<table>
<thead>
<tr>
<th>Reg 19 ID</th>
<th>Development Plan Document</th>
<th>Site reference and address</th>
<th>Spatial/Strategy area</th>
<th>Section/policy/paragraph number</th>
<th>Respondent name</th>
<th>Respondent group</th>
<th>Summary of comments</th>
<th>Support/object</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13.0003</td>
<td>Development Plan Document</td>
<td>201 Old Street roundabout area</td>
<td>B &amp; C City Fringe Opportunity Area</td>
<td>Resident</td>
<td>Respondent objects to plans to remove the gyratory at Old Street and to provide more public space, referring to these plans as 'high folly/less'. Respondent believes that the works will increase traffic congestion and pollution in the local area. Questions the desirability of additional open space near roads. Does not think the plans for Old Street will improve conditions for cyclists.</td>
<td>Object</td>
<td></td>
<td></td>
</tr>
<tr>
<td>R13.0002</td>
<td>Development Plan Document</td>
<td>BC4: Finsbury Leisure Centre</td>
<td>B &amp; C: Central Finsbury</td>
<td>Resident</td>
<td>The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2009 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.</td>
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</tr>
<tr>
<td>R13.0003</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
<td></td>
<td></td>
<td>N/A - general comment</td>
<td>Resident</td>
<td>Believes that developers are destroying communities in a search for profit. Believes that there is no consideration for development on a human scale. Concludes that people need homes and jobs but not the homes and jobs provided by the plan. Believes that the plan will result in 'could be anywhere' architecture.</td>
<td>Object</td>
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</tr>
<tr>
<td>R13.0004</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
<td></td>
<td></td>
<td>N/A - general comment</td>
<td>Resident</td>
<td>Concern about rubbish in the street and lack of waste storage in many properties. Concern about the impact of new development on traffic and parking. Need to prioritise the ongoing maintenance of public open spaces. Concern about the redevelopment of Telfer House damaging nearby street trees. Concern about light pollution, in particular caused by the development at King's Square.</td>
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<td></td>
</tr>
<tr>
<td>R13.0005</td>
<td>Site Allocations</td>
<td>BC4: Finsbury Leisure Centre</td>
<td>B &amp; C: Central Finsbury</td>
<td>Resident</td>
<td>The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2009 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.</td>
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<td>R13.0005</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
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<td>Policy BC7: Central Finsbury</td>
<td>Resident</td>
<td>Policy BC7 is not consistent with NPPF policies 96 and 97 as they allocated housing on the Finsbury Leisure Centre site, reducing open space, space for sport, and recreation facilities. There is a deficiency of open space according to the Open Space, Sport and Recreation Study 2009.</td>
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<td>R13.0006</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R3: Islington's Town Centres</td>
<td></td>
<td>Resident</td>
<td>Respondent objects to the inclusion of 211 Blackstock Road in the Finsbury Park Town Centre boundary. Its inclusion has allowed a larger convenience store to be acceptable in principle here; a larger convenience store in this location would adversely affect the viability of surrounding small independent shops which play a vital community role; Policy R2 concerns the protection of A1 uses in the PSA which seems to carry more weight than Policy R1 Part E; the site should be excluded from the town centre to protect small shops.</td>
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Strategic and Development Management Policies

Policy R3: Islington's Town Centres

Business

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Policy R3: Islington's Town Centres

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Policy R3: Islington's Town Centres

Cllr Caroline Russell Councillor

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Object

Policy R3: Islington's Town Centres

Other Important Sites

支持

Site Allocations

20124: Pentonville Prison, Caledonian Road

Object

Site Allocations

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Site Allocations

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Object
<table>
<thead>
<tr>
<th>Site Allocations</th>
<th>Alternative Policy</th>
<th>Landowner</th>
<th>Site Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>R19.0025</td>
<td>Policy R10: Culture and the Night Time Economy</td>
<td>Flowervale UK Ltd</td>
<td>The site should be allocated for B1 office use and/or general town centre uses as there is no evidence of need for its use as a cultural hub and very significant doubt that it would be deliverable for such a use. The structural condition of the site is such that it is unlikely to be economically feasible to refurbish and restore it for cultural or community use. The restrictive covenants on the site also mean it is unlikely to be used for leisure/cultural uses. In addition there is no evidence of need for further cultural facilities in Archway. The council's evidence base identifies the priority need for office floorspace which would be appropriate in this location. Amendment to ownership details requested.</td>
</tr>
<tr>
<td>R19.0026</td>
<td>Policy SP7: Archway</td>
<td>Flowervale UK Ltd</td>
<td>Flowervale objects to the designation of Archway as a Cultural Quarter in Policy R10 and the support given in Policy SP7 to Archway's designation as a Cultural Quarter. There is no justification or evidence base to support cultural provision in Archway being expanded or for there being a broader level of cultural activity in Archway which should be enhanced. Delete all references to the designation of Archway as a Cultural Quarter and/or to the use of the Methodist Hall [the Main Hall] as a cultural hub.</td>
</tr>
<tr>
<td>R19.0027</td>
<td>FP13: Tesco, 103-115 Stroud Green Road</td>
<td>Finsbury Park</td>
<td>Response to Reg. 18 consultation still relevant. Sceptical that the allocation details the full extent of the council's knowledge about Tesco's plans for the site. It is likely the site will be commercial at ground floor with flats above. As the Plan indicates there should be a minimum 18m distance between habitable rooms, new homes should be dual aspect and have private outdoor space, it seems likely that any development of the site will lead to an undisclosed number of flats, some with balconies, overlooking the respondent's home and garden and reducing their light. Home should be a place of retreat for existing residents, not just new ones.</td>
</tr>
<tr>
<td>R19.0028</td>
<td>FP13: Tesco, 103-115 Stroud Green Road</td>
<td>Finsbury Park</td>
<td>Response to Reg. 18 consultation still relevant (concerned that allocation is inappropriately frontloading community consultation to the benefit of the landowner: development of the site will affect respondent's privacy and light). Disappointed with the way recent development around Finsbury Park Station has disengaged and incinovated residents and commuters. This does not inspire confidence in future plans and the council's ability to consider the views of residents.</td>
</tr>
<tr>
<td>R19.0029</td>
<td>AUS5: Electricity substation, 84-89 White Lion Street</td>
<td>Angel and Upper Street</td>
<td>Given the site's prime location and proximity to Angel Station, there are more potentially more valuable uses, such as residential, hotel, student accommodation etc. that are not included in the allocation. Believe the value of the site would be maximised with retail on the ground floor, and either residential, hotel or student accommodation above. The allocation does not refer to the height of a prospective development, there would be added value in increasing the number of stores on the site as it is currently low for the local area.</td>
</tr>
<tr>
<td>R19.0030</td>
<td>BC4: Finsbury Leisure Centre</td>
<td>S &amp; C: Central Finsbury</td>
<td>Building on sports pitches is counter to Sport England's interests, and they will be lobbyed by users of the pitches and leisure centre facilities. Reducing facilities does not promote wider health and wellbeing initiatives. Public space on the site is minimised in the proposals, which show defensive spaces and dense development which will be conducive to anti-social behaviour. Universities are funded through significant prescribed fee income and University estates departments are financially incentivised to create their own estate, Finsbury leisure Centre Facilities and public open space should not be sacrificed on this basis.</td>
</tr>
<tr>
<td>R19.0031</td>
<td>FP4: Aldwych Estate</td>
<td>Finsbury Park</td>
<td>Suggests that the existing green space bounded by Rath Way has value and the potential to be an attractive space to rest/play with some upkeep. Plans to build on the space have safety implications. Permeability would be affected by the provision of a building in front of the walkway which provides the only access to Rath Way, or if the plan is for residents of the new building to share the walkway with Rath Way residents it could create grave danger in the event of fire or other emergency.</td>
</tr>
<tr>
<td>R19.0032</td>
<td>HCS: Highbury and Islington Station, Holloway Road</td>
<td>Finsbury Corner and Lower Holloway</td>
<td>Decking over the railway and building above it would be destructive to residents in the vicinity of the site who have already had to endure significant disruption due to the Overground extension works at the Station and more recently the Highbury Corner works. Building over the railway lines to the west of the Station would result in overlooking and the loss of light to people’s homes and gardens.</td>
</tr>
<tr>
<td>R19.0033</td>
<td>HCS: Highbury and Islington Station, Holloway Road</td>
<td>Finsbury Corner and Lower Holloway</td>
<td>The concept of decking above the platforms is totally unacceptable, and potentially an impossible task without demolishing properties on Court Gardens. Residents have already endured years of disruptive works related to Highbury and Islington Station. Development would put local streets into shadow and block historic uninterrupted views towards Union Chapel. The Station building itself does need upgrading, and the provision of a low level development above the concourse could be advantageous.</td>
</tr>
<tr>
<td>R19.0034</td>
<td>HCS: Belle Isle Frontage, land on the east side of York Way</td>
<td>King's Cross and Regent's Park Estate</td>
<td>Accommodates the site's allocation as a site suitable for a development of up to 15 stores. However feel that the site lends itself primarily to residential use with potentially a small proportion of business floorspace on lower levels, rather than office-led development. Question whether it is correct to refer to the northern part of the Kings Cross development as an office cluster. This area is predominantly in residential/student accommodation use. Modern noise abatement technology means it is possible to build residential accommodation adjacent to railway lines. Request the allocation is amended to include residential use with business use at lower levels.</td>
</tr>
</tbody>
</table>
Support the allocation but consider it substantially underplays the site's redevelopment potential. Suggest that any development should respect the amenity of neighbouring residential properties.

AUS1: Royal Bank of Scotland - 11-13 Benwell Road

Suggest the allocation wording is deleted and replaced with the wording from the 2013 Site Allocation.

NH6: 11-13 Benwell Road

National Grid - Statutory consultee

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

Not stated

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Not stated

Hauser & Wirth

The building (7 Torrens Street) was at one time a multi-story stable block with specially designed stairs so that the horses could be walked up to various floors. I would be disappointed to think that it would be pulled down and consider it to be probably the only one of its type left [even in the UK]. It should be carefully re-purposed – it would make a great arts centre and fit in very well with the area's image.

Not stated

Resident

The building (7 Torrens Street) was at one time a multi-story stable block with specially designed stairs so that the horses could be walked up to various floors. I would be disappointed to think that it would be pulled down and consider it to be probably the only one of its type left [even in the UK]. It should be carefully re-purposed – it would make a great arts centre and fit in very well with the area's image.

Not stated

Landowner

The owner has no intention of bringing the site forward for development during the Plan period and therefore the continuing allocation of the site in its current form is contrary to guidance set out in the NPPF (para. 120). The allocation is not deliverable, illustrated by the fact it was not developed during the earlier Plan period. Suggest 1 Kingdom Road should be removed from the wider site allocation, as other uses would be more appropriate there.

Object

Resident

The building (7 Torrens Street) was at one time a multi-story stable block with specially designed stairs so that the horses could be walked up to various floors. I would be disappointed to think that it would be pulled down and consider it to be probably the only one of its type left [even in the UK]. It should be carefully re-purposed – it would make a great arts centre and fit in very well with the area's image.

Not stated

Landowner

Landowner considers the public house at 262-264 Old Street has architectural and historical value that is important to the local street scene. The site offers leisure facilities and licensed premises that add to the vibrancy of the area, and specifically the late-night economy. It also adds to the commercial viability and suitability of the area. There is no need for development of the premises, any development of adjacent properties should incorporate the public house.

Not stated

Business

Support the allocation but consider it substantially underplays the site's redevelopment potential. Suggest the site has potential for buildings taller than 12 storeys (as identified in the Tall Buildings Study) as it has a high PTAL; is a major transport interchange; has no strategic or local viewing corridors crossing the site; is close to an existing 15-storey tower; and is not in a Conservation Area or close to listed buildings. The site should be considered for a tall tower subject to design considerations, which would enable a greater mix of uses including residential, which the NPPF states plays an important role in ensuring the vitality of town centres.

Object

Resident

The allocation should clearly state that 10 All Saints Street is three buildings – 10a, b and c - all of which are locally listed. Historic England should be consulted about any proposed development as the site is partially in, and adjacent to, a Conservation Area and is larger than 1,000sqm. It is repealed that the council develop an Urban Design Framework/Supplementary Planning Document for the site given its sensitivity and difficult planning history. Would like to reiterate the importance of the restrictions in the allocation regarding limited intensification, small-scale commercial uses, and the need to respect neighbouring residential amenity.

Not stated

Resident

Adherence to protecting residential amenity should be made in the development considerations. The current building on the site is low, so any taller building will have a negative impact on local residents. The allocation should state that any development should respect the amenity of neighbouring residential properties, including 3-5 All Saints Street/Elrick Street, Caledonian Road and Is Whi.

Not stated

Landowner

Suggest the allocation wording is deleted and replaced with the wording from the 2013 Site Allocation (reference H4). Removal of support for residential conversion and infill development fails to optimise development potential in the area, in conflict with the NPPF. As the borough does not have a healthy housing supply or up-to-date housing position, it should not delete existing sites allocated for housing. No justification is provided for the change to the allocation.

Object
In favour of bringing the existing building back into use but feel the proposals seek to overuse the space available, resulting in cramped, poorly proportioned development. The overall density should be reduced. Concerned that building directly adjacent to Whitehall Mansions poses a serious fire risk, and may undermine the structural integrity of the old Whitehall Mansions buildings. Construction and occupation of the site likely to create significant noise pollution. The current cycle path should be preserved and consideration given to cycling throughout.

In favour of bringing the existing building back into use but feel the proposals seek to overuse the space available, resulting in cramped, poorly proportioned development. The overall density should be reduced. Concerned that building directly adjacent to Whitehall Mansions poses a serious fire risk, and may undermine the structural integrity of the old Whitehall Mansions buildings. Construction and occupation of the site likely to create significant noise pollution. The current cycle path should be preserved and consideration given to cycling throughout.

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The site has been falling into disrepair over the past 15 years or so. More recently the garden has become the focus of anti-social behaviour, day and night, with people openly dealing and taking drugs and soliciting. The high wall at the front of the site is cracked and potentially dangerous. The current cycle path should be preserved and consideration given to cycling throughout.

