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Your ref: INS02 and INS03
Our ref: LBI02

Planning Inspectors:
Mr Manning and Mr Parker
c/o Programme Officer, Ms Edwards

29 May 2020

Dear Sirs,

Re: LB Islington response to letters from Inspectors, 26 March and 30 March 2020

Thank you for the two further letters regarding housing supply dated 26 March and 30 March 2020 and the request for additional information. This letter is the council's response to both these letters.

Introduction

Islington is a pro-growth borough, a fact clearly evidenced by historic housing delivery over the past ten years. Islington has delivered 15,841 units in the period 2008/09 to 2017/18 compared to a housing target of 11,952 for the same period¹. The council continues to promote growth and is increasingly contributing to that growth through development of its own land. The borough supports high quality development which meets identified needs. Islington faces an extreme set of circumstances when it comes to need and land supply. Land supply in Islington is constrained, and the borough is small and densely populated. The results of the SHLAA 2017 demonstrated that the borough has a shortage of land for development leading to a reduction in the borough's housing target in the draft London Plan. However, the Local Plan identifies opportunities do exist that will help the borough meet its housing target now and in the future. This letter aims to provide further information to support this.

Housing Requirement

The letter INS02 from the Inspectors asks whether the 2017 SHLAA supports the continued use of 775 dpa as the housing figure beyond the 10 year period (2019/20 to 22028/29). The

¹ Islington Housing Delivery Test Action Plan September 2019. Table 4 <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20192020/20190926lbihdtactionplan2018.pdf>

SHLAA plays a key role in understanding the extent to which London has the land capacity to meet its full objectively assessed housing need, taking into account the range of economic, environmental and social policy objectives and the various planning, environmental and deliverability constraints which may influence the potential for identified sites to come forwards for housing or mixed-use development during this timescale. Islington officers worked closely with the GLA to assess hundreds of potential housing sites. This assessment directly informed the large sites component of Islington's housing target.

Draft London Plan paragraph 4.1.12 recommends that, 'if a target is needed beyond the 10 year period it should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.'

The Council can confirm that there are no committed transport infrastructure improvements which can be considered to provide additional capacity. Crossrail 2 is not yet funded and will not be delivered until the end of the plan period at the earliest so cannot be considered to provide additional capacity.

There is further local evidence of capacity provided in this letter, in particular that provided by the council's own housing land supply, but also other registered providers of social housing. Whilst it is clear that in a borough like Islington significant capacity constraints will remain, we are sufficiently confident that this additional local evidence and other evidence provided demonstrates that the borough can meet the housing targets set by the London Plan. . Islington's constraints in terms of available sites for housing development was clearly recognised during the 2017 SHLAA and the situation has not changed in the intervening two years, nor is it currently likely to change in the context of future SHLAAs. Therefore, significant additional capacity is unlikely, certainly capacity of a scale which would materially increase the large sites element of the housing target. With the further local evidence of capacity the council considered it is appropriate to 'roll over' the 775 units until the end of the plan period. The alternative would be suggesting a decrease in housing target beyond the London Plan period of 2028/29 but this is not considered appropriate at this stage. The council notes that the Local Plan identifies in paragraph 10.6 that the council is required to review the Local Plan every five years from the date of adoption which would provide opportunity to reconsider housing targets.

The council has reviewed the 2017 London SHLAA to assess the extent to which it supports the continued use of the 775 dpa figure beyond the 10 year period. The SHLAA suggests Islington has the capacity to deliver 7,750 homes between 2019/20 and 2028/29, equal to 775 homes per year. This figure comprises an assumed small sites capacity of 4,840 dwellings (484 per year) and a large site capacity of 2,910 dwellings (291 per year). More detail on how these figures were derived is provided below.

Small sites

Paragraph 70 of the NPPF and Planning Practice Guidance² allow for the inclusion of windfall sites as part of anticipated housing supply, where there is 'compelling evidence that they will provide a reliable source of supply'. This 'should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'. Windfall sites are defined in the NPPF as 'sites not specifically identified in the development plan'.

To estimate housing capacity on small sites, the 2017 SHLAA considered three approaches:

- An 8 year windfall assessment
- A longer term 12 year windfall assessment
- A modelled approach taking the draft London Plan policy H2 Small Sites and estimates of potential for increased levels of housing delivery

8 year windfall assessment: During the 8 years from 2008/09 to 2015/16, the total completion figure for small sites in Islington was 4,150 units (519 units per year). In compliance with the 2012 NPPF, which stated at paragraph 48 that any allowance for historic windfall should not include development on residential gardens, the GLA adjusted the 8 year windfall assessment figures where relevant to remove development identified as being on residential gardens. This was not relevant in the Islington context where no such development was identified. In addition, any delivery as a result of office to residential permitted development rights (PDR) was then excluded as many boroughs, Islington included, had introduced Article 4 Directions that would limit the future use of the PDR. This amounted to 280 units in Islington (for the years in question/following introduction of the PDR in 2013) and gave a revised completions total for the 8 year period of 3,870 dwellings, or 484 dwellings per year.

Longer-term 12 year windfall assessment: Over the 12 years from 2004/05 to 2015/16, 7,080 units (590 units per year) were delivered on small sites in Islington. The GLA chose not to adjust the 12 year windfall figures to exclude infill development on residential gardens, in order to give a realistic idea of the small site development considered appropriate through the planning process during this period. Delivery through the office to residential PDR was removed from the completions figure, giving a revised total for the 12 year period of 6,800 units or 567 units per year in Islington.

The modelled approach: This approach investigated the potential of boroughs to increase small site delivery through either the conversion of houses to flats or new build infill development of 10 homes or fewer. The modelling involved various scenarios, and assumed that 1% of a borough's existing stock of housing would increase in density in areas with a PTAL of 3 to 6, with various adjustments made to take into account local factors. This modelling resulted in an assumed annual increase of units in Islington of 160,

² DHCLG, Planning Practice Guidance, Paragraph 23 Reference ID: 3-023-20190722

or 1,600 over ten years. This figure was then combined with a ten-year windfall assumption figure for those small sites not considered in the modelling, with appropriate adjustments made to prevent double counting. The windfall figure for Islington was 2,840 units, or 284 per year, giving a combined ten year capacity figure of 4,440 units. Islington was one of only three London planning authorities where the modelled approach resulted in a lower capacity figure than the 8 year windfall assessment approach. In these cases the GLA chose the higher 8 year windfall capacity figure to inform the overall 10 year housing target.

Large sites

To assess future large site capacity the SHLAA:

- Identified large sites (greater than 0.25 ha) with planning permission (approvals) from the London Development Database (LDD). LPAs were asked to verify the site status, and agree phasing and build out rates.
- Identified sites allocated (allocations) for housing development in Development Plan Documents. These sites were assumed to have a 100% probability of coming forward at some point during the plan period (to 2041), with LPAs asked to amend the GLA's assumed phasing where appropriate.
- Assessed the probability of other large sites providing additional housing capacity using a 'constraints' model taking a number of considerations into account, such as the planning policy, environmental and delivery constraints affecting a site. A notional capacity was calculated for each site using the net site area and estimated site density, multiplied by the probability of the site coming forward. The GLA shared their default assumptions with LPAs who were required to undertake a site appraisal and confirm or edit the information for each site.

The SHLAA separated delivery on the identified sites into five phases, as set out in Table 2. The two-year period in phase 1 was expected to cover the preparation and adoption of the London Plan and contains sites with planning permission where development is in progress. Phases 2 and 3 contain all other sites with planning permission and allocated sites considered to have 100% probability of coming forward. Phases 4 and 5 contain other allocated sites and sites identified in the SHLAA as having a low probability of being delivered. Phases 2 and 3 correspond to the 10 year housing targets set in the draft London Plan, whilst phase 4 and some of phase 5 are relevant for years 11 onwards of Islington's Local Plan.

Table 1: SHLAA phasing

Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
2017/18 to 2018/19	2019/20 to 2023/24	2024/25 to 2028/29	2029/30 to 2033/34	2034/35 to 2040/41

The council has considered the sites initially suggested in the SHLAA as having potential for residential development in phases 4 and 5. Whilst these sites could in theory accommodate

housing, in a number of cases the council did not consider it likely nor desirable during the plan period. The reasons for this were discussed with the GLA and may, for example, be due to a site's location within a designated employment priority area where retention and/or intensification of business uses is required by policy. In line with the approach taken in the SHLAA, site level information for other large sites considered in the SHLAA remain confidential. The GLA consider that it is for each individual local planning authority to determine which sites should be formally identified or allocated through their development plan or on their brownfield registers³. Therefore the council is unable to publish the sites it has discounted.

Of the sites where the council consider housing will be delivered, one already has planning permission and will be delivered in the first five years of the Local Plan. A number of new potential sites considered by the SHLAA are now allocations in the Local Plan, some are considered deliverable and all are developable.

