

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Support not noted.

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Support noted.

Support the aim of predominantly office uses in the Farringdon area but also would like to clarify that this could include an element of commercial retail. Policy BC1 is not intended to cater for office development only. For example, small scale development by non-commercial office developers (e.g. a retail unit) should not be required to adhere to this policy requirement (as currently drafted) and we consider that this would be an unnecessary requirement.

Support not noted.

Support not noted.

Support not noted.

Support noted.

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Support not noted.

This issue is discussed in Bunhill and Clerkenwell AAP topic paper.

Support not noted.

Support not noted.

Support not noted.

Support not noted.

Support not noted.
In general the Council supports public realm schemes which improve conditions for walking and cycling, and that reduce the impact of car ownership.

Islington Living Policy T3 sets out that charging points must be provided within the parking space (on the carriageway) to minimise street clutter and avoid impacts on the pedestrian environment.

Support Support noted for policy protection of business floorspace across the borough.

Strategic and Policy T4: Public realm, paragraph 7.31 states "The Council will take every opportunity in new developments to create walking and cycling routes (cf Charterhouse Sq ... by T1, T4 and the Urban design guide and Streetbook. Pedestrian permeability is a core planning objective in Islington.

Support Support for policy to protect existing business floorspace in the borough. The respondent supports policy to protect existing business floorspace in the borough.

Support Support for policy protection of business floorspace across the borough.

Strategic and Development Management Policies: Policy BC4: City Road Basin and Graham Street Park are places of recreation and relaxation, and should be enhanced by ensuring that they are attractive and welcoming places. The Council has begun a public realm improvement project for pedestrian and cycle improvements in the City Road Basin and Graham Street Park.

Support Support for policy to protect existing business floorspace in the borough.

Support Support for policy protection of business floorspace across the borough.

Strategic and Development Management Policies: Policy T3: Car-free development, Part 1 7.31 states "The Council will consider the possibility of pedestrianising this area, including Low Traffic Neighbourhoods; Clean Air Walking Routes; developing and improving accessibility; creating new pedestrian routes; and adding an on-street parking space." If the parking space is to be included in development proposals, then the Council will add a reference via a modification to the Local Plan to this in the policy supporting text, for clarity.

Policy T1: Enhancing the public realm and sustainable transport. Support The respondent supports policy to create new pedestrian routes, including Low Traffic Neighbourhoods; Clean Air Walking Routes; developing and improving accessibility; creating new pedestrian routes; and adding an on-street parking space.

Support Support for policy to create new pedestrian routes, including Low Traffic Neighbourhoods; Clean Air Walking Routes; developing and improving accessibility; creating new pedestrian routes; and adding an on-street parking space.

Support Support for policy to create new pedestrian routes, including Low Traffic Neighbourhoods; Clean Air Walking Routes; developing and improving accessibility; creating new pedestrian routes; and adding an on-street parking space.
Some existing allocations have been amended where updated evidence has led to changing policy requirements. The site is located in a Muslim Welfare

As the popularity of the Farringdon and Clerkenwell area continues to grow we welcome the specific support of policy BC5 for the

The respondent supports policy B1 to boost office space within EC1 and to deliver a range of workspace types/unit sizes which are

Dawnelia

Discussion of viability testing of AW is set out in the viability topic paper.

Strategic and

Islington's Employment Land Study highlights the need for 400,000sqm of additional B1a floor space by 2036. The core area of Finsbury

There are significant potential barriers to the suggested scheme as it involves building over the railway line. These barriers include viability

The limitations of the use class order are noted but this does not in itself mean that protection of the specific function is unsuitable. The

Bunhill and

Support for the introduction of new public realm through the conversion of Vine Street Bridge to public open space. Also states that a

Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response

Support noted for promotion of office space in EC1 and to deliver a range of workspace types/unit sizes for SMEs.
Development

Strategic and
Strategic and
Strategic and
Strategic and

Respondent is landowner of site at 4 Blundell Street within LSIS. Respondent notes that there has been significant change in the eastern area of

The Employment Land Study 2016 (ELS) identified a need for 400,000sqm additional business floor space by 2036 across the whole of the

As noted in response above, the fact that there is a lack of B1c B2 and B8 uses in this area does not render the LSIS designation for this area obsolete. The designation is essential to prioritise industrial uses in future and consolidate and enhance the role of the wider industrial area, which, by virtue of its location in close proximity to the CAZ, has significant potential to provide an important servicing role within the borough. This is a significant increase and one that cannot be met solely through development in the CAZ. The ELS specifically states that given its hyper-centric location, Finsbury Park could be a potential satellite location. The LSIS site shows the demand of 606,000sqm and it would be impossible to contemplate plans for additional business floor space where there is already an existing supply that has reached full capacity.

The local Plan is a strategic document that looks ahead 15 years, making it mentally appropriate to envisage the areas in which significant future need can be accommodated. Town Centres are considered suitable for development of business floor space, in rational and regional policy as well as the adopted local Plan.

Site Allocations

Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper. The justification for the Council's approach to tall buildings is discussed in more detail in the tall building topic paper. It is unclear whether the amendment to the timescale would be predicated on a change to the building heights approach as sought; the Council therefore has not articulated this timeline. This does not preclude the site coming forward earlier.

Further discussion on the Council's approach to tall buildings is set out in the tall buildings topic paper. The respondent has provided their own explanation of the process of sieve testing within the Tall Buildings Study for the actual "Local search and sieve approach for the City Fringe" at Appendix1 of the document does not show any evidence that the lungs building site has been tested in to the potential to accommodate a tall building, despite the site being within an existing tall buildings area, the existing building being over 30m and prospective and emerging policy for redmend and height that is consistent with neighbouring buildings and the site being considered "an excellent and sustainable context", which includes adjoining buildings of 30m and above. Clearly in absence of any specific consideration to our client's site in the "Tall Building Study", it is unclear why 40 Choodle Street has not been included in a site suitable to accommodate a tall building. Amended policy wording is set forward.

Policy SP3: Vale Royal

Respondent notes Finsbury Park has been identified as a CAZ satellite location although this is not founded on evidence that clearly development there is incurrently being negatively detracted from small businesses to location in Finsbury Park. The London Plan Site does not clearly identify Finsbury Park as a CAZ satellite location. New business floorspace is only likely to come forward as part of mixed use development as of WCLC commercial would not be viable in Finsbury Park, this part should also be attuned to reflect this. Paragraph 3.20 should recognied the potential for a CAZ satellite at Finsbury Park dependent on demand for employment space in the CAZ exceeding the supply.

Policy DH3: Building Heights

Concerned that policy DH3 would prevent the redevelopment of the building as the site is currently taller than 30m but not allocated as the site. As noted in response above, the fact that there is a lack of B1c B2 and B8 uses in this area does not render the LSIS designation for this area obsolete. The designation is essential to prioritise industrial uses in future and consolidate and enhance the role of the wider industrial area which, by virtue of its location in close proximity to the CAZ, has significant potential to provide an important servicing role within the borough. This is a significant increase and one that cannot be met solely through development in the CAZ. The ELS specifically states that given its hyper-centric location, Finsbury Park could be a potential satellite location. The LSIS site shows the demand of 606,000sqm and it would be impossible to contemplate plans for additional business floor space where there is already an existing supply that has reached full capacity.

Policy B4: Affordable Workspace

Support noted.

Policy DH3: Building Heights

It is the intention of the policy to require 10% of overall gross B-use floorspace. Where development comprises an extension to provide

Respondent notes the London Plan regulations for the CAZ have been amended to require 10% affordable workspace from new floorspace as a policy. The respondent proposes that supporting text in para 4.47 (policy B4) is amended so that affordable workspace provision is only applies to new floorspace for proposals involving redevelopment or extension.

Policy B4: Affordable Workspace

The respondent proposes that supporting text in para 4.47 (policy B4) is amended so that affordable workspace provision is only applies to new floorspace for proposals involving redevelopment or extension.

Policy B2: New Business Floorspace

Policy DH3: Building Heights

Policy DH3: Building Heights

Policy SP3: Vale Royal

Policy B4: Affordable Workspace

Policy DH3: Building Heights

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace

Policy DH3: Building Heights

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace

Policy B2: New Business Floorspace
Development Allocation welcomed. Estimated delivery timescale of 2021/22 to 2025/26 is in line with landowner’s aspirations for the site. Feel that a provision of on-site affordable workspace is preferred over the use of financial contributions to deliver affordable workspace. The LSIS is Islington’s most significant remaining industrial area, and as such the Council seeks to protect its industrial function. Strategic and...NH7: Holloway
An explanation of the results from the viability assessment in relation to the deliverability of affordable workspace are set out in the Viability Topic Paper. Provision of affordable workspace is essential to ensure a diverse economy and to allow development of a range of uses such as retail and community facilities at basement and ground floor levels. Request allocation is amended to allow for ‘office-to live’ the business needs of the area. Intensification of office uses at the site could easily be achieved at the same time as the delivery of more flexible approach to the range of uses possible at the site would allow effective development to come forward suitable to respond to the site would use this space to make best use of the site and re-instate the historic building line which would have a townscape benefit. The diagram should be amended accordingly.”

The respondent considers that for policy B4 to be deliverable, requirements for a 10% provision should be only based on the uplift of employment floorspace and asks for this to be clarified in the policy. Respondent considers that the amount and rent levels of AW is not more appropriate.

The diagram would significantly harm the viability of future schemes and place risk on deliverability of office space. It is proposed that a 10 year term is the design policy. The response makes reference to surrounding developments of 11 storey (Peabody housing), including 7 and 8 storeys that the design policy. The response makes reference to surrounding developments of 11 storey (Peabody housing), including 7 and 8 storeys. The respondent suggests that industrial SME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment intensification through other uses. Policy SP3(C) outlines the ability of employment sites to be fully employed as industrial uses. The respondent indicates that industrial AW space is suitable to be feasible/appropriate for industrial uses. The Landowner Respondent demonstrates a number of potential intensification options involving mixed-use for industrial uses.

