

Islington Local Plan: Scope of the Review

November 2016



How to Respond

From **Monday 28 November 2016 to Monday 27 February 2017**, the council is inviting comments on the scope of the forthcoming Local Plan Review. Responses can be submitted as follows:

- In writing: Planning Policy Team, Freepost, RSEA-CUHA-YYAS, Planning Policy, Islington Council, 222 Upper Street, London N1 1XR
- By e-mail: LDF@islington.gov.uk
- Online survey: <https://survs.com/survey/yss2e9ug55>

The council will consider all responses received. Where appropriate, please cite evidence to support any comments.

If you wish to discuss the proposals further, please contact Islington Council's Planning Policy Team on 020 7527 7109/6799 or e-mail LDF@islington.gov.uk

Tell us your views!

We are keen to hear your views on the questions raised in this consultation document. Specific consultation questions are included at the end of each section, and respondents are encouraged to answer these questions via the online survey (link above) or by submitting written responses.

We also welcome views on any other issues you think the Local Plan should consider.

This document is available to view at all of Islington's libraries and through the reception area at the council's offices at 222 Upper Street.

We will take all views into account and a summary of the comments received will be made public. If you'd like to be kept informed of the process please provide your contact details.

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1 Introduction

What is a Local Plan?

- 1.1 Islington's Local Plan sets out strategic policies and proposals to guide the future development of the borough, together with policies that are used to make decisions on planning applications. The current Local Plan is up-to-date, and includes the [Core Strategy](#) (2011), [Development Management Policies](#), [Site Allocations](#) and [Finsbury Local Plan](#) (all 2013) Development Plan Documents (DPDs). Together these documents plan for the development requirements of the borough up to 2026.

Why are we reviewing the Local Plan?

- 1.2 Our record on delivery indicates that current policies within the Local Plan are successfully achieving the Council's priorities. However, the Local Plan and evidence behind it need to be kept up-to-date to ensure that the policies will continue to enable the Council to deliver on its objectives in light of changing circumstances.
- 1.3 A review of the Local Plan is therefore necessary to consider national and regional policy changes as well as changes in development trends which may require a refinement of the current approach to balance competing pressures and accommodate projected levels of growth.
- 1.4 At the national level, the Government continues to implement wide ranging changes to the planning system, including the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG); significant changes to Permitted Development Rights (PDR); the Housing Standards Review (HSR); and further changes arising from the Housing and Planning Act 2016 and the Neighbourhood Planning Bill 2016, the extent of which have not yet been confirmed.
- 1.5 As well as reflecting national policy, the Local Plan needs to be in general conformity with the London Plan (refer to Figure 1). Since 2011 there have been several minor alterations to the London Plan, including a revision to Islington's housing target in 2015 from 1,172 to 1,264 per annum.
- 1.6 A full review of the London Plan has now commenced, with adoption scheduled for 2019. Carrying out a review of the Local Plan in parallel with the London Plan review will ensure that the two processes are aligned, including a shared evidence base where appropriate.
- 1.7 Much of the evidence informing the current Local Plan was collected prior to 2011, and requires updating to address recent trends such as population growth, economic change and the changing way essential public services are delivered.
- 1.8 In particular, the borough has experienced a period of strong economic growth following the 2008 recession, associated with an increasing level of development pressure. The review will ensure that policies reflect the current economic climate, while retaining sufficient flexibility to respond to future changes.

What is the process for reviewing the Local Plan?

- 1.9 In general terms, the Regulations set out that this stage of the Local Plan review process must seek views on what the Local Plan ought to contain. However, because the Council has an existing Local Plan, the review process takes the current Local Plan as a starting point, and is therefore not seeking to develop policies completely afresh.



Figure 1 Relationship between Islington's Local Plan and the London Plan

- 1.10 Where policies are demonstrably delivering on objectives, they are not likely to change significantly. Where the evidence suggests that new/updated approaches would better support delivery of objectives, or indeed that new objectives are required, there is greater scope for change.
- 1.11 The review process will be informed by at least two rounds of formal public consultation, together with evidence gathering and appraisal of emerging policies for their sustainability, health and equalities implications via the Integrated Impact Assessment (IIA) process. The Council is also undertaking an ongoing process of engagement with the statutory bodies, including neighbouring local authorities, as part of the Duty to Cooperate.
- 1.12 The indicative review timetable in Figure 2 is based on the current legislative and regulatory framework for production of Local Plans; this Scope of the Review consultation represents the first stage (Regulation 18) of the formal plan production process and invites views on what the new Local Plan should contain.



Figure 2 Main stages of the Local Plan Review and indicative timescales

Next Steps

- 1.13 In line with the current Statement of Community Involvement (SCI) this initial consultation gathering views on the scope of the Local Plan review will be undertaken over a three month period. During this time, evidence gathering will be ongoing and views received during the consultation period will inform the emerging policies. The Council is planning to adopt a new SCI in February 2017 and future consultations will be carried out in line with this SCI; please check the Council's website for further information on the new SCI.
- 1.14 Following this consultation period, the Council will take all responses into account and will produce a full draft plan with detailed policies (as required by Regulation 19, see Figure 2). An interim Integrated Impact Assessment (IIA) Report will also be published alongside the draft plan. Both of these documents will be subject to public consultation in summer 2017 in accordance with the statutory requirements.

Structure of this document

- 1.15 This stage of the Local Plan review does not contain any new policies. It sets out what the updated evidence base suggests needs to be considered as part of the review. For ease of reference, this document is structured to broadly accord with the main topic areas in the current Local Plan. For each topic area, a brief overview of the current approach of the Local Plan is provided. This is followed by a consideration of relevant changes or any new evidence and what challenges and opportunities this presents for the plan review process.
- 1.16 The current Government's preferred approach is for each local planning authority to prepare a single Local Plan document, whereas previously the preparation of multiple single documents was encouraged. Combining the strategic policies and development management policies into a single document could offer the opportunity to streamline and consolidate policies. We would welcome your views on this approach of bringing together strategic and detailed policies into a single document. A combined document could involve organising policies under three broad themes:

Creating balanced communities

- 1.17 This theme could focus on bringing together policies which seek to increase the opportunities and choices available to residents to meet their housing need within communities that provide the right type of infrastructure, such as:
 - New Homes
 - Affordable Homes
 - Social and Community Infrastructure
 - Utilities and Infrastructure

Supporting a vibrant and resilient local economy

- 1.18 This theme could focus on bringing together policies which seek to support and grow the diverse economic base on the borough, such as:
 - Central Activities Zone
 - Town Centres and Local Shopping Areas
 - Hotels, Culture, Leisure and Nighttime Economy
 - Micro, Small and Medium Enterprises
 - Employment and Skills
 - Industrial land

Delivering sustainable buildings and places

- 1.19 This theme could focus on bringing together policies which seek to improve the quality of the built and natural environment through facilitating sustainable and inclusive patterns and forms of development, such as:
- Built Environment
 - Streets and Public Spaces
 - Green Infrastructure
 - Resource Use
 - Active Transport
- 1.20 The Finsbury Local Plan and Site Allocations are proposed to remain as separate documents, although views are sought on how these should be reviewed in this consultation (refer to Sections 11 and 12). Islington is preparing a joint waste plan with other North London boroughs; when this is finalised this separate document will be adopted as the North London Waste Plan DPD.
- 1.21 Where additional evidence is likely to be required to inform policy review, this is highlighted within each section. We would also welcome your views on any additional evidence required that could *inform* the review process.

2 Spatial Strategy and Key Areas

Our current approach

- 2.1 Islington's greatest asset is its diversity – represented in its people, its businesses, and its neighbourhoods. Yet Islington as a place is small, only about six square miles, and densely built up, meaning that there are inevitably many constraints that require the spatial strategy to make choices about how change is guided and growth accommodated in the borough.
- 2.2 The fundamental challenge facing the borough is the degree of contrast within an area which contains both some of the country's most deprived neighbourhoods in close proximity to areas of very considerable wealth. This inequality, and particularly the effects of poverty and lack of affordable housing, is the crucial issue for the borough and underlies the vision and objectives set out in the current Core Strategy.
- 2.3 Securing a supply of housing that encourages mixed communities, promoting neighbourhoods that support wellbeing, achieving high standards of sustainable design, and ensuring a broad range of opportunities exist for all types and sizes of businesses to locate in the borough are amongst the Core Strategy's priority objectives. The current spatial strategy was developed as an ambitious plan to achieve high levels of housing and employment growth, and has supported the borough to deliver one of the highest amounts of new housing in the country.
- 2.4 The spatial strategy is based on identification of key areas where the level of change expected over the plan period requires specific spatial policies for managing growth. The Core Strategy features seven key area policies including Bunhill and Clerkenwell, which also has a specific local plan document, the Finsbury Local Plan (see section 11). The other key areas are the borough's four town centres and two other key areas of change. These policies contain a broad vision and strategic approach for each area.
- 2.5 The Development Management Policies document takes less of a spatial approach, with policies covering development in town centres, Employment Growth Areas and Local Shopping Areas that apply across each designation regardless of specific location.

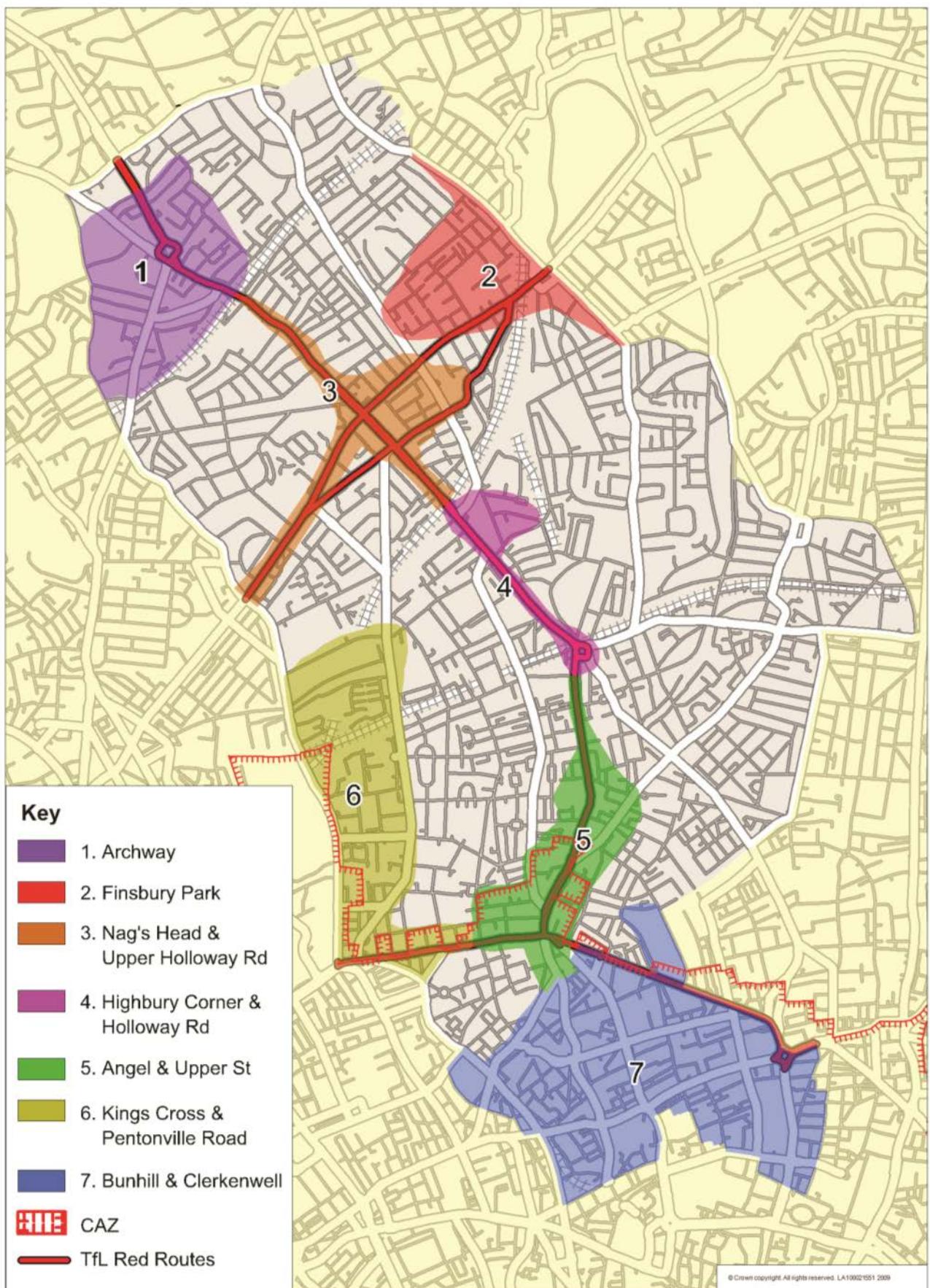


Figure 3 Key Areas as set out in the current Core Strategy

What's changed?

- 2.6 Since the Core Strategy was adopted, many of the challenges it identified have been made harder to tackle as a result of government intervention and broad economic trends in the country as a whole. The Cripplegate Report 2013 characterised Islington as “*a place of wealthy families living in owner occupied properties and low income families living in social housing.*”
- 2.7 The council’s Corporate Plan 2015-2019 ‘*Towards a Fairer Islington: Our Commitment*’, reaffirms an ongoing commitment to addressing this inequality, setting out the following vision:

To make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.

- 2.8 Welfare changes and the Housing and Planning Act (2016) have altered the way in which local authorities must look at affordable housing. Compounding this, permitted development rights such as office and retail to residential have reduced the ways in which local authorities can monitor and control changes of use and secure community benefits. In addition, economic uncertainty is likely for at least the early part of the time period the new Local Plan will cover.
- 2.9 Managing and coping with growth remains a key issue for the borough. The borough has experienced significant population growth in recent years, outpacing that of London, and the population is projected to continue to grow, albeit at a slower rate than in past years. This, alongside the borough’s central London location results in significant demand for all types of development.
- 2.10 A large amount of development has taken place in the borough over the past five years, which places even more pressure for development on the small number of sites that remain. There is heavy pressure for redevelopment and intensification of existing buildings, and in many cases this pressure is for changes which are contrary to the current objectives the council has for retaining employment space and jobs within Islington.
- 2.11 While the borough benefits from a generally sustainable pattern of development, the constrained land supply places pressure on the quality of the built environment and local character, the ability to provide for the different development needs of the area, and ultimately the quality of life of those who live and work in the borough.
- 2.12 Proposed amendments to the Neighbourhood Planning Bill currently making its way through parliament would introduce new regulations regarding the preparation of development plan documents. Local planning authorities would be required to identify the strategic priorities for the development and use of land in their area, and set out policies to address those priorities in their development plan documents. Islington’s current Local Plan identifies both the strategic priorities for the borough and policies to address these priorities. Therefore, if implemented, these regulations would not in practice require a change in how the Local Plan review is progressed.
- 2.13 Proposed changes to the NPPF consulted on in December 2015 (but not yet implemented) seek to support housing development on brownfield land by making it clearer in national policy that substantial weight should be given to the benefits of using brownfield land for housing. Due to the densely developed nature of the borough, in Islington virtually all new development is on previously developed (brownfield) land.