Auspiciously, the allocation commits to nothing more in landscaping terms than 'possible landscaping improvements to Islington's Housing Service will carry out the development instead of a private developer. Concerned that the time scale should be amended to read 2021/22. And is currently under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction. Although there is no objection to the allocation for office-led development, it is also appropriate to allocate the site for use as a hotel, as a hotel is under construction.

The development should minimise negative impacts on existing residents. The development considerations should include the preservation of the architectural expression of existing buildings, security improvements and minimisation of green space. Proceeds from the sale of new private dwellings should be used for the refurbishment of all communal areas of the estate and any remaining balance used for future refurbishment/maintenance.

Concerned that the allocation commits to nothing more in landscaping terms than 'possible landscaping improvements to existing buildings'. The proposal development will result in the reduction of much of the podium space that is a vital recreation space for local people, especially children. It is imperative that meaningful improvements are made to the space that remains. The allocation should require a landscaping strategy to be developed in consultation with residents.

Not opposed to development in principle to provide much needed housing and welcomes the fact that Islington's Housing Service will carry out the development instead of a private developer. Concerned that the allocation commits to nothing more in landscaping terms than 'possible landscaping improvements to existing buildings'. The proposal development will result in the reduction of much of the podium space that is a vital recreation space for local people, especially children. It is imperative that meaningful improvements are made to the space that remains. The allocation should require a landscaping strategy to be developed in consultation with residents.

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Both

Support

Not stated

 BOTH

Support

Support

Support

Support

Not stated

Not stated

Not stated

Not stated

Support

Not stated

Support

Not stated

Not stated

Not stated

Not stated

Support
N/A - general comment

Generally supportive of the allocated uses and the potential highlighted in the Tall Buildings Study for a local landmark building on the site. Feel that the allocation is positively prepared and consistent with national policy in line with NRRF para. 35, however unless the allocation indicates the approximate scale of town centre uses and business floorspace and quantum of residential units envisaged for the site it is unlikely to be effective.

Object

Consider the site boundary should be amended to exclude 57-65 Randall’s Road as it has an extensive, implemented planning permission and is unlikely to come forward as part of the 176-178 York Way site. Recognise that any future applications must take the implemented Randall’s Road permission into account. Any development must deliver a satisfactory engineering solution to the issue of the railway tunnels directly beneath the site. This is costly, which is partially relaxed by the identification of the site as potentially suitable for a tall building. However, the current ‘business-led’ allocation could lead to a cumbersome design in the attempt to reconcile the need for height and slender form with the larger floorplates required by offices. Seek a more flexible mix of uses to enable the delivery of a viable and attractive scheme.

Support

Ads for the allocation to be removed from the DPD as there are plans for the site, which is in private ownership.

Support

The derelict 1904 station should be preserved and reused as a new ticket hall if at all possible. Concerned that the Garage could be lost - easy to see retention being subject to a viability assessment. It is a rare live music venue in Islington. New exits from Highbury & Islington Station to the north side of Holloway Road and to Highbury Crescent would welcome.

Object

The direct 1904 station should be preserved and reused as a new ticket hall if at all possible. Concerned that the Garage could be lost - easy to see retention being subject to a viability assessment. It is a rare live music venue in Islington. New exits from Highbury & Islington Station to the north side of Holloway Road and to Highbury Crescent would be welcome.

Object

The allocation as parts of the site are very derelictated, and the station building provides an embarrassing gateway to a historic and lovely area. Suggests the Marie Curie building could be demolished; the site boundary expanded to include the Victorian terraces up to the corner of St. Paul’s Road and Canonbury Street which could do with revamping, better retail space and the provision of access to the new space above the railway line if achieved. A pocket park between Highbury Place and Canonbury Street would be interesting.

Support

No comment on the site boundary.

Support

The site allocations NH1 to NH13 go directly against the council’s Transport Strategy which claims to support a greener Islington. The proposed works would create an environmentally disastrous new area as a result of the disruption, noise and influx of vehicles and people. The proposed tall buildings will destroy views, create bad drafts and wind tunnels, and set a precedent that could destroy conservation areas. There is no mention of environmental mitigation and no assessment of the overall environmental impact of the allocations. The plans are misguided and directed at dismantling historic views.

Support

Support the principle of the allocation but consider that the evidence base has not provided a robust justification for the capped height within the allocation (15 storeys). Suggest that the allocation is amended to remove the somewhat arbitrary height limit. Believe the existing and draft allocations have affected the deliverability of the site and should be revised to allow for piecemeal development to take place across the site.

Support

Support

The site allocations NH1 to NH13 go directly against the council’s Transport Strategy which claims to support a greener Islington. The proposed works would create an environmentally disastrous new area as a result of the disruption, noise and influx of vehicles and people. The proposed tall buildings will destroy views, create bad drafts and wind tunnels, and set a precedent that could destroy conservation areas. There is no mention of environmental mitigation and no assessment of the overall environmental impact of the allocations. The plans are misguided and directed at dismantling historic views.

Support

Support

Strongly support the site allocation. Residential development of the site will contribute towards the significant need for new housing identified in the draft Local Plan, including the particular need for affordable housing. The landowner is committed to delivering the comprehensive redevelopment of the site and their emerging proposals directly accord with the site allocation. Expecting to submit proposals in the first quarter of 2020.

Support

Support

Support

Not stated

FFI is community group comprised of people who live, work and study in Islington and are committed to taking positive action to mitigate climate change at a local level. We have previously successfully lobbied Islington Council to agree to divest their pension fund from fossil fuels and to declare a Climate Emergency. FFI note IPCC report; consider that Islington Council, as a relatively affluent and technologically advanced government body, must be ambitious in implementing radical cuts to carbon emissions. Islington Council must set an example for other government bodies, both within the UK and internationally, to emulate as to how to rapidly decarbonise a community. Planning policy is a crucial way of achieving this. FFI highlight the climate emergency motion passed by Islington Council on 27 June 2019 and note that every decision made by Islington Council that has any relevance to carbon emissions (which should include the making of the Local Plan and all planning decisions) must be consistent with the 2050 net zero emissions target.

Not stated
Policy should mandate secure covered bike storage for every new development. The Plan should state that
the Plan does not provide any real obligation or incentive to increase the green spaces we have in the
borough or protect existing green spaces. We note Policy G1 but the language is weak. There have been
missed opportunities in recent developments to develop green space e.g. outside Highbury and
Islington station and Navigator Square which include large expanses of paving. The Local Plan must
therefore go further to increase and protect the amount of green space in the borough. We would be in
favour of more ambitious requirements for Urban Greening Factor (0.5 for residential developments).
We note the recently published Imperial College London research showing that Islington Parks exceed Air
Quality legal limits for NO₂ and green space design should have as a priority mitigation – air quality,
biodiversity, cooling (see published Imperial College London research showing that Islington Parks exceed
Air Quality legal limits for NO₂ and green space design should have as a priority mitigation – air quality,
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The Plan states “Refurbishment, conversion and extension of existing older buildings is preferred to
equivalent new-build in terms of costs and emissions, Part C. This contradicts the car-free policy outlined in the
Local Plan and it is our view that no new developments or extensions of existing developments of this type should be
permitted in Islington. While this may be implicitly achieved through the car-free policy, we would welcome language making it explicit that new
carbon-intensive new-build developments will not be accepted in Islington.

More should also be done to specifically encourage environmentally friendly operations such as repair shops
and tool or toy libraries.

Some businesses (e.g. petrol stations, car dealerships) directly lead to higher fossil fuel consumption and
air quality impacts, as well as increasing motorized traffic in the borough. This contradicts the car-free policy outlined in the
Local Plan and it is our view that no new developments or extensions of existing developments of this type should be
permitted in Islington. While this may be implicitly achieved through the car-free policy, we would welcome language making it explicit that new
carbon-intensive new-build developments will not be accepted in Islington.

The Plan must therefore go further to increase and protect the amount of green space in the borough. We would be in favour of more
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published Imperial College London research showing that Islington Parks exceed Air Quality legal limits for
NO₂ and green space design should have as a priority mitigation – air quality, biodiversity, cooling (see
There is significant scope to reduce emissions and improve air quality in Islington through the use of cargo bikes rather than motorised vehicles or delivery and servicing, and government support is available for the uptake of e-cargo bikes. The draft Local Plan requires that the potential for using cargo bikes or similar clean forms of transport for all servicing and delivery that is feasible in terms of distance travelled and weight/size of goods and materials. require for businesses to use clean transport for all servicing and delivery that is feasible in terms of.

There should be clearer priority for refurbishment of existing properties over building new premises. There should also be a strategy for ensuring that existing unused buildings (including homes) be used as a priority over new builds.

While we generally welcome the emphasis placed on reduction of energy demand and energy efficiency measures, we consider on-site renewable energy generation equally important and this should be required for new developments (provided there are no genuine feasibility issues), not just encouraged. London has an excellent solar resource compared to other areas of the UK where there is a much higher concentration of solar PV infrastructure, and the Local Plan should ensure that Islington meets a significant proportion of its energy demand through on-site generation (in line with the London wide Solar Action Plan ). As the Local Plan states, solar PV can be combined with green roofs and could also help tackle fuel poverty by reducing electricity bills for residents.

Further, the Local Plan should set out the Council’s strategy to promote retrofitting. While we understand FFI questions how the Council will drive the transition from natural gas CHP to waste heat. The plan does not set out any detail how this will occur.

There should be a clear requirement for businesses to use clean transport for all servicing and delivery that is feasible in terms of distance travelled and weight/use of goods and materials.
815.0047 Strategic and Development Management Policies Policy SP2: Heritage assets Fossil Free Islington Other The sections in the on conservation areas and heritage assets are very weak in relation to sustainability. Policy D12 B/C says ‘Proposals that harm the significance of a conservation area must provide clear or convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted’. Surely if there is a climate emergency, proposals aimed at increasing energy efficiency of homes, installing renewable energy generation or increasing the greening factor of the plot ought to be given priority over the appearance of the building. Yet there is no mention of initiative to reduce carbon as a priority. Paragraphs 8.16 – 8.28 makes some changes in order to achieve ‘sustainability standards’ but it sounds very restrictive and seems designed to discourage rather than encourage such action. This section does not mention climate change related adaptations to buildings at all. This ought to be prioritised. FFI supports protecting heritage assets but the Local Plan must reflect the fact that we are in a climate emergency. There should be a recognition that minor deterrents to viable heritage (such as the installation of double glazing where draught proofing will not serve) may be justified by major improvements in energy consumption. Object

815.0047 Strategic and Development Management Policies Policy SP4: Baseline development Fossil Free Islington Other There should be requirements that such developments provide bedrooms or otherwise meet widespread needs (and do not just add private cinemas, party rooms and so on). Developments for rather flippant purposes should not be acceptable, given the carbon costs. Even a basement of only 4m x 4m x 2m can generate eight lorry loads of landfill. A report for RBKC concludes that the embodied carbon in a subterranean development is three times that in a surface development and is high relative to the operational carbon over a 30 year life cycle. Object

815.0047 Strategic and Development Management Policies Appendix 5: Social Value self-assessment Fossil Free Islington Other The self-assessment of social value should be developed to give more priority to low carbon – e.g. no single use plastic; renewable generation. Object

815.0057 Strategic and Development Management Policies Policy B5: Jobs and training opportunities Islington Labour Environmental Forum Other The respondent states that policy 85 is vague and doesn’t address targets to achieve net zero energy building in accordance to declaration of climate change emergency, or provide opportunities for BAME group or women. The respondent proposes amendments to the policy. Object

815.0057 Strategic and Development Management Policies Policy T2: Sustainable Transport Islington Labour Environmental Forum Other Same points as Islington Society - see R19.0072 Not stated

815.0057 Strategic and Development Management Policies Policy T2: Sustainable Transport Islington Labour Environmental Forum Other Same points as Islington Society - see R19.0072 Object

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815.0057 Strategic and Development Management Policies Policy T2: Car-free development, Part F Islington Labour Environmental Forum Other Same points as Islington Society - see R19.0072 Object

815.0065 Strategic and Development Management Policies Policy SP2: King’s Cross and Pentonville Road The Kings Cross Baptist Church Resident Respondent claims there is no mention of ‘our’ area in the plan. Request that some improvements in the area can be included to address community safety and other problems. Object

815.0067 Strategic and Development Management Policies Policy D13: Building heights, Policy SP2: Finsbury Park The Kings Cross Baptist Church Resident Representation objects to the scale and height of development in the Finsbury Park Spatial Strategy Area, citing numerous impacts associated with tall buildings. The representation states that the 2018 tall buildings evidence base (page 21) found that none of the areas of Archway, Finsbury Park, Lower Holloway and the Angel were suitable for tall buildings. Not stated

815.0067 Strategic and Development Management Policies Policy G4: Biodiversity, landscape design and trees The Kings Cross Baptist Church Resident Representation states that there is a lack of concerted effort to improve, protect, and provide green open space and the health of children. Object

815.0067 Strategic and Development Management Policies Vision and objectives Highbury Community Association Other Respondent supports majority of objectives relating to green, open and play space but object to the support of BBQs in Islington’s parks as this increases pollution in a very densely populated borough. Both

815.0078 Strategic and Development Management Policies Policy SF3: Vale Royal / Brewery Road Sir Antony Gormley Landowner Support for policy SF3 on the restriction of land uses to business/industrial, building height parameters and protected views to avoid further encroachment of high-rise office and residential uses coming from York Way. Support

815.0078 Strategic and Development Management Policies Policy SF3: Vale Royal / Brewery Road Sir Antony Gormley Landowner Respondent recommends caution on welcoming individual development proposals of high quality that move away from the industrial character of the area. Requirement for buildings to not have blank frontages can be seen as an objection to industrial buildings. Both

815.0078 Strategic and Development Management Policies Policy SF3: Vale Royal / Brewery Road Sir Antony Gormley Landowner Respondent supports the recognition to transport access and loading requirements in the area, but mentions that roads in the Vale Royal/Brewery Road area are under pressure for delivery of raw materials/AGV. It is suggested that width of roads is protected and increased where possible. Both

815.0079 Strategic and Development Management Policies Policy B4: Affordable workspace Bayshore Estates Ltd Landowner Support the council’s aspiration to create a thriving inclusive economy and job opportunities through additional office space. Support
Strategic and Development Management Policies

Policy B4: Affordable workspace

Bayshore Estates Ltd
Landowner

Proposed policy approach discourages increase in office development and affordable workspace. It disincentivises developers if they want to redevelop office buildings by demolishing worn-out offices and creating new ones. The respondent proposed changes to policy B4, part A, to include that for development to qualify for affordable workspace provision, 1000sqm net additional gross B1a/B1b from development should be considered instead of overall proposed B1a/B1b.