The Council considers that the Tall Buildings Study identified Holloway Road and 250-260 Old Street or 264-266 Old Street as potentially suitable for a tall building. Further discussion is provided in the tall buildings topic paper.

In relation to SP3(C), the respondent defends that a landowner with a lawful use should not have uses withdrawn/imposed by the LPA and that the sitting uses on site should be a material consideration for future Redevelopment. It mentions that the Agent of Change policies are set out in Appendix 4. Object Support noted. LBI’s approach to tall buildings is in line with the draft London Plan and underpinned by comprehensive evidence. Where have been identified as being suitable for tall buildings, the location of the taller elements is specified. On this site, the Tall Buildings Study identified Holloway Road and 250-260 Old Street or 264-266 Old Street as potentially suitable for a tall building. Further discussion is provided in the tall buildings topic paper. The respondent suggests that industrial SME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment intensification through other uses. Policy SP3(C) outlines the ability of employment sites to be fully employed as industrial uses. The respondent indicates that industrial AW space is suitable to be feasible/appropriate for industrial uses. The Landowner Respondent demonstrates a number of potential intensification options involving mixed-use for industrial uses.

There is no protected open space within site BC10. The Council will amend mapping through modification to the Local Plan to avoid the presence of other tall buildings with the area does not permit the building height guidelines for the site sit unimpeded by the site. The study conclusions are based on detailed townscapes and a review of existing planning policies and are considered appropriate. The study is an evidence-based document which has informed the Local Plan. It is also capable of being a material consideration for relevant applications. The proposal height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives significant opportunity for intensification of the site to maximise the potential height in the area as generally lower. The development which exceeds these height parameters could create an adverse canyon effect (plan to narrow street profile) and could weaken the industrial character of the area. and highlights the importance of historic buildings and the viewing corridor from Kendall’s Road bridge to the clock tower on Markham Road. The Council therefore considers that the height restrictions are justified in the area, so they will ensure design and site use benefits. The diagram would significantly harm the viability of future schemes and place risk on deliverability of office space. It is proposed that a 10 year term is the design policy. The response makes reference to surrounding developments of 11 storey (Peabody housing), including 7 and 8 storeys. The respondent suggests that industrial SME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment intensification through other uses. Policy SP3(C) outlines the ability of employment sites to be fully employed as industrial uses. The respondent indicates that industrial AW space is suitable to be feasible/appropriate for industrial uses. The Landowner Respondent demonstrates a number of potential intensification options involving mixed-use for industrial uses.

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The approach taken by the allocation is supported. 250-260 Old Street is considered an area that it currently a two story building set back from the street. It is considered to present an excellent development opportunity for optimisation and regeneration should be given into the allocation. The allocation does not refer to suitable heights for the site to the allocation, the building, Albert House, is identified in the Tall Buildings Study as potentially suitable for a tall landmark building. The site is not affected by any strategic, viewing corridors, tall legacies or a conservation area, and has a limited number of residential properties close to which limits the potential height/footprint developments of employment. The respondent suggests that industrial SME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment intensification through other uses. Policy SP3(C) outlines the ability of employment sites to be fully employed as industrial uses. The respondent indicates that industrial AW space is suitable to be feasible/appropriate for industrial uses. The Landowner Respondent demonstrates a number of potential intensification options involving mixed-use for industrial uses.

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Development Policy BC1 Part C reflects the overarching priority for business floorspace but does not prescribe a specific percentage. Maximisation of employment topic paper discusses the issues raised by TLL. The proposed amendment would not maximise essential business floorspace in the borough’s most prominent business location. Further guidance is provided in the Planning Practice Guidance in terms of ensuring there is sufficient consideration in the policy wording. Suggest an amendment which removes specific percentage requirement and requires the majority of mixed use development across the borough.

Strategic and Development Management Policies Policy BC6 Sustainable Design Standards Part C reflect the importance of the local planning authority working positively with the businesses that have established at Tileyard. Further discussion is provided in the BCAAP and employment topic papers. Discussion is provided is the BCAAP and employment topic papers. Further information is set out in the council’s Affordable Workspace Strategy.

Policy BC6 Thriving Communities Part D shows that there is sufficient demand for business floorspace to provide high quality office floorspace, maintaining and developing business and job growth. The Oliver’s House site development proposal is in order to contribute to climate change mitigation. Further discussion is provided in the sustainability topic paper.
The development of industrial land is consistent with the draft London Plan, as the site is located within the designated Local Significant Industrial Site (LSIS) and the proposed development is in line with the LSIS designation that is based on a detailed evidence base. The GLA response supports the Council’s approach to industrial land as consistent with the draft London Plan.
Development

It appears that there is a minor error in the residential cycle parking standards, in Table A4.1: where it sets out '1.5 per bedroom' we...evidenced need for additional housing. The site was identified through the 'call for sites' for the GLA's Strategic

The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the new London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in the ELS, this area comprises a mix of traditional industrial activities and storage facilities that could benefit from emerging industrial uses, including a significant concentration of creative production businesses which are typically located in industrial areas...

The principle of providing play space is well established and supported by the London Plan. The inspector's report supports the London Plan policy which seeks new play space. The LBI policy already provides flexibility, using the London Plan benchmark as a starting point but also...

The requirement of all major development to make provision for on-site publicly accessible play space is not deliverable on constrained sites and smaller sites. Major developments include sites delivering 10 or more homes; this would include individual apartment blocks at major developments or...
The housing topic paper provides justification for the proposed size mix. The mix is not entirely prescriptive (i.e. it does not set out a

The requirement for all major developments to have a ‘communal low-temperature heating system’ is unnecessarily prescriptive and may

The Council find that the proposed changes are unnecessary. The policy on residential use in town centres is clear when Local Plan is read

The Mayor has stated that the Local Plan is in conformity with the London Plan. The Local Plan viability study factors in a range of

The proposed policy, which excludes viability as a material consideration in all but exceptional circumstances, would severely hamper the

Strategic and

The council considers that, generally, studios/bedsits are not a sustainable form of accommodation and therefore do not constitute the

These issues are discussed in the viability topic paper. The Mayor has noted that Islington’s approach is consistent with the London Plan.

Islington is proposing an ambitious affordable housing target, it is essential that a ‘safety valve’ is allowed for, to ensure that delivery is

Decarbonisation of the National Grid should also be factored into the need for on-site energy generation over the plan period.

...the Mayor has noted that the intention to reduce the amount of housing for three-bedroom homes than one-bedroom homes is not reflective of market conditions, with regards to both demand and affordability

We suggest that the policy should clearly allow for up to 5% of market homes to be studios, with justification only required for a high level

...enlarged, instead of providing studio units, is unjustified and would undermine housing delivery.

If the policy refers to up to 5% provision, the requirement to provide evidence of exceptional circumstances to justify the provision of studio units is

...introduces requirements which would undermine the delivery against objectively assesses needs of the local authority, the strategy

It is also inconsistent that the draft policy only allows viability to be assessed as ‘generally acceptable circumstances’, whereas in reality it only allows viability to be assessed as ‘generally acceptable circumstances’.

...to prepare the site for the decommissioned energy network on long-term terms produced by the council’s energy teams. The relevant part of the plan of application will provide a firm basis against which to assess any proposals.

...energy study and sustainability brief paper provide further information. Decommissioning of the electricity network has no bearing on heat

The news energy study and sustainability brief paper provide further information. Decommissioning of the electricity network has no bearing on heat

The news energy study and sustainability brief paper provide further information. Decommissioning of the electricity network has no bearing on heat

...viability study factors in taxes to carbon/carbon networks and decommissioning of the grid as its modelling, and still shows net carbon emissions that require further reduction to meet the CLG target. The approach is consistent with the London Plan.

The news energy study and sustainability brief paper provide further information. Decommissioning of the electricity network has no bearing on heat

The news energy study and sustainability brief paper provide further information. Decommissioning of the electricity network has no bearing on heat

...understandable in terms of added risk, which would have a knock-on effect on funding and the cost of

...within that period. It is notable that during the last recession it was necessary for the Government to introduce measures (in 2009) to

...grant of planning permission. The policy should require the LPA to

...within the round.

...we note that the inclusion of site-specific viability as a material consideration...
Development

The loss of industrial floorspace experienced in Islington is significantly above benchmark release figures, as set by the Mayor in the Strategic and Support noted.

Site Allocations

The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A Consider the strings attached to the site allocations are indicative of an ever more restrictive policy regime which will make future good Moorings will be suitable if they meet criteria in relevant policies.

Reg 19.0136 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

The site is not a "strategic" planning area, but its spatial impact is considered significant by some perspective. It represents a higher level location to approximate employment opportunities, and should not suffer subject to an unjustified and mechanically applied blanket policies (including those as height).

Reg 19.0137 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0136 Standard: "a development opportunity which fall within the criteria for industrial floorspace will not be developed. The site has a significant and sustainable commercial use that can accommodate a range of uses including the existing industrial or warehouse uses, without any flexibility. Redistribution of the recommendations of the Council's own evidence base, and would not fail to comply with the Mayor's objective to make more efficient use of land through the location of industrial activity with other uses. As currently drafted, Policy SP3 of the draft Islington Local Plan therefore fails to recognize the fundamental shift which has already taken place in this part of the Cold, despite the alterations to its own study. In this context, my clients support the recommendation of the Study ( Draft Study report) that there should be no less of industrial floorspace within the Cold. However, the consequence of this would Policy SP3 of the Cold draft London Plan would be to remove the existing base of industrial use and warehouse uses (based on an increasing flexibility to allow for a wider variety of business uses (including office) as, so as mix-use developments that would enable the more efficient use of industrial sites in accordance with sustainable development objectives. My clients therefore object to Policy LC as currently drafted.