- 2.14 If this proposed change to national policy is taken forward, the Local Plan review will need to consider how to best ensure that the updated Plan appropriately and effectively provides for the varied development needs of the borough, all of which must be accommodated on brownfield land. For example, to maintain the strong growth in employment evidenced over the past ten years, the Local Plan may need to identify opportunities to protect and intensify employment land through site allocations.
- 2.15 One area of particular importance for the retention of jobs and businesses of a particular type in the borough is the Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS). This area has established itself as a crucial location for businesses that service both the wider borough and central London. In addition to the more conventional industrial uses such as builders' merchants and catering operations expected in an inner London industrial area, the area is home to a vibrant cluster of creative industries and specialist event companies/music orientated businesses.
- 2.16 Large-scale public realm improvements that involve the removal of gyratories at Archway, Highbury Corner and Old Street are under construction or being explored, which offer great opportunities to reconnect areas divided by wide roads, improve cycling and pedestrian access and improve the experience for residents and visitors alike.

How can we respond?

- 2.17 The spatial strategy has been successful at directing new development to the right locations and supported the delivery of the growth agenda set out in the current Core Strategy. In light of the evidence gathered to date, and the ongoing commitment of the Council to delivering on the strategic priorities that informed the approach of the current Local Plan, many of the policies in the current plan could be considered broadly fit for purpose and are likely to require only minor changes as part of the review process.
- 2.18 Moreover, the constraints that existed at the time the spatial strategy was developed still exist, and indeed have been amplified by the amount of development delivered in recent years and the increasing development pressure in the borough. Therefore, there are likely few if any alternatives to the existing key areas where growth could be accommodated.
- 2.19 The Local Plan Review offers a chance to unify the Core Strategy area policies with more place-specific and locally focussed approaches to development management, in order to be more responsive to the particular needs and context of different parts of the borough. This approach could better support the delivery of strategic land use priorities.
- 2.20 It might be necessary to explicitly set out both the type and quantum of growth required to meet the development needs of the borough and where it can best be accommodated to balance competing development pressures in the context of an increasingly limited land supply. This could potentially involve a fine-grained allocation and designation of land for specific uses.
- 2.21 The needs of different parts of the borough could be addressed with a tailored approach to ensure that neighbourhoods do have an appropriate mix of uses; that the worst inequalities in Islington are reduced; and to deliver outcomes that can be achieved through planning, such as housing and employment that works for local people, maintaining the vitality of social and cultural life in the borough. Tackling worklessness and enabling an increase in job opportunities for local people is a key objective of the Council, and a number of policies will play a part in securing this objective.

- 2.22 Balancing the need for housing, employment, retail, cultural and community development as well as pressures on open space requires not just an assessment of the overall need for each, but how each of these should be encouraged and facilitated in different areas of the borough.
- 2.23 For example, in terms of monitoring and regulating changes of use away from retail, what works for Angel may not be appropriate for Archway. There is always a tension between maintaining the retail function of a town centre and diversification to ensure that centres do not suffer from vacancy or lose their distinctiveness. Similarly, the Vale Royal LSIS could benefit from more detailed policies that reflect and support the unique character and function of this area.
- 2.24 The Local Plan Review could address not just the use of land, but the spaces between and around buildings that people use every day, which make the biggest difference in how an area is perceived. We could explore how public spaces could be further improved, and focus additional attention on how new development influences the ways in which people move around in town centres and other busy areas.

Tell us your views on the Key Areas

Q1: Are there any changes that you would like to see to the existing key area policies?

Q2: Are there any other area specific issues that the Local Plan review should address?

3 Housing

Our current approach

- 3.1 Islington has a clear need for more housing, and for more of the housing that is delivered to be genuinely affordable. One of the key objectives of Islington's current Local Plan is to secure a supply of housing which encourages mixed communities, with priority given to the provision of social rented housing.
- 3.2 The high values housing in Islington can achieve has made the borough attractive to residential developers. While the delivery of more housing is a strategic priority for the council, the Local Plan ensures that this is balanced against other requirements, such as securing sufficient employment floorspace to support the borough's economic growth, and ensuring there are a range of shopping, leisure and community facilities to meet local needs.
- 3.3 The Core Strategy, the key part of the current Local Plan, sets out the main policy requirements for housing development in the borough. These include that a range of unit sizes should be delivered; that 50 percent of this delivery should be affordable housing with a tenure split of 70 percent social rent and 30 percent intermediate; that the maximum reasonable amount of affordable housing will be sought taking into the strategic target of 50 percent; that schemes over 10 units should deliver affordable housing on site, with smaller schemes making a financial contribution; and that new housing should achieve relevant design quality standards.
- 3.4 Development Management policies provide further detail on how the housing requirements set out in the Core Strategy should be met, including the required unit size mix across tenures; minimum housing standards; and the amount of private garden space and play space required from housing developments. Due to the substantial amount of student accommodation delivered/in the pipeline and the need to prioritise conventional housing and employment growth, the Local Plan limits this type of development to allocated sites in line with the London Plan's dispersal policy.
- 3.5 When the Core Strategy was published Islington's housing target, as set out in the London Plan, was to deliver at least 1,170 units per year. This target was revised in the March 2015 version of the London Plan, and is currently 1,264 units per year. The borough has successfully exceeded its targets over the past five monitoring years (2010/11 to 2014/15) by delivering 7,306 dwellings, or an average of 1,461 new homes per year. Over the ten year period from 2003 to 2014, the borough had the second highest rate of average annual net completions in London at 1,705 dwellings¹ and amongst the highest in the country.
- 3.6 The most recent housing trajectory indicates that the borough has a healthy five year supply and will continue to exceed its targets over the five year period (2016/17 to 2020/21). In addition, projections of the ten year supply of housing anticipate that Islington's housing pipeline is sufficient to meet and exceed its current targets until 2025/26. As part of this, the Council envisages significant delivery of affordable housing including on council-owned sites as part of the New Build Programme.

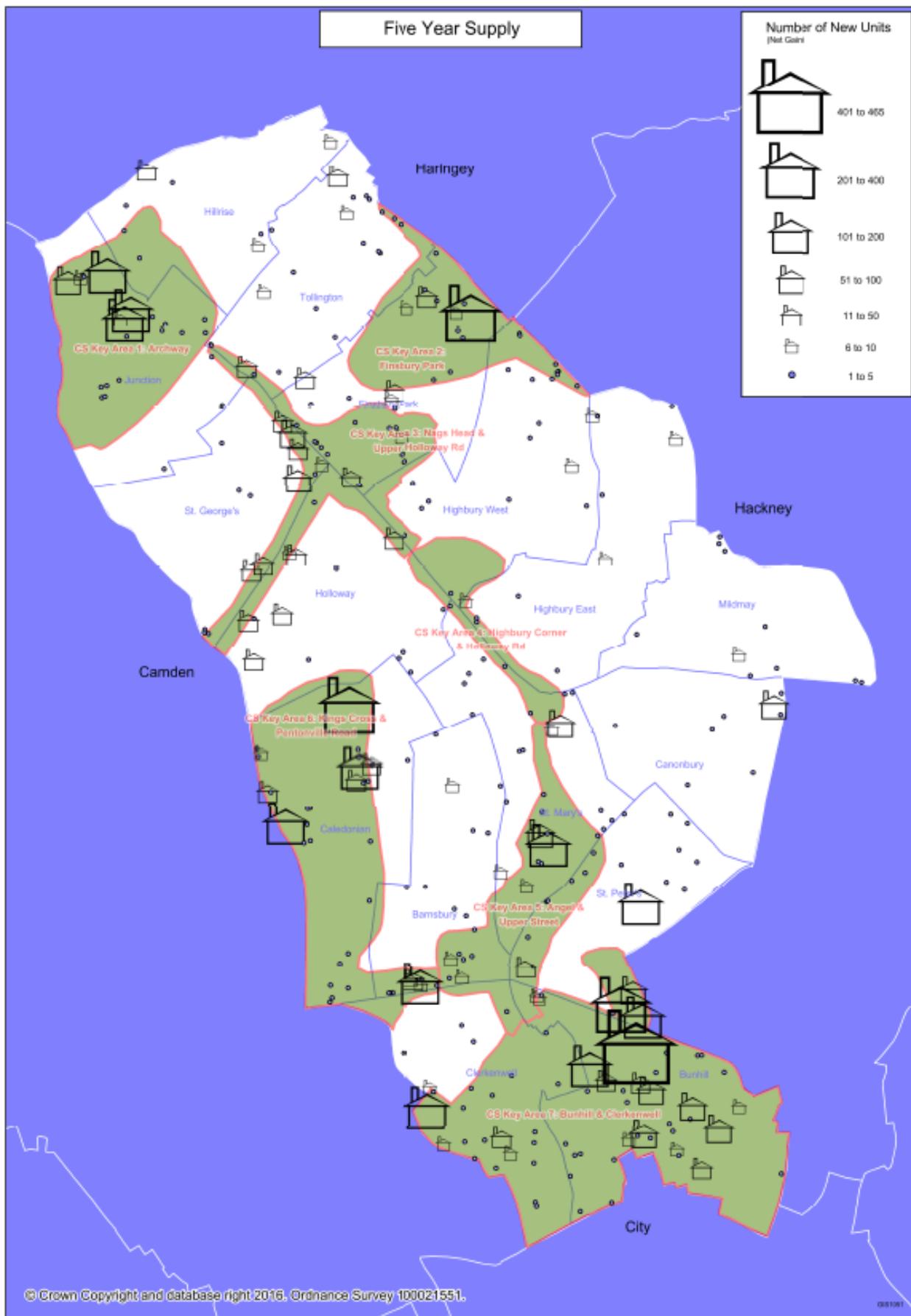


Figure 4 Current five year housing supply

What's changed?

National and regional policy changes

- 3.7 A number of changes at the national and London levels have and/or will impact on the implementation of Islington's housing policies. At the national level, the *Housing and Planning Act (2016)* contains a number of provisions that may impact on housing supply in Islington. A key provision of the Act is a duty on local planning authorities (LPAs) to promote the supply of Starter Homes by requiring their delivery in new residential developments. Starter Homes are required to be made available to qualifying first time buyers at a discount of at least 20 percent below market value, although in high value boroughs such as Islington the discount required to bring the value under the £450,000 price cap would be much higher.
- 3.8 Other provisions in the Act include the extension of the Right to Buy to housing associations, the forced sale of 'high value' council homes as they become vacant, and the ability for the Secretary of State to impose restrictions or conditions on how planning obligations relating to the provision of affordable housing can be enforced. Taken together, the changes introduced by the Act have the potential to severely limit the ability of local authorities to provide genuinely affordable housing that meets local needs.
- 3.9 The 2010 spending review and subsequent publication of the NPPF introduced Affordable Rent as a new form of affordable housing tenure alongside Social Rent. Both Affordable Rented and Social Rented housing are owned by local authorities and private registered providers, and have the same eligibility criteria. While Social Rented properties have their rents set in accordance with the guideline Target Rents determined through the national rent regime, Affordable Rented properties can have rents set at up to 80 percent of the local market rent.
- 3.10 Due to the high market rents in Islington, this means that Affordable Rented properties would have much higher rent levels than social rented properties. In 2015-2016, guideline Target Rents for Islington were approximately £142 to £167 per week depending on property size. Over the same period, median market rents in the borough ranged from £292 to £775 per week depending on property size². Islington's Housing Strategy 2014-2019 therefore sets out the council's continued commitment to increasing the supply of Social Rented homes to provide genuinely affordable housing.
- 3.11 The Government has also issued guidance, via a Written Ministerial Statement (WMS) and revisions to its Planning Practice Guidance (PPG) that affordable housing and tariff style planning obligations should not be sought from developments of 10 units or fewer. At the same time, the Vacant Building Credit was introduced.
- 3.12 This states that where a vacant building is brought back into use affordable housing contributions should be discounted proportionately according to the amount of existing vacant floorspace. This guidance now forms a material consideration in the determination of planning applications, to be considered alongside the borough's adopted policies.
- 3.13 The borough has required financial contributions from residential developments of fewer than 10 units since the adoption of its Small Sites Affordable Housing SPD in 2012. Islington has a large number of small sites, an inevitable consequence of the densely built-up nature of the borough, which is one of the smallest local authority areas in the country as well as the most densely populated.

- 3.14 The SPD includes processes to ensure that the borough's small sites policy does not have a disproportionate impact on the financial viability of developments, and since its inception over £15.8 million has been secured from small sites towards the delivery of additional affordable housing in the borough.
- 3.15 The introduction of office to residential permitted development rights (PDR) has further eroded the ability of the borough to meet its affordable housing need, by allowing developers to benefit from high market values for residential properties in Islington without providing any affordable housing or contributing to infrastructure.
- 3.16 A report prepared by London Councils lists the key consequences of the PDR which include the loss of key, occupied office space; the loss of new affordable housing supply; and the introduction of poor quality new housing³. In Islington, two thirds of the units granted permission under the PDR will be studios or one bedroom flats, which is not in line with the assessed need for housing in the borough.
- 3.17 In March 2015, the government introduced new technical housing standards, including new minimum space and accessibility standards. These were incorporated into the 2015-16 Minor Alterations to the London Plan (MALP) in March 2016 and are applicable to development in Islington. The standards are intended to ensure that all new homes are functional and fit for purpose and offer the potential to be occupied over time by households of all tenures.
- 3.18 In April 2016 the household income cap for accessing shared ownership in London was increased to £90,000 by the Government. However, the Mayor suggests that LPAs should seek to ensure that intermediate provision is accessible to households with a range of incomes below the upper limit, and that a range of dwelling types in a mix of sizes (measured by number of bedrooms) are available. When it provides funding for intermediate products, the GLA requires that average housing costs, including service charges, should be affordable to households with an annual income of £55,850.