Object

Draft local Plan Viability Study (2018) indicates that site 17 becomes unviable if the affordable workspace requirement is extended to 15 years and 10 years. Respondent suggests amending wording to policy B4, part A, which introduces that development specific circumstances show that affordable workspace is not achievable, the proposal should be subject to an independent viability assessment. This approach will allow assessment on a case by case basis.

Support

Policy T3: Enhancing the public realm and sustainable transport; Policy T5: Car-free development

Highways England
Statutory consultee

We are pleased to see that the Strategic and Development management policies document now makes reference to Highways England as the infrastructure provider for the SRN based on our previous comments to the Islington Local Plan Regulation 18 draft documents consultation (November 2018).

Support

Having examined the re-designation of the Islington Local Plan Proposed Submission (Regulation 19) documents, we are encouraged to see Policy T3 included in the draft Plan: Car-free development which states “All new development will be car free.” We note this policy complements other measures taken to promote sustainable transport methods.

Support

We welcome part D of the Flood Risk Policy S8 with the inclusion of the sequential approach to site layout for new development along with the reference to the Sequential Test. We are also pleased to see that the sequential text has been applied as part of the Sustainability Appraisal (SA) for the sites which have been allocated in the Local Plan as indicated in paragraph 6.119. However, some additional clarification may be required to supporting text 6.118 on the Exceptions Test. Also for clarity we suggest you add the following addition: A site specific flood risk assessment can help determine whether part (b) of the Exceptions Test can be met. EA note that Council's internal surface water flood risk team may also have comments on this chapter of the plan.

Support

Policy S5: Integrated Water Management and Sustainable Drainage

Environment Agency
Statutory consultee

We welcome the opportunity to comment on the Strategic and Development Management Policies, Site Allocations and the Bartlett and Clerkenwell Area Action Plan (AAP). In general we support these plans however we have recommended some minor amendments to clarify or strengthen the policies or supporting text to policies.

Object

Policy S1: Flood Risk Management

Environment Agency
Statutory consultee

We welcome part D of the Flood Risk Policy S8 with the inclusion of the sequential approach to site layout for new development along with the reference to the Sequential Test. We are also pleased to see that the sequential text has been applied as part of the Sustainability Appraisal (SA) for the sites which have been allocated in the Local Plan as indicated in paragraph 6.119. However, some additional clarification may be required to supporting text 6.118 on the Exceptions Test. Also for clarity we suggest you add the following addition: A site specific flood risk assessment can help determine whether part (b) of the Exceptions Test can be met. EA note that Council’s internal surface water flood risk team may also have comments on this chapter of the plan.

Support

Policy S5: Integrated Water Management and Sustainable Drainage

Environment Agency
Statutory consultee

We are pleased to see the inclusion of a requirement for an appropriate 50/50 maintenance plan. We welcome the addition of a contaminated land policy S9 point D and F. We have some concerns with wording of the final sentence of point D because it is very strongly worded and in some instances developers will not be able to treat contamination fully prior to commencement of development as they tend to combine remediation with the groundwork for development. Amended wording suggested.

Object

Policy S5: Integrated Water Management and Sustainable Drainage

Environment Agency
Statutory consultee

In addition supporting text 6.147 may be very difficult for developers to implement as it uniformly that a developer will commit to procuring a full remedial design until they have certainty that they can get planning permission for a scheme. Amended wording suggested.

Object

Policy S5: Integrated Water Management and Sustainable Drainage

Environment Agency
Statutory consultee

We welcome the inclusion of point Q which required development adjacent to the New River or Regent’s Canal to ensure that these waterways can be maintained and managed to encourage good ecological status, in accordance with the recommendations of the Thames River Basin Management Plan (TRBMP).

Support

Policy S5: Integrated Water Management and Sustainable Drainage

Environment Agency
Statutory consultee

We are pleased to see the added policy however additional wording recommended for clarity. As it is the responsibility of the water companies to provide connection to mains for both provision and waste water collection and if developers approach the water companies at the earliest opportunity they will be better equipped to plan out how to provide such services, especially in areas where there may be limited capacity.

Not stated

Policy S5: Biodiversity, landscape design and trees

Environment Agency
Statutory consultee

It is positive to see that this policy requires development proposals to aim to secure a net gain in biodiversity value.

Support

Policy S5: Heritage assets

Islington Society
Local society

Refer to previous reg 14 comments. We welcome the wording of policy UN2 Part 1 to strengthen the significance of locally listed buildings and shopfronts. We welcome the inclusion of a definition of non-designated heritage assets in Appendix J: Glossary and abbreviations.

Support

Policy S5: Sustainable Design Standards

Islington Society
Local society

Based on the life-time use of existing stock, we continue to a recommend a sustainable lifetime of greater than 75 years. Recommendation: Add Section 1 to Policy S5, “All Residential and nonresidential building should be capable of an expected life of greater than 75 years”.

Support

Policy S5: Delivering Sustainable Design Standards

Islington Society
Local society

Policy S5: Part B does not differentiate between new buildings and existing buildings. New buildings should aim higher. Recommendation: Add after “all buildings in Islington will be zero carbon by 2050,” “and all new buildings will be zero carbon by 2025”.

Object

Policy S5: Enhancing communities

Islington Society
Local society

Refer to previous reg 18 comments on R1 requesting inclusion of buy to leave policy. Note this is covered by Policy H2 Part H.

Not stated
Refer to previous reg 18 comments requesting greater restriction of tall buildings in line with the Core Local society

Islington Society

Journeys that could equally well be made by bus, or a combination of bus and rail should be promoted in

Developer

Local society

The Islington Society is sensitive to the significant adverse impacts that basement development has on

Local society

Developer

Unite Students

They argue that the removal of gyratory systems has worsened modal interchange at stations, and increased

Local society

Local society

The “negative impacts” of developments need to be prevented and those which have happened in the last

Strategic and Development Management

Local society

The policy as drafted aims to prevent the delivery of any co-living schemes in the borough, as the policy

Strategic and Development Management

The reference to interchange is welcome but in practice the interchange at Archway and Highbury Corner is

Strategic and Development Management

Islington Society

R19.0073

R19.0072

Policy H10: Houses in Multiple Occupation (HMOs), Part C(iii) Unite Students Developer

We would like to stress that Unite acknowledge that wheelchair accessible housing is an important requirement and agree that homes should be accessible for everyone. As outlined in our representations to Policy H10, Unite are committed to providing wheelchair accessible units and ensuring that their student accommodation is fully accessible. It is, however, important to highlight that providing 10% of lettings as wheelchair accessible is not a specific requirement for co-living developments as per draft Policy H18 (Large-scale purpose-built shared living) of the emerging London Plan. As pointed out previously, we understand the 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Those who live in conventional housing are generally of an older demographics than those living in co-living developments, suggesting that the proportion of those who have a disability and require wheelchair accessibility would be greater than the demographics affiliated with co-living accommodation. We would thus recommend that the 10% requirement need not strictly apply to this development type due to its generally younger demographics and differentiation from conventional housing, as our generation is rather than C3 use class.

Strategic and Development Management

Local society

Islington Society

R19.0071

R19.0072

Policy H1: Thriving communities, Part Q

Policy T2: Sustainable Transport Choices, Part G

Policy PLAN1: Site appraisal, design

Policy T3: Car-free development, Part H

Policy T2: Sustainable Transport Choices, Part F

Policy T2: Sustainable Transport Choices, Part G

Policy T2: Sustainable Transport Choices, Part F

Policy T2: Sustainable Transport Choices, Part A

Policy H18: Basement development

Policy H13: Building heights

Policy H10: Houses in Multiple Occupation (HMOs), Part C(iii)
Support for policy SP3 in relation to protection/promotion of industrial uses in the Vale Royal/Brewery Road.

Object to the inclusion of a policy seeking 35% affordable rent as considered there is no evidence that this level of affordable rent is a requirement, and the policy is therefore object to the affordability of the rent. This policy is seeking to achieve the payment of the council's evidence base.

Developer

There is no evidence that 10% of bedspaces in PBSA should be wheelchair accessible, and thus this policy is unsound. The requirement should not exceed 5% or be in excess of 5% in line with BR. The respondent supports the general aim to maximise new office floorspace through policy B1, particularly for the benefit of the SME sector.

Developer

Object to the restriction on B1(a) business space from policy SP3 which will result in a reduction of the space available for business use.

Developer

Object to the inclusion of the SME sector.

Developer

Object to the policy seeking the provision of bursaries as part of new PBSA. There is no evidence that bursaries are needed in the locality, and they would not meet the criteria of the London Plan.

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Strategic and Development Management

Policy B2: New business floorspace
Policy B3: Existing business floorspace
Policy B4: Affordable workspace
Policy SP5: Nag’s Head and Holloway
Policy H6: Purpose-built Student Accommodation

iQ Student
H.J Francis Ltd
Landowner

Consider that policy H1 part M is not positively prepared and does not conform with the NPPF or reflect the main national and local policy aims. Furthermore, when assessed in tandem with draft Policy B3 ‘Existing business floorspace’, (discussed in the next section) it would not be able to be used to provide office use. It is evident that this policy has undergone a significant transition over the last two decades. While it was originally dominated by industrial uses, it is clear that the area has evolved and is now a mixed-use area that includes office based employment and residential houses.

Policy B2: Delivering business floorspace
Policy B3: Existing business floorspace
Policy B4: Affordable workspace
Policy SP5: Nag’s Head and Holloway
Policy H6: Purpose-built Student Accommodation

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Consider that policy H1 part M is not positively prepared and does not conform with the NPPF or reflect the main national and local policy aims. Furthermore, when assessed in tandem with draft Policy B3 ‘Existing business floorspace’, (discussed in the next section) it would not be able to be used to provide office use. It is evident that this policy has undergone a significant transition over the last two decades. While it was originally dominated by industrial uses, it is clear that the area has evolved and is now a mixed-use area that includes office based employment and residential houses.

Policy B2: Delivering business floorspace
Policy B3: Existing business floorspace
Policy B4: Affordable workspace
Policy SP5: Nag’s Head and Holloway
Policy H6: Purpose-built Student Accommodation

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Respondents are concerned with the shift from current policy to restrict broader business uses in the Vale Royal/Brewery Road area, and argue that restricting offices in this area this would result in an inefficient use of land that is contrary to sustainable development objectives. It is also contrary to the London Plan’s objectives (policy E4) and to the council’s evidence base for the draft Local Plan.

Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site

Property: Valeyard Estates and Sand Catering

Landowner

Support respondents the creation of new B2a office in the Vale Royal/Brewery Road area, and argue that restricting offices in this area this would result in an inefficient use of land that is contrary to sustainable development objectives. It is also contrary to the London Plan’s objectives (policy E4) and to the council’s evidence base for the draft Local Plan.

Policy S4: Minimising greenhouse gas emissions

Other

Support the policy which will deliver significantly more value for the communities directly and indirectly affected by new development. Urge the council to adopt the National Social Value Measurement (NSVM) framework as the basis for developers to assess social value. This comprises 5 themes, 17 outcomes and 55 measures that were developed in collaboration with local government and private sector organisations. The NSVM are considered to meet the requirements of the Social Value Act as they are proportional and relevant to the contract; level the playing field for all developers whatever their size and capabilities; provide a means of consolidating answers into a single value which will help planning officers benchmark proposals; and will allow Islington to report the additional financial (social) value created by each development.

Policy G4: Biodiversity, landscape design and trees

Support allocation for a tall buildings however question why the limit has been set at 37m. States that planning legislation is clear that planning applications should be determined on a site by site basis and on their own merits. Respondents believes that it is inappropriate to have a blanket borough wide height restriction and consider the policy to be unsound. Also believe the policy is not in line with London Plan policy D6 relating to optimising density. Representation includes wording changes to remove the limit of either 20m considered for the Vale Royal/Brewery Road LSIS (supported in policy DH3). The restrictions that this area, recognising that the area’s industrial function is being encroached by corporate offices.

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Policy DH1: Fostering innovation and encouraging growth

Councillor

Supports the importance of Tileyard as a creative cluster in the area.