Reg 19.0139 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0139 Standard: "An additional five points within the criteria for industrial floorspace will be developed. The site has a significant and sustainable commercial use that can accommodate a range of uses including the existing industrial or warehouse uses, without any flexibility. Redistribution of the recommendations of the Council's own evidence base, and would not fail to comply with the Mayor's objective to make more efficient use of land through the location of industrial activity with other uses. As currently drafted, Policy SP3 of the draft Islington Local Plan therefore fails to recognize the fundamental shift which has already taken place in this part of the Cold, despite the alterations to its own study. In this context, my clients support the recommendation of the Study ( Draft Study report) that there should be no less of industrial floorspace within the Cold. However, the consequence of this would Policy SP3 of the Cold draft London Plan would be to remove the existing base of industrial use and warehouse uses (based on an increasing flexibility to allow for a wider variety of business uses (including office) as, so as mix-use developments that would enable the more efficient use of industrial sites in accordance with sustainable development objectives. My clients therefore object to Policy LC as currently drafted.

Reg 19.0144 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0144 Standard: "Not applicable to the context of this Local Plan. The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives more than sufficient level of protection for our boaters. We have reviewed the Gypsy & Traveller Accommodation Assessment in the evidence base and would advise there is a finite protect and improve the benefits provided by the water environment. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is considered to be an important document which has informed the local plan, it is also capable of being a material consideration for relevant applications.

Reg 19.0145 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0145 Standard: "Not applicable to the context of this Local Plan. The proposed height of development can generally be up to a maximum of five commercial storeys. It is noted that five storeys still gives more than sufficient level of protection for our boaters. We have reviewed the Gypsy & Traveller Accommodation Assessment in the evidence base and would advise there is a finite protect and improve the benefits provided by the water environment. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is considered to be an important document which has informed the local plan, it is also capable of being a material consideration for relevant applications.

Reg 19.0146 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0146 Standard: "The study's conclusions are based on detailed townscape analysis and a review of planning sensitivities and are considered appropriate. The study is considered to be an important document which has informed the local plan, it is also capable of being a material consideration for relevant applications.

Reg 19.0147 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0147 Standard: "The study's conclusions are based on detailed townscape analysis and a review of planning sensitivities and are considered appropriate. The study is considered to be an important document which has informed the local plan, it is also capable of being a material consideration for relevant applications.

Reg 19.0148 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

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Reg 19.0149 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

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Reg 19.0150 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

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Reg 19.0152 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

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Reg 19.0157 Strategic and Development Management Policies

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Reg 19.0158 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

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Reg 19.0159 Strategic and Development Management Policies

Policy LC: 108-110 Boundary Road locally significant Industrial Site

Lawno. 19.0159 Standard: "The study's conclusions are based on detailed townscape analysis and a review of planning sensitivities and are considered appropriate. The study is considered to be an important document which has informed the local plan, it is also capable of being a material consideration for relevant applications.
Development

BC13: Car park at The policy is for new spaces, not existing ones. Wherever new shared footpaths are provided, there should be a delineation, unless the works does not allow it.

Strategic and

Support noted.

Strategic and

Support noted.

Strategic and

Support noted. The Council will make suggested changes through modifications to the Local Plan.

Strategic and

Support noted. The Council will make suggested changes through modifications to the Local Plan.

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Support noted.

Strategic and

Support noted.

Strategic and

Support not stated. Part 1 of DM states: 'King's Cross has a distinct character, and the area contains a number of heritage assets, including the Regent's Canal and a number of listed buildings. The area's character will be protected and enhanced, with high quality design encouraged to respect the local context of King's Cross and its surroundings.'
Development

Strategic and Property owners should have the right to decide who and what organisations may occupy the affordable workspace premises. It is

The proposed Local Plan policy B2 promotes the provision of a range of workspace typologies (including co-working, hybrid space and

Strategic and It must be for the owners and developers of new office floorspace to ensure that it meets the requirements of a dynamic market. Being

The allocation should be expanded to include Sui Generis uses akin to industrial uses in line with other policies in the Plan. The future

The respondent states that part F (v) is unnecessary as by definition an activity that is ancillary to the business function of the premises is

Paragraph 4.27 provides further information on part F(v). It is considered appropriate to control suitable ancillary uses through policy; a

The Council argue that such an approach runs counter to the notion of strategic planning and sustainable development. It is not

Strategic and Strategic

Bunhill and Bunhill and Bunhill and Bunhill and Bunhill and

Strategic and

The affordable workspace definition, contained in appendix 9 should be amended to reflect the above comments. Object See comment above re: policy B4.

Support noted. Where an extant permission exists on an allocated site but the permitted uses differ from the allocated uses the allocation

Part F (iv) of policy B2 to demonstrate cumulative contribution to a range of spaces is too onerous given that the primary delivery

Strategic and

Strategic and

Strategic and

Strategic and

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Bunhill and

Strategic and

Bunhill and

Bunhill and

Strategic and

The affordable workspace definition, contained in appendix 9 should be amended to reflect the above comments. Object See comment above re: policy B4.

Support noted. No objection to policy stated.

Support noted. No objective to policy stated.

Support noted. Where an-related permission exists on an extant use it may be permitted use differ from the extant uses the allocation

The allocation should be expanded to include Sui Generis uses akin to industrial uses in line with other policies in the Plan. The future

Support noted. The concept ensures that the user identified in appropriate for each site allocation are determined, with the caveat

Support noted. Where an-related permission exists on an extant use it may be permitted use differ from the extant uses the allocation

Strategic and

Strategic and

Strategic and

Strategic and
Part B of policy B4 should be subject to viability. Part C of policy B4 should be reduced to 10 years because it is not justified by evidence.

The Council considers that the Tall Buildings Study is a robust basis for the proposed approach set out in the Local Plan proposed.

Part E has the potential to restrict innovative co-location and mixed use development and it conflicts with other parts of the plan in terms of the approach advocated in Draft London Plan policy D8 is not a wholly prescriptive that can rule out the potential for tall buildings.

The respondent suggests that policy B8 should be subject to viability criteria. The Council considers that the quality of floorspace is vitally important to ensure that it remains suitable for a range of occupiers.

The respondent suggests that the marketing exercise only be considered proportionate when undertaken for reasons other than evictions. The respondent suggests that the marketing exercise should only be considered proportionate, for reasons not only evictions. The respondent suggests that the marketing process should only be considered proportionate, for reasons not only evictions.

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The respondent suggests that the marketing exercise should only be considered proportionate, for reasons not only evictions.
Development

Our client is generally supportive of the spatial strategy policy, which identifies the Bunhill and Clerkenwell area as the area in the

Further discussion on the Council’s approach to tall buildings is set out in the tall buildings topic paper.

The Council considers that the merged allocation will have no bearing on the TBS assessment. It is noted that the original assessment

The allocation sites of Castle House and Fitzroy House have now been combined as a single allocation

Developer

Suggest that proposals for tall buildings should be guided to the strategic search areas identified in the tall buildings study then

Developer

Strategic and

The Tall Buildings Study uses basic 3D modelling that does not include landscaping of other existing details. Object

Support noted.

Respondent suggests a number of amendments to policy DH3. Object

Support noted

Object

The end users of such space is determined through an established commissioning process, led by the Council’s Inclusive Economy team,

1,000sqm), can be achieved in the identified locations without negatively impacting overall scheme viability. Viability testing indicates 10%

Support noted

Object

The employment land study provides further analysis of recent office development and sets out an updated position in terms of the

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Support noted

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Support noted

Object
Development

Site Allocations

OIS24: Pentonville Site Allocations

The policy requirement for the provision of affordable workspace is a mechanism to allow the Local Plan viability testing to indicate that the landowner

Suggest more flexible wording regarding the location of tall buildings: Instead of 'The northwest corner of the site (corner of Cayton Street and

The policy seeks the site to be redeveloped as a high-quality business quarter. We continue to welcome this position. We would also

Amend the site boundary as a modification to the Local Plan.

The representation states that the plan should place more priority on the need for using the site as facilitating development for active frontages along Caledonian Road will unduly constrain design options and should be relaxed. In addition, requiring a new east-west and north-south access across the site where possible could limit the development potential of the site. The reference to upgrading the wastewater network is onerous and unnecessary.

Policy BC3: City Fringe Opportunity Area

With a targeted quantum of 400,000 sqm of B1 office floorspace over the plan period, the 10% affordable workspace requirement equates to 40,000 sqm of affordable workspace provision overall, which is a very large amount. The provision of 40,000 sqm of affordable workspace could create a market in which the majority of new B1 office offers in the borough comprise either affordable workspace, or grade A office offers.

Refusal

It is important to note that there is no specific target for affordable workspace delivery in the LTP, but to achieve that 10% of the 400,000 sqm office floorspace required will be toward this end. It is assumed that all floorspace will be delivered through major development (the trigger for policy B4). It is likely that a significant amount will come forward from minor development as well. Ensuring that legislation is in place where small and medium enterprises (SMEs) can do business is a key priority for the council. Legislation that accommodated a substantial amount of small and micro enterprises (less than 50 people) would be achieved in the identified locations. This has been shown to attract new businesses in the long term. The site has a suitable location to accommodate this type of development.

Refusal

The council's own viability evidence base suggests that this approach is problematic where the site is small and the opportunity area would not be viable with policy B6 in place.

Refusal

Given the heritage conditions placed a Wellington Mews by its close proximity to the Grade II listed Pentonville Prison buildings, the scope for significantly intensifying its use is considered limited and an allocation unreasonable. This does not produce an appropriate parking location for the site and the principle of residential use is supported.