Housing affordability in Islington

- 3.19 Housing affordability is one of the most significant issues in Islington. Despite consistently high rates of housing delivery over the past ten years, affordability indicators demonstrate that the situation has not improved since the adoption of the Local Plan.
- 3.20 The average price of a property in Islington increased by 63% between October 2007 (the peak in the market preceding the financial crisis of 2008) and July 2016 (the most recent published figure) and is now £683,349⁴. Although the financial crisis led to a relatively small reduction or 'correction' in London's house prices, very rapid price growth began again in 2013. Prices now exceed pre-recession levels by a significant margin.
- 3.21 In Islington, and some other London boroughs, increases in housing supply to exceed London Plan targets have not had the cooling effect on house prices that may have been hoped for. Moreover, wages have been not keeping pace with house price increases. The Office of National Statistics' Annual Survey of Hours and Earnings suggests that median wages for Islington residents actually fell by 1.4% (around £464) between 2014 and 2015 and mean wages fell by 7.5% (£3,347)⁵. As the affordability of housing in Islington is already an issue for many residents, any reduction in income is likely to prove very challenging.
- 3.22 One consequence of rising house prices is that Islington is the tenth most overcrowded borough in the country⁶ and consistently has 8,500-9,000 people who qualify for allocations on its housing register. The number of people accepted as homeless is increasing across London⁷ and Crisis, the national charity for homeless people, reports that 158 people were seen sleeping rough in Islington in 2015/16, up from 135 people the previous year.

- 3.23 A lack of affordability is also impacting on the competitiveness of the economy. The Confederation of British Industry (CBI)⁸, London Chamber of Commerce and KPMG have raised concerns about the difficulties that businesses are experiencing in recruiting entry and mid-level staff due to the high costs of housing in the capital.
- 3.24 An increasing reliance on the private rented sector (PRS) has accompanied rapidly rising house prices. ONS data shows that the share of Islington's households renting privately rose from 18.6% to 28.2% in the ten years to 2011. This is a significant change over a ten year period. Figure 5 provides information from the Valuation Office Agency on median private rents in Islington, London and England in the year from April 2014 to March 2015.

What it costs to rent privately in...

	England	London	Islington
Room	£400	£525	£704
Studio	£500	£850	£997
1 bed	£525	£1,155	£1,452
2 bed	£595	£1,400	£1,907
3 bed	£675	£1,695	£2,492
4+ bed	£1,175	£2,500	£3,163

Figure 5 Median monthly rents in Islington, Greater London and England⁹

- 3.25 Equivalent data for 2015/16 has not yet been released but is expected to show that median rents have continued to rise. The median rent is the midway point of the rents of all a given unit size, so that one half of properties of that size will have reported a rent above the median, and one half of properties of that size will have a rent below the median.
- 3.26 On the borough's median salary of £35,235, renting a room at £704 a month (£8,448 per year) would take 31% of the net (take home) wage. For a couple with a dependent child where one partner is on the median full-time wage and one partner is on the median part-time wage for Islington (£9,188) the gross household income would be around £45,380 or £36,180 net.
- 3.27 Renting a two-bedroom home at £1,907 a month (£22,884 per year) would mean that 63% of their household income was going towards rent, leaving little for other basic costs of living, let alone an opportunity to save towards home ownership. Renting a three-bedroom property at the median monthly rent would cost £29,904 a year or 83% of the median household income.
- 3.28 The GLA considers that for a dwelling to be deemed affordable, annual housing costs including service charges should not exceed 40% of net household income¹⁰. In 2015 the typical private renter in London spent 46% of their income on housing costs¹¹.

- 3.29 Given the growth in private renting in London, the London Plan suggests that the planning system should take a more positive approach in enabling purpose-built PRS to contribute to the achievement of housing targets, specifically in terms of capturing a new source of investment in the housing market and increasing the rate in supply. However it is clear that in Islington PRS would not serve to meet affordable need due to very high market rent levels.
- 3.30 Following the London Mayoral elections in May 2016, the new Mayor is promoting initiatives that may impact on future housing delivery in Islington. These include *Homes for Londoners*, an initiative aimed at bringing together representatives from the GLA, London Councils, Transport for London, London's housing associations and the property sector to oversee housing development in London; and the introduction of a new *London Living Rent* affordable housing product.
- 3.31 The London Living Rent is to be based on a third of median gross household income in each borough, and it is envisaged that new homes will be offered to low and middle-income households, typically earning between £35,000 and £45,000, who are currently renting privately. Further details are due to published on this by the Mayor.

How can we respond?

- 3.32 The borough has commissioned a Strategic Housing Market Assessment (SHMA) which will calculate the objectively assessed need for housing, including the level of affordable housing required and the unit sizes needed to meet need. This information will be used to help formulate policies setting out requirements on the size and type of housing. Although the latest GLA population projections suggest a lower rate of growth than in recent years, based on available information it is likely that affordable housing need will have increased since the last SHMA.
- 3.33 The delivery of genuinely affordable housing remains the council's top priority. It is clear that the only effective means of addressing the affordable housing need is by delivering additional affordable housing – in Islington, this need simply cannot be addressed by delivering market housing, regardless of the quantum of market housing delivered. Moreover, in the context of the borough's high market housing costs, some types of affordable housing, such as Affordable Rent and Starter Homes, are not affordable for the majority of residents in housing need and indeed even for those on above average incomes.
- 3.34 It is therefore critical to harness every opportunity to deliver genuinely affordable housing alongside market housing, even more so because of the constrained land supply in the borough. The Local Plan review will need to consider how to best support the delivery of this much needed affordable housing in light of national changes. It will be important for the review to consider if and how PPG changes regarding small sites and the Vacant Building Credit are applied in the local context.
- 3.35 Long-term population projections released by the GLA predict that Islington's population will increase from 222,890 in 2016 to 254,430 in 2041. Although this is the lowest projected growth of any of the London boroughs over this period, it will still generate additional need for housing as well as jobs, infrastructure and services. A significant barrier to the delivery of housing and affordable housing in Islington is the scarcity of land available for development.

- 3.36 As the Local Plan must set out the supply of land available to meet the housing requirement there is a need for the Local Plan review to identify sites suitable for housing, alongside sufficient sites to meet the other priority development needs of the borough. As part of the London Plan review, the GLA has commenced work on the London Strategic Housing Land Availability Assessment (SHLAA) to identify housing land capacity. The Council will liaise with the GLA to complete this exercise and ensure that the results are incorporated into the Local Plan review as appropriate.
- 3.37 Islington's population is relatively young (nearly 65 percent under 40) but there is expected to be a 20% increase in those aged 65 and over and a 25% increase in those aged 80 years and over in the years to 2025.¹² The Local Plan review will need to consider how to best provide for the aging population, within the context of the Council's commitment to supporting people to stay within their own homes as long as they wish.
- 3.38 In light of the rising proportion of residents accommodated in the PRS, and emerging forms of provision within this tenure, the Local Plan review will also need to consider what role, if any, such products/initiatives could play in widening the housing choice available to residents and meeting the identified housing need.
- 3.39 In response to the quantum of student bedspaces delivered in Inner London over the past ten years, the London Plan dispersal policy supports inner London boroughs limiting the quantum of additional student development to ensure delivery of conventional housing. The Local Plan review will need to conform with this strategic approach. In light of recent delivery rates of student accommodation, one of the highest in London, and the scarcity of land in Islington, the local plan review will therefore likely need to continue with the current restrictive approach to student accommodation.

Tell us your views on Housing

Q3: How can we best continue to maximise provision of social rented housing?

Q4: How can we best provide housing options for middle income earners? Should we prioritise homes for sale, such as shared owned, or for rent, or should we seek to deliver both?

Q5: In planning for the needs of all of Islington's communities are there any other forms of housing that should be prioritised?

Q6: Are there any other housing issues that you feel need to be addressed within the plan?

4 Employment

- 4.1 Islington has a prosperous economy, having added over 30,000 jobs between 2005 and 2015 and remaining a net importer of labour with a job density of 1.36 compared to the London average of 0.93. The majority of the borough's jobs – 70 percent – are concentrated in the CAZ. Of the central London boroughs, Islington has the fifth highest economic output as measured by GVA, behind only the City of London, Westminster, Tower Hamlets (Canary Wharf) and Camden. Residents are generally highly skilled, however the borough has persistently lower than London average rates of economic activity and higher than average rates of JSA claimants.
- 4.2 Small and micro enterprises play a vital role in the local economy. Of the 14,715 businesses in Islington, 97% have fewer than 50 employees and 87% have fewer than 10 employees; there has also been a major growth in self-employment (ONS, 2015). There are a variety of broad sectors represented in the borough, with notable concentrations in professional, scientific and technical; information and communication; arts, entertainment, recreation and other services; business administration and support services; and retail.

Our current approach

- 4.3 Current employment policies are based on accommodating a projected jobs growth of c. 40,000 to 2027, half of which would be provided for by floorspace falling within the B-use classes, predominately offices located within or in close proximity to the CAZ. To encourage a diverse and vibrant economic base in the borough, thereby ensuring long term economic sustainability, policies focus on maximising the provision of suitable B-use floorspace in the CAZ (Employment Priority Areas) and identified clusters (Employment Growth Areas and Town Centres) to deliver a wide range of business space of different types, including low value and affordable workspace. The recent City Fringe OAPF and CAZ SPG further underscore the significance of the borough in meeting future demand for office floorspace for London's global city role. The Vale Road/Brewery Road area is protected as a Locally Significant Industrial Site (LSIS).

What's changed?

- 4.4 Strong population growth alongside strong economic growth has led to growing competition between residential and commercial uses in the borough, placing pressure on land markets. Data from the past ten years shows an ongoing erosion of employment space of all types in the borough, further exacerbated by the introduction of office to residential permitted development rights in 2013.
- 4.5 While jobs growth thus far has been enabled by an intensification of existing employment land (through conversion from lower density business uses), this is unlikely to be a sustainable approach given the level of employment growth forecast, and the scarcity of employment land with potential for intensification. Levels of office stock have been relatively static, and the B-use floorspace pipeline is increasingly insufficient in terms of offering choice to occupiers.

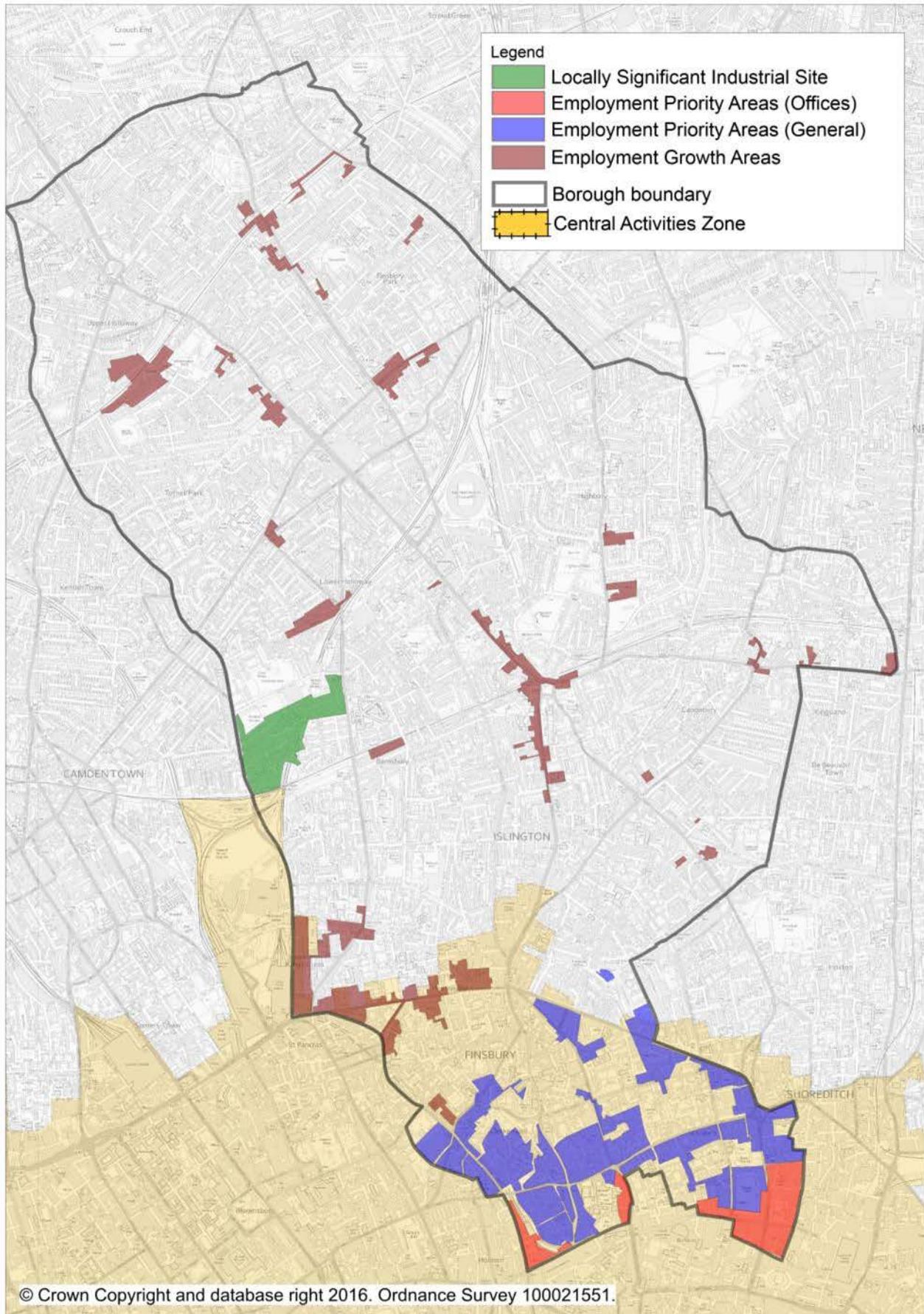


Figure 6 Employment designations in the current Local Plan

- 4.6 In order to retain local planning control over the changes of use of offices to residential, the Council has introduced an Article 4 Direction removing the permitted development right in key office locations, and is currently consulting on an Article 4 Direction to remove the forthcoming light industrial (B1c) to residential permitted development right.
- 4.7 The Council also intends to seek an Article 4 Direction to remove the office to residential permitted development right prior to the CAZ exemption from PDR being lifted in May 2019. The Local Plan review will need to consider what further interventions are required in response to the pressure from the residential market and other competing land uses, such as hotels, to ensure that the additional floorspace required is delivered and economic growth is not constrained.
- 4.8 The digital economy is developing rapidly, and is now a major feature of the national, London and local economy. The high concentration of businesses in the information and communications sector reflects the borough's role in supporting digital/creative clusters. However, the digital economy encompasses much more than the digital businesses within this sector; the digital economy refers to both the digital access of goods and services, and the use of digital technology to help businesses. Digital technology is transforming virtually all aspects of the economy and society, and the digital economy is therefore linked to many policy areas including retail, health, transport and energy as well as employment.