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| R19.0086 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Landowner | Respondent is the owner of the building at 188 York Way, currently being redeveloped following permission 18/00357/PP. Respondent supports the creation of new B1 office in the Vale Royal/Brewery Road area, and argues that limiting use of land that is contrary to sustainable development objectives, which would damage the economic potential of the area. It is also contrary to the London Plan’s objectives (policy EC4) and to the council’s evidence base for the draft Local Plan. | Object |
| R19.0086 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Landowner | Respondent considers that proposed policy hasn’t been drafted in conformity with the NPPF, para 82. The respondents oppose Islington’s draft plan which seeks to limit the height of new development under 30 meters. | Object |
| R19.0087 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Other | Respondents strongly oppose to the restriction of additional office uses in the Vale Royal/Brewery Road LSIS if these are not in a predominantly industrial building, because it prevents job growth in creative industries. They propose that the council consideration of policy SP3, and suggest removing part C (related to encroachment of offices in the LSIS). | Object |
| R19.0087 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Other | Respondents oppose to Islington’s draft plan which seeks to limit the height of new development under 30 meters. | Object |
| R19.0088 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Other | Respondents support the development of a Creative Enterprise Zone, as per London Plan policy HC5, which we are deeply concerned about the impact on air quality by prioritising certain industrial uses over other uses. | Object |
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| R19.0088 | Strategic and Development Management Policies | Policy B2: New business floorspace | Fitzpatrick Team Developments Ltd | The respondent objects to the proposed designation of 4008 Hornsey Road as being part of a Priority Employment Location. States that the council’s response to their Reg 18 representations - as set out in the consultation statement - doesn’t address the points raised. The property has been unsuccessfully marketed for several years since 2017. An appendix containing marketing evidence has been included in this response. The site has extant permission for the introduction of 4 residential dwellings and it is included residential users. | Object |
| R19.0088 | Strategic and Development Management Policies | Policy B2: New business floorspace | Fitzpatrick Team Developments Ltd | Landowner | Respondents suggest that the blanket restriction on residential use in Priority Employment Locations is contrary to national and regional planning policy guidance, and thus the wording “residential use will not be supported” should be deleted from Policy B2. | Object |
| R19.0089 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Other | Respondents support the development of a Creative Enterprise Zone, as per London Plan policy HC5, which we are deeply concerned about the impact on air quality by prioritising certain industrial uses over other uses. | Object |
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| R19.0089 | Strategic and Development Management Policies | Policy SF5: Vale Royal / Brewery Road Locally Significant Industrial Site | Other | Respondents support the development of a Creative EnterpriseZone around the southern part of the LSIS (e.g. south of Brandon Road). This will help deliver the council’s goals of promoting sustainable development objectives, which will damage the economic potential of the area. | Object |
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### Strategic and Development Management Policies

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<td>Granger Plc, a leading provider of private rental homes in the UK. Note they have a number of partnerships with public sector organisations including RSL, but currently no business interest in Islington. Granger Plc have not considered a number of key positive aspects of build to rent, including improved housing delivery; long-term stable housing for local residents; priced for local residents; better housing standards; high quality design; improved health and wellbeing; support for art and investment in local communities. Consider that H1 will reduce delivery of new homes and note Granger Plc have not met the latest housing delivery test. Surprised to see that LB do not consider there is a need for private rental accommodation, which is inconsistent with SHMA 2017. Recommend that policy and tax changes mean that buy-to-let investors will not be as prominent, and note that BPR can help to backfill this potential lessoned supply. Council should assess an publish local need for private rented accommodation. Policy should allow for API and OMN. Policy does not set out what form of API is acceptable or state why API/OMN is unacceptable. 50 year covenant prevents flexibility and will discourage investment; should be 15 years in line with London Plan. The cladding and component are both designed to ensure LPA can recoup API units are sold privately, therefore it is unnecessary to include both. We evidence to justify Council’s approach to restricting BPR.</td>
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<td>Developer Background on Granger Plc, a leading provider of private rental homes in the UK. Note they have a number of partnerships with public sector organisations including RSL, but currently no business interest in Islington. Granger Plc have not considered a number of key positive aspects of build to rent, including improved housing delivery; long-term stable housing for local residents; priced for local residents; better housing standards; high quality design; improved health and wellbeing; support for art and investment in local communities. Consider that H1 will reduce delivery of new homes and note Granger Plc have not met the latest housing delivery test. Surprised to see that LB do not consider there is a need for private rental accommodation, which is inconsistent with SHMA 2017. Recommend that policy and tax changes mean that buy-to-let investors will not be as prominent, and note that BPR can help to backfill this potential lessoned supply. Council should assess an publish local need for private rented accommodation. Policy should allow for API and OMN. Policy does not set out what form of API is acceptable or state why API/OMN is unacceptable. 50 year covenant prevents flexibility and will discourage investment; should be 15 years in line with London Plan. The cladding and component are both designed to ensure LPA can recoup API units are sold privately, therefore it is unnecessary to include both. We evidence to justify Council’s approach to restricting BPR.</td>
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### Evidence base, IDP

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<td>Policy SP2: King’s Cross and Pentonville Road</td>
<td>N/A - general comment Great Ormond Street Hospital and Puttinu Cares Foundation Business There is a distinct requirement for associated accommodation to be reasonably close to the relevant hospitals to make journey times for family members travelling to/from hospital manageable and the search area for new sites therefore becomes extremely limited. When taking a 15 minute walking distance from GOSH, there is only a limited search area for GOSH and charities such as Puttinu Cares to locate suitable sites for development to meet the clear needs of patients and their families. Respondent is seeking a policy to be introduced which would support the use of land for specialist accommodation associated to hospitals, for use by families of patients rather than just patients themselves. Where there is protection of other uses in planning policy, that policy should include an explicit exception for development proposals for specialist accommodation where an exceptional case is demonstrated. Such an approach would be supported by the draft London Plan which states that boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS organisations to identify and address local health needs (Policy S2). Policy H14 of the draft London Plan also states that the delivery of supported and specialised housing which meets an identified need should be supported and that boroughs should undertake assessments of the need for short term, medium-term and permanent supported and specialised accommodation within their borough.</td>
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### Background on Grainger Plc, a leading provider of private rental homes in the UK. Note they have a number of partnerships with public sector organisations including RSL, but currently no business interest in Islington. Granger Plc have not considered a number of key positive aspects of build to rent, including improved housing delivery; long-term stable housing for local residents; priced for local residents; better housing standards; high quality design; improved health and wellbeing; support for art and investment in local communities. Consider that H1 will reduce delivery of new homes and note Granger Plc have not met the latest housing delivery test. Surprised to see that LB do not consider there is a need for private rental accommodation, which is inconsistent with SHMA 2017. Recommend that policy and tax changes mean that buy-to-let investors will not be as prominent, and note that BPR can help to backfill this potential lessoned supply. Council should assess an publish local need for private rented accommodation. Policy should allow for API and OMN. Policy does not set out what form of API is acceptable or state why API/OMN is unacceptable. 50 year covenant prevents flexibility and will discourage investment; should be 15 years in line with London Plan. The cladding and component are both designed to ensure LPA can recoup API units are sold privately, therefore it is unnecessary to include both. We evidence to justify Council’s approach to restricting BPR. | Object |
Strategic and Development Management

Policy SP7: Archway
Resident

Note that some tall buildings are proposed near the tube station despite the conclusion in the appendix to the tall buildings report of 2018. My belief is that this is not an area for tall buildings. Additionally, most people living here will want to commute into central London on the tube but I doubt the Northern Line has the capacity to cope, especially given the developments on TL land further north.

Object

Policy SP9: Finsbury Park
Resident

Independent welcomes paragraph 2.7 to improve capacity and access to Finsbury Park station

Support

Resident

Policy SP2: Pedestrian areas need to be kept clear of obstacles such as dockless bikes. Bus stops need to be positioned so as not to obstruct the pavement.

Not stated

Policy SP4: Public realm
Resident

Increased public toilet accommodation supported, especially to support elderly citizens whose mobility can be constrained by the availability of toilets. Maps should be readily available showing the location of toilets.

Support

Site Allocations

N9: Holloway Prison, Parkhurst Road
线规划 业务

Holloway Prison is the borough’s largest housing site and the council must follow a logical and consistent method of assessing the site in respect of inter-generational needs and the housing shortage. The CSL should reflect development plan policies and the Holloway Prison SPD. In relation to policy SC1 (social and community infrastructure) the community should have early sight of the Community Needs Assessment, which should demonstrate how the Women’s Building will address the loss of support services for women that previously operated from Holloway Prison. The site should provide a London-wide or national base for women’s support services that could be associated with rehabilitation, positive mental health, domestic abuse prevention etc. The site could promote work opportunities for women with training and education on the construction trades, and the inclusion of creative work-spaces for women. The council has a duty to co-operate with Camden Council with respect to provision for older people. Agree smaller scale retail provision would be suitable on Cardwell Terrace as set out in Policy SP5.

Not stated

Policy H2: Thriving communities

Small householder developers of say one or two units may find the affordable housing unit contribution a high hurdle. The AH contribution approach and this should be reflected in text. Also check the NPPG.

We support this subject to a caveat for a clarification of text on achieving housing quality.

Support

Policy H3: Thriving communities

Policy H3: Small householders of say one or two units may find the affordable housing unit contribution a deterrent to redevelopment. A balance has to be struck with safeguards to protect small developers from exposure to undue costs which may inhibit small scale development from coming forward and thus conflict with London Plan policy and also householders’ / small landowner desires to improve the quality of buildings that they live in, own or manage. E.g. could the Council include an indication of the amount of this liability relative to the cost of a scheme e.g. on say a development of £1m or £2m, by way of illustration? Small developers typically will not plan sufficiently far ahead to understand their liabilities. They want to get access to this information quickly when preparing a financial appraisal and the detail could be produced in a form that is more readily accessible. With respect to the redevelopment of small sites and AH contributions, an arrangement for off site AH contributions is currently being reviewed by PINS in relation to the draft London Plan. If the Inspector recommends the proposed wording above the draft LP will need to reflect the off-site AH contribution approach and this should be reflected in text. Also check the NPPG.

Support

Policy H4: Thriving communities

Policy H4: Amend the wording to “the size and mix” etc. Or state how “size mix” differs from size and mix. Cross refer this to Table 3.2 of H2. We support this subject to a caveat for a clarification of text on achieving housing quality.

Both

Policy H5: Thriving communities

Policy H5: Can the Council clarify the definition. Conventional residential accommodation or perhaps avoid the use of the phrase which is rather meaningless? Does the Council mean family sized? Or does it just mean “self contained” (as in early drafts of the London Plan)? If in the current version of the London Plan please add a footnote to that effect. Does it mean accommodation with a space ratio appropriate to quality, number of persons and lawful in terms of occupation? H2. C and justification text 3.28 refers to “floor space” but there is no guidance on floorspace dimensions (other than minimum sizes in other policy). The ORS SIMA evidence base shows that too many families are living in accommodation that is too small for their requirements. The report proposes that 2-4ps units are “family sized” units. It’s also old wording from historic policies and is at risk of perpetuating low quality standards in terms of unit variety. The fact that other London Councils adopt this wording does not make the policy acceptable. The NPPG do say it is appropriate to set out a range of densities. The efficient use of land should respond to the type of housing offer and whether the offer matches housing preferences to enable people to stay together over the long term.

Not stated
R19.0094 Strategic and Development Management Policies

Policy H1: Thriving communities, Part K
Line Planning Business

Policy H1: Thriving communities, Part K is strongly supported. Is there scope for further modification? We suggest that the justification text refers to the responsibility for ensuring that the housing provision is necessary and should therefore be supported by contributions from developers (probably in a pooling arrangement) as the S106 tests in terms of being site specific and mitigating the impact of the development proposal will not work for smaller sites. But arguably could work for strategic sites. The alternative is to use the CIL regime (derived from the Infrastructure Delivery Plan). ‘Relevant infrastructure projects’ should include housing related projects that are developed to meet emergency and short term housing needs (e.g. up to 1 or 2 years) on site or could surely be funded by some pooled contributions that relate to ‘community safety’/affordable housing (so householders who are eligible for universal housing credit would qualify). This may also have a cross cutting relationship with ‘preventing wasted housing supply’ policies which would enable developers to put this type of housing forward. It’s not clear to us whether the Update IDP 2019 document is actually adopted. Is there scope to amend it? Can legal advice be taken on using CIL for this purpose to mitigate against the constant financial crisis of funding such housing? Also see our paragraph 52 on this point.

R19.0094 Strategic and Development Management Policies

Policy H1: Thriving communities, Part V
Line Planning Business

Is Policy H1.V meant to also cross refer to Policy SC1 on social and community infrastructure?

R19.0094 Strategic and Development Management Policies

Policy H1: Thriving communities, Part L
Line Planning Business

H1. L and H7 We recommend a modification to this wording. We suggest it could be phrased differently e.g. Housing for older people will be predominantly met through conventional and supported housing. These will include models that support the independence of older people including co-housing, and forms of sheltered housing. Extra care home provision should be justified in the context of ‘need’ as indicated by demographic, health care, and social services data. This will ensure that there is sufficient housing provision to match the requirements for people with disabilities where conventional housing will not be adequate to meet need. The Council should not confuse the terminologies: co-housing with co-living. Does co-living need to be removed from the H Policies? We do not think there is a definition. Should the Council produce a Topic Paper on Housing for Older People (for the next housing review)?

R19.0094 Strategic and Development Management Policies

Policy H2: New and existing conventional housing
Line Planning Business

Paragraphs 14-15: The risk is that the mix of provision is dominated by 2b4p units. This may create units with very limited space e.g. without sufficient space or a mix which can offer a pipeline to families who require to upscale to 3/4 bed units. 2b4p will not meet the needs of growing families who need to have the right number of bedrooms, storage and study areas for education/work. 3 beds are required by law for a family with 2 kids with children of different sexes from age 10; otherwise there is statutory overcrowding. This is not mentioned in the policy justification text and could be helpful to include to remind developers.

Poor housing conditions such as overcrowding are a known factor in increasing the incidence of mental ill-health and these conditions may contribute to domestic violence as well. Small units can put pressures on young families to leave the unit before they ideally want to. Choice, comfort and greater permanence is what families want in general terms. Families should also be able to have space to accommodate temporary visitors.

R19.0094 Strategic and Development Management Policies

Policy H2: New and existing conventional housing
Line Planning Business

Paragraphs 16-17: Page 72 of the SHMA reports that Islington is worse than other London Boroughs for overcrowding: 29.1% of households in the study area are overcrowded based on an objective measure, which is much higher than England (8.7%). The Council needs to assess where the overcrowding is coming from and consider whether it has the correct policies in place to deal with this. This is not mentioned in the policy justification text and could be helpful to include to remind developers.

Object
We refer the Council to MHCLG’s newly published National Design Guidance (October 2019) –

Paragraphs 26-27: Quality and space standards should be assessed against lifetime needs. E.g. Many people

Paragraphs 18-21: Quality in terms of size standards should not become a race to the bottom, i.e. the

Paragraph 24: Optimisation does not mean maximisation. Alternatively, the policy could for example include

This unit size may suit small young families but is not likely to meet the variety that the

Paragraph 29: From a viability point of view it may suit developers and Councils to meet principal provision

Paragraph 22: The driver behind Policy H2 is presumably the NPPG standard test. But there is scope for

R19.0094

Policies

Policy H2: New and existing conventional housing

Line Planning

Business

Paragraph 25: This unit size may suit small young families but is not likely to meet the variety that the market could support and the housing variety that some developers and architects would be prepared to design and build for. Surely there is scope for more 3b provision including the bracket of intermediate-shared ownership.