The Council can confirm that the 2017 SHLAA will be added to the examination library – document reference SD62.

Housing Shortfall

The council has sought further information to help demonstrate sufficient housing supply to address the housing shortfall. Based on the information in this letter the total anticipated supply is 13,199 dwellings over a 16 year plan period starting in 2020/21. The first Inspectors letter (ref INSP01) requested initial thoughts on how to address housing supply; which were provided. The council has evolved those initial thoughts and built on them, helped in no small part through responding to the Inspectors further questions. The council is keen to continue to work with the Inspectors on this fundamental issue to ensure that housing supply in Islington can be considered robust both now and in the future. Letter INS02 from the Inspectors requested further information on what evidence there is that additional opportunities exist to accommodate more housing than is currently provided through the site allocations for the Area Spatial Strategies.

The Site Allocations DPD Introduction sets out in paragraphs 1.7 to 1.14 the site selection process. As this section explains new additional sites have been added to those retained and undeveloped sites from the 2013 Site Allocations DPD. These additional sites have been identified from a number of sources including 'call for sites' exercise, the SHLAA process, planning briefs and guidance and planning applications and pre-applications. There is a strong windfall element to housing supply in Islington from small sites less than 0.25Ha in size. Islington is one of three boroughs whose small sites portion of the London Plan target was trend-based, using the original methodology in the SHLAA 2017.

The Council is now in a position to clarify additional capacity from the Council's own house building programme. Further detail on this programme and sites are set out in the section below titled 'Council owned land' of this letter. This includes two large sites (Bemerton Estate South and Drakely and Aubert Court that are scheduled to be delivered within the

³ Paragraph 1.6 London SHLAA 2017

first 5 years of the plan. Table 1 in the letter at appendix 1 sets out the forecast units and target completion date.

The Council has considered the historic development pattern and previous Local Plan. As identified in the Topic Paper – Vision and Objectives, Policy PLAN1 and Spatial Strategies (document reference SD20) the Area Spatial Strategies have been carried forward from the Core Strategy. There are a total 101 sites allocated in the 2013 Local Plan across the Site Allocations DPD and Finsbury Local Plan. Of this total, 44 have been delivered and have been removed from site allocations⁴. 84% of the completed sites were within the area spatial strategies. The draft Local Plan sets out in the Site Allocations Topic Paper (document reference SD23) that the majority of the anticipated new housing (78%) will be delivered within the Spatial Strategy Areas, which continues the existing delivery pattern. The Local Plan Review demonstrates that new sites have come forward within the Key Areas and the Council consider there is scope for additional sites to come forward over the plan period and as part of a future plan review. Whilst the number of Other Important Sites has doubled in number from 11 sites in the 2013 Site Allocations to 26 sites in the Local Plan it is noted that 15 of these sites have capacity for housing.

Further detail on the site capacity assumptions are set out in the section below titled; 'Site Capacity Assumptions and Methodology'.

Council owned land

The letter attached at appendix 1 from the council's new build team demonstrates the delivery and ambition for future delivery of genuinely affordable housing in the borough. The team has over 10 years of experience delivering good quality, genuinely affordable homes, having already successfully completed 33 new schemes, the highest of any London Borough, delivering 406 new homes, 83% of which are homes for social rent. In the early years delivery was generally smaller scale but proposals are expanding and the new build team are dealing with larger and more complex sites. The council has the ambition is to ramp up delivery over the next 15 years, which is clearly set out in the letter.

This ambition is in part supported by recent funding changes to the Housing Revenue Account (HRA) which have enabled a step change in the amount the Council is able to borrow against its rental income. The HRA is the account in which a council's housing revenue (e.g. tenants' rent) and housing costs (e.g. property management and maintenance) are kept. By law this account is separate from the 'General Fund' that councils use for other fiscal purposes. Borrowing caps were introduced as part of local government self-financing reforms in 2012 over concerns about wider levels of borrowing. There were various proposals from government for more flexible HRA borrowing which didn't take off and then in October 2018, the government confirmed that the HRA borrowing cap would be abolished. As a result, local authorities with an HRA are no longer constrained by government controls over borrowing for housebuilding and are able to borrow against their expected rental income, in line with the Prudential Code. For Islington this has enabled a step change in work to deliver genuinely affordable council homes for residents.

⁴ Examination library ref PD12: Site Allocations Direction of Travel, appendix 1

As stated in the letter at appendix 1 over the last 18 months the council has undertaken a thorough review of all council land held in the housing and general fund to identify potential new supply opportunities. Planning advice has identified the most deliverable of these sites which are currently being worked through feasibility. Delivery from these sites is anticipated to commence in the later two thirds of the plan period commencing 2025/26. The scale of opportunity from these sites is considerable and cannot be ignored so has been included in the trajectory. The map of Council housing estates at appendix 6 shows the extent of the Councils housing estate across the borough. Using the anticipated delivery data and site size (to confirm they are large sites for the purposes of the trajectory) provided by the New Build Team the expected delivery per annum has been added to the housing trajectory at a rate of 123 units per annum over a 10 year period to the end of the Local plan period which totals 1,230 additional dwellings over the plan period. This additional capacity will be reviewed each time the trajectory is reviewed as and when further detail of sites becomes available.

The letter identifies those sites without planning permissions that are confirmed to complete in the 5 year housing land supply period (2020/21 to 2024/25) and the longer term supply of large sites which are expected to deliver in the plan period. This is summarised below:

Table 2: Summary of council owned land confirmed to contribute to housing supply

Housing Supply	Units to complete by 2024/25 (including large and small sites)	Units expected to be delivered between 2025/26 – 2034/5 (large sites)
Housing Land	252 - 264	1305
General Fund	132	
Acquisitions	50-85	
Total	434-481	1305

Other Social landlords

The Council response LBI01 made reference to other identified sources of potential 'windfall' capacity which could contribute in the medium to longer term to addressing a housing shortfall. These were identified in the section on 'discussion of potential 'windfall' housing capacity' included in the Housing Trajectory for 2019 (version 2) (SD 5a). The Council has been considering further how this source of supply can be evidenced now and in the future. We are aware that several social landlords are looking at their estate to explore further opportunities in the borough.

There are currently roughly 15,800 dwellings owned by registered providers across Islington – see maps in appendix 6 for Council landholdings and Registered Providers – although note this not a complete list of registered provider dwellings in the borough. These dwellings are predominantly estates and street dwellings. This includes the City of London who have

identified in their Corporation Housing Strategy Report⁵ an ambition to deliver 3,700 new homes. This is an ambition that will be spread across their land holdings throughout London. The Corporation manages roughly 400 dwellings in Islington. The Corporation is progressing plans for the York Way Estate and will shortly be re-starting consultation on this project. The project has secured grant funding from the GLA.

Further to our previous letter where we discussed potential for additional homes on the Barnsbury Estate, the Council has been in an ongoing dialogue with Newlon. There is currently pre-app process under way (PPA signed on 6th September 2019). This site offers a significant new housing opportunity, with the potential to deliver a significant number of new homes (net additional). LBI and Newlon would be willing to consider this as an additional site allocation through Main Modifications subject to the steer of the Planning Inspectors. Allocating the site would acknowledge and support the work Newlon have been undertaking on developing plans for the future of the site, including the ongoing engagement with the estate residents.

We will continue to engage with Newlon to estimate provisional capacity figures for the site, which may be expressed as a range and will be subject to all the technical assessments and considerations to be undertaken in due course, including consultation with residents on the detailed planning proposal. Please note that Newlon is currently undertaking a housing needs survey with the residents on the estate. Amongst other things, this will inform future dwelling size mix on the estate, and will be one of the important factors which will inform the overall number of additional homes that can be delivered

Both the first and second letters from the Inspectors have asked the Council what changes to the Plan would be needed to ensure that the shortfall in supply is suitably addressed. The council has been able to identify sufficient deliverable and developable new housing from social landlords as an important new source of supply that can address the shortfall. In order to support this further the council proposes a suitable modification in Policy H2 which promotes the delivery of new housing on existing social housing estates. Given the significance of this source to the overall supply of housing in Islington, this would seem appropriate to provide recognition in policy terms of the support that the council intends for social landlords' as well as for council led proposals.

Tall Buildings

Letter INS02 questioned whether the capacity projections could reduce as well as increase. This issue was raised as while Islington have stated that the capacity projections are generally conservative, in the case of tall buildings sites they may only be developed if they meet the detailed design criteria, which has not been established, and some of these sites may not be developed for tall buildings. Both of these points are true, however the tall building sites only constitute a small proportion of the projected homes. Appendix 3 sets out the tall building sites, and sets out where they contain an allocation for residential

⁵ Page 24 City of London Corporation Housing Strategy Report 2019-2023
<https://www.cityoflondon.gov.uk/services/housing/Documents/housing-strategy-report-2019-2023.pdf>

development. As set out in this table a total of 633 homes are on tall building sites. This comprises 4.8% of all homes in the housing trajectory (13,199 homes). Because some of the tall building sites are small sites there are 6 allocated large sites with tall buildings in the trajectory estimated to provide a total of 439 homes.