How can we respond?

- 4.9 An [Employment Land Study](#) (ELS, 2016) has been undertaken to provide up-to-date employment forecasts and inform the Local Plan review process. Over the period to 2036, Islington's workforce is forecast to grow significantly, particularly within the professional and technical services sectors which generate most demand for office floorspace.
- 4.10 Of the forecast growth of 50,500 jobs, 60% of these are within sectors that would require office accommodation. In order to meet this expected demand, the ELS suggests a target of 400,000sqm office floorspace between 2014 and 2036. Forecasts for sectors requiring industrial land are consistent with the borough's designation as a 'restricted transfer' borough, suggesting a continuation of the moratorium on release.
- 4.11 Current permissions coming through the planning system will generate a loss of some 12,000 sqm of office space, and at present there is no identified pipeline of new office proposals that will come close to meeting the forecast target. The biggest threat to growth therefore is restricted supply caused by potential new office developments being outbid, in terms of land value, by residential development.
- 4.12 The Local Plan review will therefore need to identify substantial sources of additional supply in the right locations, including locations where only office uses should be permitted. In considering how the Local Plan review could accommodate the projected employment growth, the ELS identified two key property market trends to be taken into account in identifying potential new supply: the geography of demand and the rise of the flexible space market.
- 4.13 Islington's employment sites fall into two distinct categories – those inside the CAZ and the rest – and the Local Plan review will need to consider how current policies could be refined to better reflect the two distinct areas of demand within the borough. Islington's part of the CAZ performs a critical function in absorbing growth from the central London economy. Occupier demand is predominantly from financial, professional and creative services, with sub-areas drawing particular types of firms.

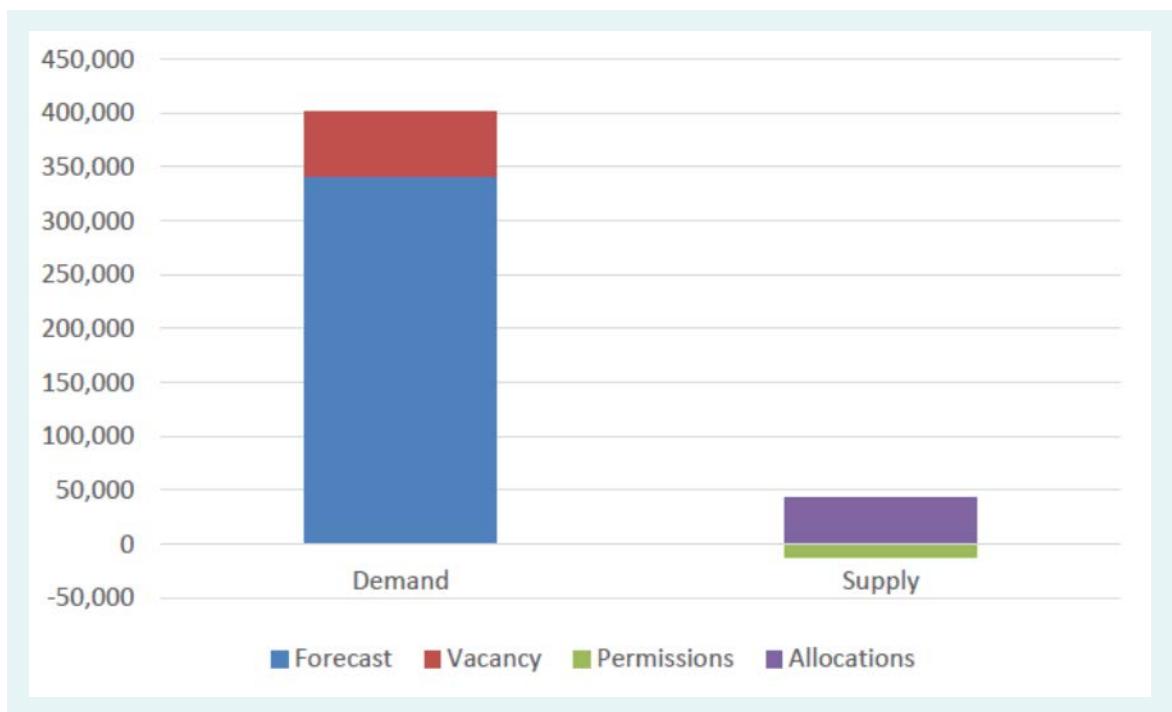


Figure 7 Demand and supply of office floorspace in Islington 2011-2036 (ELS, 2016). Existing site allocations have an identified capacity of c. 42,000sqm of office floorspace, although this delivery is not guaranteed. However, the current planning pipeline delivers a loss of 12,000sqm floorspace. This is due in large part to the amount of office floorspace lost via permitted development, in the range of 55,000sqm since the new right was introduced in 2013.

- 4.14 The ELS identified a clear opportunity for the borough to benefit from the expansion of Tech City/wider growth in the sector, as well as the establishment of the King's Cross area, with fringe areas offering significant potential for attracting growth sectors and larger occupiers. An extension of the CAZ boundary as recommended by the ELS could be one way of realising this opportunity.
- 4.15 Outside of the CAZ/fringe area, there is a strong level of localised demand for premises ranging from secondary offices, to studio, to business centres and co-working spaces. In particular, business centres such as Leroy House and Canonbury Business Centre are important in supporting the growth and intensification of the vibrant small business sector which forms a critical part of the local economy. The ELS also recommended consideration of Finsbury Park as a potential satellite office location due to its excellent connectivity and location within the London-Stansted-Cambridge growth corridor.
- 4.16 The Local Plan review will also need to consider the implications of the growth in the flexible space market on the demand for buildings and sites in the borough. The flexible space market includes serviced offices, co-working spaces and 'hybrid' space combining features of light industrial, studio and production space.
- 4.17 The demand for this type of space is driven by growth in SMEs/self-employment and the transformative impact of the digital economy on business structure; it appeals to both micro/small companies seeking a presence in central London and larger firms in need of flexibility, for example temporary accommodation for project teams. Flexible space is primarily seen around the fringes of the central London core, including Islington's part of the CAZ, and in businesses centres outside the CAZ.

- 4.18 While serviced offices and co-working spaces can generally be accommodated within office floorplates, hybrid space is a distinctly different typology. It is normally older, industrial style stock that has been refurbished not as Grade A office stock, but as studio/light production space or low specification office space (non air-conditioned, revealed ceilings, flexible and collaborative). Hybrid space therefore represents a new role for industrial space in accommodating more intensive serviced based activities alongside traditional industrial uses, and the Local Plan review will need to consider how to best identify and protect premises/areas suitable for this use.
- 4.19 In particular, the Vale Royal/Brewery Road LSIS provides a unique function that has established itself due to proximity to central London. The ELS recommends that it is protected and nurtured to allow intensification of business uses, specifically provision of hybrid space that offers lower threshold enterprise space including for start-ups.
- 4.20 While the nature of activities and occupiers in the LSIS is likely to continue to evolve, the Local Plan review will need to ensure that the conditions which allowed this area to establish itself, including the continued protection of the area as an LSIS with the associated limitations on uses such as residential, are maintained.
- 4.21 Within this context of strong occupier demand and the associated upwards pressure of rents, the provision of affordable workspace remains a priority. The Local Plan review will need to consider whether current policies regarding affordable workspace are sufficient to ensure a good supply of flexible, adaptable, and affordable space is available to meet the needs of occupiers, or whether any changes are required.
- 4.22 To support the growth of the digital economy, at the basic level there is a need to ensure sufficient infrastructure and connectivity standards for businesses and residents to take full advantage of new digital opportunities. In addition to continuing to support Tech City and the growth of digital businesses, the Local Plan review will need to consider how to effectively facilitate the provision of the infrastructure necessary to support the digital economy. With digital technology continuously advancing, the Local Plan review will also need to consider the potential transformative impacts of this on a range of policy areas. These are discussed further in the relevant sections.

Tell us your views on Employment

Q7: How can we help to support existing businesses to remain and expand within the borough?

Q8: How can we best provide for new businesses so that projected jobs growth is achieved? Should the CAZ boundary be expanded?

Q9: How can we support small and micro enterprises SMEs?

Q10: How can we support job opportunities for local people through planning?

5 Retail, Culture and Services

RETAIL

Our current approach

- 5.1 Islington is a densely populated borough with significant demand for retail, including essential everyday services and specialist retail with London-wide significance. The retail sector is also a significant employer in the borough. The current Local Plan therefore seeks to maintain provision of retail in the borough in order to serve local communities and to support the local economy. This includes a significant supply of small shops which add a unique character to the borough.

What's changed?

- 5.2 Capacity for new development in Islington is an issue across all land uses. For retail, there are also pressures from other higher value land uses, particularly residential. Changes to national policy and regulations have added to this pressure and have made it easier to change use from retail to other uses, for example Permitted Development rights which allow retail uses to change to residential use. The Council has introduced Article 4 directions to protect retail across the borough in response to these national changes.
- 5.3 The increasing role of online shopping has changed the dynamics of the UK retail industry. This can be viewed as both an opportunity and a threat to traditional 'bricks and mortar' retail provision.

How can we respond?

- 5.4 The Local Plan review will need to consider if the current policy approach should be revised in light of the changes to the retail environment identified above. As part of the review, evidence on the role and health of Islington's retail areas will be collated, and additional quantitative evidence about projected retail need, i.e. the amount of retail floorspace that will be required in future, will be commissioned.
- 5.5 The review will need to ensure that the impact of national policy and regulatory changes is fully assessed and factored into future retail policy, and translated locally to ensure the best outcome for Islington. As part of this, the review will investigate how Islington's retail areas can respond at a strategic level to the changing retail sector dynamics (such as using new technologies in sync to improve the shopping experience, so-called 'multi-channel retailing'). The review will also investigate the scope for diversification in retail areas, to accommodate cultural, leisure and entertainment uses.
- 5.6 Small and dispersed shops bring a unique character to Islington's retail areas and the borough as a whole. The review will consider the role of dispersed shops and local retail parades in meeting the need for retail, particularly accessible everyday retail provision, and how to best reinforce the role of small shops as a key part of both the overall retail provision and wider character of the borough.

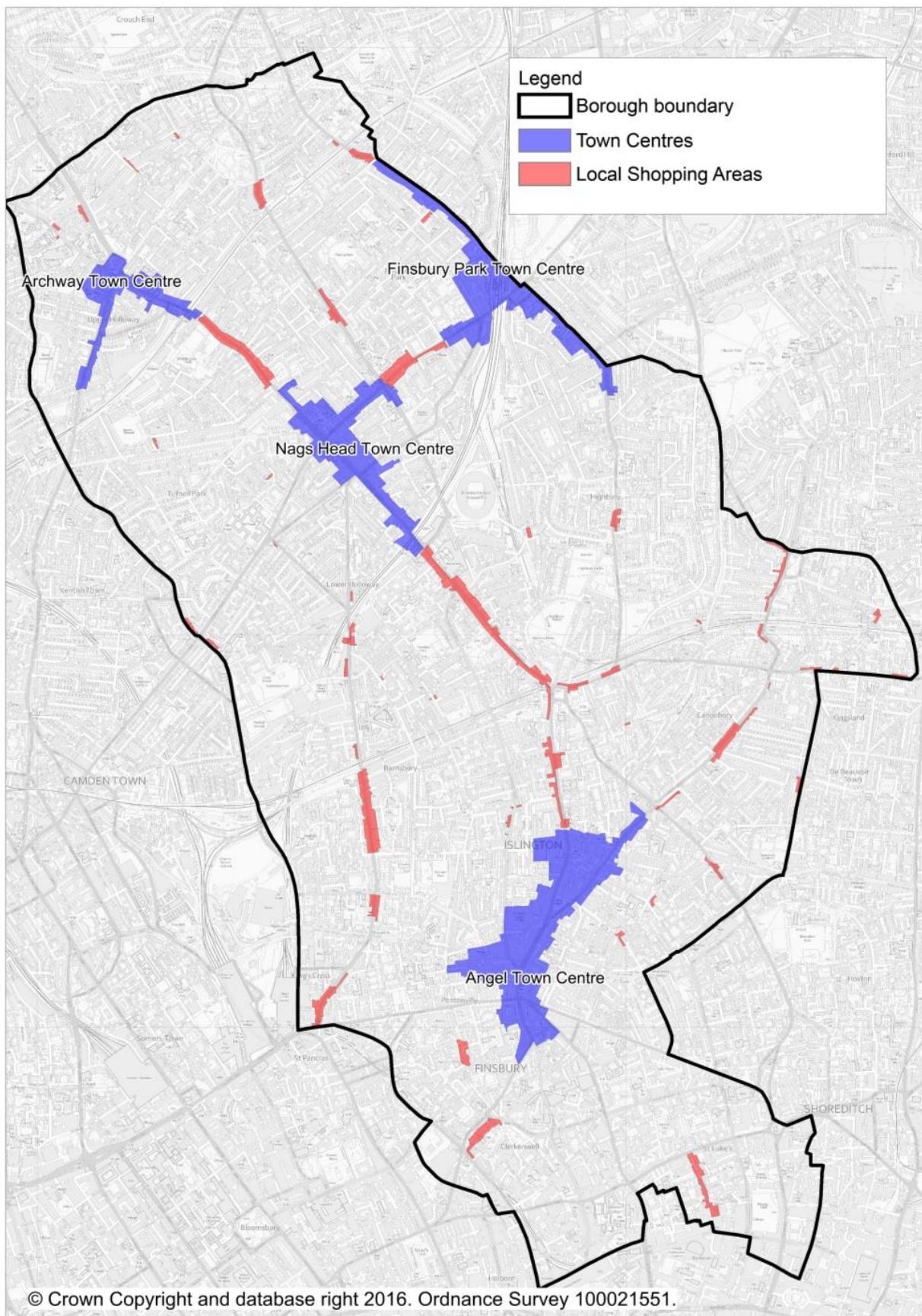


Figure 8 Town Centres and Local Shopping Areas identified in the current Local Plan

5.6.1 The London Plan has identified Town Centres as possible locations for intensification of residential development. Due to this potential increased focus on accommodating residential development in Town Centres at the London level, the review will need to consider setting out clear parameters for accommodating residential development in Town Centres. While it is recognised that these areas offer potential for higher density residential uses, a balance needs to be struck with protection and provision of commercial (including retail) floorspace and maintaining commercial vitality and viability of Town Centres.