Refusal

Policy SC1 would apply as the site constitutes social infrastructure. However, a loss could be justified through evidence of a rationalisation programme. Heritage assets on site would have a balance between maintaining housing and protecting heritage, hence the heritage led approach, which has been supported historically.

Refusal

In the Local Plan there are a number of forms of affordable housing that will not be acceptable in Islington and as such genuinely affordable housing has meaning within the context of the Plan and the borough's aspirations for future housing delivery.

Reference to viability is not appropriate in the allocation, and would be justified on a case-by-case basis.

Refusal

We consider that it is not appropriate to approve the site boundary as a modification to the local plan. The council considers that policy BC3 is inappropriate in the context of the Plan and the borough's aspirations for future housing delivery.

Refusal

We consider that policy BC3 is not appropriate to approve. Given the conservation status of the Grade II Listed Pentonville Prison buildings, the scope for significantly intensifying this use is considered limited and an allocation unreasonable. This does not produce an appropriate parking location for the site and the principle of residential use is supported.

Refusal
It is not considered appropriate to include reference to receipts in planning policy.

It is considered that in order for this policy to be deliverable, the 10% requirement for affordable workspace should be required on the policy. Policy B4 is written broadly suggesting there is no differentiation in terms of conventional workspace and affordable workspace. It is the intention of the policy to require 10% of overall gross B-use floorspace. Where development comprises an extension to provide additional floorspace, affordable workspace should be provided according to the calculation. Affordable workspace is defined as low cost space (lower specification office space) suitable for SMEs. This is in line with London Plan policy PL2 which seeks to protect and promote the provision of low cost business space.

Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response

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Islington Local Plan Regulation 19 Consultation response spreadsheet organised by respondent with Council response
As stated in the council’s response to the representations submitted as part of the Regulation 18 consultation, much of Archway’s TfL Commercial Support the allocation and agree there is potential for decking over the railway land. However, consider that development should be Site Allocations

Site Allocations

The council considers its response to the Regulation 18 consultation representations is still valid: the Employment Land Study highlights Welcome the allocation, and support the aim to re-open the station with residential over-station development that preserves and Site Allocations

TfL CD supports the objectives of this policy to increase the supply of new housing in suitable locations. However, the policy must Site Allocations

The wording of the policy should be amended to allow flexibility where it is not appropriate to provide on-site construction training opportunities for financial payment can be made towards training initiatives or similar. Support to objective on site training opportunities. Site Allocations

The Plan has a high level of affordable housing across all TfL landholdings. This policy conflicts with DLP policy H5 and as such the local plan as drafted Site Allocations

There is a site located in Archway Town Centre which could enhance local context and potentially provide income to support regeneration and much needed upgrade of Old Street Station. We suggest that this site allocation is aimed at focusing on development opportunities which may come forward in the future, depending on changing market trends and需求, and therefore the topic would not be precluded from consideration. Site Allocations

The site is in a CAZ-fringe location where proposals for new business floorspace are required to maximise the provision of business Site Allocations

The plan is very clear that the key growth locations in the borough correlate largely around the key transport nodes. Site Allocations

The site has a PTAL of 6 and the potential to deliver significant residential development. The allocation should be amended to include residential use. Site Allocations

The site is located adjacent to Old Street Roundabout and represents an opportunity for a highly sustainable development providing significant amounts of business, retail and residential development. The council’s suggestion that the town centre is predominantly commercial is not an acceptable justification to completely preclude residential use. Site Allocations

TfL CD will continue to explore development opportunities at Old Street Roundabout, which could enhance local context and potentially provide income to support regeneration and much needed upgrade of Old Street Station. We suggest that this site allocation is aimed at focusing on development opportunities which may come forward in the future, depending on changing market trends and 需求, and therefore the topic would not be precluded from consideration. Site Allocations

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TfL CD wishes to ensure that the Mayor considers that Islington’s approach is acceptable. We note that the policy does not preclude the Mayor ‘calling in’ a portfolio approach in any previous conformity responses. In fact, the Mayor has been very supportive of our AH policy which will mean TfL CD will continue to explore development opportunities at Old Street Roundabout, which could enhance local context and potentially provide income to support regeneration and much needed upgrade of Old Street Station. We suggest that this site allocation is aimed at focusing on development opportunities which may come forward in the future, depending on changing market trends and 需求, and therefore the topic would not be precluded from consideration.
Policy H11 is overly negative and inconsistent with the London Plan. The supporting text to this policy focuses on BtR being a way to provide improved housing quality that creates, due to density and demand within the borough. However, for some developers, the full cost just isn't quality or value for money in the context of their business model - see footnote 23. The SHMA does highlight that private rented accommodation has a role to play in meeting this demand. As stated in the SHMA 2017 paragraph 4.8, private rented housing (which would be provided by HDP product) offers a flexible form of tenure and meets a wide range of housing needs.

In addition, the development site is located in an area that will see a significant increase in demand for housing and retail facilities, and will experience increased traffic in the area. The development site is located in an area that will see a significant increase in demand for housing and retail facilities, and will experience increased traffic in the area. The development site is located in an area that will see a significant increase in demand for housing and retail facilities, and will experience increased traffic in the area.
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<tr>
<th>Reg</th>
<th>13.5 Development</th>
<th>Site reference</th>
<th>Spatial Strategy</th>
<th>Strategic/policy/paving</th>
<th>Respondent name</th>
<th>Respondent ID</th>
<th>Support/submit</th>
<th>13.6 response</th>
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Development

The NPPF identifies at paragraph 59 that the Government’s objective is to significantly boost the supply of homes. Paragraph 61 adds that Chapter 3 Thriving Communities of the Regulation 19 Plan recognises the need for housing in the borough. It states that Islington faces an acute housing supply challenge due to its high land values and a high rate of population growth. The plan aims to address this challenge by increasing the supply of homes, particularly affordable housing, and improving the quality of existing housing.

Respondent

Policy H11 does not aim to restrict new housing being rented privately - see footnote 23; it aims to prevent use of a specific business model that would lead to a lack of conventional housing being rented privately. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council’s housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the objective of increasing the availability of residential units at AR1.

The respondent cites a number of issues raised in the policy supporting text, and are elaborated in the housing topic paper. This response does not address the key points raised by the respondent.

The plan aims to increase the supply of homes, particularly affordable housing, and improve the quality of existing housing. It identifies the importance of housing to the Council. Given the identified housing need, and limited land supply it remains unclear why residential uses have been excluded from AUS6, certainly when the AUS6 is the kind of site that offers a good supply of land, and is close to the existing residential area.

The plan seeks ambitious growth targets for the Capital. Regulation 19 Policy H2: New housing states that site allowances should not exceed its minimum housing target. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council’s housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the objective of increasing the availability of residential units at AR1.

The respondent cites a number of issues raised in the policy supporting text, and are elaborated in the housing topic paper. This response does not address the key points raised by the respondent.

The plan identifies its importance as a core component of the local housing market with its proportion of the overall market growing in response to changing economic activity, new homes and a substantial improvement to the urban realm. Improved place-making along Tolpuddle Street can be seen as a direct result of this. The respondent points out that the plan has not been amended to reflect this.

The respondent makes a number of observations that highlight the significance of social rent as a component of the housing market. The use of the terms ‘affordable housing’ and ‘social rent’ are not clearly defined in the plan. This is important as the plan seeks to prioritise the delivery of conventional housing. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council’s housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the objective of increasing the availability of residential units at AR1.

The respondent does not cite any direct socio-economic or demographic data to support the plan’s objective of increasing the supply of homes. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council’s housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the objective of increasing the availability of residential units at AR1.

The respondent cites a number of issues raised in the policy supporting text, and are elaborated in the housing topic paper. This response does not address the key points raised by the respondent.

The plan seeks ambitious growth targets for the Capital. Regulation 19 Policy H2: New housing states that the Council’s housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the objective of increasing the availability of residential units at AR1.

Improved place-making along Tolpuddle Street can be seen as a direct result of this. The respondent points out that the plan has not been amended to reflect this.
Development
Strategic and
This section of the response is very similar to the response from Quod, reference R19.0113. The Council's response to R19.0113 provided
Policy H11 (A)(iv) proposes that private rented sector units are held under a restrictive covenant for the lifetime of the building which is
85% of these houses have no savings for a deposit. (p.132 Gs.17)
85% of households who pay rent or a mortgage say it is "either within budget", "about right" or "just manageable". (p.14) 85% of the same group say, they are not considering the prospect of falling into arrears. (2.124)
These headlines illustrate that many households in rental accommodation have limited capacity to afford to purchase an expense
through the long-term where market sale products generally require significant deposits or existing equity. Whilst the provision of shared
ownership can target some of these households it will not be accessible to or appropriate for all households currently residing in the
private rented sector. Evidence there will be an increase in income above those which would prioritise them for the range of rented
affordable products including London rent (also for those but with still have insufficient savings for an open market or shared ownership purchase) The Council noted that the threshold
so 1% is 65 which shows that a large proportion of the proposed houses on our council could access LHA. Leaving the aside, the
income profile of social housing is generally gross income but this is not confirmed that approximately 65% of householder have an
income less than £65,000. At this end would load to the overwhelming need for generally affordable housing. Particularly
and the same income profile show that a quarter of households have an income of less than £63k. Figure 11 of the SHMA
during the distribution of gross income in a similar manner to the respondents table, the results are not too dissimilar to face value,
though actual comparisons is difficult without further detail in the respondents information.
Fig 10 provides further evidence that market rent is not affordable to the majority of households. At 30% of income, only 15%
of households can afford market rent. At 45% of income, which is a very high proportion, only 20% of households can afford market rent. As
a comparison, the same table show that many half of households cannot afford target rent based on 60% of income.
To assert, the overwhelming need for affordable housing. The approach taken by the respondent seems to suggest that there are plenty
of households who can pay market rent and that they are stalling their ability to rent privately suggesting households would look to
affordable housing, landlords seek affordable housing because they cannot afford anything else. As noted above Figure 4 (SHMA),
the majority of households can only afford market rent if they speed high proportions of income as rent which, has a significant effect on
living standards and standards, amongst other things.