The approach in Policy DH3: Building Heights is clear that the sites are only identified as suitable in principle for tall buildings and have to ensure they satisfy the criteria related to visual, functional and environmental impact. If detailed proposals cannot satisfy all the relevant criteria then the maximum height may not be considered suitable. However where sites do not feature a tall building the Council considers the projected housing capacity figures to be conservative and a baseline position. The Council was not suggesting that the housing capacity figures should be increased, simply that the Inspectors should take comfort that the figures used are not unrealistic and inflated.

The following list are the site allocations which are over 0.25 Ha, identified as suitable in principle for tall buildings and are allocated for either residential, residential led or contain 'an element of residential':

- ARCH1: Vorley Road/Archway Bus Station – Residential led with an element of business use
- FP2: Morris Place/Wells Terrace – mixed use retail, residential and business floorspace
- FP3: Finsbury Park Station and Island, Seven Sisters Road – mixed use commercial led scheme with an element of residential
- NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road and 8-32 Seven Sisters Road – retail led mixed use with significant amount of office, residential accommodation It is worth noting that this site is a large site (16,015 m2) and the tall building will represent a small quantum of the capacity.
- NH10: 45 Hornsey Road and 252 Holloway Road – conventional housing or student accommodation
- KC1: King's Cross Triangle site – site has planning permission for mixed use residential led development

As the above list demonstrates 6 out of 22 potential tall building sites are large sites which have housing capacity figures estimated in the housing trajectory. Only two are residential led. The King's Cross triangle site unit numbers are sourced from a planning permission – note that no additional capacity is identified for the tall building element of this allocation. A number of the sites which are suitable in principle for tall buildings are allocated entirely for commercial uses, including the five sites identified in the Bunhill and Clerkenwell AAP. The rest are small sites with a mix of uses allocated and would in any case contribute to the small sites windfall allowance.

Inspectors letter dated 30 March

The Inspectors third letter dated 30 March identified 23 site allocations not included in the revised housing trajectory (SD5a) some of which have a capacity identified in Site Allocation topic paper (SD23). The council has reviewed these sites and can confirm that all of them

except two are considered to be small sites i.e. less than 0.25Ha. In line with the housing trajectory methodology capacity from these sites will not feature in the trajectory until the site gains planning permission and construction is considered imminent to feature the capacity in the first two years of the trajectory. This is in line with the methodology set out in the Housing Trajectory 2019 version 2 (SD5a) in paragraph 1.15. If capacity from allocated small sites were to be included then the small sites component of the London Plan housing target (484 units) could not be used without double counting. If Islington did not include the small sites component then housing supply would be significantly affected. Small sites make a significant contribution to the housing supply in Islington and are certain enough to include a windfall element as part of the housing trajectory. This is in line with paragraph 70 of the NPPF and supported by the London Plan and related evidence in the SHLAA.

The two sites identified in the Inspectors letter which are the exceptions to the above are:

- BC35: Finsbury Tower, a large site at 5,043sqm. This site has planning consent (P2016/3939/FUL) and is identified under this reference rather than the site allocation reference. Whilst the allocation identifies the site for intensification of office use the consent includes 25 units affordable housing. If the landowners were to seek further amendments then entirely office use would be sought for this site.
- BC14: Peabody Whitecross estate which should be on the trajectory to bring it in line with the trajectory methodology as this is a large site. However the site capacity for two additional units will be subject to review so the site has not been added to the trajectory at the moment.

The additional sites without capacity identified are summarised below:

- KC4: Former York Road Station is a small site. The site size is under 0.25Ha so any capacity would not be added to the trajectory in line with the small sites methodology. The site allocation is for business-led development with an element of residential use. Whilst the site is developable and the allocation is supported by the landowner the capacity is considered aspirational at this point. The council will continue to explore potential capacity.
- OIS19: 25-27 Horsell Road is small site. Planning consent for residential was approved in July 2016 but was not implemented and has now lapsed. The allocation is for intensification of business floorspace.
- OIS26: Amwell Street Water pumping station is a large site with heritage constraints. The heritage constraints were the main factor in not identifying capacity and because of the purposely flexible nature of the allocation to help facilitate appropriate heritage-led development and preserve the setting of the heritage assets on the site.
- FP3: Finsbury Park Station is a large site. As noted in the site allocation development above the railway station is a long-term ambition. There are particular constraints and uncertainties linked to overstation development and if it does come forward it is likely to be towards the end of the plan period. Given the uncertainties around making

assumptions until further work is carried out no site capacity has been assumed for this site, however it could provide a significant amount of development which could further contribute towards identified needs within the plan. We note the support for the allocation from the landowner. The council will continue to explore capacity.

Five Year Housing Land Supply

The council can confirm that the Inspectors understanding is correct. In line with the approach set out in the NPPF a 20% buffer should be included as part of Islington's 5 year housing supply of specific deliverable sites for the purposes of the housing trajectory.

The council has produced an Action Plan (2018) which sets out historic delivery in the borough. Islington has over-delivered on its housing targets by a third over the decade from April 2008 to March 2018. Delivery was consistent over this period with rolling three year delivery exceeding the target. The Housing Delivery Test (HDT) looks at a very narrow three-year window and, as a consequence, can trigger the buffer due to a single year of under delivery, which is the case with the 2018 HDT figures. The council does not think the 20% buffer is appropriate to apply as part of the draft Local Plan. The HDT is applied to the current plan and target of 1,264 set out in the London Plan further alterations 2015. There is a significant drop in housing target in the draft Local Plan, applying the 20% to this new target would seem to be inconsistent. The constrained land supply is a feature of the draft Local Plan and a significant justification for bringing forward the plan review. Applying the HDT trigger to a new Local Plan target, within the context of the borough's unique circumstances of significant historical over delivery and now a more constrained land supply before a draft Local Plan has been put in place which recognises this context is not considered justified. Notwithstanding the above, it is considered that the 20% buffer can be achieved.

Housing Trajectory

The figures set out in this letter have been added to a draft of the Housing trajectory 2018/19 v2. Appendix 4 sets out the changes made to sites in the five year supply and the housing trajectory. Appendix 5 sets out the updated five year housing supply position. The council will be commencing its annual starts and completions survey shortly and would expect the results to be available by early September which will be used to inform an updated housing trajectory. We anticipate that this will result in additional capacity in the five year supply based on updated information we have already received on some sites.

Deliverability

In the letter INS02 the Inspectors have requested further information on deliverability of sites anticipated to deliver in the five year housing supply. The Council has written to the landowners of the eight sites identified by the Inspectors from the trajectory which are

allocated and do not have planning permission. The letters sought from landowners their delivery intentions for the sites and requested the following:

- When the planning application was estimated to be submitted?
- Which financial year the development was estimated to be completed in?

The letters set out the estimated delivery and capacity provided in the housing trajectory and suggested landowners could also comment on the capacity figures. Landowners confirmation of delivery dates and suggested capacity are set out in table 3 below. The relevant letters are included at appendix 2 to this response.

Table 3: Landowners responses to Council request for anticipated start and build out rate

Site Allocation Ref	Site address	Landowner / reference number	Trajectory Delivery year	Previous 5 year supply unit capacity	Revised 5 year supply unit capacity	Landowner Delivery	Landowner planning approval date	Landowner capacity
ARCH1	Vorley Road / Archway Bus station, N19	London Borough Islington / n/a	2022/23	70	70	2023/24	Expect to submit a planning application in December 2020	70
ARCH5	Archway Campus, Highgate Hill, N19	Peabody / R19.0178	2023/24 2024/25	130 130	130	n/a	n/a	290
ARCH6	Job Centre, 1 Elthorne Road, N19 4A	Gladquote Ltd / R19.0170	2022/23	30	0	n/a	n/a	n/a
NH4	Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP	Fairview New Homes / R19.0062	2022/23	96	118	Q4 2022	June 2020 committee	118
NH7	Holloway Prison	Peabody / R19.0130	2023/24 2024/25	220 220	220	n/a	Expected to submit an application by September 2020 but now likely to be subject to delay	1,000
NH10	45 Hornsey Road and 252 Holloway Road, N19 4AL	Ashburton Trading Ltd / R19.0083	2024/25	47	47	2023/24	Expect to submit a planning application in next 6 months	325 NSC beds
FP13	Tesco, 105-119 Stroud Green Road, N4 3PX	Grovesworld Ltd / R19.0135	2024/25	65	65	2025	2021	77
BC4	Finsbury Leisure Centre, EC1V 3PU	London Borough Islington / n/a	2022/23	120	120	2024/25	2021	132

Table 3 confirms the deliverability for five of the eight sites. This confirms that 420 of the 1,150 units queried by the Inspectors have had a response from the landowner confirming their deliverability in the timescale. However, the Council consider it reasonable to assume that some housing will be delivered in the 5 year supply period on site allocation ARCH5 and NH7. Further commentary on individual sites, where required, is provided below.