Tell us your views on Retail

Q11: Is there anything else we can do to support key retail areas (e.g. town centres and local shopping areas)?

Q12: How should the changing nature of retail, for example the growth of online shopping, be taken into account?

Q13: Are there any other issues about retail provision that you think are important – these can either be general points or specific to a particular retail area?

HOTELS, CULTURE, NIGHT-TIME ECONOMY AND LEISURE

Our current approach

- 5.7 Culture, night-time economy and leisure uses – such as theatres, cafes, restaurants and music venues - add value to Islington, contributing to the local economy and to the character, vitality and viability of the borough. Public Houses also play a valuable role as a leisure use but also they often fulfil an important social/community function. Recent statistics from the Campaign for Real Ale (CAMRA) show that 29 pubs a week are being lost across the UK.¹³
- 5.8 The current Local Plan places strong protection on such uses through aspects of several different policies. However, these uses can lead to adverse amenity impacts for adjacent residents and businesses, for example noise and disturbance related to later opening hours. Therefore, new culture, night-time economy and leisure uses are directed to Town Centres and parts of the Finsbury Local Plan area.
- 5.9 Hotels provide accommodation for leisure and business visitors alike. While ensuring sufficient accommodation is important, hotels can limit the development of other priority land uses, notably business and residential uses. The current Local Plan policy therefore limits new hotels and visitor accommodation to specific areas of the borough.

What's changed?

- 5.10 Culture, leisure and night-time economy uses face pressure from other higher value land uses, particularly residential, which affects both existing uses and potential new uses. The picture is complicated with regard to culture, night-time economy and leisure uses as it can be difficult to secure them as part of mixed-use development due to potential amenity impacts on residents. The incursion of new homes into previously predominately commercial areas can also cause conflict between the new occupiers and established culture, night-time and leisure uses.
- 5.11 Shoppers are increasingly seeking an extra dimension to shopping trips, increasing the importance of having a strong entertainment and cultural offer in Town Centres. Uses such as theatres and cinemas are a proven draw for users of retail centres and can add significant footfall and vibrancy to an area, as in Angel Town Centre and increasingly in Finsbury Park Town Centre with the establishment of the Park Theatre.
- 5.12 The deregulation of short term lets along with the emergence of B&B letting websites such as Airbnb and One Fine Stay has the potential to change the way that visitors use accommodation in London. Since the deregulation there has been a marked increase in Airbnb listings; there are over 3,200 listings in Islington, 7% of the London total Airbnb listings.¹⁴
- 5.13 The London Plan identifies a need for 40,000 net additional hotel rooms across London to 2036, and against this benchmark target the pipeline of extant permissions in Islington will deliver a net increase in rooms that is 25 percent above the borough-level benchmark.¹⁵

How can we respond?

- 5.14 Due to the increasing importance of culture, night-time economy and leisure uses to the vibrancy of town centres, the review could look to develop a policy approach for culture, night-time economy and leisure that reflects the distinct function and impacts of these uses, maximising benefits from these uses whilst mitigating against potential adverse impacts. Such a policy could be fine-grained and spatially tailored for different parts of the borough. For example, it could allow parts of certain centres to develop as food destinations.
- 5.15 The review will also need to identify the scope for diversification in retail areas. Protection of retail in the borough will continue to be important as it comprises the primary function of Islington's four Town Centres, but recent changes to the retail environment require an acknowledgement of the potential role that cultural, leisure and entertainment uses could play in achieving continued vibrant, sustainable retail areas. The review could also explore the potential for designating cultural quarters as identified in the London Plan.
- 5.16 As Public Houses continue to play a specific role in the cultural and community life of the borough, the review will explore ways to strengthen this policy particularly with regard to uses in close proximity which may affect the future operation of a Public House.
- 5.17 As noted above, provision of sufficient hotel accommodation is important to support the operations of other businesses and the visitor economy. However, from a broader economic perspective, hotels play a supporting economic role while other business types in B-class accommodation are likely to play a driving economic role. The [Hotels in Islington](#) Report (2016) concluded that strong viability for hotels means that without planning constraints they may be able to outbid office uses in most parts of the Borough, thereby posing a significant threat to meeting future jobs projections.
- 5.18 Considering the significant number of hotel rooms within the planning pipeline, which if completed would mean that Islington comfortably exceeds monitoring benchmarks, the Local Plan review will need to consider how to best manage new applications for visitor accommodation in the borough, for example through the continuation of an approach which restricts hotel development to certain parts of the borough.

Tell us your views on Culture and Services

Q14: How can culture, night-time economy and leisure uses best support our town centres? Is there a role for these uses anywhere else? If so, what uses and where?

6 Social Infrastructure

- 6.1 Social infrastructure uses such as hospitals, doctors' surgeries, nurseries, schools, leisure centres, libraries and community centres are vital for the creation and maintenance of strong, vibrant and healthy communities. Ensuring new development is supported by necessary social infrastructure is important not only for the quality of life of residents in new developments, but also for the existing population who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in London.¹⁶

Our current approach

- 6.2 The current Local Plan protects the specific use of social infrastructure uses, unless it can be robustly demonstrated that the use is no longer required on site and its loss will not lead to a shortfall in provision of that use within the local catchment area. Due to ongoing development pressures, the higher land values associated with other uses such as housing and offices, and the densely developed nature of the borough, there are limited opportunities for delivering new social infrastructure facilities. Current policy requires that large scale mixed-use developments provide additional community facilities in line with need.

What's changed?

- 6.3 Since the Local Plan documents were adopted, house prices in the borough have continued to rise, making it increasingly difficult for non-residential uses to compete for land. In this context it is important to consider the social infrastructure uses required to meet current and future need, and the level of protection that should be assigned to the borough's existing social infrastructure to prevent its loss to other uses. There are a number of specific changes relating to the various types of social infrastructure that need to be taken into account in the Local Plan review.

Early years' provision

- 6.4 From September 2017 local authorities will be required to offer an additional 15 hours a week free childcare to working parents of 3 and 4 year olds, on top of the existing requirement to provide places for disadvantaged 2 year olds and the universal provision for 3 and 4 year olds. The council is currently working to ensure it has enough capacity to meet the increase in demand likely to be brought about by this change.

Education

- 6.5 The responsibility of local authorities to ensure there are enough school places to meet demand has been complicated by the introduction of free schools. The Government is promoting the introduction of additional free schools but there remains scope and willingness for the council to expand capacity at its existing school sites, including allocation of additional sites, if necessary to meet demand.

Sports and recreation provision

- 6.6 Since the previous policies were adopted some of the borough's leisure facilities have been subject to extensive improvement and investment (e.g. Ironmonger Row Baths) and there has been a continued increase in private provision. The borough has changed its leisure provider and a number of schools have new or improved sports facilities that can be accessed by the public.
- 6.7 The borough has seen increasing levels of participation in sport and has a higher proportion of physically active adults than London or England. However, a fifth of adults are estimated to be physically inactive and there are still high levels of obesity in children. Whilst space for new facilities is limited, the council could continue to protect existing facilities and seek to increase capacity where required.

Healthcare

- 6.8 The NHS is reviewing its future models of service provision and governance to focus on health promotion and disease prevention services delivered in the community. The Council is working closely with the Health Service to understand their future models of service provision, accommodation strategies and the borough's future health needs to assess how the health estate can be best utilised and ensure that there is sufficient space to accommodate these needs. This work includes ensuring that the location and supply of GP practices matches current and future demand.

Introduction of the Community Infrastructure Levy (CIL)

- 6.9 The adoption of Islington's borough CIL in 2014 marked a change in the way funding to mitigate the impacts of new development is secured. As explained in greater detail in the council's Planning Obligations SPD, CIL is a non-negotiable charge for funding infrastructure to support the development of an area. Once CIL is in place planning obligations can no longer be used to fund general infrastructure projects but may still be used for non-infrastructure related development mitigation measures (e.g. employment and training opportunities, accessible transport provision).
- 6.10 The Council may also use planning obligations to require suitable larger developments to provide certain infrastructure items on-site, such as community facilities (e.g. healthcare) or public open space, to meet the needs of their future occupiers. A proportion of CIL receipts will be allocated at the local level to projects proposed by the community. This could benefit social infrastructure facilities such as community centres if improvement projects are put forward and supported by the community. However CIL funds are unlikely to be sufficient to fund all infrastructure needs.

How can we respond?

- 6.11 A number of potential themes have been identified to be considered as part of the Local Plan review process.

The existing level of provision in the borough

- 6.12 There is a need to collate evidence on the facilities offered both by the council and private providers. The council is seeking to improve its understanding of which facilities are underused or in poor condition, and to assist with this is currently conducting a review of its community centres. Some facilities provide more than one service but this is not always widely known or publicised and it would be beneficial to have better information on this.

Local and strategic facilities

- 6.13 The Mayor's Social Infrastructure SPG suggests that it might be useful to distinguish between local or neighbourhood services and facilities (such as primary schools and community centres) and strategic services and facilities (such as secondary schools and hospitals) when assessing existing levels of provision.
- 6.14 In some cases social infrastructure facilities, for example specialist hospitals such as Moorfields Eye Hospital, are of national and international significance. Moorfields Eye Hospital and the Institute of Ophthalmology are looking to improve and expand their facilities, and the council understands their preference is to relocate from their current site. Given constraints at the existing site, it would be difficult for these institutions to expand their operations through redevelopment on the site, whilst continuing to operate the functions of the hospital and institute.
- 6.15 There is usually a limit in terms of the time and distance users are willing or able to travel to access a facility or service and measuring this can help to identify gaps in provision. Whilst people may expect to have to travel further to access strategic facilities, local or neighbourhood facilities can be important in fostering local community identity and should be located within easy walking distance of potential users. The local plan review will consider if local and strategic facilities should be considered separately through policy.

Protecting existing facilities and the potential for co-locating uses

- 6.16 In the current constrained financial climate, refurbishment or modernisation of existing facilities may be critical to maintaining an appropriate level of social infrastructure. This applies to most forms of social infrastructure including community centres, sport and recreation facilities, health services and schools. The local plan review will consider the level of protection that should be applied to existing facilities.
- 6.17 The potential for co-locating existing social infrastructure facilities with complementary uses, for example schools with housing, in order to maximise the use of land and premises will also be considered as part of the review process. London Plan Policy 3.16 states that the multiple use of premises should be encouraged wherever possible. Co-location of different social infrastructure uses on the same site can help to reduce management and maintenance costs and improve the quality and accessibility of services for users.

The borough's future requirements

- 6.18 Pressures on space and funding are likely to place continuing constraints on the provision of social infrastructure in Islington over the Plan period. Throughout the Local Plan review process the council will investigate the need for additional social infrastructure facilities to support growth in the borough. If gaps in provision are identified, the council will consider if it can play a role in facilitating the type of development necessary to meet need, for example this could be through site allocations.

Tell us your views on Social Infrastructure

Q15: How can we make better use of our existing facilities?

Q16: What are the priorities for new facilities?

7 Design

- 7.1 From formal Georgian residential squares to cutting-edge office buildings on the edge of the City of London, and a twentieth-century pedigree of progressive civic architecture, Islington has a rich architectural history which continues to evolve to the present day. The densely developed nature of the borough is based on buildings of eclectic and diverse architecture and age, which creates an exceptionally fine-grained character experienced at a human scale despite the borough's central/inner London location.

Our current approach

- 7.2 The success of any development depends largely on how it relates to and fits within its wider context. The current Local Plan recognizes that high quality architecture and urban design are key to enhancing Islington's built environment, making it safer and more inclusive. The approach aims to accommodate growth while ensuring that new buildings and places are complementary to the local identity, preserving and enhancing those assets which make a positive contribution to Islington's unique character.
- 7.3 This approach recognizes that an essential role of urban design is to resolve the competing demands of development pressure, communities and the environment, and bring them together into a solution that works. Central to the successful realisation of high quality design at the borough level is the Core Strategy's plan-led approach to tall buildings, which directs this type of development to three appropriate locations in the south of the borough. At the more detailed level, Development Management policies require that all development takes the opportunities available for improving the quality and character of an area and the way it functions.
- 7.4 The Council's view is that successful design is that which responds effectively to physical, social and economic demands; design should be contextual in the broadest sense of that word. The diagram below shows the elements of high quality contextual design that are set out in the current Local Plan. They are not presented in a hierarchy – each element is equally important and must be considered concurrently as part of the integrated approach to good design.

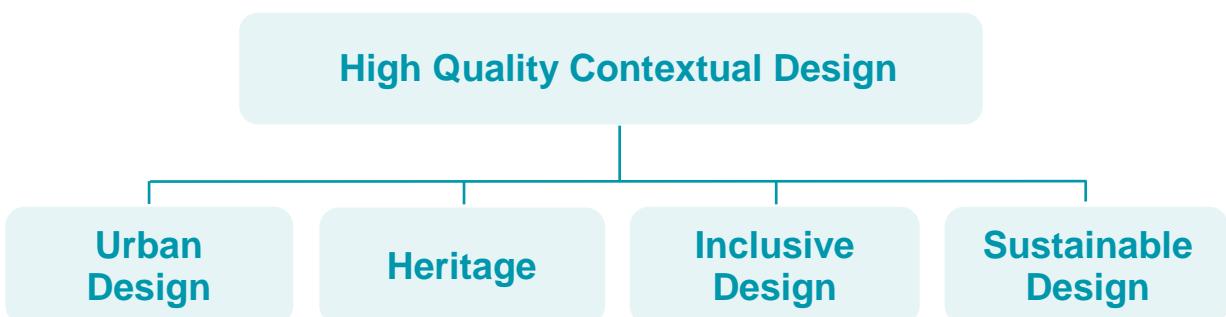


Figure 9 Components of high quality contextual design

What's changed?