Policy H11: Purpose Built Private Rented Sector Development
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Support/Rejection
Support/Rejection
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Wherever possible, remove cycle and pedestrian permeability barriers when planning new developments. Redevelopment is a chance to simplify governance and remove regulatory uncertainty for dockless cycle hire operators. Determine that the draft could take a different approach to the adopted plan by seeking business fleaspace in a suitable priority order. The evidence base to support this approach is new dated and should be updated for purposes of the policy review. Express expectation that enforceable recommendations of evidence have been taken forward without taking into account water development plus policies. The policy states that the introduction of uses that could undermine the primary economic function of that particular area will not be allowed. The policy refers to the specific roles and function of the Angel and Angel Upper Street location suggesting that that is solely a business location, akin to the City of London or Canary Wharf. It is not. It is a mixed-use town centre which includes residential accommodation. The Council should take a proactive approach to working with businesses to find delivery solutions which eliminate as many vehicle journeys as possible. It's important to spell out the essential criterion for a successful pedestrian-friendly street environment: clear design for a future which prioritises carbon-free modes. Developments must not install barriers which could preclude residential uses also.

Policy B2: New Town Centres

Shopping Area

AUS6 is overly restrictive given the capacity improvements expected with Crossrail 2; office uses could be utilised as part of any development that came forward as a result of Crossrail 2; development at ground floor level can also cause negative amenity impacts for residential occupiers as well as reducing viability of future floor will harm the commercial function and on upper floors can harm operational functioning of individual units. Residential uses at ground floor will harm the commercial function and on upper floors can harm operational functioning of individual units.

Policy R1: Retail, Upper Street

Section/policy/paragraph number

Agreed. The Department is currently preparing a further consultation on the non-inclusion of residential uses on one side. Angel may have residential uses for upper floors and circulation not occurring in ground floor space. However, the paragraph is necessary because of the inflexible recommendations of evidence have been taken forward without taking into account wider development plan policies. The evidence base to support this approach is new dated and should be updated for purposes of the policy review. Express expectation that enforceable recommendations of evidence have been taken forward without taking into account water development plus policies. The policy states that the introduction of uses that could undermine the primary economic function of that particular area will not be allowed. The policy refers to the specific roles and function of the Angel and Angel Upper Street location suggesting that that is solely a business location, akin to the City of London or Canary Wharf. It is not. It is a mixed-use town centre which includes residential accommodation. The Council should take a proactive approach to working with businesses to find delivery solutions which eliminate as many vehicle journeys as possible. It's important to spell out the essential criterion for a successful pedestrian-friendly street environment: clear design for a future which prioritises carbon-free modes. Developments must not install barriers which could preclude residential uses also.

Policy T5.B.viii states that proposed delivery arrangements must investigate the potential for non motorised delivery modes. The Council is actually allowing many operators of dockless cycles in Islington. However, the paragraph is necessary because of the inflexible recommendations of evidence have been taken forward without taking into account water development plus policies. The policy states that the introduction of uses that could undermine the primary economic function of that particular area will not be allowed. The policy refers to the specific roles and function of the Angel and Angel Upper Street location suggesting that that is solely a business location, akin to the City of London or Canary Wharf. It is not. It is a mixed-use town centre which includes residential accommodation. The Council should take a proactive approach to working with businesses to find delivery solutions which eliminate as many vehicle journeys as possible. It's important to spell out the essential criterion for a successful pedestrian-friendly street environment: clear design for a future which prioritises carbon-free modes. Developments must not install barriers which could preclude residential uses also.

Policy R19.0154

Appendix 4: Cycle workspace

- While it's good that the council is encouraging Sheffield stands (Appendix 4, pg 5), we recommend setting requirements which are more specific in relation to suitability of an allocation was predicated on the same use existing on site currently, this would preclude residential uses also. The council does not consider the evidence is dated. There has been on significant shift in market circumstances or context that would render the conclusions, and the need for a large amount of new fleaspace to meet projected growth, invalid. The requestors have not sought to provide any robust commentary on the methodology or the reasons why it is considered dated. The document does not claim that Angel and Upper Street is akin to the City of Canary Wharf, it states that the area is an important business location and within the CAZ. Angel does have residential uses but in no way could they be considered inflexible, in terms of their influence on the function and character of the area, to commercial rent and business uses. This is evident from their busy walkway through the area or sight touch research exercise. The lack of existing office on the site does not affect the proposed allocation. If suitability of an allocation was predicated on the same use existing on site currently, this would preclude residential uses also.

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Development
Strategic and
Draft Policy B3 ('Existing Business Floorspace') relates to all business floorspace, where existing business uses are industrial in nature (i.e.
Better Archway
Strategic and
LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building
Strategic and
Strategic and
Better Archway
Site Allocations
Metropolitan
ARCH3: Archway
Campaign
The respondent supports policy B3 which ensures that there is not net loss of industrial business uses, and that employment generating
Suggested addition is unnecessary. Policy SC1 would, in principle, already support such provision where proposed. No specific allocations
Respondent
Consider the site allocation is superfluous. The site has been constructed, the vast majority of it has been completed and the residential
The council consider a two year temporary use period to be too long and risks precluding permanent development. Although large sites
Policy support noted on consideration of Sui Generis uses akin to industrial uses, such as Builders' Merchants.
Campaign
Landowner
Relocating the portacabins which block the tube station entrance would be an important improvement that boosts the retail frontage. Not stated
Comment noted. It is not considered to require amendment to the allocation.
Campaign
AUS11: Proposed
Site Allocations
TP wish to record their support of the amended glossary definitions and in particular the inclusion of builders' merchants within the
Respondent supports approach. However, the time allowed for temporary uses is not of sufficient time to attract potential occupants. The
Introduce change via a modification to the Local Plan to include reference to cyclists as well as pedestrian movements in paragraph 9.12.
ARCH4:
ARCH5: Archway
Strategic and
Strategic and
Better Archway
Site Allocations
Recommends safeguarding future kerblines from infrastructure providers construction of new equipment which could obstruct cycle
Work here could be made dependent on the re-opening of Junction Road Station, providing a clear and immediate public benefit. LBI are not aware of TfL priority for such a scheme, thus it is not considered appropriate to amend the allocation.
ARCH4:
ARCH5: Archway
Strategic and
Strategic and
Better Archway
Site Allocations
Introduce change via a modification to the Local Plan to include reference to cyclists as well as pedestrian movements in paragraph 9.12.
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Better Archway
Site Allocations
Introduce change via a modification to the Local Plan to include reference to cyclists as well as pedestrian movements in paragraph 9.12.
The Council is not aware of any TfL priority for such a scheme, but we note that it does not need to be explicitly stated in the Local Plan in order to come forward. Local Plan transport policies would provide in principle support in any event.

There is an increase in vehicle speed on main roads, especially Holloway Road and Junction Road. Public realm interventions, such as attempts to reach BREEAM standards on the cheap.

Policy S7 provides detailed requirements to improve air quality. Policy T3 requires car free development.

Islington should talk to TfL to terminate buses to stop at points of demand, such as Whittington Hospital and Upper Holloway, this would encourage the use of the bus as a feeder service for Archway. Good public transport. TfL needs to understand the issues.

In order to come forward. Local Plan transport polciies would provide in principle support in any event.

Permeability is an important principle but actual design of schemes will be a case by case consideration, taking into account local context.

This is supported by Local Plan transport policies and the Transport Strategy.

Policy S7: Improving the public realm and sustainable transport
Policy T2: Sustainable Transport Choices
Policy T1: Enhancing the public realm and sustainable transport
Policy H1: Thriving Local Society
Policy S8 and S9 provide detailed requirements re: managing flood risk and implementing sustainable drainage.

Sustainable drainage is imperative and should be required as widely as possible.

The Local Plan has a number of policies which would cover the issues raised, including PLAN1. Paragraph 7.32 relates to surface permeability i.e. sections which are actively ponded and/or in a clear sense of ownership.

Neither re: bike parking. 24 hours per day is required.

Policy I1: Forster Road
Policy I2: Designing
Policy I3: Lifecycle
Policy I4: Site
Policy I5: Delivering
Policy I6: Satisfied
Policy I7: Affordable
Policy I8: Environmental
Policy I9: Economic
Policy I10: Social
Policy I11: Cultural
Policy I12: Community
Policy I13: Health
Policy I14: Resilience
Policy I15: Quality
Policy I16: Management
Policy I17: Development
Policy I18: Neighbourhood
Policy I19: Area
Policy I20: City
Policy I21: Borough
Policy I22: City Region
Policy I23: Nation
Policy I24: Global
Policy I25: The local plan has an important part to play but actual design of schemes will be a case by case consideration, taking into account local context.

There are a number of policies which would cover these issues, including PLAN1. Paragraph 7.32 relates to surface permeability in the ability of the water to drain easily.

In the Local Plan there is a number of policies which would cover good quality sustainable design, which includes daylight and sunlit requirements as well as specific BREEAM standards. Policy 60 provides specific requirements for green roofs, including requirements for a maintenance plan.

Policy 60 promotes the circular economy, which looks to reduce demolition and promote reuse of buildings.

Policy 60 and 32 provide detailed requirements re: managing flood risk and implementing sustainable drainage.