ARCH6

The landowner for ARCH6 was unable to provide evidence of their delivery expectations. The coronavirus situation was cited by the agent. As a consequence the council will remove this site from the five year housing land supply but retain the site in the housing trajectory. If the landowner of ARCH6 subsequently responds to the Council during the examination with detail on delivery then the council will forward this onto the Inspectors.

NH7

In relation to site NH7, although the landowners have indicated some delays to the original timetable and did not confirm delivery timescales there is evidence that work for a planning application progressing. Consultation on proposals is still scheduled to take place⁶, and an EIA scoping application has been submitted to the council. Peabody also confirmed that their intention is to submit a planning application later this year in a recent press release⁷. Discussions on pre-application proposals have continued to take place with both the council and the GLA. Peabody have expressed their continued commitment to find agreement and take forward delivery of the site as part of ongoing discussions. It is also important to note that from a delivery perspective the landowners have a funding agreement in place with the GLA for the delivery of affordable housing. This funding agreement is based on a number of milestones including practical completion of the affordable housing and full repayment of the loan provided by March 2027. It is therefore reasonable to assume that some housing on the site would be completed within the final year of Islington's five year supply, with the remaining units delivered in years 5-10. The sites phasing and the housing trajectory has been updated to reflect this with 220 units retained in the five year supply.

It is important to point out that both the Council, the GLA and Peabody want to deliver the site and deliver it expediently; there is no disagreement about the principle of development, but rather the overall quantum as, in the council's view, this impacts on the quality of new homes and has the potential to undermine its objective to secure a high quality new neighbourhood on this unique site. This is actively being discussed through the planning application process and is not considered an issue which is fundamental to the delivery of the site allocations document or the Local Plan. Whilst the council consider the figure for the site in the trajectory is appropriate based on detailed work that took place as part of the development for the SPD for the site, the funding agreement with the GLA suggests a development of around 1000 units, with Peabody's response to the council also confirming their view that the site has capacity for a minimum of 1000 units. However the recently submitted EIA scoping report considers a scheme of up to 1200 units. The planning application process is considered to be most appropriate mechanism to resolve the exact

⁶ <http://hollowayprisonconsultation.co.uk/>

⁷ <http://islingtontribune.com/article/16-storey-tower-blocks-included-in-holloway-prison-redevelopment-plans>

mix, quantum and design of the proposals, where detailed discussions and relevant technical evidence can be assessed.

ARCH5

In the response on Archway Campus, although the response does not specifically mention timescales it highlights continuous engagement with LBI during 2019 and 2020. It should be noted that although Peabody are currently reviewing their position on the site following previous engagement, the website for public consultation in summer of last year provides an indicative timescale of construction works being complete by spring 2024. Even if this is delayed it is not unreasonable to assume some of the units would be provided within the 5 year supply and therefore 130 units have been retained.

Applied drop out / lapse rate

In the letter INS02 the Inspectors have requested further information on the drop-out rate applied to small sites. The Council can confirm that the rate is 12.65%. This is a rolling drop-out rate that provides an average lapse rate from all applications consented in last 13 years from 2005 onwards, grouped by gross number of units proposed, 1-10, 11-50, 50+. The smallest scale is for schemes up to 10 units which is considered equivalent for small sites of less than 0.25Ha, in any case the drop-out rate for schemes from 11 – 50 units in size is very similar. Table 4 below sets out the percentage drop-out rate for the various scales of development considered.

Table 4: Percentage drop-out rates and scheme size group

Convention al	# of units	# of units	# of units
Up to 10	11 - 50	51 - 100	101+
12.65%	12.40%	5.27%	9.41%

Site Capacity Assumptions and Methodology

In the letter INS02 the Inspectors have requested confirmation regarding discussions with landowners in reference to capacity methodology. The Council has consulted on the site allocations on three separate occasions as part of the Local Plan review - the detail on this is set out in the previous letter from the Council (LBI01). This has provided site owners ample opportunities to put forward their case for sites, the potential uses and potential capacity which a site could address. Many landowners have taken this opportunity to respond with representations related to sites. There are a total of 170 sites consulted on during the three stages of the Local Plan, with small numbers of sites added and removed at different stages. The Council received a representation from a landowner or developer on at least one stage of consultation for slightly less than half of the Site Allocation sites throughout the process (79 sites of 170, or 46%). A large number of these representations requested that the allocated uses be expanded or that increased density or height should be supported through the allocation.

In addition to the engagement process that has taken place on the site allocations document, discussions with site owners have also taken place where a planning proposal

has come forward either as part of the planning application process or where a pre-application proposal has come forward from landowners. Of the 157 site allocations in the draft plan it is estimated that 65 sites (41%) have planning permission, with an additional 9 sites subject to live planning applications and 4 sites having refused or withdrawn applications. Of the remaining 79 sites, 29 have been or are currently subject to pre-application discussions in the last three years. This demonstrates a high proportion of the sites (approximately 68%) are active in the development management process. In some cases extensive discussions have taken place with landowners and their representatives and the Policy Team have liaised closely with Development Management colleagues where proposals are under active consideration. Unfortunately, it is not possible to provide evidence of this. In any case the particular nature of the land market in London with sites in a range of active land uses with complex and fragmented ownership means landowners decisions and priorities for sites can change for a variety of reasons during the planning process

It is important to note that site capacity assumptions are broad estimates and are not intended to provide a precise assessment of the capacity of the site. This would require a detailed design exercise to be undertaken which would happen as part of the application process. The site capacity assumptions are likely to differ from the quantum of development proposed in actual planning applications which would be assessed as part of the overall development management process, as noted in the draft Local Plan viability study. Also as noted in the previous letter from the council and above in relation to tall buildings it is likely that many sites' capacity assumption figures are conservative because the proposals have not been designed in detail. For this reason specific discussions have not taken place for the assumptions for the capacity of sites without planning permission where these have been made. However, the council considers that the site capacity assumptions to be a reasonable judgement of the likely acceptable quantum of development which cumulatively would be expected to come forward in each spatial strategy area over the lifetime of the new local plan.

As you would expect, situations on many sites are evolving and the site capacity assumptions reflect the situations on sites at the time of drafting. Some sites, now have planning consent. It might be useful for the council to provide an updated set of site capacity assumptions in the summer.

The approach to assuming site capacities where these are not based on planning applications is carried over from the current local plan and was supported by the Planning Inspector⁸:

“Table 2.2 of the SALP sets out indicative site capacities for housing and employment development in each key area. “Other important sites” are grouped together as “non key”. These area targets are based on the estimated number of dwellings and the amount of business and retail floorspace for each site allocation within that area. The methodology used to determine these estimates is set out in Appendix 5 of the SALP and is supported by evidence which provides individual site capacity estimates which have informed the SALP. By providing broad, area based targets the SALP allows for

⁸ Report on the Examination into Islington Site Allocations Local Plan, 17 June 2013

flexibility within each area to maximise growth and to allow design and viability considerations to be taken into account. This approach to assessing the quantum of development is consistent with the NPPF which encourages site allocations to promote development and flexible use of land.”

In the adopted Site Allocations DPD (2013) the majority of sites have been delivered or carried forward into this plan. There are very few sites that fall away. There were 101 sites allocated in 2013 (across both the SA DPD and Finsbury Local Plan). Of these sites:

- 44 have been developed or are close to completion so the allocation was no longer considered necessary.
- Two sites (BC11: Gambier House and BC14: Storage Facility, Europa Place) have not been allocated this time following discussions with colleagues in Council property services as they are no longer considered likely to come forward during the plan period.
- 55 sites have been carried forward either partially or fully into the new plan – 29 in the SA DPD and 26 in the B&C AAP. Of these 29 sites carried forward from the 2013 SA DPD now comprise 39 allocations as they include five large sites that have been broken down into smaller parts:
 - The former AUS4 is now four allocations (AUS2: Pride Court; AUS3: 84-89 White Lion Street; AUS4: 90-92 White Lion Street; and AUS5: 94 White Lion Street)
 - HC3 is now three allocations (NH10: 45 Hornsey Rd; NH13: 166-220 Holloway Rd; and NH14: 236-250 Holloway Rd and 29 Hornsey Rd)
 - FP1 is now three allocations (FP1: City North; FP2: Morris Place/Wells Terrace; and FP3: Finsbury Park Station and Island)
 - ARCH1 is now three allocations (ARCH1: Vorley Rd; ARCH2: 4-10 Junction Rd; and ARCH3: Archway Central Methodist Hall)
 - HC2 is two allocations (HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner; and HC2: Spring House)

Further detail on the deliverability of the individual sites identified by the Inspectors is set out in letter LBI03.