- 7.5 Islington is a densely built-up urban area with many areas of important local character and historical or cultural value – 38 percent of the borough is within a conservation area. The borough has accommodated a significant amount of new development in recent years, and while the majority of new development delivered has been of high quality, the pressure to accommodate further growth remains strong.
- 7.6 Although the borough benefits from a generally sustainable pattern of development, the constrained land supply places pressure on the quality of the built environment and local character. The Local Plan review will therefore need to consider how to respond to this development pressure in a way that both provides for the different development needs of the area, and also improves quality of life those who live and work in the borough by creating safe and pleasant environments with a strong sense of place.

How can we respond?

- 7.7 The four components of high quality design as set out in Figure 9 are definitive and vital to the creation of successful places. The Local Plan review will therefore aim to build on the existing design policies, to be forward-looking and proactive in making new developments as well designed as they can be in the context of such rich and culturally valuable surroundings and the needs of all residents.
- 7.8 Tall buildings are a key issue for London at the strategic level, as boroughs grapple with how to accommodate the necessary volume of growth to meet needs in both housing and commercial development. Islington's plan-led approach to tall buildings has successfully ensured that where tall buildings are permitted this is in a coordinated manner that makes a positive contribution to the borough's character.
- 7.9 As part of the local plan review, the Council will need to consider how the borough can meet challenging housing targets and facilitate an increase in commercial floorspace to retain jobs and support economic growth. In line with the London Plan, the Local Plan review will continue the plan-led approach to identifying appropriate, sensitive and inappropriate locations for tall and large buildings. An Urban Design and Tall Buildings study will be prepared to explore whether there are any additional locations where taller buildings could potentially deliver regeneration and economic development benefits and make a positive contribution to the townscape.
- 7.10 The densely developed nature of the borough means that just over 80 percent of existing homes are flats or maisonettes, and limited land availability makes it likely that most new homes in Islington will be built in the form of apartments. The existing and fine-grained character of the borough also means that tall buildings are appropriate in relatively few locations. Therefore, in order to optimise the quantity of homes that are delivered, including the highest amount of on-site affordable housing, it is likely that the predominant building type will continue to be developments of between four to eight storeys.
- 7.11 This compact, 'mid-rise' form can achieve a balance between density and inappropriate impacts on the existing townscape and context that exists in the borough. High density development is not something to be pursued for its own sake, but in a borough where land is scarce, it is important not to miss out on maximising the numbers of new affordable homes that can be delivered through new residential development.

- 7.12 The Local Plan review will need to examine how mid-rise buildings can be best designed to offer good standards of internal space standards, storage, communal space, outdoor space, soundproofing, privacy and other factors at the neighbourhood scale such as public green space, which determine whether they are good places to live.
- 7.13 The council is particularly interested in how mid-rise (and high rise if considered to be appropriate in identified locations) buildings can best be designed to accommodate families. The Local Plan review will investigate how new residential buildings can work better for families and other households with different generations, as they must if Islington is to deliver housing that works for everyone.
- 7.14 Whilst imaginative design can increase the density of mid-rise building types without sacrificing internal space, storage and accessibility, there is an unavoidable limit beyond which an increased number of dwellings cannot be accommodated in compact developments without unacceptable compromise. Ultimately, Local Plan policies will need to focus on ensuring that high quality, liveable, sustainable and inclusive homes, with a good standard of both internal and outdoor space, are secured.

Tell us your views on Design

Q17: Are there any other issues the borough should consider in order to promote successful design?

Q18: Could tall buildings play a role in meeting Islington's need for more housing and employment floorspace? If so, what are the key factors you consider important to ensure they contribute positively to the local area?

BASEMENTS

Our current approach

- 7.15 The council's current approach to ensuring sustainable levels of Basement Development in the borough is through a Supplementary Planning Document (SPD) which brings together various Core Strategy and Development Management policies that are applicable to this form of development. As part of the Local Plan review, the Council is considering whether it would be appropriate to introduce a specific policy on basements.

What's changed?

- 7.16 As seen in other Central London boroughs, development constraints coupled with high levels of development pressure and high residential values has given rise to an increasing level of subterranean development occurring in order to achieve highly valuable additional floorspace within existing homes, and similarly in new construction. This trend is now being echoed in Islington.
- 7.17 Whilst basement development can potentially help to make efficient use of the borough's limited land, in some cases, and particularly in the case of retrospective construction of basements within high density areas, the construction of basements or basement extensions can cause harm to the natural environment, the stability of existing buildings, the amenity of nearby residents and the character and appearance of an area.
- 7.18 The creation of new or expansion of existing basements beyond the footprint of a building (often into otherwise soft landscaped areas) is a recent trend that has no known historical precedence in Islington. Given the dense and highly urbanised nature of the borough, set against the existing lack of open space and green infrastructure, the impact of incremental green spaces losses are potentially significant.

How can we respond?

- 7.19 The Local Plan review will need to explore whether these issues would be most effectively addressed through the inclusion of a specific basements policy in the Local Plan, as well as any potential revisions to open spaces policies. The Government is currently examining the role of the planning system in managing basement development, and the Local Plan review will also need to consider the results of this consultation when they become available and to what degree they are relevant to the local context.

Tell us your views on Basements

Q19: What approach should the local plan take towards basement development?

Q20: How could the local plan best manage the cumulative impacts of basement development?

8 Transport

Our current approach

- 8.1 Transport policies address the movement hierarchy, managing the transport impacts of new development through car-free policy, and how land value uplift will be used to secure improvements in public transport, walking and cycling infrastructure.
- 8.2 Islington has the lowest car ownership of all London boroughs and local authority areas in the United Kingdom, and generally excellent public transport connectivity. Despite this, the borough experiences very high road congestion and car density, the fourth highest in London, primarily due to its proximity to central London. The overall aim of the current approach is to ensure that the borough can accommodate the significant development needed to deliver homes and jobs without unacceptably worsening these conditions.
- 8.3 The successful implementation of the current Local Plan policy of car free development has been critical in enabling the large amount of development that has taken place in the borough over the past five years. To facilitate more sustainable car travel, the council supports Car Clubs through developer contributions by allocating parking bays for car club members to use. This is cheaper than owning and running a car full time and allows members of the scheme to use a car when they need it in a more sustainable and efficient way. Islington has the largest car club membership in the UK.

What's changed?

- 8.4 Since the Local Plan documents were adopted, Islington's population has increased significantly, making it even more important to ensure that the borough's transport networks are not overloaded. Islington is the most densely populated local authority area in the country, almost 50% more densely populated than the inner London average and 34 times the England average, and has a very dense and complex transport network. This transport network is heavily used by local residents and businesses, as well as people passing through on the way to Central London. As a result the road network is very congested.
- 8.5 Existing traffic congestion is serious, and Islington has the 5th highest average excess delays in London during the morning peak period, as well as the third lowest average morning peak speed. Vehicles are responsible for approximately 50% of the emissions contributing to air pollution, mainly through traffic congestion and the use of diesel powered engines. The entirety of the borough has been designated an Air Quality Management Area (AQMA) since 2003, and the majority of Islington's primary and secondary schools recorded concentrations of NOx above the EU limit in 2015.
- 8.6 Islington has all of these problems with congestion and pollution despite having the second lowest vehicle ownership rate of any London borough at 31%, and the lowest number of daily trips by car per resident. Therefore, for the borough to consistently meet and exceed its housing target, it has been essential that the substantial amount of new housing that has been delivered has not included vehicle parking; otherwise the impacts on congestion and pollution would have made additional development unacceptable.

- 8.7 The borough as a whole has excellent public transport accessibility, and connectivity will be further improved with the opening of Crossrail in 2018. Farringdon station in the south of the borough will be the most connected interchange in London and the only station where Crossrail will connect with Thameslink, the two major cross-city rail projects currently under construction.
- 8.8 London's cycling infrastructure has radically improved over the past five years with segregated Cycle Superhighways running north-south (including through Islington down Farringdon Road) and east-west across central London, and other superhighways including segregated sections around Old Street Roundabout. One of the biggest opportunities for relieving pressure on both the road and railway networks will be how Islington connects its own roads with the Superhighways, further raising cycling's modal share.
- 8.9 Since the existing Local Plan documents were adopted the government has sent signals in National Planning Practice Guidance that maximum parking standards should not set below a level that could be considered reasonable. Whatever may be acceptable elsewhere in the country, a one-size fits all national approach is not appropriate in Islington's specific circumstances as set out above.

How can we respond?

- 8.10 In the context of an inner London borough with Islington's population density, congestion, air quality issues and severely constrained land supply, there is no prospect of accommodating car parking into new development without unacceptable detrimental impact on the environment, the road network and health.
- 8.11 The Local Plan review will therefore need to consider how to ensure that new development does not facilitate car use, both through retention of the car-free policy and if there are additional interventions that could further support new development to adhere to the movement framework, prioritising walking, cycling and public transport above those of motor vehicles.

Tell us your views on Transport

Q21: Is there anything else we can do to promote sustainable transport choices?

9 Sustainability

- 9.1 Delivering a sustainable built environment is crucial for Islington's long term sustainability and prosperity. Set against high and rising development pressures, Islington has high levels of existing development density, low levels of land availability, open space deficiency and an ageing building stock.
- 9.2 Islington has above the national average carbon dioxide emissions per capita, has the fourth highest rate of air quality deaths in London and the entirety of the borough falls within an Air Quality Management Area (AQMA). The borough has also been identified as an area with climate vulnerability including high levels of heat exposure, flood disadvantage and fuel poverty , largely a result of complex (micro) climate interactions with the dense urban form, and the proportion of residents in flatted accommodation (approximately 80%).

Our current approach

- 9.3 The existing Local Plan seeks to minimise Islington's contribution to climate change and ensure that the borough develops in a way which respects environmental limits and improves quality of life. It does this by seeking:
 - zero carbon development
 - highest sustainability standards – BREEAM and Code for Sustainable Homes
 - promoting decentralised energy opportunities
 - climate change adaptation and mitigation
 - resource efficiency
 - sustainable drainage design standards
 - biodiversity enhancement and urban greening (e.g. green roofs and walls)
- 9.4 Together these policies have been successful in achieving a stepped change in sustainable design of the built environment coming forward in Islington. Often leaders in promoting sustainable design, Islington was one of the first London boroughs to introduce a zero carbon policy which through its carbon offset requirements has successfully negotiated over £9 million towards implementing carbon abatement measures.

What's changed?

- 9.5 The need to deliver quality sustainable development remains a high priority for the borough. If anything, the need has increased since the adoption of the Core Strategy when considered in light of updated scientific evidence on our changing climate, and current and predicted further intensification of development in the borough alongside changing user expectations on building performance. The Local Plan review will need to consider how to respond to a number of issues.

Industry advances

- 9.6 The industry has made significant progress since the preparation of the current Core Strategy. The council's policy aims and objectives continue to be relevant; however, the ways and means of achieving specific policy requirements has been influenced by technological innovation. For example, the availability, cost, and improvements in efficiency of low carbon technologies. In order to ensure Local Plan policies continue to secure the most sustainable outcomes for the borough as well as drive innovation, the review will need to take into account these industry improvements in creating effective and realistic policy requirements.

National policy reform

- 9.7 Despite the technological improvements and the industry largely embracing sustainable design policies in London, the national government has sought to intervene. There have been various changes to the national government's National Zero Carbon Development policy since its introduction in 2008, including definition changes, building regulation updates, ministerial statements and changes to primary legislation.
- 9.8 Whilst there is ambiguity about Government commitment to fully implementing this policy, the local drivers and specific circumstances for Islington are such that without these policies it will not be possible to accommodate the level of planned growth whilst ensuring sustainable development in line with the NPPF. This approach is echoed by the Mayor, who has reconfirmed the London commitment to zero carbon development in the updated Housing SPG published earlier this year.
- 9.9 The Government undertook a Housing Standards Review, and subsequent national policy statements were issued in 2015 and the Code for Sustainable Homes (Code) was formally withdrawn. Current policies have used Code certification as a means of demonstrating compliance with sustainable design policy objectives, therefore the local plan review will need to consider alternative measures that will continue to promote high quality sustainable homes in the borough.

Energy security

- 9.10 The capacity of London's energy grid is a strategic issue for the city, reflected as a key priority in the Mayor's London Infrastructure Plan 2050. With part of the borough falling within the Central Activities Zone (CAZ) and high usage and demand placed upon the network, this is an increasingly important issue for the borough.

How can we respond?

- 9.11 It is important that Islington continues to secure high quality buildings using sustainable design best practice, and drive innovation in the development sector. The Local Plan review will need to consider how to effectively continue to achieve this through the planning system.
- 9.12 With cities such as London being major consumers of natural resources and often disconnected from their source, it is essential that policy makers consider the wider implications of the way cities regenerate and operate. The Local Plan review will need to look beyond the immediate development pressures facing the borough to understand the long term implications of what is built now, and consider ways to promote and ensure design quality, adaptability and durability of Islington's buildings and places.

- 9.13 London remains committed to low carbon buildings, and there remains a strong need to drive further improvements in building performance in the domestic, commercial and industrial sectors due to their significant contribution to overall borough emissions (see Figure 10). The Local Plan review will need to consider the existing policies on energy efficient buildings, and consider how to best continue on the path to zero carbon. Sustainable buildings are not just resource efficient, but provide for the health and wellbeing of occupants as a key deliverable of quality design, for example by reducing the incidence of fuel poverty in the borough which is a key objective of the Council.