Paragraph 23: The driver behind Policy H2 is presumably the NPPG standard test. But there is scope for nuance. H2B is a policy proposal that will drive down quality. The words “regardless of site size” should be removed at site size is a material consideration in decision making. We don’t think this is what is intended by the NPPG approach, guidance on density and so forth.

Paragraph 24: Optimisation does not mean maximisation. Alternatively, the policy could for example include extra wording as follows:-

B (i) the contribution to meeting need for particular types of housing that will include addressing the backlog of overcrowding;

Paragraph 25: H2 test on conventional housing is therefore a policy which must be assessed against the correct data, recommendations about standards and other aspects of design quality. This is relevant to decision making so could be referred to in justification text. Is the 3.27 test from the NPPG? The standard method only leads to indicative trajectories and it would be helpful to clarify that in text. More could be done to explain the policy approach to decision making.

Paragraph 26: Quality and space standards should be assessed against lifetime needs. E.g. Many people are now working from home (and indeed are expected to do so by employers) and room sizes should reflect this reality. Requirements for a minimum of up to 2 desk spaces should be factored in – just as storage allocation was required to be factored into national housing standards some years ago. This will make home working a viable option.

Paragraph 27: Quality and space standards should be assessed against lifetime needs. E.g. Many people are now working from home (and indeed are expected to do so by employers) and room sizes should reflect this reality. Requirements for a minimum of up to 2 desk spaces should be factored in – just as storage allocation was required to be factored into national housing standards some years ago. This will make home working a viable option.

Paragraph 28: We refer the Council to MHCLG’s newly published National Design Guidance (October 2018) – see paragraph 67 which states that the built form of well-designed places should relate well to: the lifestyles of occupants and other users; this could be referenced in justification text. The issue about space links to the

Paragraph 29: From a viability point of view it may suit developers and Councils to meet principal provision on 2b 4p (so meeting Council housing unit targets). However, ultimately the test of good housing quality from the occupants’ point of view is not the response to viability. A balance has to be struck to safeguard the quality of the housing legacy.
The housing backlog also has to consider the number of 'concealed homes' in the approach to homelessness. The number of concealed families living with households in Islington increased from 709 to 917 over the 10-year period 2001-11 (Figure 50), an increase of 208 families (29%). And also a very old piece of data. The number of sharing households increased from 1,078 to 1,624 over the 10-year period 2001-11 (Figure 51), an increase of 546 households (52%) (SHMA page 67). Questions: is there a policy case for separating the categories of people caught by homelessness or inadequate homes for different reasons? Grouping them together in the way proposed is a conventional way of addressing this aspect of need but restricts policy solutions in finer detail. The distinct needs of the borough need to be identified. The provision of small sites to help meet vulnerable need could be a consideration (e.g. larger developers buying sites for SH homes but then providing an off site small site to help meet this type of need under a S106 or CIL obligation). The 'LSIS' 'Community' heading in the SPO dated 2016 could then be amended in line with policy. At present it is not sufficiently explicit about the need to include a funding element for the above.

The link in terms of the relevance of the S106 statutory tests for the aged and victims of domestic violence (many of whom will have children with them) can be met by a 'general needs' justification.

• Homelessness could have its own distinct test. Or provide clarity if a specific NPPF test applies.

The Council has failed to identify the potential of the concrete batching plant site and adjoining Network Rail land off Randell’s Road (York Way) for major mixed-use regeneration, including the potential for a tall building(s). The proposed local and protected viewing corridor from Randell’s Road Bridge to the Market Road Clock Tower is flawed and unnecessarily hinders development in the area.

The respondent supports the promotion and preservation of industrial uses in the Vale Royal/Brewery Road area.

The link in terms of the relevance of the S106 statutory tests for the aged and victims of domestic violence (many of whom will have children with them) can be met by a 'general needs' justification.

The London Plan and Islington SHMA set out significant need for housing. Purpose built shared housing can play an important role. The Local Plan should positively enable the assessment of applications for co-living, even if it still prioritises conventional accommodation.

The respondent has not provided any evidence of the impact of the policy which states that there is no need for market extra care in the borough.

The respondent supports the promotion and preservation of industrial uses in the Vale Royal/Brewery Road area.

The respondent supports the promotion and preservation of industrial uses in the Vale Royal/Brewery Road area.

Thank you for sight of these fascinating documents. To me, your plans seem excellent. I feel privileged to live in an area run by such a wise & clear thinking council.
<table>
<thead>
<tr>
<th>ID</th>
<th>Strategic and Development Management Policies</th>
<th>Policy/SP: Angel and Upper Street</th>
<th>M &amp; G Real Estate</th>
<th>Landowner</th>
<th>Support/Objection</th>
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<tbody>
<tr>
<td>R1.0099</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R3: Retail, leisure and services, culture and visitor accommodation</td>
<td>M &amp; G Real Estate</td>
<td>Landowner</td>
<td>Objection. There is a reducing requirement from retail occupiers and the number of occupiers for retail space. The policy target to increase the amount of retail floor space within all centres should be amended to reflect the positive strategy as identified in paragraph 85 of the NPPF. Amendment should include an objective to increase all main town centre uses in town centres as it is not feasible to target only an increase in retail floor space.</td>
</tr>
<tr>
<td>R1.0099</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R2: Primary Shopping Areas</td>
<td>M &amp; G Real Estate</td>
<td>Landowner</td>
<td>Objection. An approach requiring a proportion of units within the PSA to be Class A1 would be dated and inflexible. Instead a case by case consideration of a range of town centre uses that does not undermine the predominance of A1 retail is a better approach to securing long term vitality and viability. This will accord with Objective 5 of the Local Plan. Respondent cites CB1 report (June 2019) that UK Retail Sales fell at its fastest pace for ten years, and that retailers’ requirements for new floor space is significantly reducing as well as occupiers store portfolios. Respondent undertook a survey of the emerging Primary Shopping Area in Angel which was at 65.8% which makes a 60% A1 requirement here quickly unachievable and will lead to increased vacancies. It is therefore not a positive strategy and will become outdated within the 15-year plan period. The two-year marketing requirement is counter-productive to ensuring town centre vitality and viability. Some landlords are retaining some retailers temporarily on rates only deals while they market the promise, however, requirement for the unit to be vacant would mean a longer period of time to attract an occupier. The policy should not be overly prescriptive in setting specific percentage thresholds. It is crucial for landlords to be able to act decisively to meet opportunities to accommodate uses alternative to A1 use that can contribute to vitality and viability. Such an approach is required by the NPPF paragraph 91 and paragraph 85a that requires the promotion of long term vitality and viability of town centres.</td>
</tr>
<tr>
<td>R1.0099</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R3: Islington’s Town Centres</td>
<td>M &amp; G Real Estate</td>
<td>Landowner</td>
<td>Support. Policy R3 focuses on protecting A1-A5, D2 and Sui Generis main town centre use floorspace in designated centres. However, the policy should be updated such that it takes account of all main town centre uses as defined by the NPPF.</td>
</tr>
<tr>
<td>R1.0099</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R8: Location and Concentration of Uses</td>
<td>M &amp; G Real Estate</td>
<td>Landowner</td>
<td>Objection. Respondent understands the aims of the policy but feels it is not appropriate to restrict concentrations of food, drink and night-time economy uses where these would add to vitality and viability of town centres. A case by case approach should be taken that seeks to not undermine the predominance of A1 retailing. Landlords and operators of commercial property assets have sought to provide a much wider offer to increase attraction and dwell times which has seen a substantial increase in leisure floor space. As such the policy should be more flexible.</td>
</tr>
<tr>
<td>R1.0100</td>
<td>Site Allocations</td>
<td>FP3: Finsbury Park Station and Island, Seven Sisters Road</td>
<td>LB Haringey</td>
<td>Statutory consultant</td>
<td>Support. If it noted a number of Site Allocations within the Finsbury Park Area propose tall buildings as part of a cluster within that area. It is welcome that the proposed heights have been robustly considered in the Islington Tall Buildings study and it is considered the criteria within Policy DH3 are an appropriate framework to manage tall building proposals across the Borough including impacts on the visual amenity and views within adjacent authorities. There is strong support for Site Allocation FP3: Finsbury Park Station and Island, and the allocation for improved underground and railway station infrastructure and public realm, which will help support growth on the Finsbury Park side of Finsbury Park.</td>
</tr>
<tr>
<td>R1.0100</td>
<td>Strategic and Development Management Policies</td>
<td>N/A - general comment</td>
<td>LB Haringey</td>
<td>Statutory consultant</td>
<td>Support. Haringey remains committed to working with Islington on cross-boundary issues particularly in respect of the Finsbury Park area, where both boroughs have strategic objectives for managing growth. With regards to the agreed strategic matters in the signed Statement of Common Ground between our Boroughs, and the content of the Proposed Submission Local Plan, Haringey broadly supports the objectives and policies within the Local Plan and consider it a sound and appropriate strategy.</td>
</tr>
<tr>
<td>R1.0100</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R2: New and existing conventional housing</td>
<td>LB Haringey</td>
<td>Statutory consultant</td>
<td>Support. There is specific support for Policy H2 and Hlington’s commitment to meeting its share of London’s growth by adopting the Housing Target set out within the draft London Plan for Islington.</td>
</tr>
<tr>
<td>R1.0100</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H2: Gypsy and Traveller Accommodation</td>
<td>LB Haringey</td>
<td>Statutory consultant</td>
<td>Support. Policy H2: Gypsy and Traveller Accommodation is supported and considered sound, specifically provison A2 and A4, noting that Islington will be able to accommodate additional pitches above our own targets. Haringey therefore supports joint working with the GLA and working with other Boroughs on a sub-regional basis as one option to accommodate need.</td>
</tr>
<tr>
<td>R1.0100</td>
<td>Strategic and Development Management Policies</td>
<td>Policy R3: Retail, leisure and services, culture and visitor accommodation</td>
<td>LB Haringey</td>
<td>Statutory consultant</td>
<td>Support. Haringey also considers the policies to manage the retail areas of Islington, particularly those of Finsbury Park and Archway appropriate and support the Primary Shopping Areas defined and the direction of A2 retail to those locatons, which will enhance the vitality of these town centres.</td>
</tr>
</tbody>
</table>
CAMRA fully support comments from Theatres Trust and GLA relating to marketing efforts to be a rent or
Islington should welcome ACV nominations for all public houses within the borough, similar to that stated in
The respondent asks for further clarification about the definition of “peppercorn”; longer lease periods
HBF note viability studies produced to support the plan.
Respondent objects to blanket restrictions that buildings should not exceed more than 20m in height. The
Respondent is concerned about the restriction on B1(a) business space from policy SP3 which will result in
Landowners note that policy H11 is extreme. The Council does not explain what is identified housing need in
We would also question some of the other value inputs into the appraisal that we consider may be pitched
Some costs are assumed to be already ‘embedded’ within BCIS costs. See paragraph 2.41 of the December
The respondent also recommends a series of operational aspects such as marketing and agreeing the lease
The respondent asks for further clarification about the definition of “peppercorn”; longer lease periods
Not stated
CAMRA North London Branch
CAMRA fully support comments from Theatres Trust and GLA relating to marketing efforts to be a rent or
CAMRA North London Branch
Additional pub protection should be given in line with the Agent of Change principle in London Plan policy
Islington should welcome ACV nominations for all public houses within the borough, similar to that stated in
Notes para 3.80 and requests that this applies to existing as well as new properties. Highlights quite a few
This would cover the possibility that not all schemes in the recent past have incorporated fully all the
The respondent states that view of the Market Place Clocktower from Randell’s Road to the south has no merit
Nevertheless, we think it would be prudent for the Council to assess the cost of policy requirements listed in
Our current position continues to be that the London Plan 2015 was adopted (the Minor Alterations to the London Plan that incorporated the optional technical standards). While affordable housing is only one of a number of policy requirements in the Islington Local Plan, it would provide a good indicator of the extent to which applicants have been able to be policy compliant.
Nevertheless, we think it would be prudent for the Council to assess the cost of policy requirements listed in para. 2.41. to ensure that development will be viable. An alternative would be to factor in a contingency allowance as a percentage of total build costs including fees (base unit build costs, external and abnormal costs). This would cover the possibility that not all schemes in the recent past have incorporated fully all the elements of policy in the London and Islington local plans.
We would also question some of the other value inputs into the appraisal that we consider may be pitched too low. Evidence from landowners would be helpful here and we urge the Council to engage with them to test the assumptions in the two reports.
The report assumes a rate of 6%. We think this is a little low. The HBF recommends 6.5 to 7% as a more
It is well acknowledged that Policy ST2: Waste, safeguards the Hornsey Street Re-Use and Recycling centre, and
Support
Object
Both
Object
Object
Object
Object
Support
The Council needs to provide a SHLAA and Five Year Land Supply statement to support the delivery of the Home Builders Federation. The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.

For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.

R19.0106

Policy H1: Thriving communities, Part F

The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.

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R19.0106

Policy H1: Thriving communities, Part G

The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.

For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.

R19.0106

Policy H1: Thriving communities, Part E

The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.

For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.

R19.0106

Policy H1: Thriving communities, Part I

The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.

For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.

R19.0106

Policy H1: Thriving communities, Part I

The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.

For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.

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R19.0106

Policy H1: Thriving communities, Part I

The term genuinely affordable could be misleading as the general public may think this refers to affordable housing. Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should allow for other affordable home ownership products.
Home Builders Federation

The policy is unclear about what is being required and how decision-maker can take policy into account. It is

Business

Part A is sound because it aligns with the Draft London Plan (DLP), although it is noted that the plan is

Policy is unsound as it will fail to cater for the need for older persons housing as required by national and

regional policy and guidance. The Local Plan will need to be revised to refer to the Draft London Plan older

persons benchmarks. Policy should introduce a ‘presumption in favour of schemes involving older persons

housing’ in the policy if the benchmark target is not achieved in both of the previous two years after the plan

has been adopted. The presumption would dis-apply as soon as the benchmark target is achieved in the

current year. Supporting paragraph 5.18 is unsound and unqualified in stating that the Council will reject

applications for older persons housing; the effect of Islington Council’s decision not to provide any older

persons housing would be to shift the burden of responsibility onto other boroughs. They would be faced

with greater demands for older persons housing in their own areas as to make-up for those homes not being

provided in Islington – in the order of 60 units a year. The Council’s rejection of older persons’ housing on

the basis that it requires more communal space is mean-spirited. Communal areas are an essential part of

housing for older people.