Conclusion

Islington is a pro-growth borough, a fact clearly evidenced by historic housing delivery over the past ten years. The council continues to promote growth and is increasingly contributing to that growth through development of its own land. As the draft Local Plan makes clear Islington faces an extreme set of circumstances when it comes to need and land supply. Land supply in Islington is constrained, and the borough is small and densely populated. Therefore, this local evidence of capacity is not put forward as a significant solution to the fundamental capacity constraints in the borough in the longer term but as a supplement to existing identified housing delivery set out in the housing trajectory for the plan period.

The Inspectors have requested further information from the council on housing including the housing requirement, the housing shortfall, the five year supply, deliverability and site capacity. The council has sought further information to help demonstrate sufficient housing supply to address the housing shortfall.

The council has been able to identify sufficient deliverable and developable new housing from social landlords as an important new source of supply that can address the shortfall. We have reviewed historic delivery and patterns of development to provide information which supports our expectations of achieving estimated capacity and provided further explanation of the methodology, in particular with respect to tall buildings.

The letter identifies an increase in housing supply of 1,498 dwellings over the plan period bringing the total housing supply to 13,199 dwellings. Over the five year supply the response from various landowners has resulted in a reduction of 141 dwellings to the five year supply resulting in 4,745 units. An updated five year supply table is set out in appendix 5. This has reduced the five years supply to 5.10 years including the 20% buffer.

We hope that this letter has addressed all the requests for information in your initial letter and look forward to hearing from you further.

Yours sincerely



Jonny Gibb
Team Leader Planning Policy
Islington Council

Appendix 1: Letter from New Build Team on future council housing supply

Sakiba Gurda
Head of Service
Planning Policy Development and Viability
Islington Council
Islington Town Hall, Upper Street
N1 1UD

Housing Directorate
Town Hall
Upper Street
London N1 2UD


www.islington.gov.uk

15 April 2020

Dear Sakiba,

Re: Islington Draft Local Plan

Response from Islington Council's New Build Team regarding future council housing supply in the short and long term

I have set out the New Build Teams plans for the delivery of genuinely affordable council homes over the short and long term below. As you are aware, Islington Council is committed to the continued delivery of genuinely affordable council homes in the long term.

The council's new build team have already successfully completed 33 new schemes, the highest of any London Borough, delivering 406 new homes, 83% of which are homes for social rent. The council has over 10 years of experience delivering good quality, genuinely affordable homes and its ambition is to ramp up delivery over the next 10 years and beyond.

Before discussing short and longer term supply it is important to provide context on resources and systems that are being put in place to assist with delivery.

Resourcing

Despite the council being under considerable pressure from cuts to its budget over the last 10 years, it has agreed to more than double the size of its New Build Team to meet its ambitious plans to ramp up new council homes delivery. The current team of 18 will be increase to circa 40 permanent members of staff. As well as increasing the number of project managers who are responsible for delivering individual schemes, new appointments include a construction manager, design manager, acquisitions manager, defect co-ordinator and customer care roles.

These specialist roles will help to deliver the council's ambitious long term programme, improve the efficiency and quality of supply, as well as taking advantage of acquisition opportunities in the public and private sectors.

New Contractor Framework

The council recently completed the procurement of a £1.2bn contractor framework covering 3 lots of 8 contractors with values of schemes from £1m to £20m+⁹. This speeds up the ability of the council to procure contractors and guarantees quality and value for money as well as providing flexibility over the types of contract awarded to build out schemes more quickly and efficiently.

The new Framework is due to launch this Summer.

The council also has approval to use the Notting Hill Housing Group Consultant Framework for quick and efficient procurement of consultants post such as architects, Employers Agents, Quantity Surveyors.

Five Year Housing Supply (up to 2024/25)

Current Corporate Council Housing Target and performance

The council has an objective to deliver 550 genuinely affordable council homes by between 2018/19 and 2022/23. The council's New Build Team currently forecasts completing 561 new genuinely affordable homes in this period as well as 17 homes for shared ownership and 80 homes for private sale to fund the affordable council homes. 718 new homes are planned in total. 150 new homes have been completed with 177 homes to be delivered this year and 391 new homes to complete in the two subsequent years¹⁰.

Table 1 - Identified sites to complete by 2024/25

The table below provides an update on those sites without planning permission. Please note the table below sets out the sites without planning permission on housing land only, which are due to be completed by 2024/25. (My understanding is that the Planning Team have accounted for sites with planning permission elsewhere in their submissions to the Examination.)

9

<https://democracy.islington.gov.uk/documents/s15277/Procurement%20Strategy%20for%20New%20Build%20Construction%20and%20Refurbishment%20Works.pdf>

¹⁰ 8 schemes have been completed, 7 schemes are on site, 10 schemes have planning approval and 3 are at the pre-planning stage.

Scheme	Site Allocations reference (where allocated)	Site area (sqm)	Forecast unit no's (approx.)	Planning status	Forecast completion date
Vorley Rd Bus Stand	ARCH1	2,633	70	First pre-app meeting has taken place, date due to be confirmed for second –pre-app meeting and Design Review Panel. Planning application submission forecast for Dec 2020.	2023/24
Bemerton Est. South	n/a	15,000	75	In formal pre-app. The Design Review Panel has taken place. Submission forecast for Nov 2020.	2023/24
Braithwaite and Quaker Crt	BC47	1,309	40	In formal pre-app. Submission forecast for July 2020.	2023/24
Drakely and Aubert Court	n/a	2,800	45	In formal pre-app. Submission forecast for Nov 2020.	2023/24
Elmore and Lyndsey Mews	n/a	1,500	10	At options appraisal stage with informal planning advice. Submission forecast for Jun 2021	2023/24
Drovers Day Centre	n/a	600	12-24	Building vacated and initial massing exercise underway prior to discussions with Planning. Submission forecast 2022.	2024/25

Housing Supply Longer Term (up to 2035/36)

Site finder programme

Over the last 18 months the council has undertaken a thorough review of all council land held in the housing and general fund to identify potential new supply opportunities.

A close working arrangement has been established with Development Management to enable potential development sites to be explored in an effective manner, through which sites with more significant constraints can be sifted out early on in the process, so that sites with

greater potential can be focused on and significant issues on these sites can be addressed early on in the process. This ongoing collaborative approach contributes to a speedier and more effective process overall. Please note that the council's New Build Programme funds 5 planning officers including an urban design post.

It is also worth noting that a New Homes Board was established a couple of years ago to drive forward and oversee the council's New Build Programme. The Board, which meets every six to eight weeks, is chaired by the Lead Member for Housing and Development, and is attended by senior officers from all relevant council's departments.

The most deliverable of the site finder sites, following planning advice, are being worked up into feasibility and are of a scale in excess of the current programme.

Considering the borough is the densest in London, a significant portion of new build potential is building extra storeys on top of existing blocks. The council has secured funding from the GLA to undertake structural studies of buildings where there could be buildover opportunities on existing blocks to help speed up delivery.

Longer term delivery

Sites identified as having excellent development potential are being reviewed by planning and also the council's legal department to ensure there are no covenants or rights of way that would impact on development. Further in-depth feasibility work will then be carried out prior to pre-application stage.

Currently the council estimates up to 1300 new homes could be built on the first raft of site opportunities, beyond those already identified in the period up to complete by 2024/25.

Estate	Site size (sq.m)*	Estimate net gain
1	10,900	120
2	3,800	50
3	10,000	40
4	9,800	70
5	11,900	30
6	41,100	180
7	89,000	200
8	27,400	130
9	13,600	125
10	38,900	110
11	24,000	250
Total		1305

* Figures rounded to nearest 100.

11 estates on which significant feasibility work has been done to date can deliver between 50 and 250 additional units through various degrees of infill and buildover and do not involve estate demolition and rebuild. This gives total of 1,300 additional homes to be delivered post 2024/25 and up to 2035/36. All of these estates would be classified as large sites (over 0.25ha). This is an ongoing programme and further sites are likely to be identified for the longer term delivery.

Sites within the council's General Fund

The council has also undertaken some high level design studies of buildings within the General Fund (non-housing land). As the council continually reviews its asset portfolio sites within the General Fund will be reviewed for their potential for development of residential and service provision. The Finsbury Leisure Centre is one such site that is expected to deliver 132 units by 2024/25 and is addressed in detail in a separate letter.

Acquisitions and working in partnership with public sector landowners

The new post of Acquisitions Manager will enable the council to take advantage of opportunities to purchase third party land for the purposes of delivering affordable housing.