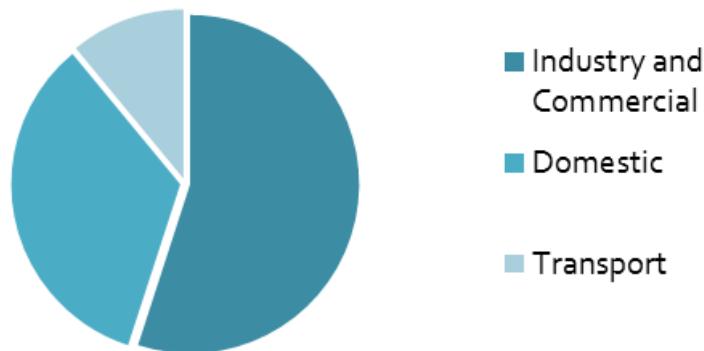


Figure 10 Source of carbon emissions in Islington by sector, 2013

- 9.14 Decentralised energy presents a significant opportunity to improve the efficiency of energy infrastructure, incorporate low carbon technologies, and increase energy security. The decarbonisation of the grid will further help to reduce the contribution of building operations to climate change.
- 9.15 Islington's central London location provides significant potential for the development and expansion of decentralised energy (DE) networks. The Local Plan review will therefore need to consider how to best support DE networks, through retention of current DE policies and if any refinements are necessary in order to continue to promote the most effective application of the policy and its objectives.

Flexibility and resilience

- 9.16 Islington will seek to continue to promote a high quality, flexible and adaptable building stock. Buildings should be designed to respond to change whether that change is to the physical environment, or market demands and land use change over time. Designers should consider the building design life and likely future needs of users when making design choices, and incorporate features within buildings that enable them to adapt.
- 9.17 For example, a commercial building designed with floor plates that can be reshuffled to create alternative internal configurations avoiding the need for future extensive refurbishment or building obsolescence. Enhanced resilience and flexibility within our building stock will serve to attract longer-term investment in the borough. The Local Plan review will explore the most effective ways to facilitate this, potentially through the integration of key principles into design policies.

Use resources efficiently

- 9.18 A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from them whilst in use, and products and materials are recovered and regenerated at the end of each service life.

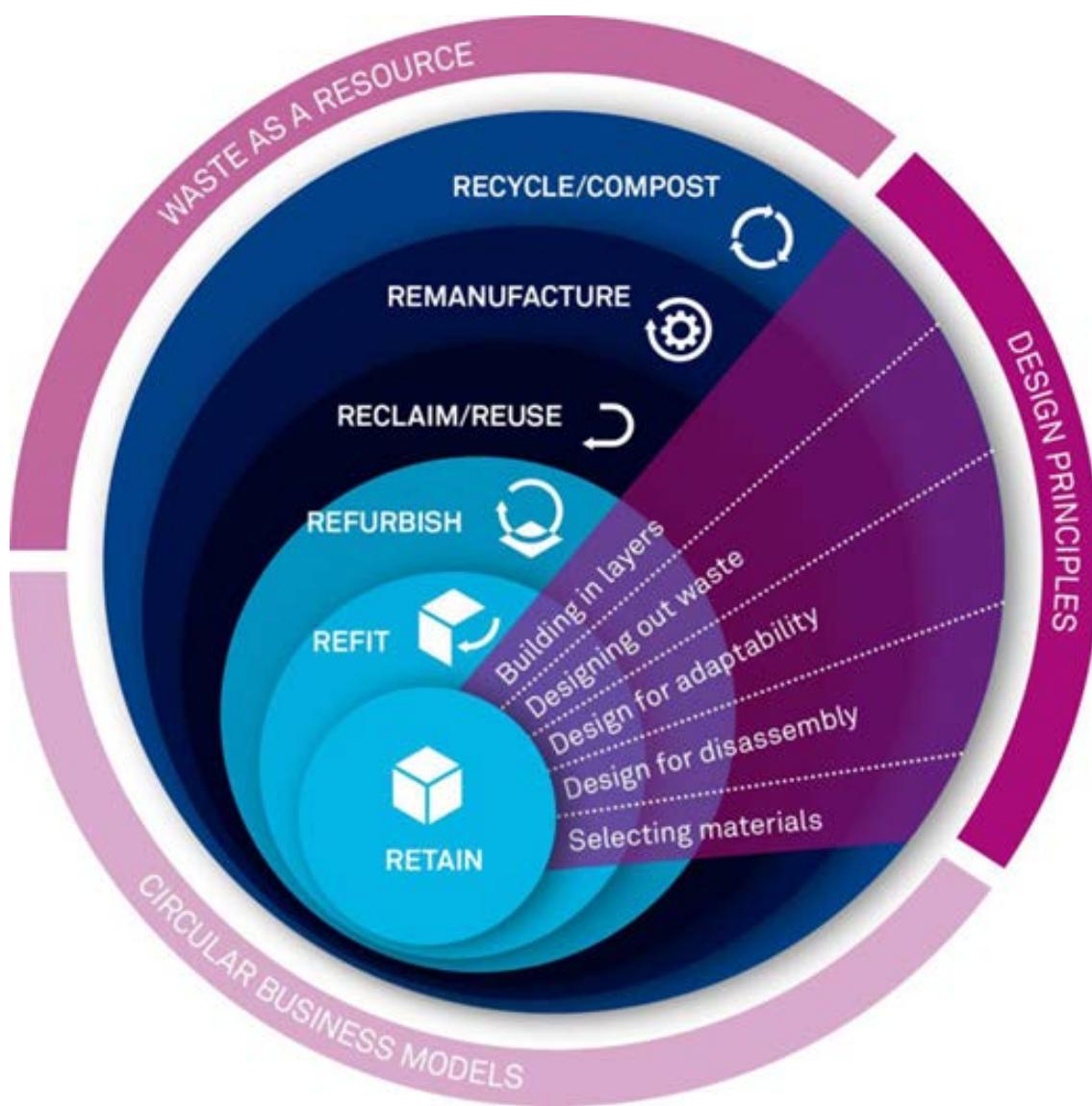


Figure 11 Applying circular economy principles to building design. The hierarchy shown identifies the inner three circles as the most resource efficient options for redevelopment (retain, refit and refurbish) as these retain the most resource-intensive parts of the building. The three outer circles cover the options for deconstructing buildings and making the most resource-efficient use of buildings components (Source: David Cheshire, 2016. *Building Revolutions: Applying the Circular Economy to the Built Environment*)

- 9.19 Designing and constructing buildings that can be adapted and deconstructed, and which are made from materials and components that can be reused or recycled, would help to create a more regenerative built environment. The role of the building and construction industry (accounting for 60% of UK materials use and a third of all waste arisings) in this transformation is reflected in the Mayor's *Route map: London – the Circular Economy Capital* (2015) as a key area for action in London. To achieve the shift required to move into a circular economy the local plan review will need to explore how this approach can best be embedded into the range of relevant policy areas.
- 9.20 The use of industry tools such as Building Information Modelling (BIM) also have significant potential to deliver project efficiencies, promote informed design decisions and ensure building knowledge is retained. The Local Plan review could consider if the encouragement of such software is appropriate and how best this could be facilitated.
- 9.21 Currently, policies relating to building design and urban greening are considered separately, although the two areas are critically linked. The local plan review could consider if integrating the urban greening policies with the building design policies will better facilitate the best development outcomes such as facilitating and inviting more sustainable forms and patterns of development. Retention and strengthening of policies relating to water sensitive urban design, landscaping and biodiversity enhancement would help to secure the desired outcomes.

Tell us your views on Sustainability

Q22: Given Islington's particular characteristics, how can the local plan accommodate growth in a sustainable way?

Q23: How can the local plan promote high quality sustainable new homes in the borough?

Q24: How can the local plan continue to facilitate the transition to zero carbon buildings?

Q25: How can the local plan promote high quality, flexible and resilient buildings and places?

Q26: Are there any other sustainability issues that should be addressed?

10 Health and Open Space

HEALTH

- 10.1 Islington is a borough with significant health challenges and stark health inequalities. Evidence highlights the importance of wider environmental determinants on health in the borough. The built environment can have significant effects on the health outcomes of the population. The NPPF is explicit about the role planning and planning policy can play in promoting health and well-being. Healthy communities are at the heart of the definition of achieving sustainable development – the purpose of the planning system.
- 10.2 The wider determinants of health, summarised in Figure 12 below, are relevant to a number of policy areas within the Local Plan including housing, employment, transport and design.



Figure 12 Wider determinants of health (Source: Dahlgren and Whitehead 1991 as cited within Closing the Gap, Tackling Health Inequalities in Islington 2010-2030)

Our current approach

- 10.3 Although health is relevant to a number of policy areas, the current Local Plan has a specific policy which seeks to promote healthy development, including the requirement for health impact assessments, guidance on new/improved health facilities as well other elements of policy which have explicit links to health.

What's changed?

- 10.4 There have been no significant changes in the current situation in terms of health challenges or policies. The primary way that planning can promote better health is through exploring interventions in the areas that are relevant to the wider determinants of health.

How can we respond?

- 10.5 Whilst there is some merit in having a specific policy on health, in considering health holistically across the Local Plan and the wider determinants of health, there is an argument that it may be wider reaching and more effective to consider how health outcomes could be considered and promoted throughout the plan. Such a cross-cutting approach could seek to give health prominence as an issue and key objective and more explicitly thread it through different sections.

Tell us your views on Health

Q27: How can the Local Plan help to optimise health outcomes through the built environment?

OPEN SPACE AND GREEN INFRASTRUCTURE

- 10.6 Islington's open spaces and green infrastructure is diverse. It includes parks (large and small), nature sites, playgrounds, squares, civic spaces, food growing spaces, amenity green spaces, private gardens, railway cuttings and canals.
- 10.7 These spaces perform a number of important functions as places for physical activity and relaxation, wildlife habitats as well as helping to mitigate the impacts of climate change, to name a few. Islington is the most densely populated local authority in the country with around 15,000 people per square kilometre and has one of the smallest amounts of open space per person.

Photo 1: Arlington Square



Photo 2: Packington Gardens

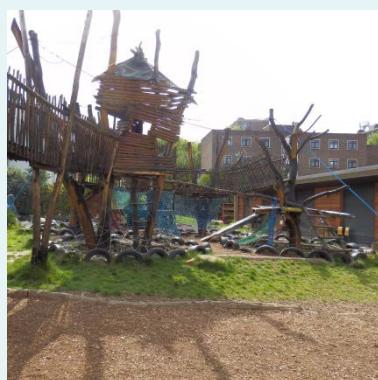


Photo 3: Barnsbury Wood



Photo 4: City Road Basin



Photo 5: Islington Green

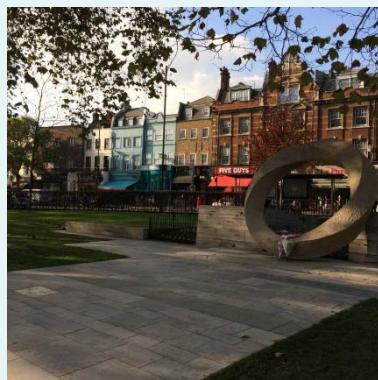


Photo 6: Market Road



Our current approach

- 10.8 The borough's highly urban and densely populated character means there is great pressure on the borough's existing green spaces to perform multiple functions and there are limited opportunities for the creation of large new green spaces. Given this context the current Local Plan seeks to protect existing open and green spaces in the borough, secure improvements to existing provision and maximise opportunities for further provision.

What's changed?

- 10.9 There remains a very low proportion of open space per person and, within the context of continued population growth and climate change, the pressure on existing spaces within the borough is likely to intensify. However, there have been various changes to the level and type of open space provision that the Local Plan review will need to consider.
- 10.10 There have been some new open spaces that have been secured, as well as a number of improvements to existing parks and playgrounds. Following a review and re-categorisation of Sites of Importance for Nature Conservation less of the borough is now considered to be deficient in access to nature. Current policies have been successful in securing a large number of green roofs that form part of the boroughs green infrastructure.
- 10.11 However, there has also been an increased pressure for development on garden land and amenity green space through infill development, extensions to residential dwellings and basement development.
- 10.12 At the national and regional level, there has been an increased focus on looking at the multiple functions of green spaces as part of a more strategic approach to green infrastructure, including an increased focus on how this can help to respond to the impacts of climate change.

How can we respond?

Take a strategic approach to green infrastructure

- 10.13 The Local Plan review could consider existing open space policy as part of a more comprehensive strategic approach to green infrastructure. This would include analysing its multiple functions and the relationships between a wide range of issues including flood risk, air quality, urban heating/cooling, health, biodiversity and recreation.
- 10.14 As part of this, the review could consider if there are different priorities for green infrastructure in different parts of the borough and how interventions can be most effectively targeted. The review could also consider how proposals can provide multiple benefits – for example, how changes to existing green spaces can assist in maximising sustainable drainage and biodiversity.

Protection of existing green infrastructure

- 10.15 The Local Plan review will need to continue to offer a high level of protection for open spaces and sites of nature conservation, but could also consider how the approach to proposals on other elements of green infrastructure that are coming under increasing pressure could be clarified.
- 10.16 For example, the review could look at strengthening policies on garden protection, including setting out in more detail how proposals for the loss of garden land and proposals on amenity space will be approached and what information would be required. The review could also usefully further clarify how existing green infrastructure is valued – for example the value of trees and the cost of their equivalent replacement.

Improving and maximising provision

- 10.17 Given the pressure on existing open spaces, the Local Plan review will need to consider setting out in more detail how proposals could contribute to the improvement of existing open and green spaces - in general terms and/or through specific guidance in certain areas.

10.18 This potentially could involve clarifying information required as part of planning applications to assess green infrastructure on sites, what should be included in landscape plans and how applicants should demonstrate maximisation of green infrastructure features such as food growing opportunities, biodiversity and trees, for example.

10.19 It could also be clarified how proposals can contribute towards green infrastructure by exploring options for on-site interventions, through borough wide and location specific recommendations where evidence suggests there are particular open space or green infrastructure needs.

Evidence requirements

10.20 As part of the review, up to date evidence on open space and green infrastructure in the borough including open spaces, green roofs and garden land will be collated. An analysis of different elements of green infrastructure in the borough will also be undertaken to establish where different issues are and what interventions should be prioritised in different places.

Play provision

10.21 Play spaces are often situated within and can contribute towards green infrastructure. Current policies seek to maximise opportunities for play through improving existing play spaces and access to them and sustaining existing levels of play space. The review will retain the requirement for play provision for existing and future populations.

Tell us your views on Open Space and Green Infrastructure

Q28: Is there anything else we can do to improve and maximise the borough's green infrastructure?

Q29: How should we prioritise between the competing functions of open space?