Islington Council should avoid developing a reputation as borough that is only interested in housing the

young and able-bodied. HBF quote research by WPI which argues how the provision of specialist older

persons housing will help reduce the cost to the public purse in terms of reduced health and social care

dependency.

Home Builders Federation

Policy H2: New and existing conventional housing

The policy is unclear about what is being required and how decision-maker can take policy into account. It is

Business

the responsibility of the Council as the plan-maker to make policies that cumulatively have the effect of

‘maximising social value’. These policy requirements should be specific and deliverable. Policy should be

 objectively identified and allocated through their development plan (para. 1.6), and it is for each local planning authority to determine which of the sites in the SHLAA should be

formally identified and allocated through their development plan (para. 1.6).

Paragraph 4.1.8 of the Draft London Plan states that “boroughs should identify as many sites, including small

sites, as possible via their Development Plan documents”.

The GLA SHLAA cannot be relied upon by the Council to satisfy the requirement of para. 67 of the

Framework. The Council needs to set out which large sites it is relying on for the first ten years of the Plan

to deliver the 10-year Draft London Plan requirement) and work to identify more specific small sites to

address para. 68 of the NPPF. Para. 3.24 of the DLP states that a number of allocations have been made by

the GLA (to deliver the 10-year Draft London Plan requirement) and work to identify more specific small sites to

address para. 68 of the NPPF. Para. 3.24 of the DLP states that a number of allocations have been made by

the Plan but these will only address the large sites benchmark.

Note that they have been unable to locate an up-to-date housing trajectory which would be helpful to

interrogate whether the housing objectives of the Plan are deliverable.

Home Builders Federation

Policy H2: New and existing conventional housing

No reference to the London Plan small sites policy. Notes that table 6.3 of the GLA SHLAA which shows that

in the last ten years – 2004/5 to 2015/16 housing completions on small sites from all sources (change of use,

conversions and new build) was 7,080 in total or an annual average of 708. While this provides some

reassurance that the DLP monitoring target of 484dpa from small sites is achievable, whether delivery at this

rate can be sustained over the next ten years requires closer analysis. Considers that the Plan should be

revised to explain how the Council will encourage small sites delivery in Islington including the application of

the presumption in favour of small site development (referred to in supporting text in para. 1.29 but not in policy).

This does also beg the question whether the weight of policy expectations introduced by the

Islington Local Plan (e.g. the approach to affordable housing and Policy SC2: Play Space) are conducive to

achieving 484 completions a year from small sites.

Home Builders Federation

Policy H2: New and existing conventional housing

Part A is sound because it aligns with the Draft London Plan (DLP), although it is noted that the plan is

potentially subject to change following the inspectors report.

HBF note need figure of 1,150 from SHLAA and provide standard method need for comparative purposes (a

figure of 2,492dpa would be needed 1,800 households per annum using the 2014 household projections,

based on a period 2017-2027, applying the latest median workplace-based affordability ratio of 15.69 for

Islington, and applying a 20% cap).

Not stated
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<td><strong>Policy H2</strong>: New and existing conventional housing, Part H</td>
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<tr>
<td><strong>Home Builders Federation</strong></td>
<td></td>
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<td><strong>Business</strong></td>
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<tr>
<td>Part H requires developers to enter into a S106 obligation to ensure that all residential units will be occupied, which is inconsistent with CIL regulations and the NPPF. The policy is not supported by evidence; cites research from LSE and the Universities of Sheffield and York. Respondent notes GLA concern that a large proportion of property priced under £500k is increasingly being purchased by overseas buyers. This is of concern because this is the key entry level price bracket for UK residents and first-time buyers. The prime markets are less of a concern politically. The HBF has worked hard with the Mayor to introduce the so-called ‘First Dibs’ initiative whereby homes are marketed exclusively to Londoners for three weeks before they can be marked overseas. This is referred to in para. 4.1.6 of the DLP. Most HBF members operating within London are signatories to this protocol. The HBF will be meeting with the GLA on the 13 November 2019 to review the parameters of the scheme and its effectiveness to date.</td>
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<td><strong>Policy H3</strong>: Genuinely affordable housing, Part A</td>
<td></td>
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<td></td>
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<tr>
<td><strong>Business</strong></td>
<td></td>
</tr>
<tr>
<td>Part A is unsound because it is contrary to national policy. It fails to provide sufficient clarity for the applicant and decision-taker. The Plan, therefore, needs to be amended to make it clear that 50% affordable housing is the maximum that is to be expected from sites delivered on privately owned land. This is supported by the evidence from the two viability reports.</td>
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<td>Part B (iii) requires applicants to “exhaust all potential options for maximising the delivery of on-site affordable housing to reach and exceed the strategic 50% target.” This is unsound because it is unclear and lack of clarity, contrary to paragraph 16 (d) of the NPPF. This should be deleted. The Council should set out a clear requirement for affordable housing obligations. This should be 50% including on publicly owned land, bringing this into line with the Draft London Plan.</td>
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<td>The Plan is unsound in rejecting other forms of affordable housing defined in the glossary to the NPPF. Para. 63 of the NPPF requires plan-makers to apply the definitions contained in Annex 2 of the Framework. While we appreciate the desire of the Council to focus on social rent and intermediate homes, there may be instances where these other affordable products designed to improve home ownership will be appropriate and help to address the aspirations of Islington’s residents. London Living Rent cannot be treated as the same thing as an affordable home ownership product. Suggest amended wording to allow intermediate element to include tenure types set out in Annex 2 of the NPPF. Supporting para. 3.56 should be deleted. Part H should also include additional words recognising that there may be circumstances where it is appropriate to provide affordable home ownership products as part of the affordable housing contribution. This would require the applicant to engage early with the Council to discuss the circumstances.</td>
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<tr>
<td>The dis-application of the Vacant Building Credit (VBC) is unsound because it conflicts with the national policy in para. 63 of the NPPF. The aim of this policy, along with the exemption from S106 obligations for affordable housing on small schemes, is to support small scale developers. Since Islington Council will rely heavily on developers of small sites to deliver the housing requirement (two thirds of the need) it is perverse that it is suspended this element of national policy. Part I and paragraph 3.61 should be deleted.</td>
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<td>Part B and paragraphs 3.73-3.76 are inconsistent with national policy and guidance as it introduces additional information requirement for applicants in the form of the requirement in (i) to (iv). These additional requirements should be removed. Part B also fails to comply with national policy by failing to specify that the requirement for 30% of homes constructed to the NHER standard – wheelchair accessible homes – should, in the words of the NPPF, “be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling” – i.e. to the affordable housing element of a scheme.</td>
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<td>Part C requires applicants to ‘meet or exceed’ the Nationally Described Space Standards adopted as policy through the London Plan in 2015. In terms of decision-taking, what is implied by the use of the word ‘exceed’ is unclear and a consequently contrary to para. 16 of the NPPF. Could a scheme be rejected if it only met the standard? The standard is the Nationally Described Space Standard. There is no requirement or obligation for the developer to have to exceed this. The word ‘exceed’ should be removed.</td>
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As discussed above, the Policy should be revised by the Council to support the provision of older persons housing – both C2 and C3 – using the indicative benchmark in the London Plan as the basis for monitoring provision against needs. In terms of the assessment of housing needs, London is treated as a single housing market area. This means that para. 3.108 of the DLP carries much less weight. Therefore, the decision by the Council to dis-apply Draft London Plan policy H15 (to replace the current London Plan policy) would have consequences for other boroughs in London, as they would have to provide more homes for older people to compensate for Islington Council’s unilateral decision.

The policy is unsound as it conflicts with national policy. The Council in asking for a Sustainable Design and Construction Statement to be adhered to is making a demand on developers that is not justified. It is argued that the impact on the environment can be maximised through the Building Regulations, which can be achieved by using high quality building materials as well as ensuring that the design of the building is sustainable. The policy also conflicts with national policy as it requires the use of a certain standard, namely the BRE Home Quality Mark, which is not mandatory. The policy should therefore be revised to ensure that it is in line with national policy.

Similarly, Part B is a general statement of intent. It does not tell applicants what is expected from them. The policy should be revised to make it more specific and clear.

Part D refers to Islington’s carbon offset fund. The Council will need to make sure that contributions to carbon offsetting are not sought from small schemes of 10 units or less. This is in line with Government policy as outlined in the Written Ministerial Statement of March 2015. The policy should be removed from the Plan.

The policy is unsound as it conflicts with national policy. The Council in asking for a Sustainable Design and Construction Statement to be adhered to is making a demand on developers that is not justified. It is argued that the impact on the environment can be maximised through the Building Regulations, which can be achieved by using high quality building materials as well as ensuring that the design of the building is sustainable. The policy also conflicts with national policy as it requires the use of a certain standard, namely the BRE Home Quality Mark, which is not mandatory. The policy should therefore be revised to ensure that it is in line with national policy. The DILP should be amended to reflect this exemption.

Part A states that the Council will seek to maximise the positive effects on the environment and quality of life while minimising or avoiding negative impacts. It is unnecessary to say this in policy – this is a broad statement of intent. Instead the policy should simply focus on those elements needed to provide the levels of sustainable design that the Council wishes new development to achieve. Part A should be deleted as it does not add anything of real value in terms of guiding development activity or decisions.

Similarly, Part B is a general statement of intent. It does not tell applicants what is expected from them. The policy should be revised to make it more specific and clear.

Part D (iii) adheres to the national policy by requiring a 19% improvement on Part L. The DILP should be amended to align with the London Plan. The policy is unsound as it conflicts with national policy. The Council in asking for a Sustainable Design and Construction Statement to be adhered to is making a demand on developers that is not justified. It is argued that the impact on the environment can be maximised through the Building Regulations, which can be achieved by using high quality building materials as well as ensuring that the design of the building is sustainable. The policy also conflicts with national policy as it requires the use of a certain standard, namely the BRE Home Quality Mark, which is not mandatory. The policy should therefore be revised to ensure that it is in line with national policy. From this it is apparent that the only standards that now relate to residential development comprise the applicable elements of Part C to be identified through pre-app (in relation to certain small schemes).
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<tr>
<td>SC2: Play space</td>
<td>Home Builders Federation Business</td>
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<tr>
<td>Part C requires all major developments – i.e. those of 10 units or more – to make provision for play space. This requirement could represent an obstacle for some small site developments, and given the Plan’s heavy reliance on small sites to meet the housing requirement, plus the observation by the council in para. 1.26 that development sites are decreasing significantly, this may be difficult to achieve. This is particularly the case on tightly bounded small brownfield sites. Suggest more flexible wording of policy.</td>
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<tr>
<td>SC3: Health Impact Assessment</td>
<td>Home Builders Federation Business</td>
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<tr>
<td>The need for Health Impact Assessments is superfluous as the aims will be achieved by other planning policy objectives in the Local Plan. This policy should be deleted. It will merely generate waste paper and only add unnecessarily to the cost of development. This will ultimately detract from the sum of real benefits that could accrue to the public without bringing any tangible benefit.</td>
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<tr>
<td>SC4: Promoting Social Value</td>
<td>Home Builders Federation Business</td>
</tr>
<tr>
<td>We are not sure what is meant by ‘maximising social value’ and how this might be measured by the applicant or assessed by the decision-taker. There is the risk that applications could be arbitrarily rejected on the basis of being deemed to have failed to promote social value sufficiently. This is what is suggested by supporting para. 3.183. The policy consequently fails to comply with national policy. The overall objective of making sure that new residential development contributes to wider social good will be met through the other variegated and specifically worded policies contained in the DILP, such as affordable housing, play space, bio-diversity net gain, S106 obligations towards education and health surgeries etc. The policy is superfluous and should be deleted.</td>
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<tr>
<th>Policy</th>
<th>R19.0107 Strategic and Development Management Policies</th>
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<tbody>
<tr>
<td>SC3: Health Impact Assessment</td>
<td>Kentucky Fried Chicken Ltd Business</td>
</tr>
<tr>
<td>Policy SC3 is unsound as it is: positively prepared and is not based on objective assessment of the existing or required nutritional intake on offer; justified, as it requires a HIA without specifying its format or scope; effective, as the supporting text suggests all A5 use proposals will be scoped in to HIA, yet would relate to a use capable of change within the same use class; consistent with national policy (PPG53-005) requiring HIA only where significant impacts are expected. Propose amendment of Part A of Policy SC3 to delete &quot;and developments where potential health issues are likely to arise,&quot; and consequential amendment of the supporting text.</td>
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<tr>
<td>R8: Location and Concentration of Uses</td>
<td>Kentucky Fried Chicken Ltd Business</td>
</tr>
<tr>
<td>Respondent considers Policy R8 is not: positively prepared, as it is not based on objective assessment either of the existing or required concentrations of uses or of the numbers of A5 uses in areas within 200m of schools; justified, as there is no evidence of proliferation; effective, as there is no evidence that A5 uses cause obesity more than any other use where food and drink is sold or that their existence within 200m of schools is a greater cause of obesity than their existence generally; or consistent with national policy, which PPG53-004 only allows policies to limit proliferation subject to evidence. Propose deletion of Part B (i) and (ii) of Policy R8.</td>
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<td>N/A - general comment</td>
<td>LB Hackney Statutory consultee</td>
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<td>Welcome the continuing engagement on planning policy documents being prepared by both boroughs, including the above documents, and Hackney’s Local Plan and emerging area based plans for Shoreditch and Dalston. Hackney supports the overall vision and objectives of the draft Local Plan, which broadly align with Hackney’s new Local Plan (2033) and the draft Future Shoreditch Area Action Plan. For the vast majority of policy areas, the approach proposed in the draft Plan aligns with Hackney’s approach and is supported. This includes policy approaches regarding affordable housing delivery, protecting and promoting industrial floorspace and affordable employment floorspace and policies to secure the ongoing vitality and viability of Finsbury Park. The majority of policies will enable cross-boundary impacts to be considered effectively to mitigate or prevent any adverse impacts on Hackney and we welcome the ongoing engagement on planning matters to fully duty-to-cooperate requirements.</td>
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Not stated
Strategic and Development Management Policies

Policy DR3: Building heights
London Borough of Hackney

Statutory consultee

We acknowledge that Islington has a fundamentally different approach to Hackney on tall buildings as set out in our response to your Reg 18 consultation, Hackney are still not convinced that identifying the maximum permissible height for site allocations in a strategic borough-wide planning document is the best way of ensuring high-quality development. Hackney are concerned that Policy DR3 as currently drafted, does not adequately address the potential impact of tall buildings on Hackney’s local character, historic townscapes and landscapes. Further that it could potentially restrict development opportunities on adjacent sites, which are outside of the Islington borough boundary and within Hackney.