The council has submitted a bid for the former prison officers' accommodation at HMP Pentonville via an open market sale by the MoJ. We have estimated the site can deliver approx. 35 new homes.

The council is also finalising the purchase of the Clerkenwell Fire Station from the London Fire Brigade supported by funding from the GLA's small sites fund, further information about this is provided below.

Scheme	Site Allocations reference (where allocated)	Site area (sqm)	Forecast unit no's (approx.)	Planning status	Forecast completion date
Clerkenwell Fire Station	BC24	1,298	50	Undertaking detailed design work prior to entering formal pre-app but significant informal discussions have taken place with Planning. Submission forecast mid – late 2021.	2024/25

As well as acquisitions the council has established a working relationship with local Whittington Hospital Trust and Clinical Commissioning Group for the borough through the One Public Estate

programme and is undertaking capacity studies to understand where there are residential and health use opportunities for sites within each parties ownership. It is anticipated that there will be a further supply of housing land identified through this work.


Conclusion

The council is committed to the delivery of more genuinely affordable homes in the borough. This includes utilising a range of funding streams and fully exploring opportunities on council land as well as land owned by third parties. The council has a track record of delivery and this is set to increase further over the next 10 years in order to help meet the borough's significant and identified need for affordable homes.

In summary the table below shows deliverable housing from all sources. It is anticipated that further opportunities will also be identified. Please note the table below sets out the sites without planning permission only. My understanding is that the Planning Team have accounted for sites with planning permission elsewhere in their submissions to the Examination.

Housing Supply	Units to complete by 2024/25	Units expected to be delivered between 2025/26 – 2034/5
Housing Land	252 - 264	1305
General Fund	132	
Acquisitions	50-85	
Total	434-481	1305

If you have any further questions then please do not hesitate to contact me. Your sincerely


Director of New Build
Islington Council

Appendix 2: Letters from landowner/developers in response to council

Carless, Michael

From: [REDACTED]
Sent: 20 April 2020 17:05
To: [REDACTED]
[REDACTED]
Subject: Draft Islington Local Plan; site allocation NH10; 45 Hornsey Road, N5

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Carless,

Further to your conversation earlier with [REDACTED], I confirm as follows:

1. It is the intention of the owners of this site to submit a planning application within the next six months.
2. The proposed development is expected to be generally in accordance with the draft Local Plan, and we estimate it will comprise around 325 student bedspaces.
3. Provided LBI approves the application without delay, and subject to the inevitable uncertainty that will exist post Covid-19, the intention is to commence development during the 2021/22 year and complete it during 2023/24.

I hope this is of assistance.

Regards.

[REDACTED]
Director



Planning,

Environment

&
Development

45 Welbeck Street, London W1G 8DZ

[REDACTED]

Follow updates on: [REDACTED]

[hghconsulting](http://hghconsulting.com)

From: [REDACTED]
To: [Carless, Michael](#)
Subject: 65-69 Parkhurst Road
Date: 06 April 2020 09:55:42

Morning Michael,

I write in relation to the above site and particularly correspondence dated 1 April 2020. In line with your requests I can confirm that Islington is currently considering our planning application for the site and this includes:

- 118 residential units comprising 42no. 1 bed units (36%), 58no. 2 bed units (49%) and 18no. 3 bed units (15%).
- 59 units will be affordable, which equates to a provision of 50% affordable housing by unit. This is comprised of 41 social rent and 18 shared ownership units, which fully accord with Policy aspirations

It is our hope that the matter will be presented to the planning committee in June (at the latest). This date is enshrined in our mutually agreed PPA. In terms of delivery provided approval times are met we are envisaging final completions by Q4 2022.

Please let me know if you require any further information.

Regards,

[REDACTED]

Fairview Estates (Housing) Ltd, 50 Lancaster Road, Enfield, Middlesex EN2 0BY
[REDACTED]

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Fairview New Homes Limited, 50 Lancaster Road, Enfield, Middlesex, EN2 0BY.
Company Registration Number 4081723 (CARDIFF).

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Our Ref:
Your Ref:

29 April 2020

Michael Carless
Deputy Team Leader Planning Policy
Planning and Development
Town Hall
Upper Street
London N1 2UD

Dear Michael

ISLINGTON DRAFT LOCAL PLAN

REQUEST FROM LONDON BOROUGH OF ISLINGTON FOR ANTICIPATED START AND BUILD-OUT RATE OF SITES [FORMER HOLLOWAY PRISON AND ARCHWAY CAMPUS]

Thank you for your letter issued 9th April. As you know, Peabody is the owner and developer of two draft Local Plan allocations – Holloway Prison (NH7) and Archway Campus (ARCH5). This letter relates to the Holloway Prison site. CBRE, on behalf of Peabody, will be submitting a separate letter related to the Archway Campus site.

Please find enclosed information regarding the following matters for Holloway Prison:

- Anticipated planning application submission date for each site;
- Estimated timescale for delivery of new homes in a given financial year.
- Comments on the estimated capacity figures.

Holloway Prison, emerging allocation ref. NH7

Anticipated planning application submission date

Peabody's project programme forecasts submission of the planning application at the end of September 2020. A formal pre-application response was, however, issued by LBI planning officers on 21st April 2020.

Given that the Council's position sets out a number of issues of concern, the current programme, forecasting submission of the application in September 2020, is likely to be subject to delay.

Estimated timescale for delivery of new homes

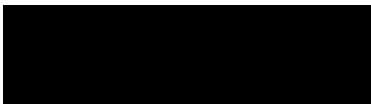
The Council's Housing Trajectory 2019 Version 2 estimates delivery of 220 homes in 2023/24 and a further 220 homes in 2024/25 on the Holloway Prison site. A further 440 homes is estimated for delivery in years 5-10 of the plan period.

As set out above, Peabody's current programme is likely to be subject to delay and we are therefore unable to provide an estimate for the number of homes to be delivered per annum for 2023/24 and 2024/25 at this moment in time.

Comments on the estimated capacity figures

The Council's Housing Trajectory 2019 Version 2 considers the Site would deliver a total of 880 homes. This figure is based on the Holloway Prison SPD. This 880 homes figure does not reflect Peabody's position that a minimum of 1000 homes can reasonably be accommodated on the site.

Yours sincerely

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the signature area, with a smaller box overlapping the top left corner.

For and on behalf of Avison Young (UK) Limited

Carless, Michael

From: [REDACTED]
Sent: 14 May 2020 10:53
To: Carless, Michael
Cc: [REDACTED]
Subject: RE: Islington Local Plan Examination- Archway Campus

Hi Michael

I'm well thank you, I hope you are too.

Sorry for the delay in getting this across to you, please see our response below on behalf of Peabody to your letter dated 8th April 2020.

"As you may be aware, Peabody are currently reviewing our options for Archway Campus. Although we engaged with Officers on our latest scheme for the site throughout 2019 and early 2020, we are currently reviewing our position on these proposals and as such would request that the emerging site allocation remain as flexible as possible. We will naturally keep the council informed of any future developments, however as the scheme is in flux, we have no set timescale for the submission of a planning application."

Our consultation stage representations (Reg 18 letter dated 14th January 2019 and Reg 19 letter dated 18th October 2019) welcomed the inclusion of the draft allocation as it aligned with our forthcoming development proposals as a residential-led mixed-use development.

The Council have identified that Archway Campus could deliver 260 units over 23/24 and 24/25. Peabody's most recent scheme was a design-led solution that celebrated and met the challenges in developing this heritage site, and included the delivery of 290 homes. This was a reduction from previous iterations of the proposals that were tested up to 450 units, appropriate for the site's PTAL rating of 6b. At 290 units, our scheme could not viably support a policy compliant mix of 50% affordable units, which had necessitated a dialogue with the council regarding the affordable housing offer. We would like to stress that a scheme of fewer units is likely to be completely unviable, and thus undeliverable, and would suggest that this number is reviewed."

I hope that's clear and helpful. Should you require any more information, please do let us know.

Peabody expect to attend the Local Plan examination hearings, therefore if you could keep us up to date on timings for this, that would be much appreciated.

Kind regards

[REDACTED]

From: Carless, Michael <Michael.Carless@islington.gov.uk>
Sent: 11 May 2020 16:51
To: [REDACTED]
Subject: RE: Islington Local Plan Examination- Archway Campus

External

14 April 2020
Delivered by email

Michael Carless
Planning Policy
London Borough of Islington
Islington Town Hall
London
N1 2UD

Dear Mr Carless

RE: Islington draft Local Plan - draft site allocation FP13

Thank you for your letter dated 1st April, requesting information regarding the anticipated start date and build-out rate, in relation to the above site, and following our previous representations in relation to both the Local Plan and this site allocation.

We note that the council's Housing Trajectory 2019 (version 2) estimates housing capacity of 65 new homes on this site. We consider that this figure is significantly below the potential capacity that this key Town Centre site can deliver.