Policies and project on the whole site and achieve more than the Act requires. Please take it as read that we are supportive of what the Plan sets out. The following are suggestions where we believe there is scope for increasing the effectiveness of the proposals. We appreciate that some of these points are exactly matching matters for TfL but include them as part of the local picture.
The suggestion is overly onerous. Part B would allow for case by case assessment of such issues where there was evidence to demonstrate. It is not clear what the suggestion is in relation to, as all planning policy works within the Use Class Order and not by any other mechanism.

The tall buildings study identified a number of locations which are suitable, in principle, for buildings over 30m. There is no convincing evidence that a sustained programme of new extensions could gradually evolve from areas of green space. Again, it were to be drawn to the maps of green space that would be helpful.

Policy 5.2 states that lots of some green space `may be acceptable where specific criteria are addressed'. This will be tested upon by any developer, whether appropriate or not. For purposes, it is not helpful to include. If genuine, Islington may obviously negotiate such a loss in exceptional circumstances.

That greenery is of course important for managing heat risk and on point B Managing heat risk, it would be helpful for policy to actively require more trees, together with care for those in the trees for 10 years, of securing that are ensured during what are necessarily but uncommonly summer months.

In consideration of the Historic Environment we note the reference to contextual area. Given that in Archway developers use the retail units to the branches of Sainsbury's and Tesco's, but that there is a proposal that the retail frontages should extend up Highgate Hill, and that the part of the building most visible to the public looks compressed and ‘mean’. A requirement to reflect that quality would be particularly expensive in terms of maintenance so are liable to become much more run down than properties where maintenance is easier and more affordable. And of course you may require a great deal of investment in its safety. Tall buildings do not appear to offer long term value, whatever the short term return.

Section/policy/paragraph 8.53 provides clear guidance related to determining the surrounding context height re: tall buildings. Paragraph 3.95 state that access to communal space should not be restricted on the basis of tenure. Spatial Planning and Policy H5 and paragraph 6.06 state that access to communal space should not be restricted on the basis of tenure.

While houses are green space, this local plan places a strong presumption against this, as set out in policy G4. We note that the PSA does not extend up Highgate Hill, nor does it include the Holborn Union (Archway Campus) site; both locations fall within this area.

It is clear in policy G4 that tall buildings are not the default form of future tower living. Given that in Archway developers use the retail units to the branches of Sainsbury's and Tesco's, but that there is a proposal that the retail frontages should extend up Highgate Hill, developers need to be able to convince planners that the buildings being proposed are of a quality which is considered to be of a quality which is of exceptional quality.

In terms of basement applications outside Conservation Areas it would be very helpful to also require that unless a lower ground floor / basement is to be retained, the development should be shown on the site plan so that it may be seen that a provision is being made for such a lower ground floor / basement.

Recently reports by Savills show that pre 1900 buildings are particularly appreciated across London and neighbouring boroughs protect farmland, and policy DH1 F, if kept, should be amended to require that no building above 20 storeys be permitted. Professor Steadman has also found that particularly expensive in terms of maintenance so are liable to become much more run down than properties where maintenance is easier and more affordable. And of course you may require a great deal of investment in its safety. Tall buildings do not appear to offer long term value, whatever the short term return.

Policy 6.06 has detailed criteria to protect and promote trees.

New developments on the Holborn Union site would have the effect of adding additional, unnecessary mass to a site where the proposed height of new development is already significant. Given their importance ideally policy would require that new green spaces provided in developments be made over to public ownership. This would also be of benefit to prevent for example play spaces only being made available to children living in privately owned accommodation. The Local Plan promotes tenure blind development and policy H5 and paragraph 6.06 state that access to communal space should not be restricted on the basis of tenure.

We note that through the Historic Environment we note the reference to contextual area. This reflects consensus that tall buildings are not the default form of future tower living. Given that in Archway developers use the retail units to the branches of Sainsbury's and Tesco's, but that there is a proposal that the retail frontages should extend up Highgate Hill, developers need to be able to convince planners that the buildings being proposed are of a quality which is considered to be of a quality which is of exceptional quality.

In terms of basement applications outside Conservation Areas it would be very helpful to also require that unless a lower ground floor / basement is to be retained, the development should be shown on the site plan so that it may be seen that a provision is being made for such a lower ground floor / basement. A tall buildings study reported a number of locations which are suitable, in principle, for buildings over 30m. There is no convincing evidence that a sustained programme of new extensions could gradually evolve from areas of green space. Again, it were to be drawn to the maps of green space that would be helpful.

Stakeholders are puzzled that the map indicates that Archway town centre primary frontage is not designated as extending down Holloway Road to the branches of Sainsbury's and Tesco's, but that there is a proposal that the retail frontages should extend up Highgate Hill, developers need to be able to convince planners that the buildings being proposed are of a quality which is considered to be of a quality which is of exceptional quality.

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CEMEX would like to see their site included within the CAZ boundary. Three of the four tall building sites identified in the policy neighbour the CEMEX site. Policy DH4 (for the High Night Time Economy) specifically states that: ‘Policy DH4 is designed to create an environment in which the ongoing functionality of local areas is maintained and protected. It is intended to strengthen protection for one operator. Policy DH5 would apply to applications, there is no need to repeat in SP2; Policy DH3 does not go far enough in addressing the particular issues faced by existing businesses and operations such as CEMEX which are considered to be existing noise generating activities – whether from the site operations or associated traffic. CEMEX has found in London and elsewhere in the country, that LPA’s have not ensured that new developers, particularly for residential developments, adequately mitigate their developments from existing noise, vibration and emission’s, despite CEMEX objecting to proposals on these grounds. Such mitigation may mean no opening windows or vents, no balconies and no sleeping or living accommodation overlooking or facing the site. The installation of mechanical ventilation may also need to be part of the new building to ensure its use can continue. Without such measures proper mitigation measures are in place and implemented by developers for new residential developments, the tonal new developments can threaten the closure of these sites through noise annoyance.

Policy DH5 describes new development being located close to sensitive uses – but does not reflect the fact that new sensitive uses may also be developed alongside existing noise generating uses. Under the agents of change approach in particular, this policy is the developer proposing the sensitive use into the existing environment – and if so they requesting permission to be granted they should ensure that the users of their proposed development are properly mitigated from the existing noise environment of businesses such as CEMEX. Such Clause C and D need amending to reflect that the agents of change approach may be a developer trying to introduce a use into an existing environment – which needs to be mitigated to ensure that once occupied – the operators or residential occupiers are not adversely impacted by the existing operations. Granting of development need to ensure that they are allowed to continue to operate. Paragraph 8.87 reflects the principle that new noise sensitive developments in proximity to existing noise generating uses must follow the agent of change principle – but this needs to be written into the actual policy to carry weight. This process less weight than words written as supporting text. As such CEMEX would like to see policy DH5 changed to address this and have a standard which reflects more clearly the draft policy set out in the London Plan Policy 012.

Policy DH6: Agent of change: noise and vibration

CEMEX welcomes the principle of the Agent of Change Policy contained in the draft submission plan, but makes it clear that the policy does not go far enough in addressing the particular issues faced by existing businesses and operations such as CEMEX which are considered to be existing noise generating activities – whether from the site operations or associated traffic. CEMEX has found in London and elsewhere in the country, that LPAs have not ensured that new developers, particularly for residential developments, adequately mitigate their developments from existing noise, vibration and emission’s, despite CEMEX objecting to proposals on these grounds. Such mitigation may mean no opening windows or vents, no balconies and no sleeping or living accommodation overlooking or facing the site. The installation of mechanical ventilation may also need to be part of the new building to ensure its use can continue. Without such measures proper mitigation measures are in place and implemented by developers for new residential developments, the tonal new developments can threaten the closure of these sites through noise annoyance.

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Policy DH6: Agent of change: noise and vibration

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Policy DH5 describes new development being located close to sensitive uses – but does not reflect the fact that new sensitive uses may also be developed alongside existing noise generating uses. Under the agents of change approach in particular, this policy is the developer proposing the sensitive use into the existing environment – and if so they requesting permission to be granted they should ensure that the users of their proposed development are properly mitigated from the existing noise environment of businesses such as CEMEX. Such Clause C and D need amending to reflect that the agents of change approach may be a developer trying to introduce a use into an existing environment – which needs to be mitigated to ensure that once occupied – the operators or residential occupiers are not adversely impacted by the existing operations. Granting of development need to ensure that they are allowed to continue to operate. Paragraph 8.87 reflects the principle that new noise sensitive developments in proximity to existing noise generating uses must follow the agent of change principle – but this needs to be written into the actual policy to carry weight. This process less weight than words written as supporting text. As such CEMEX would like to see policy DH5 changed to address this and have a standard which reflects more clearly the draft policy set out in the London Plan Policy 012.

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Strategic and BC5: London

Statutory

Policies R3, R9 and R10 all prioritise cultural uses in Town Centres and the CAZ, which are the boroughs primary commercial areas. The loss of industrial floorspace experienced in Islington is significantly above benchmark release figures, as set by the Mayor in the

Site Allocations

Strategic and Support

To meet Islington's need for 400,000sqm business floorspace, business use has to be prioritised in appropriate locations such as this. Policies R19.0163-165 seek to rationalise the small number of large central locations that are currently designated for business use, and ensure that any increase in height or massing would require a thorough assessment to ensure there are no major adverse impacts on surrounding heritage assets.

