

Zumbado-Sadarangani, Sara

From: [REDACTED]
Sent: 19 October 2019 00:00
To: planningpolicy
Subject: Comments on Local Plan Latest Draft

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: REG 19 RESPONSE, Ben

Both Site allocation BC4 Finsbury Leisure Centre and AAP Policy BC7 F do not comply with the National Planning Policy Framework (NPPF) Policies 96 and 97, as they allocate housing and other uses on the site, thereby reducing the existing open space, space for sports, recreational facilities and green space, which are all in undersupply in the area.

**National Planning Policy Framework (NPPF) policies 96 and 97 state that:
"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.**

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or**
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or**
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."**

In the case of the Finsbury Leisure Centre, Islington Council's design competition and preferred design proposal demonstrate that allocating housing and additional uses on the site significantly reduces the area of open space, space for sports (indoor and outdoor), recreational facilities and green space. This reduction of area is not justified by the council's Local Plan evidence. According to the council's Open space, sport and recreation (PPG17) assessment (2009) and the Sport Facilities Update (2018), there is an undersupply of open space, green space, sports and recreational facilities in the area. In addition, Bunhill has seen a large number of homes built since the 2009 report.

Additional housing is not required on the Finsbury Leisure Centre site according to Islington Council's evidence in the Bunhill and Clerkenwell Urban Design Study (2010) p.45, which suggests that development that was already planned in Bunhill and Clerkenwell would cover the area's share of new homes targets.

Allocating housing and other uses on the Finsbury Leisure Centre site will seriously limit Islington's capacity to respond to the growing demand and need for open space,

space for sports, recreational facilities (indoor and outdoor) and green space in the area.

Regards