Pre-application advice was received from LBI in 2018 for a mixed-use scheme which would deliver 77 new homes (ref. Q2017/4457/MJR), as well as a replacement food store and other town centre uses. We consider that there is potential for at least 77 homes and up to circa 100 homes on the site. The site is important within the Finsbury Park Town Centre and is currently under-utilised, predominantly as a supermarket and associated rear service yard. The regeneration benefits of this pivotal Town Centre site coming forward are both qualitative and, in housing terms, quantitative.

Based on the current London Plan, given the PTAL of 6a and the 'urban' classification of the site, the site could deliver 96 units, taking the upper value within the 'density matrix' range of 260 units per hectare and a site area of 0.37 hectares. The removal of the density matrix from the draft London Plan allows for a site-specific approach to optimisation, which may facilitate a greater number of homes being delivered on this site.

Islington's Housing Delivery Test measurement for 2019 indicates a 63% performance against the three-year requirement and this places the council in 'buffer' status. This puts more onus on optimising the delivery of homes from allocated sites, particularly those in town centre locations.

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London
WC1X 8NL

T 020 7851 4010 turley.co.uk

With regards to programme, it is anticipated that a planning application will be submitted in 2021, following further pre-application engagement. This would enable planning permission to be granted in 2022, construction on site to commence in 2022/2023 and completion of the development to occur by 2025.

[REDACTED]

[REDACTED]

[REDACTED]

Associate Director

[REDACTED]

Mike Carless/Sakiba Gurda
Planning Policy Team
Planning and Development
Islington Town Hall, Upper Street
N1 1UD

Housing Directorate
Town Hall
Upper Street
London N1 2UD


www.islington.gov.uk

25 April 2020

Dear Mike,

Re: Independent Examination into Islington's Draft Local Plan

Request for information on Vorley Road/Archway Bus Station and Finsbury Leisure Centre Sites

I am writing in response to your letter regarding the request for information in respect of the above two sites.

The two Council-owned sites are included in our New Build Programme. This programme focusses on delivering new genuinely affordable housing as well as social infrastructure.

Both schemes are a priority for the council. I can confirm that we are working to deliver both schemes by 2024/25.


Details of the work undertaken to date and the future milestones are set out below.

Vorley Road/Archway Bus Station Site (site allocation ref ARCH1)

The site is currently vacant. The redevelopment of the site involves a proposal for 70 new mainly social rented homes, with an element of affordable workspace or a community/social infrastructure use (likely to be a GP Practice) on the ground floor. Following the council's Tall Building study the site has been allocated for a tall building. This has significantly increased the development potential of the site.

It is anticipated that this development would be completed in June 2024.

Pre-application discussions between the New Build and Planning and Development Services are currently ongoing and significant progress has been made to date. The discussions with the Primary Care Trust on the provision of a GP Practice are at an advanced stage.



An outline of the work undertaken to date on developing the proposal and the key future milestones are set out below.

- First Pre-Application Meeting took place on 14th October 2019.
- Regular Design Team Meetings are taking place – the last being 6th April 2020. Meetings include Architects, Planning Consultant and Employer’s Agent.)
- Regular dialogue continues with Planning Service and potential non - residential end users.
- Site inspection undertaken with Planning Service recently.
- Design work is continuing, addressing comments from Planning Service and regular updates on progress are provided.
- Order of Cost Estimate recently completed. Viability assessments being carried out by LBI.
- Design Team are in discussion with Planning Service regarding arranging a virtual Design Review Panel (DRP) and consultation process. A virtual DRP has worked well on other schemes.
- To date consultants have been appointed to undertake the following technical assessments: Daylight/Sunlight, Topographical, Services and Energy. Consultants in the process of being appointed to undertake Electrical and Mechanical and Fire assessments.
- **Forecast date for submitting a planning application - December 2020.**
- Forecast for receiving planning approval - March/April 2021.
- Following a tender process, it is anticipated that the successful contractor should be known by November 2021. Approvals/Contract awarded - February/March 2022.
- Commencement of construction - June 2022.
- **Anticipated completion - June 2024.**

Finsbury Leisure Centre site (site allocation ref. BC4)

A detailed proposal for the redevelopment of the Finsbury Leisure Centre site was prepared during 2017 and 2018. The proposal involved redevelopment of the site to provide a new leisure centre, a nursery, a GP practice, and 120 new homes, 50% of which were required to be genuinely affordable housing.

Public consultation on the plans for the redevelopment of the site was also undertaken during this period. The scheme was designed in detail, pre-application discussions were at an advanced stage, and a planning application was almost ready to be submitted.

However, uncertainties around Brexit were starting to cause fluctuations in the housing market and in the wider construction sector. In terms of scheme viability, these impacts included some dampening in residential sales values as well as an increase in construction costs. As a result, a £5 million funding gap appeared, and the project was temporarily paused.

A value engineering process identified a design solution that would enable the £5 million funding gap to be addressed. The revised scheme will deliver 132 new homes.

This project remains an important corporate priority. The council’s budget for 2020-21 has allocated £1 million to take a planning application for the scheme forward.

The work on taking a scheme forward will resume in early Summer 2020 with the re-appointment of the design team and the other professional advisors. Moving forward, the timetable is as follows:

- Scheme revisions completed and submitted to Design Review Panel and Members Pre-application Forum in Autumn 2020;
- Pre-application public consultation in Winter 2020;
- Planning application submitted in early Spring 2021;
- Planning application determined Autumn 2021;
- Following a tender process, it is anticipated that the successful contractor should be identified by Spring 2022.
- Approvals/Contract awarded - Autumn 2022.
- Construction completed Spring 2025.

I hope the information provided in this letter will assist the Inspectors appointed to examine Islington's draft Local Plan. If you or the Inspectors have any queries or require further clarification, we will be happy to assist.

Yours sincerely,



**Director - New Build
Islington Council**

If you would like this document in large print or Braille, audiotape or in another language, please telephone 020 7527 2000.



Appendix 3 Tall building sites – residential provision

Table A1: Tall Building sites – residential provision

Tall building site	Site allocation	Residential provision	Homes to be delivered (Site Allocations Topic Paper and housing trajectory five year supply)
A1	Not a site allocation	This site is not a site allocation because it has a scheme on site which is under construction and close to being complete. No residential units are counted in the five year supply or site allocations for this site.	None
A2	ARCH1 Vorley Road/Archway Bus Station	The site allocation is for a residential led development.	70
A3	Not a site allocation	This site is not a site allocation. This tall building could only be provided if Salisbury Walk Estate is redeveloped.	None
B1	FP3 Finsbury Park Station and Island	The site allocation includes residential if development takes place above the station. However this is longer term ambition and no residential units have been added to the site capacity assumptions or housing trajectory five year supply.	None
B3	FP9 221-233 Seven Sisters Road	The site allocation includes an element of residential use.	33
B4	FP2 Morris Place/Wells Terrace (including Clifton House), N4 2AL	The site allocation includes residential uses.	53
B5	FP8 113-119 Fonthill Road	No residential use in site allocation.	None
C1	NH1	The site allocation includes residential development on upper floors. It is	154

Tall building site	Site allocation	Residential provision	Homes to be delivered (Site Allocations Topic Paper and housing trajectory five year supply)
	Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG	worth noting that this site is a large site (16,015 m2) and the tall building will represent a small quantum of the capacity.	
C2	NH2 368-376 Holloway Road (Argos and adjoining shops), N7 6PN	The site allocation includes residential uses above.	29
C3	NH12 379-391 Camden Road and 341-345 Holloway Road	The site allocation includes residential uses	47
C4	NH10 45 Hornsey Road, including land and railway arches 1-21 to rear and 252 Holloway Road	The site allocation states that the site is suitable for redevelopment for conventional housing.	47 students units
C5	NH13 166-220 Holloway Road	No residential use in site allocation.	None
C6	OIS21 Former railway sidings adjacent to and potentially including Caledonian Road Station	The site allocation is for residential-led, mixed use development.	16
F1	KC1 King's Cross Triangle, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1	The site has planning permission for a mixed used, residential-led development.	115
F2	KC5 Belle Isle Frontage, land to the east of York Way	The site allocation does not include residential development.	None
F4	KC2 176-178 York Way, N1	The site allocation is for business-led, mixed use development.	69

Tall building site	Site allocation	Residential provision	Homes to be delivered (Site Allocations Topic Paper and housing trajectory five year supply)
F5	None	There is no site allocation for this site. Would only be in the case of comprehensive redevelopment of the housing estate.	None
G1	BC9 Inmarsat - 99 City Road	No residential use in site allocation.	None
G2	BC7 198-208 Old Street (petrol station), EC1V 9FR	No residential use in site allocation.	None
G3	BC10 254-262 Old Street (east of roundabout)	No residential use in site allocation.	None
G4 and G5	BC38 Moorfields Eye Hospital	No residential use in site allocation.	None