We remain concerned regarding the impact of sites identified in Table 8.1 which are close to the borough boundary and are specified as suitable for Tall buildings, within Finsbury Park and the City fringe opportunity area. The two specific site allocations that are of concern are site B1, the proposed Finsbury Park Station tower, and site G1; a proposed tower on the south-east corner of the City Road junction which are allocated for very tall buildings. We are concerned that these sites have the potential to detrimentally impact on Hackney’s local character and conservation areas. Additionally, as discussed at our recent meeting, Hackney intends to designate a new Conservation Area for the Brownwood area in early 2020, which will directly affect the Finsbury Park strategic area.

Hackney would therefore request that the current policy DR3 be amended to include consideration of the impact on local character and in particular the adjoining borough conservation areas.

Hackney are also concerned that Policy DR3 could potentially restrict development opportunities on adjacent sites, which are outside of the Islington borough boundary. Hackney would request therefore that a further criteria is included to ensure that proposals for tall buildings do not constrain the development potential on adjoining sites, including sites within adjoining boroughs. This will ensure that guidance of relevant neighbouring authorities and the Council’s planning policies, Area Action Plans, and other guidance will be taken into consideration.

Strategic and Development Management Policies

Policy R3: Islington’s Town Centres
Legal and General UK Property Fund

Developer

The respondent states that the retail sector is experiencing a significantly challenging market with rapidly evolving requirements. This evolution will require the introduction of ancillary and alternative uses. The mix of retail spaces is also important with larger spaces being demanded, interspersed with smaller, more affordable units. The policy review should allow for flexibility. Suggested addition to the policy: ‘Where the loss of above or below ground retail (A1-A5) floorspace is proposed, the applicant should provide justification that the loss would not harm the vitality or viability of the town centre’.

Strategic and Development Management Policies

Policy B4: Affordable workspace
Legal and General UK Property Fund

Developer

In the response it is proposed that wording of the policy changes to consider the following:
- the affordable workspace should be leased to the council for “10 years” instead of 20 years as the latter is not a viable approach for the majority of schemes that B4 policy will apply to.
- the affordable workspace should “normally” incorporate 10% of affordable workspace;
- development should “net additional” as opposed to overall proposed floorspace;
- development should “normandy” incorporate 10% of affordable workspace;
- the affordable workspace proportion should be considered “additional” Proposal B1A/B1C floorspace; the affordable workspace should be leased to the council for “10 years” instead of 20 years as the latter is not a viable approach for the majority of schemes that B4 policy will apply to.

Strategic and Development Management Policies

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Quod have been approached by a number of clients who are considering investment in the Borough but

Business

Recommends that the council should consider making reference to negotiated stopping as a meanwhile use

Consider that site allocations are being excluded at this stage which is not compliant with the boroughs

The Local Plan needs to provide more detail on the sites being assessed as part of housing provision and

Evidence suggests that the private rented sector has an important current, and future role, in meeting

Part A of Policy H11 should be deleted to ensure the policy does not prejudice the delivery of private rented

The respondent particularly supports paragraphs SP3 para 2.30 on recognising employment benefits of SME

The respondent supports policy SP3 and describes the broad variety of creative and non-creative uses that
take place in the Brewery Road under the classification of “light industrial”. The respondent recognises the
delicate nature of this ecosystem, its great location in relation to central London, and acknowledges the
pressure that the area is under, particularly because of the encroachment of glass and steel towers.

The policy is not considered sound. Respondent considers that the purpose of Part A of Policy H11 should be to ensure the private rented accommodation is of equally high standards, point A should be modified to include “specialist housing identified in policies H6 to H12”

The policy found to be undeliverable. The most recent available information on the mix of tenures in the Borough sets out that

type of housing to scenarios where the delivery of conventional housing is demonstrated to be

Evidence suggests that the private rented sector has an important current, and future role, in meeting

Business

Quod have been approached by a number of clients who are considering investment in the Borough but

have significant concerns over the wording of draft Policy H11, as it is currently drafted. The Policy is
unnecessarily restrictive in its approach to Build to Rent (BtR), contrary to the National Planning Policy
Framework (NPPF) (2019) and Guidance, and is consistent with the Local Plan evidence base, and the
existing London Plan and draft New London Plan (July 2019). The policy is not considered sound. Respondent
provides links to parts of national land regional policy they consider reinforces these claims. As a minimum,
Part A of Policy H11 should be deleted to ensure the policy does not prejudice the delivery of private rented
housing as part of an overall response to meeting needs in the Borough.

Evidence suggests that the private rented sector has an important current, and future role, in meeting

housing need in the Borough and it would be inappropriate therefore to arbitrarily limit the delivery of this
type of housing to scenarios where the delivery of conventional housing is demonstrated to be
undeliverable. The most recent available information on the mix of tenures in the Borough sets out that
rented affordable (c.42%) and private rented (c.26%) make up 68% of housing tenure in LB Islington.

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Strategic and Development Management

R19.0113 Strategic and Development Management Policies

**Policy H21: Purpose Built Private Rented Sector development**

**Qud** Business

**Policy H21 (ii)(c) proposes that private rented sector units are held under a restrictive covenant for the lifetime of the building which is expressed as "generally no less than 50 years" with rights to the open market (individually or as a group) not to be allowed during this period. Requiring developers to commit to a 50-year covenant is far in excess of the 15-year covenant period required by the draft London Plan, with 15 years generally applied by other London Boroughs. There is no justification within the published LB Islington evidence base to explain this approach. As such, it is clear why the council have opted for a 50-year timeframe and why this length of time is considered necessary or appropriate. Applying a 50-year timescale will adversely affect the ability to fund this type of provision and prevent schemes from remaining flexible to allow for market changes over their lifespan. It is likely that a 50-year covenant will make any potential BCP schemes uninvestable and undesirable. The wording of part (ii) should be amended to state that PRS units are held in a covenant of no less than 15 years, consistent with London policy.

Object

R19.0113 Strategic and Development Management Policies

**Policy H21: Purpose Built Private Rented Sector development**

**Qud** Business

No evidence is presented by LB Islington to support restriction of APR. This implies that the only obstacle to this type of provision is the level of rent and whether this is sufficiently discounted from its market rent level to meet identified affordable housing need. It is inappropriate for the policy to remove the opportunity for APR in the absence of any understanding of its relative rent pricing point and understanding how this relates to the market rent and other affordable products. This is inconsistent with the London Plan and NPPF. An APR product, for instance, set at a % of open market rent, delivering a starting rent equivalent to London living rent, is manifestly affordable housing in the context of the evidence base, the London Plan and the NPPF. The provision of APR should not be prevented from coming forward by the policy wording. The wording of part (ii) should be amended to state that APR may be included, where it can be demonstrated as genuinely affordable housing.

Object

R19.0114 Site Allocations

**N/A - general comment**

Sunnymode Road Land Limited

**Sunnymode Road**

**Landowner**

Consider the council is unjustified in choosing not to allocate 87 Sunnymode Road and it is not sound to prohibit residential development on the site. Whilst it is agreed there should be some retention of employment generating uses on site, residential-led development would be suitable. Internalisation of business use has the potential to be detrimental to nearby residential amenity and may detract from the conservation area. Do not agree that the site is inaccessible.

Object

R19.0115 Strategic and Development Management Policies

**N/A - general comment**

The Bomb Factory

**Business**

Respondent fully supports ambition to make Archway a cultural quarter. The Bomb Factory Art Foundation exists as a crucial resource for a large group of local contemporary artists. The organisation wishes to maintain their charitable status in Archway and expand in the future. Respondent has received notification that in 2021 a 50% rent increase can be expected. Current Bomb Factory building should be protected from further development and the old jobcentre at 1a Ethorne Road would be ideal as an artist hub and should be designated a cultural space.

Support

R19.0116 Strategic and Development Management Policies

**Policy SP3: Vale Roya/ Brewery Road Locally Significant Industrial Site**

Thames Creative Quarter Neighbourhood Forum

**Campaign**

The respondent objects to policy SP3 and states that it will have a detrimental impact on local businesses and employees as it prevents the creation of business expansion space by restricting additional office space. Respondent proposes the introduction of flexible business space on upper floors and the retention of industrial uses at basement level.

Object

R19.0116 Strategic and Development Management Policies

**Policy SP3: Vale Roya/ Brewery Road Locally Significant Industrial Site**

Thames Creative Quarter Neighbourhood Forum

**Campaign**

Respondent objects to the height limit restriction of 20m in the Vale Royal/Brewery Road LSIS and also states that this will prevent business expansion/employment creation.

Object

R19.0117 Strategic and Development Management Policies

**Policy SPF: Nag’s Head and Holloway, Part K**

Waitrose Limited

**Business**

Concern that the removal of the Nag’s Head gyratory system could have an adverse effect on the store, and negatively impact the health of the Town Centre. Accessibility here is undermined in terms of vehicular access.

Object

R19.0118 Site Allocations

**Site capacity assumptions**

Thames Water

**Statutory consultee**

In order to make a more detailed assessment of each site’s individual needs we would need to know specific numbers for each site, and not for an overall area. We would encourage the Council and Developers as per policy SPF to contact Thames Water as early as possible to discuss each allocation in detail. Comments provided on a number of allocations as per comments provided at Reg 18.

Not stated

R19.0118 Strategic and Development Management Policies

**Policy SPF: Water and wastewater infrastructure**

Thames Water

**Statutory consultee**

Support the policy, which reflects comments made by Thames Water in response to an earlier consultation. It is considered to be a strong policy.

Support

R19.0118 Strategic and Development Management Policies

**Policy SP5: Integrated Water Management and Sustainable Drainage**

Thames Water

**Statutory consultee**

Support the policy, specifically the requirement for all development to adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site, and in the context of links with wider-than-site level plans. Also support the requirement to ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy.

Support

R19.0119 Site Allocations

**N/A - general comment**

Sport England

**Statutory consultee**

Overall, Sport England is concerned that some site allocations advocate the loss of sports facilities without sufficient robust justification that the sites are surplus. Sport England does not, therefore, consider some of the allocations sound at this stage. It is advised that the allocations associating loss of sports facilities/B2 space should be amended to ensure that they are retained or replaced unless it can be robustly demonstrated that the facility is surplus to the borough’s current and future needs. The Council’s Sports Facilities Update 2018 might be of assistance when considering what facilities are required to meet current and future needs.

Object

R19.0119 Site Allocations

**ARCH10: Ethorne Estate, Archway**

Archway

**Sport England**

**Statutory consultee**

Advise the lost sports facilities should be replaced for this allocation to accord with the NPPF.

Not stated

R19.0119 Site Allocations

**ARCH17: Junction Road**

Archway

**Sport England**

**Statutory consultee**

State the existing 02 floorspace must be repositioned as part of any development to align with national policy.

Not stated
Site Allocation:

Sports England Statutory Consultant

Suggest that other D2 uses are considered for the site to address need identified in the Council's Sports Facilities Update 2018.

Site Allocation:

BC1: Longbow House, 14-20 Chivial Street

S&GC: City Fringe Opportunity Area

Sports England Statutory Consultant

Suggest England is likely to object to any proposals that prejudice the use of the adjacent playing field such as reducing its size or increasing the risk of ball strike from cricket balls for example.

Site Allocation:

BC1: Richmond Stroudley School, 99 Golden Lane

S&GC: Central Finsbury

Sports England Statutory Consultant

Recommend that the new sports facilities address local community needs.

Site Allocation:

BC1: Hixton Boat Club, 14-34 Graham Street

S&GC: City Road

Sports England Statutory Consultant

Welcome the proposed refurbishment of the facilities. Should ensure that the function and use of the building is not eroded, and the residential uses proposed are located so as not to affect the operation of the boat club.

Site Allocation:

FP2: Martin’s Place/Wells Terrace (including Milton House)

Finsbury Park

Sports England Statutory Consultant

Object to the potential loss of a yoga studio on site. This is not in accordance with the NPPF, paragraph 97 on Sport England’s Policy unless there is a robust assessment that identifies the D2 facility as surplus to the Borough’s needs.

Site Allocation:

W11: Morden’s supermarket and adjacent car park, 10 Heriot’s Road, and 8-32 Seven Sisters Road

Hag’s Head and Holloway

Sports England Statutory Consultant

Concerned that development would involve the loss of the snooker hall on the site. Suggest that if the allocation does not require a replacement facility for sporting use it does not comply with NPPF paragraph 97 and Sport England policy and cannot be considered sound.

Site Allocation:

W11: 104-110 Holloway Road

Hag’s Head and Holloway

Sports England Statutory Consultant

Unclear if the site has any sports facilities, for example a sports hall. If there are such facilities on site then these should be retained or replaced to ensure that the allocation aligns with national policy.

Site Allocation:

W11: 206-210 Holloway Road

Hag’s Head and Holloway

Sports England Statutory Consultant

Unclear if the site has any sports facilities, for example a sports hall. If there are such facilities on site then these should be retained or replaced to ensure that the allocation aligns with national policy.

Site Allocation:

D16: Harvest Estate Car Park

Other Important Sites

Sports England Statutory Consultant

Any redevelopment of the site should retain the existing MUGA/sports pitch.