Strategic and Development Management Policies

Locally Significant Infrastructure

Houses Policy R11: Public

All site allocations are not flexible enough in terms of use class or building heights and should be amended. Request that the allocation is amended to include residential and hotel uses as acceptable alternative uses to office development, which is why B1 is strongly encouraged in the CAZ, Priority Employment Locations and Town Centres. The council's scheme, but it must constitute a small proportion of the overall proposal. The Council recognises the employment potential from B1 office floorspace. Such development could seriously harm the area's primary economic function and could lead to the deterioration and gradual loss of industrial uses in this area. The introduction of B1 space is permitted, when provided as part of a hybrid workplace scheme, but it must constitute a small proportion of the overall proposal. The Council recognises the employment potential from B1 development, and is why B1 is strongly encouraged in the CAZ, Priority Employment Locations and Town Centres. The council's approach is supported by the Mayor, and is considered to be in line with the draft London Plan.

The allocation of available housing in both existing and new development is key to ensuring design and land use benefits. The study's conclusions are based on detailed townscapes and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the core plan; it is also capable of being a material consideration for relevant applications. The proposed height of development can generally be up to a maximum of five storeys in the CAZ, whereas other policies afford greater flexibility in certain circumstances. Policy should read 'should be located' or 'must be located'. The policy could also undermine the small locational requirement in R1 and R10 reflects this. Other locations can still be justified by policy R3.

Residential and hotel uses are not appropriate alternative uses in line with relevant AAP policies and objectives. The site is locally listed and within the setting of a variety of heritage assets; the allocation for refurbishment with sensitive infill development on the undeveloped part of the site is therefore considered appropriate.

Support the policy, and particularly welcome reference to Deeds of Easement being in place within part C. Support the policy.

The council's consultation on the London Plan regulations organised by respondent with Council response

The study's conclusions are based on detailed townscapes and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the core plan; it is also capable of being a material consideration for relevant applications. The proposed height of development can generally be up to a maximum of five storeys in the CAZ, whereas other policies afford greater flexibility in certain circumstances. Policy should read 'should be located' or 'must be located'. The policy could also undermine the small locational requirement in R1 and R10 reflects this. Other locations can still be justified by policy R3.

We previously wrote in support of this policy, this remains the case. Welcome amendment in line with Regulation 18 comment.

London's cultural uses in the borough, business use has to be prioritised in appropriate locations such as this. Residential and hotel uses are not appropriate alternative uses in line with relevant AAP policies and objectives. The site is locally listed and within the setting of a variety of heritage assets; the allocation for refurbishment with sensitive infill development on the undeveloped part of the site is therefore considered appropriate.

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We support this policy, and particularly welcome reference to Deeds of Easement being in place within part C. We support this policy, and particularly welcome reference to Deeds of Easement being in place within part C. Support the policy.

Please stated that the London council has included in an initial allocation but would prefer the ability to provide a variety of uses on the site. Request that the allocation is amended to include residential and hotel uses as acceptable alternative uses to office development. The allocation does not refer to the possibility of increasing the height of the existing building. It should be amended to state that any increase in height or massing would require a thorough assessment to ensure there are no major adverse impacts on surrounding heritage assets.

The proposed height of development can generally be up to a maximum of five storeys. It is noted that five storeys is strongly encouraged in the CAZ, Priority Employment Locations and Town Centres. The council's approach is supported by the Mayor, and is considered to be in line with the draft London Plan.

The council's consultation on the London Plan regulations organised by respondent with Council response
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Development

Consider that the site allocations should be withdrawn as the site has planning permission and development is due to commence. It is not considered that the site should be reallocated to another use. In addition, the site allocations do not include any provision for the retention of the open space. As described in criterion (d) of the policy, site allocations should not include any provision for business uses on or near a main road, nor place any restrictions on the provision of other business uses on or near the site. To ensure that the local plan continues to make provision for other business uses on or near the site, it is recommended that the site's allocation should be amended to ensure maximum flexibility of the floorspace in future so as to avoid unnecessary vacancy and keep the site in its worst use.

Strategic and Business Support for the main objectives of Policy G1. Support noted.

Inconsistent with the Employment Land Study 2016 identifies this part of the area as a potential future use, depending on specific circumstances. It is expected that the policy should include a pathway to alternative uses other than industrial or secondary uses and to accommodate the change in land use for long periods.

The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.

Support/Impact: Islington Local Plan Regulation 19 Consultation response spreadsheets organised by respondent with Council response

The site should also be considered an appropriate location for a tall building given its high PTAL rating; limited topography constraints; it is not in a conservation area; it is not listed; and it does not fall within protected vistas or strategic views. Suggests that allocations should include an indicator minimum development capacity.

The site is in existing employment use in a conversion site and given the demand for business floor space, the allocation is appropriate. The potential for future development has been identified through a detailed study, which does not identify conflicts with a suitable tall building. An alternative use for the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.

The policy will assess the introduction of other business uses on a case-by-case basis, to ensure that exceptional circumstances for the consideration of non-business uses in the area through exceptional circumstances should not define the character or the priority uses of the area. As previously mentioned above, the allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.

The consideration of non-business uses in the area through exceptional circumstances should not define the character or the priority uses of the area. As previously mentioned above, the allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
The prioritisation of office floorspace within this area is supported but it should be acknowledged that other ancillary commercial and potentially ancillary uses can support the economy and create a sense of place. The respondent suggests that a flexible approach is applied to supporting uses/multi-use schemes which include office floorspace.

The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional business floorspace up to the year 2036. The development of retail, leisure and other business uses is to be encouraged and facilitated. This is therefore a key priority. However the Council acknowledges that certain uses support office uses particularly, in the CAZ and in a proportion of Borough Policy H1 and paragraph H2 and provides office services for office workers, like cafes and shops, and will provide active frontages to the ground floor. In addition sites have been allocated for visitor accommodation in the Site Allocations and the draft Local Plan supports the intensification of existing visitor accommodation. The development of retail / leisure uses are to be located to Town Centres and local shopping centres. Residential development is not a key priority for the CAZ.

The respondent suggests that flexible workspace typologies introduced by policy B3 support.

The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. A high quality leisure centre is needed to support the vitality and viability of the area. The recommendation should be amended to indicate that the existing leisure centre was closed in 2013.

Policy B1: Delivering business floorspace

The site is discussed in detail in the Site Allocations.

Policy BC2: Culture, Arts, Heritage, Tourism and Leisure

This site is discussed in detail in the Site Allocations.

Policy BC7 reflects the site allocation which requires the re-provision of a high quality leisure centre, as well as public open space. A high quality leisure centre is needed to support the vitality and viability of the area. The recommendation should be amended to indicate that the existing leisure centre was closed in 2013.

Support/issue

Support noted

Not stated Correct.

Policy BC3: City fringe opportunity area

Policy A1: Overview

In terms of housing delivery, Islington has a strong track record of high levels of housing delivery, and will comfortably be able to deliver its housing target within 10 years of starting delivery through the release of existing business sites, including this site. The respondent refers to the London Plan for 2012, which identified that 400,000 sqm of office floorspace (up to the year 2036). The employment topic paper provides an up to date picture of supply, but it is not clear what proportion of the site will be allocated to housing. The respondent considers that the London Plan target does not allow for sufficient office floorspace capacity according to the London Employment Sites Database which identifies additional 14,118,550 sqm up to 2036.

Policy BC1 is consistent with both the current and emerging London Plan, including policies C4 and C6 of the draft London Plan.

The respondent refers to the London Plan which identifies the site for employment. Taking the respondents' figures at face value and comparing them against policies and policies for housing it is clear that the employment growth is over twice the amount set in the professional and technical services sector, which generates demand for office spaces. To meet this demand, the Council's objectives identified as 400,000sqm of office floorspace (up to the year 2036). The employment topic paper provides an up to date picture of supply, but it is not clear what proportion of the site will be allocated to housing. The respondent considers that the London Plan target does not allow for sufficient office floorspace capacity according to the London Employment Sites Database which identifies additional 14,118,550 sqm up to 2036.

Support/issue

Support noted

Support noted

Support noted
Part D discusses how new homes should be “made adaptable over their lifetime” to accommodate changing needs, we disagree, as free

In relation to the need to deliver Genuinely Affordable Housing (Part A of the Policy), we ask that:

Respondent

This is discussed in the housing and specialist housing topic papers. We note that the needs of ‘sofa surfers’ is encompassed within the

Strategic and

Strategic and

Whilst we are happy to see Under Part S the retention of social and community infrastructure we would request that Islington fully takes

This is discussed in the housing and viability topic papers.

We agree with Part A, that Islington needs to be a place that supports a range of different incomes, tenures and backgrounds, as this

This is discussed in the housing and planning topic papers. We note that the current policy position is to have a mix of tenure on new sites,

R19.0174

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Development
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Strategic and
London Centric disagrees with the view that the need for accommodation for older people must primarily be met via the delivery of
Strategic and
This is discussed in the specialist housing topic paper.
London Centric is unhappy to learn that: i) Under Part B that for sites capable of delivering 10 or more conventional housing units/and or
Respondent
In relation to Islington's Draft Policy on HMO's, we ask that:

R19.0174 Strategy and development management policies
Policy B7: Meeting the needs of vulnerable older people
London Centric Ltd London Centric Ltd London Centric Ltd
London Centric disagrees with the view that the need for accommodation for older people must primarily be met via the delivery of conventional
London Centric contests the wording of Part C which refuses the prospect of large-scale HMO's coming forward if they limit capacity to deliver
London Centric are disappointed to see the latter section of Part C (under the previous Regulation 18 consultation), which once discussed
London Centric finds it unacceptable to learn that under Part G, that site specific viability information will only be accepted in
Policy H3: Purpose built Private Rented sector development
London Centric Ltd
London Centric disagrees with Part A that Islington considers that purpose built Private Rented sector (PRS) development models do not have a role in meeting housing need in Islington. This is very short-sighted especially in the understanding that Islington is a generation of
Policy H11: Purpose built Private Rented sector development
London Centric Ltd
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This is discussed in the housing topic paper. Build to rent is a self-contained accommodation, as set out in national and regional policy. The expectation that clusters flats be allowed to act as a self-contained unit with a certain number of occupants living in it is considered as HMO by the Council.