Appendix 4: Dwelling unit numbers and list of changes to list of sites in housing trajectory

Table A2.1: 5 year supply site amendments

Site Reference / Planning Ref	Site name	Total units	Year delivery Change from / to	Units previously identified	Updated units numbers	Change in unit numbers	Notes
P2015/0709/FUL	Bartholemew Court	55	Change from 2019/20 to 2020/21	0	55	55	Moves all units into 5ys
P2014/3363/FUL	Dover Court estate	52	Change from 2019/20 to 2020/21	0	52	52	Moves all units into 5ys
OIS17	Hathersage Court	45	Change from spread to 2022/23	29	45	16	Amended units in line with information from housing new build team. Moves some units into 5ys
OIS14	17-23 Beaumont Rise	17	Change from spread to 2022/23	16	17	1	Moves some units into 5ys. Amended units in line with information from housing new build team. Need to amend name to remove 'Elthorne Community Care Centre' from trajectory.
OIS25	Charles Simmons House	9	Change from spread to 2021/22	5	9	4	Amended units in line with information from housing new build team. Moves some units into 5ys
P2017/2444/FUL	Park View Estate	38	2022/23	40	38	-2	Amended units in line with information from housing new build team.
P2017/3493/FUL	Windsor Street car park	11	Change from spread to 2022/23	9	11	2	Amended units in line with information from housing new build team.
n/a	Drakely and Aubert Court	45	2023/24	0	45	45	New site from housing new build team added to the trajectory
n/a	Bemerton estate south	75	2023/24	0	75	75	New site from housing new build team added to the trajectory
FP14	Andover estate	71	2022/23 to 2025/26	71	42	-29	Moves 29 units out of 5yls. Need to amend name to remove 61 corker walk and rename Andover estate
OIS16 / P2018/2767/FUL	Harvist estate car park	24	Change from spread to 2021/22	16	24	8	Amended units in line with information from housing new build team. Need to amend name to remove Everett House, 94, Hornsey Road and rename Andover estate.
ARCH6	1 Elthorne Road	30	2022/23 to 2026/27	30	0	-30	Moves all units out of 5yls in light of information from landowner
BC4	Finsbury Leisure Centre	120	2022/23 to 2024/25	120	132	12	Amended units in line with information from housing new build team.
NH7	Holloway prison	880	2025/26	440	220	-220	Moves 220 units out of 5yls in light of information from landowner
ARCH5	Archway Campus	260	2025/26	260	130	-130	Moves 130 units out of 5yls in light of information from landowner

TOTAL CHANGE						-141	
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Table A2.2: Housing trajectory amendments

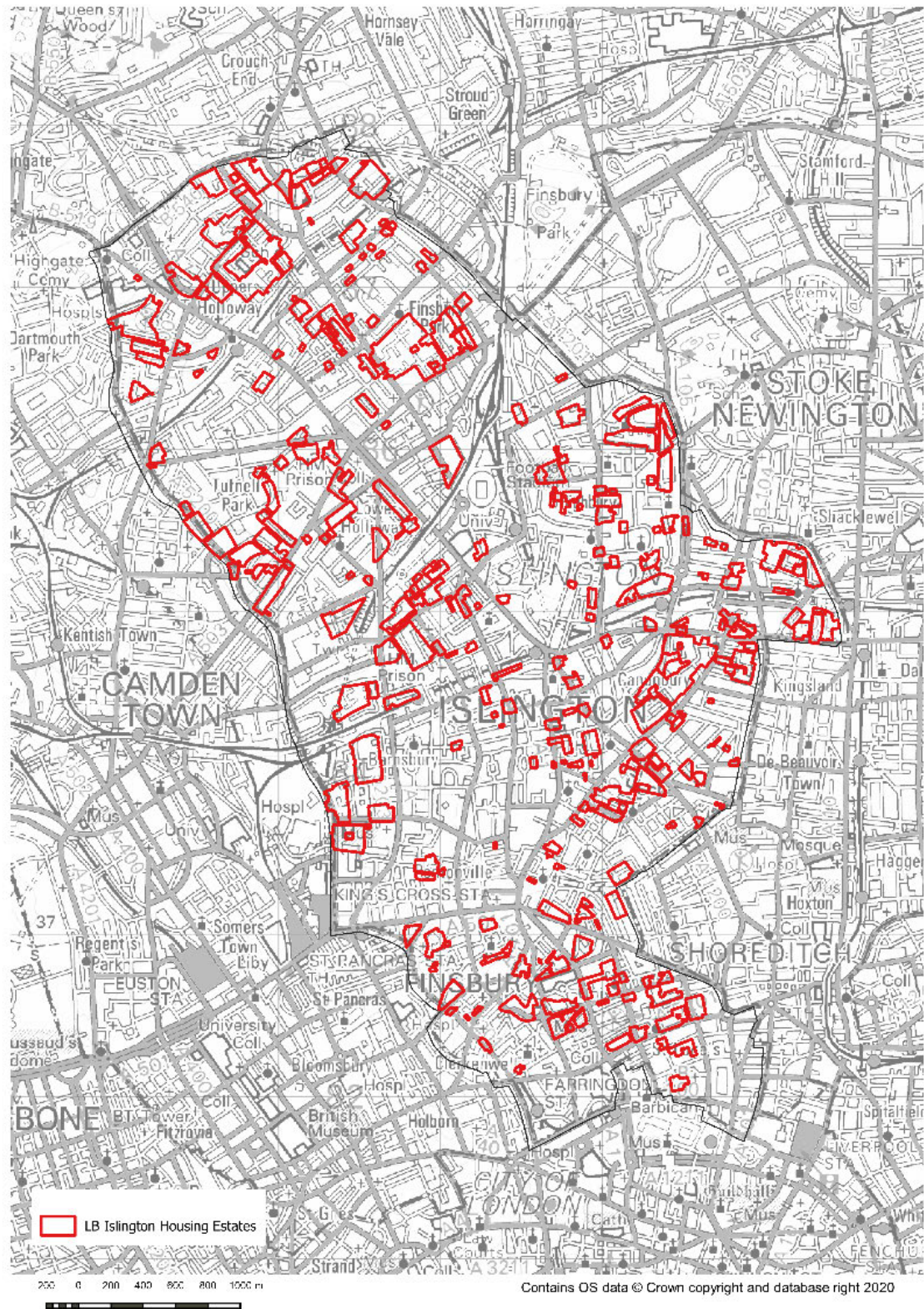
Site Reference / Planning Ref	Site name	Total units	Year delivery Change from / to	Units previously identified	Updated units numbers	Change in unit numbers	Notes
P2015/0709/FUL	Bartholemew Court	55	Change from 2019/20 to 2020/21	0	55	55	Moves all units into 5ys
P2014/3363/FUL	Dover Court estate	52	Change from 2019/20 to 2020/21	0	52	52	Moves all units into 5ys
OIS17	Hathersage Court	45	Change from spread to 2022/23	29	45	16	Amended units in line with information from housing new build team. Moves some units into 5ys
OIS14	17-23 Beaumont Rise	17	Change from spread to 2022/23	16	17	1	Moves some units into 5ys. Amended units in line with information from housing new build team. Need to amend name to remove 'Elthorne Community Care Centre' from trajectory.
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P2017/2444/FUL	Park View Estate	38	2022/23	40	38	-2	Amended units in line with information from housing new build team.
P2017/3493/FUL	Windsor Street car park	11	Change from spread to 2022/23	9	11	2	Amended units in line with information from housing new build team.
n/a	Drakely and Aubert Court	45	2023/24	0	45	45	New site from housing new build team added to the trajectory
n/a	Bemerton estate south	75	2023/24	0	75	75	New site from housing new build team added to the trajectory
BC4	Finsbury Leisure Centre	120	2022/23 to 2024/25	120	132	12	Amended units in line with information from housing new build team.
OIS16 / P2018/2767/FUL	Harvist estate car park	24	Change from spread to 2021/22	16	24	8	Amended units in line with information from housing new build team. Need to amend name to remove Everett House, 94, Hornsey Road and rename Andover estate.
	Annualised average for New Build programme for large sites: 1,300 approx units	1230	2025/26 to 2034/35	0	1230	1230	
TOTAL CHANGE						1498	

Appendix 5: Updated 5 year housing supply

Housing type	2020/21	2021/22	2022/23	2023/24	2024/25	Five-year supply total
Conventional net additions	1,423	598	904	674	1,079	4,678
Non self-contained net additions	9	0	11	0	47	67
Total net additions	1,432	598	915	674	1,126	4,745
<i>LP Target</i>	775	775	775	775	775	3,875

Appendix 6 Maps

Map A4.1: London Borough of Islington housing estates



Map A4.2: Registered provider housing estates