11 Finsbury Local Plan

Our current approach

- 11.1 The Finsbury area (covering Bunhill and Clerkenwell wards) features a variety of uses often in close proximity to one another; significant competing development pressures; a unique historic character of the built environment and copious heritage assets. The Finsbury Local Plan (FLP) sets out a fine-grain policy approach for this area, produced in response to these issues.
- 11.2 The document has both general and spatial policies to address these issues, as well as identifying specific site allocations to guide certain developments at a site level. Current FLP policies interact harmoniously with the more strategic policies in the Core Strategy and the policies in the DMP. These documents do not have the same level of detail as the FLP which again reflects the unique complexities in the FLP area.

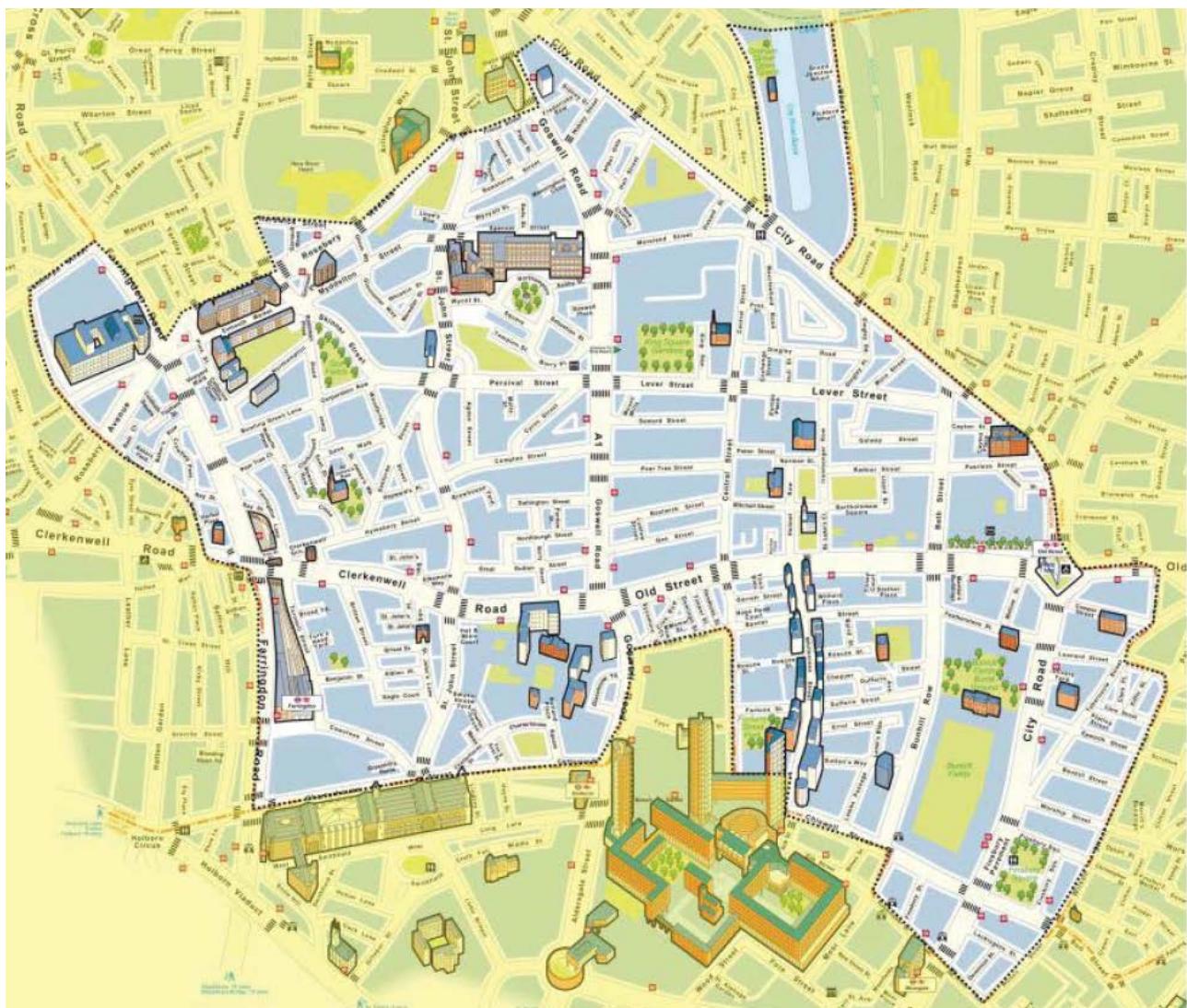


Figure 13 Finsbury Local Plan area

What's changed?

- 11.3 Changes inside and outside the FLP area necessitate a review of certain policies to ensure they remain fit for purpose. Development pressures are a particularly significant issue, both pressures to develop a variety of uses within the FLP area, but also significant losses of employment floorspace – particularly office uses – outside the area which increases the importance of consolidating and enhancing the office function of the FLP area to meet the borough's updated employment projections set out in Employment Land Study (ELS, 2016).
- 11.4 Coupled with these pressures are national and London-wide policy changes, such as the emergence of the Tech City cluster around Old Street roundabout and the wider City Fringe Opportunity Area, and the adoption of the Mayor's CAZ Supplementary Planning Guidance (SPG). Changes to the exemption from office to residential Permitted Development rights are due to come into effect in May 2019, which means that an Article 4 Direction will need to be put in place to ensure that offices have continued protection from change of use after this date.
- 11.5 Changes due to be introduced through the Housing and Planning Act 2016 and the updated National Planning Policy Framework will potentially be a major threat to the success of the Finsbury Local Plan area, due to the one-size-fits-all approach with heavy emphasis on housing delivery, with no regard to the specific circumstances of Central London. This necessitates a robust local response to ensure continued successful planning for the area, and the need for fine-grain, specific policies and site allocations.

How can we respond?

- 11.6 The council is seeking views to inform a revised Finsbury Local Plan as part of the wider Local Plan review. The following broad review themes are provided to guide discussion. These are based on the current policy approach and the changes identified above:
 - Retain a separate Local Plan document for the Finsbury area, with specific spatial policies covering specific areas and general policies covering broad land uses.
 - Update site allocations with a view to allocating new sites where possible.
 - Refine and strengthen policies relating to maintaining and enhancing business floorspace, taking on board the recommendations from the ELS including exploring an extension to the Central Activities Zone boundary.
 - Investigate stronger mechanisms for securing affordable workspace and other business space suitable for SMEs.
 - Review the policy position for other land uses, particularly retail, hotels, culture, night-time economy and leisure, in line with any changes proposed as part of the wider review of the Core Strategy and Development Management Policies.
 - Ensure that the unique historic character of the area has continued strong protection through specific design policies and through location specific considerations in the various spatial policies.

Tell us your views on the Finsbury Local Plan

Q30: Do you agree this complex area which experiences extreme developments pressures still requires its own detailed plan? Should the boundaries be reviewed and a wider or smaller area considered?

Q31: Are any changes needed to existing policies?

Q32: How can we build on the success of Tech City?

Q33: Are there any new issues or policies required?

12 Site Allocations

- 12.1 Site allocations provide site specific policy for key sites to help to secure specific land uses, to meet identified development needs (e.g. for housing and employment) along with the infrastructure required to support growth. Site allocations bring certainty about what will come forward on different sites.

Our current approach

- 12.2 There are currently over 100 sites allocated in the Site Allocations document and the Finsbury Local Plan. These are identified for a variety of uses including housing, employment, leisure, community facilities and open space. The majority of sites are within the identified key areas of growth and change and are currently allocated for housing or housing-led mixed use development.
- 12.3 The site allocations aim to strike a balance between providing sufficient information to bring certainty to future development sites, whilst providing flexibility to accommodate future changes and/or needs not yet anticipated. Most allocations specify the most appropriate use or mix of uses as well as setting out key design considerations and constraints, however the exact mix of uses and design criteria such as building heights have not been specified.
- 12.4 The allocations have been useful in providing an additional layer of policy which has helped to proactively inform development proposals and decisions. Most sites allocated within the current local plan now have planning permission, an application under consideration or are being discussed as part of the pre-application process, demonstrating the effectiveness of the site allocations document in bringing forward development.

What's changed?

- 12.5 There have been a number of changes to national planning policy and legislation with implications for site allocations, in particular the Housing and Planning Act 2016, the proposed introduction of the Brownfield Register and Permission in Principle. Further, the changes proposed to the NPPF seeking to support housing development on brownfield land potentially pose a threat to the economies of Central London boroughs like Islington where all development takes place on previously developed land.
- 12.6 In addition, the introduction of permitted development rights has increased the loss of business floorspace and magnified the need to provide for employment floorspace, particularly business space, to meet jobs growth ambitions. The evidence and recommendations of Islington's Employment Land Study (2016) warrant a call for more robust fine grain approach to the protection of existing and provision of new employment floorspace in order to facilitate achievement of forecast jobs growth.

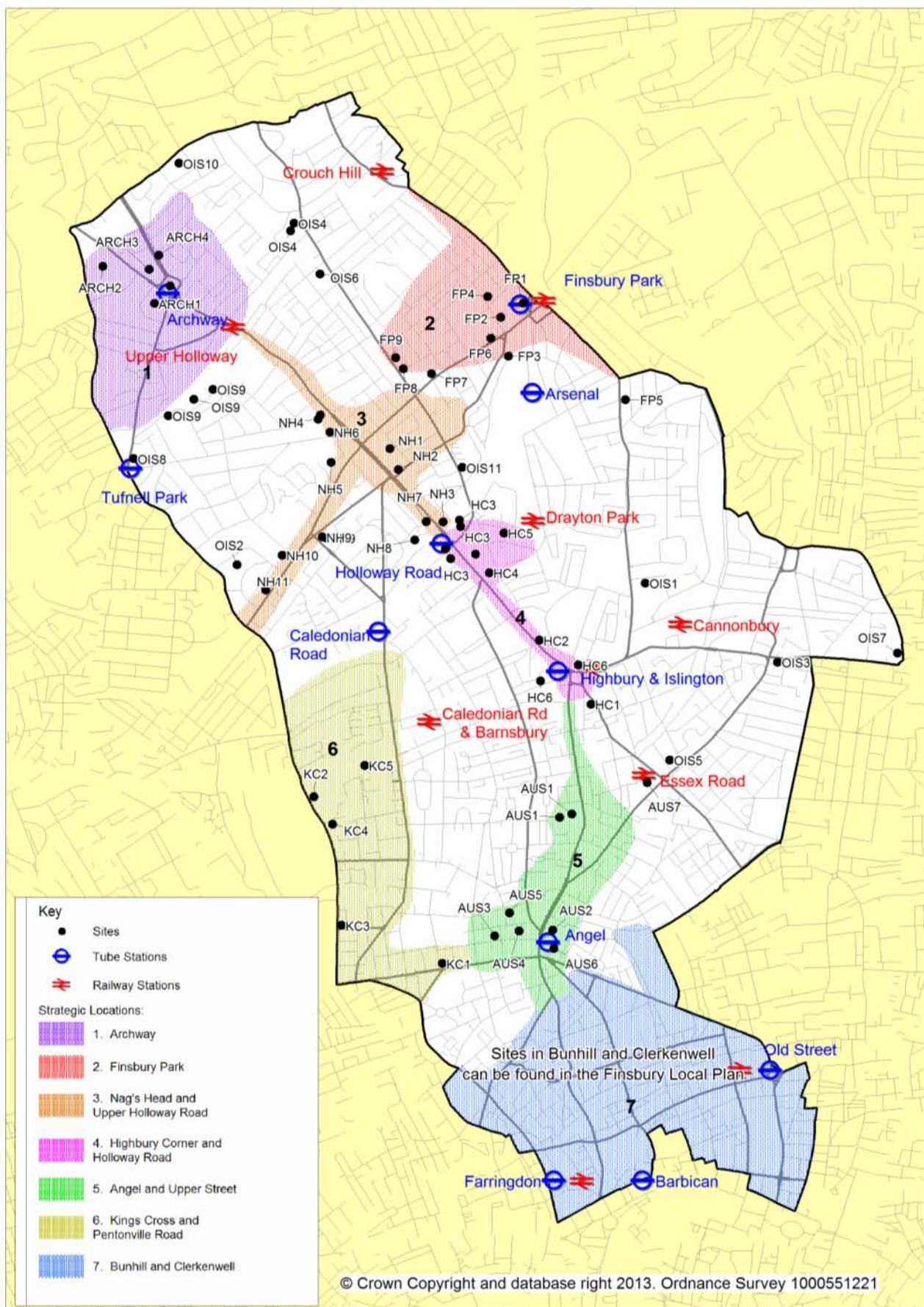


Figure 14 Current Local Plan site allocations

How can we respond?

- 12.7 The limited amount of land within the borough and the evidence as set out above necessitates a new approach to site specific policies and allocations with more explicit land use requirements. Given the need to accommodate ambitious amounts of both employment and housing, it may be necessary to be more specific about the amounts of employment space and other uses that should be provided on each site, as well as other key parameters such as building heights.
- 12.8 Many existing site allocations are progressing well; however some need refinement in light of changed circumstances. Also, there is a need to identify additional sites for housing, business and other uses. The Local Plan review will therefore need to:
 - Consider what new sites are available alongside existing site allocations and the extent to which they can help to meet identified development needs.
 - Review the existing site allocations to see which sites still require policy, if there should be different policy guidance for them or a site specific policy is no longer needed.
- 12.9 The Local Plan review will also need to consider the extent of planning reform currently underway, and the implications this may have for the type of allocations necessary to provide for the full range of the borough's development needs. This could potentially involve allocating or designating sites where retaining the existing use is necessary to secure the borough's strong and diverse local economy.

Call for Sites

Earlier in 2016, the Greater London Authority (GLA) together with London boroughs undertook a Call for Sites to feed into the London Strategic Housing Land Availability Assessment (SHLAA) which is being undertaken as part of the London Plan Review.

As part of this consultation, the council is undertaking a further call for sites to inform the review of the Local Plan. If you have already submitted your site as part of the GLA's call for sites it's not necessary to submit the site again.

For further information on Islington's call for sites refer to the council's website at <https://www.islington.gov.uk/consultations/>

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**Spatial Planning and Transport
Islington Council
222 Upper Street
London N1 1XR**

E: contact@islington.gov.uk
T: 020 7527 2000
F: 020 7527 5001
Minicom: 020 7527 1900
W: www.islington.gov.uk/localplan

Further information

If you would like independent external advice on planning please contact Planning Aid for London <http://planningaidforlondon.org.uk/>

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