There is a need for 50% space in the borough. The employment topic paper discusses this in more detail.

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<td>Respondent disagrees with policy R19.0176 as the government will not consider the site allocations unnecessarily restrictive.</td>
<td>Respondent disagrees. Council have not been asked to make the plans.</td>
</tr>
</tbody>
</table>

Islington Local Plan Regulation 10: Consultation response spreadsheet organised by respondent with Council response.
Development

Strategic and Site Allocations

It is not clear why the proposed allocations within the Vale Royal/Brewery Road site are for the retention and intensification of industrial uses which is supported by the Mayor in his strong alignment with draft new London Plan Policies R19.0177.

Site Allocations

Greater London Authority/Mayor of London

It is not clear why the proposed allocations within the Vale Royal/Brewery Road site are for the retention and intensification of industrial uses which is supported by the Mayor in his strong alignment with draft new London Plan Policies R19.0177.

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Greater London Authority/Mayor of London

It is not clear why the proposed allocations within the Vale Royal/Brewery Road site are for the retention and intensification of industrial uses which is supported by the Mayor in his strong alignment with draft new London Plan Policies R19.0177.
The council considers that enhancing affordable workspace requirements to 25% may lose the breadth of businesses and industries across the borough.  

The protection and intensification of industrial uses continues to be sought in Locally Significant Industrial Sites (LSIS), with some former landowners requesting changes to the approach. Peabody requests that the residential cycle parking standards are in line with those identified in the draft London Plan. It can lead to an oversupply of cycle parking for local offices.  

Policy H12: Gypsy and Traveller Accommodation  

The council is welcome, which sets out clearly, the extent of the AAP boundary and so too is Figure 1.2 which sets the context of the AAP campaign area in relation to the CAZ, City Fringe  

Policy B4 focuses on those business uses which are uniformly more viable in terms of delivering affordable workspace. B1c uses can viably deliver office spaces. Thereafter: 1 space per 40 dwellings - Accessible Provision: 5% accessible cycle parking spaces must be provided, keeping the 25% - space per studio or 1 person 1-bed, 1.5 spaces per 2-person 1 bed dwelling, 2 spaces per all other dwellings - Short Stay: 5 to 40 : 2 spaces per 40 dwellings.  

The council should consider extending affordable workspace requirements to 25%, to recognise the breadth of businesses and industries across the borough.  

There are 44 sites identified in the current Local Plan policy that are subject to justification against Policy SC1 and reference to such should be removed from the allocation. Peabody requests that the London Plan can lead to the protection of certain businesses within this area. Peabody requested that the policy re-frames business uses which are uniformly more viable in terms of delivering affordable workspace. Peabody can vary dependent affordable workspace but results are more mixed. In addition, it is an industrial use promoted within industrial areas, hence the council sought to remove any additional barriers that may preclude additional industrial capacity coming forward.  

The council should consider extending affordable workspace requirements to 25%, to recognise the breadth of businesses and industries across the borough.  

A key focus of the Local Plan is to ensure that there is a balance between the provision of tall buildings in the area in relation to the CAZ, City Fringe and so too is Figure 1.2 which sets the context of the AAP campaign area in relation to the CAZ, City Fringe and other local authority boundaries.

Policy B4: Affordable workspace  

The council should consider extending affordable workspace requirements to 25%, to recognise the breadth of businesses and industries across the borough.  

The council is welcome, which sets out clearly, the extent of the AAP boundary and so too is Figure 1.2 which sets the context of the AAP campaign area in relation to the CAZ, City Fringe and other local authority boundaries.
In this consultation, Peabody consider the dual aspect policy should refer to studio units, to align with the definition of ‘dual aspect units’ in the London Plan. This is consistent with NPPF paragraph 96 which specifies: ‘development which provides 30% dual aspect units will:...’ Peabody would like to see the policy worded more flexibly to allow for the provision of some studio units in residential schemes where they are proposed to a high-quality. Peabody consider that an ‘or’ approach would be more flexible and allow for a small number of studio units in high-quality residential units. It is noted that high-quality design may not allow for true dual aspect units. Planning permission may be refused or subject to listed building consent if the design is not acceptable. Furthermore, it should be recognised within the explanatory text that in some cases the provision of single aspect units will be acceptable where it can be demonstrated that these units will foster adequate social amenities, daylight and privacy, and avoid overcrowding, in line with DLP Policy Plan D4 (housing quality and standards).
Support noted. The Council intends to update CADGs in future, as noted in the LDS.

Support noted. Green infrastructure policies provide strong protection for trees. Tree planting would be supported under GI and public.

Support noted. We note controls proposed in advertising property Marketing and Vacancy criteria.

Support noted. Broad support with comments on the IIA objectives, baseline information, and assessment of likely effects of Local Plan objectives and GI

The Council's policies support a modal shift from private motorised vehicles to active travel and public transport. T1 does not have a

Support noted. Although note that the increase in relocate shops equates to reduction in car ownership. They think that cycle

We note that Para 6.93 stresses that 'the whole of Islington is covered by an Air Quality Management Area (AQMA), where national air

We would like to see a wider new general Policy requiring estate agents to rely primarily on advertising by internet, as is the real case

We are concerned by the council's determination that any developments involving basements will be strictly controlled. Policy T7, which regulates the development of basements, is vital in this regard.

Support not stated. Evidence also suggests that this technology is not going to be widely available anytime soon. Walking, cycling and public transport are the

Support not stated. We support the council's proposed policies and its commitment "to conserve and enhance the significance of heritage assets and their

The local community will be required as part of any development proposals for the site.

The Canonbury Society

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Holloway Road, N5 1RA

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We are concerned at the encroachment any new development which will negatively impact on the local character of a CA. We appreciate that

We believe that in certain London Boroughs- and indeed in some Scottish city-centre- agent's hardwings are banned, restricted or bow- limited.

Advertising boards are an appropriate form of marketing but the apparatus does also promote wider-marketing.

Support not stated. We are concerned that there is no express reference to density of population in the beginning of the Local Plan, to inform the whole. The Ofcom for

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Support not stated. We believe that certain London Basings- and indeed in some Scottish city-centre- agent's hardwings are banned, restricted or bow- limited.
QMUL supports the principle of the uses outlined in part A (i) of policy B2, and requests clarity that medical research uses (B1b) be included within the policy wording of Section 9.3. QMUL notes that the creation of a pedestrian link through the Charterhouse Square campus is not deliverable, mainly due to safety concerns for their staff, and request that this is removed from the development considerations. 

Policy SP1: Bunhill & Clerkenwell. We note and accept that policy should optimise development while providing a form of development at a human scale. There are significant limitations to optimise development while providing a form of development at a human scale which is responsive to the surrounding contextual heights across much of the borough. We support the principle of making provision to enable the creation of a pedestrian link through the Charterhouse Square campus. QMUL requests an amendment to state that other medical and research uses (B1(b)) be included within the policy wording of this section.

Policy SP4: Angel and Upper Street. TfL City Planning have confirmed that the queries they raised regarding a number of site allocations in response to the Regulation 18 Consultation response spread sheet are no longer relevant. They state the proposed route would materially impact the operation of the WHRI and create a public thoroughfare through a closed pedestrian area.

Policy BC1: Purpose-Built Student Accommodation. QMUL object to the potential north south pedestrian route through the Charterhouse Square campus. The Upper Street Area Action Plan states: “Higher education and medical and research uses, alongside improvements to the transport infrastructure and other uses on site.” QMUL states that there are clear differences in the visibility of development between these two categories and that policy should consider these.

Support: QMUL object to the potential north south pedestrian route through the Charterhouse Square campus.

Support SP1: Bunhill & Clerkenwell. We note that the full conformity response considered the draft plan to be in general conformity with the London Plan and makes no comment on policy SP1.

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Support: QMUL object to the potential north south pedestrian route through the Charterhouse Square campus.
It is at paragraph 7.12. We have kept a strong line to seek the installation of kerbs for streets, or the delineation of pedestrians and cyclists. Respondent

The issue is more relevant to the Transport Strategy. Quoting different targets from different sources just risks confusion. We have cited Policies T1 and T2 have sufficient reference to signpost to more substantive guidance in the London Plan and Mayor’s Transport Strategy.

Para 7.31 clarifies that EVCP must be provided within the parking space to minimise street clutter. Policies T1 and T2 will ensure impacts considered necessary.

The paragraph is not worded negatively. The Local Plan fundamentally concerns Islington but the paragraph (amended in response to TfLs previous comments) acknowledges the need to work with other boroughs and stakeholders, which would ensure impacts elsewhere are mitigated.

Not stated. It is paragraph 7.20. We have kept a strong line to seek the installation of kerbs for streets, or the delineation of pedestrians and cyclists.

Not stated. Paragraph 7.20 was amended to refer to cycle hire infrastructure, in response to TfL’s position. Further amendment is not considered necessary.

Paragraph 2.52 still states that Crossrail 2 ‘will not be delivered until the end of the plan period at the earliest’. We therefore again committed to working with other boroughs and relevant stakeholders to deliver such development while preventing/mitigating impacts for considered necessary.

It seems that the section on Shared space in supporting text has been removed. It is paragraph 7.20. We have kept a strong line to seek the installation of kerbs for streets, or the delineation of pedestrians and cyclists.

Not stated. Paragraph 7.12 states that E. (v) supporting the maintenance and expansion of the TfL Cycle Hire network, at a level proportionate to the size of the development. This would align with the critique of dockless bikes sometimes causing street clutter at Paragraph 1.26.

Support noted. See responses to DH3 re: objections to tall buildings policy.

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