Strategic and Development Management Policies

Policy G1: Green Infrastructure

Sports England Statutory Consultant

Sport England supports the policy intention to enhance the green infrastructure network which will provide physical and mental wellbeing benefits. With regard to policy G1 reference should be made within the supporting text to updated Sports Facilities evidence to inform when the intervention of sports pitches and facilities would apply.

Strategic and Development Management Policies

Policy G2: Protecting open space

Sports England Statutory Consultant

Sport England welcomes the policy intention of protecting all open spaces including private open spaces not designated in Figure 5.1, which displays the public open spaces designations. However, it should be noted that the open spaces designations includes some school playing field land and should there be a circumstance where a school is redeveloped on site there is no criteria requiring replacement provision in line with NPPF 97(3). Consideration should be had to inserting such provision.

Strategic and Development Management Policies

Policy SC1: Social and Community Infrastructure

Sports England Statutory Consultant

Supportive of the policy which contains many facets of Sport England’s Active Design Guidance principles such as co-location of facilities; walkable communities; and connected walking and cycling routes. Supports part F of the policy, which provides a positive approach to enabling community access to sports facilities in line with NPPF para. 121; and the use of the Council’s updated Sports Facilities evidence to inform Community Needs Assessments.

Strategic and Development Management Policies

Policy SC2: Play space

Sports England Statutory Consultant

Supportive of the policy which will provide physical and mental wellbeing benefits.

Strategic and Development Management Policies

Policy T1: Enhancing the public realm and sustainable transport

Sports England Statutory Consultant

Supportive of the policy promoting physical activity by ensuring that all development proposals must take account of active travel and ensuring that the design of development must prioritising safe and convenient access and use by sustainable transport modes, namely walking, cycling and public transport.

Strategic and Development Management Policies

Policy T2: Sustainable Transport Choices

Sports England Statutory Consultant

Supportive of the policy promoting active travel and the provision of appropriate infrastructure to support cycling, which are principles contained within Sport England’s Active Design Guidance.

Strategic and Development Management Policies

Policy T4: Public realm

Sports England Statutory Consultant

Supports the policy with meeting a number of principles of Sport England Active Design Guidance such as high quality streets & spaces and appropriate infrastructure which would encourage dwell time.

Sunhill and Clerkenwell Area Action Plan

N/A - general comment

Sports England Statutory Consultant

Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has some synergy with policies of the Area Action Plan and the Council’s overriding objectives of the Local Plan, particularly in relation to encouraging healthy communities. Sport England recommend that the links between the Area Action Plan and Active Design are developed further and are really drawn out in the document by having clear references to Active Design, its principles and the Active Design Checklist within the Area Action Plan. Active Design principles and the checklist, for example, could be added to the design requirements for the developments/enhancements of Finsbury Square, Old Street Station, Old Street and Clerkenwell Road Corridor, City Road and many others. More information on Active Design, including the guidance, can be found via the following link.

Object
Bunhill and Clerkenwell Area Action Plan

Policy BC1: Prioritising office use; Policy BC2: Culture, retail and leisure uses

Sport England

Statutory consultee

El highlight research on the economic and societal benefits of sport. State that the Council should consider]

D2 sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment

sites, as they do create sustainable employment opportunities and provide work experience and

qualifications. Although paragraph 2.13 does appear to recognise that leisure uses are employment

generating and can support the office function of an area Sport England recommends that this is reflected in

both Policy BC1: Prioritising Office Use and Policy BC2: Culture, Retail and Leisure Uses.

Site Allocations

BC20, 50 Farringdon Road E & L. Farringdon

Picton Property Income Ltd Landowner

Consider the allocation should be amended to recognise the potential to bridge over the adjacent railway

cutting, providing a development platform that will enable commercial development and creation of a new

public square. This approach promotes the comprehensive development of the site and would result in

multiple public benefits.

Strategic and Development Management Policies

Policy DH2: Heritage assets

Picton Property Income Ltd Landowner

Respondent considers that there is ample opportunity to enhance views, whilst also providing new

development opportunities (see detailed representations in relation to 50 Farringdon Road). Such proposals

should be entertained if applicants can demonstrate that there is a qualitative and quantitative

enhancement to such views. We consider that the current policy approach is overly restrictive, inflexible

and draconian. Alternative, more flexible wording is suggested.

Strategic and Development Management Policies

Policy DH3: Building heights

Picton Property Income Ltd Landowner

Respondent considers the restriction on potential building heights (30 metres and above and / or twice the

height of the surrounding context) is too restrictive and may not be able to adequately respond to all

eventualities. They state that this could result in development proposals failing to optimise the development

potential of sites, in conflict with Section 11 'Making effective use of land', within the National Planning

Policy Framework (February 2019). They also set out that 30 metres represents a 6 or 7 storey building

which are commonplace in Central London. The representation also states that the policy pays little regard

to design quality in assessing the impact of tall buildings.

Strategic and Development Management Policies

Policy B2: Delivering business floorspace

Picton Property Income Ltd Landowner

The respondent supports the council's general aim to maximise the amount of business floorspace.

Support

Strategic and Development Management Policies

Policy B2: Delivering business floorspace

Picton Property Income Ltd Landowner

The respondent proposes to recognise the introduction of residential uses alongside new business

floorspace to part B of policy B1 to enhance scheme viability and delivery (in line with adopted London Plan

policy 4.3 for mixed use development and office).

Object

Strategic and Development Management Policies

Policy B2: New business floorspace

Picton Property Income Ltd Landowner

The respondent proposes changes to part A of policy B2 to show that although proposals should aim to

maximise business floorspace within CAZ and BC AAP, residential and other uses will be acceptable where

they enhance scheme viability an delivery as part of a commercial-led scheme. In addition, the respondent

proposes amendments to part A (i) of the policy to consider residential uses in this part to support scheme

viability and to assist in the delivery of mixed and balanced communities.

Object

Strategic and Development Management Policies

Policy B2: New business floorspace

Picton Property Income Ltd Landowner

The respondent recommends that part F (i) of policy B2 is deleted because it restricts innovative design

and efficient use of vacant car parks of other basement floors which have little or no access to daylight and
could be used for meeting rooms. Office development does not generally require to have adequate levels of

daylight according to BREE guidance.

Object

Strategic and Development Management Policies

Policy B4: Affordable workspace

Picton Property Income Ltd Landowner

The respondent recommends that the affordable workspace requirement/policy B4 is removed, because the

need for affordable workspace must be balanced with overall scheme viability and other competing

development demands such as CIL charges and S106 financial contributions, including potential affordable

housing contributions if residential uses were promoted.

Object

Bunhill and Clerkenwell Area Action Plan

N/A - general comment

Picton Property Income Ltd Landowner

Picton Properties Ltd. are wholly supportive of the Council's ambition to focus regeneration and
development within the Bunhill and Clerkenwell area, in light of the site being a centre for employment and

business and the increased activity that will result from the Elizabeth Line. The approach promotes a more

diversified employment use mix, including leisure and retail, and also focuses on the underused public

space. This approach promotes the comprehensive development of the site and would result in

multiple public benefits.

Bunhill and Clerkenwell Area Action Plan

Policy BC1: Prioritising office use

Picton Property Income Ltd Landowner

Note the anticipated demand for new office floorspace over the plan period but consider that part A of

policy BC1 should be amended to provide flexibility and assist the delivery of potential development sites

that may not be located in core commercial centres within the AAP. They suggest adding "however,
supporting residential and other uses will be acceptable where they enhance scheme viability and delivery

as part of a commercial led mixed-use scheme."

Not stated

Bunhill and Clerkenwell Area Action Plan

Policy BC1: Prioritising office use

Picton Property Income Ltd Landowner

Consider that policy BC1 part A, which requires developments of 500sqm or more of any use class to be 80

or 90% office use, to be be unreasonable, and that it might act as a deterrent for other commercial uses (e.g.

retail) coming forward for new employment or leisure (e.g. a gym or restaurant) development. They

consider that this requirement should relate to proposals for new office led development only. They also

consider the 80% requirement to be high, and suggest changing the proportion down to 60% Amended

wording suggested.
Support / Not stated

Object / Not stated

Support / Not stated
Bunhill and Clerkenwell Area Action Plan

Islington Living Streets Campaign

Local developers are concerned that the new policy could impact their viability as this is an additional demand placed on development. It is suggested that this initiative is monitored so that future development does not impact on businesses within the area, regardless of their size.

Para 3.48 states: ‘The busy Farringdon Road and Rosebery Avenue cross through this area. The junction of these two roads is located near Exmouth Market and there is an opportunity to improve this area for pedestrians and cyclists’. Insert: ‘We will focus on improving the Clean Air Walking route along Amwell St to Farringdon, reducing traffic at the south end of Amwell St and make major improvements to the pedestrian crossing of Rosebery Avenue’.

Support

Policy B2: New business floor space

The respondent supports part D of policy B2 to ensure that new office locations are of high-quality design and accessible, and prioritise sustainable transport.

Support

The respondent supports policy B3 to protect existing business floorspace in the borough.

Support

Policy B2: New business floor space

The respondent supports part D of policy B2 to ensure that new office locations are of high-quality design and accessible, and prioritise sustainable transport.

Support

Policy B2: New business floor space

The response includes the respondent’s own research of EC1 to demonstrate that within the last five years, location and accessibility have increased these types/unit sizes which are affordable to a range of small occupiers.

Not stated

Policy B4: Affordable workspace

The respondent supports part A of policy B4 to provide 10% of affordable workspace, but want to see more details on how this is delivered, including the criteria that the council will use for businesses to be put on the list/manage workspace, viability assessments and details on how off-site contributions are being used.

Not stated

Policy B4: Affordable workspace

Local developers are concerned that the new policy could impact their viability as this is an additional demand placed on development. It is suggested that this initiative is monitored so that future development does not impact on businesses within the area, regardless of their size.

Dispect

Bunhill and Clerkenwell Area Action Plan

Policy B7: Central Finsbury

1.58 City University, Northampton Sq states ‘Improve accessibility both within the campus and connect it to the surrounding area’ This must mean public accessibility, and particularly northwards from the square to Spencer St.

Dispect

Policy B2: Culture, retail and leisure uses

The respondent supports policy B2 to boost office space within EC1 and to deliver a range of workspace types/unit sizes which are affordable to a range of small occupiers.

Support
As the popularity of the Farringdon and Clerkenwell area continues to grow we welcome the specific support of policy BC5 for the importance of cultural and leisure venues within the area including the globally renowned design sector within Clerkenwell. The area continues to have a significant cultural role with special historic character and heritage assets. While the opening of the Elizabeth Line will thoroughly improve connectivity to the area from across London, with an estimated 200,000 passengers projected to travel through Farringdon every day, it will also put significant pressure on Farringdon and Historic Clerkenwell’s public spaces. There is a need to ensure that new developments and investment reflects this new role with a focus on enhancing public realm to promote pedestrian circulation and high quality linked public spaces. As such, we support and would like to work with the council to ensure that development in the area promotes public realm improvements which are conducive to active travel and sustainable methods of transport. This includes the proposed improvements surrounding the Clerkenwell Road and Goswell Road junction, improved pedestrian access at Turnmill Street and Farringdon Road and in Clerkenwell Green. We would be keen to discuss these plans further as they progress and offer our support to help them move forward. The untapped transport networks, attractions and location of EC1 means that the area has the opportunity to be a commercial beacon for London. We look forward to continuing working with Islington to ensure we are at the forefront of promoting sustainable modes of transport and making the area more pleasant to visit, work and live in.

Support

Respondent notes Finsbury Park has been identified as a CAZ satellite location although this is not founded on evidence that clearly demonstrates there is a current or likely demand from small businesses to locate in Finsbury Park. The London Plan also does not identify Finsbury Park as a CAZ satellite location. New business floorspace is only likely to come forward as part of mixed use development as 100% commercial would not be viable in Finsbury Park. Part D should be amended to reflect this. Paragraph 2.70 should recognise the potential for a CAZ satellite at Finsbury Park dependent on demand for employment space in the CAZ exceeding the supply.

Object

Object

Support

Concerned that policy DH3 would prevent the redevelopment of the building as the site is currently taller than 30m but not allocated as appropriate for a tall building. Request amendment to the allocation to state that as the existing building is over 30m, development of a tall building is suitable on site. Suggest amendment to estimated timescale.

Object
| R19.0127 | Strategic and Development Management Policies | Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part A | Noble House Projects Ltd | Landowner | The respondent is the owner of site BC13: Longbow House. Objection is raised to Draft Policy SP3 as it is considered overly prescriptive and has not provided a robust and credible evidence base. The draft policy is considered unacceptable in its current state. It should be more adaptable to provide more possible locations for tall buildings on an area basis, as per the approach of the Core Strategy, Development Management Policies and Findbury Local Plan. The City Fringe Area section of the Tall Buildings Study defines the zoning process to narrow down the areas where tall buildings could be appropriate through application of six principles. Respondent has provided their own assessment of the Moorgate Cluster against each of these principles with specific reference to Longbow House. Despite the detailed explanation of the process of sieve testing within the Tall Buildings Study the actual "Local search and sieve approach for the City Fringe" at Appendix G of the document does not show any evidence that the Longbow House site has been tested as to the potential to accommodate a tall building, despite the site being within an existing tall buildings area, the existing building being over 30m and proposed in existing and emerging policy for redevelopment a scale and height that is consistent with neighbouring buildings and the immediate context, which includes adjoining buildings of 54.6m and 46m. Clearly in absence of any specific considerations to our client's site in the 'Tall Building Study', it is unclear why 14-20 Chiswell Street has not been included as a site suitable to accommodate a tall building. Amended policy wording put forward. |
| R19.0127 | Strategic and Development Management Policies | Policy B4: Affordable workspace locally Significant Industrial Site, Part A | Noble House Projects Ltd | Landowner | The council's viability study shows that one site is not viable if the requirement for affordable workspace is extended for more than 10 years. The respondent suggests amendments to policy B4 for the provision to be for 10 years instead of 20 (including supporting text in para 4.51 and 4.52). |
| R19.0127 | Strategic and Development Management Policies | Policy B4: Affordable workspace locally Significant Industrial Site, Part B | Noble House Projects Ltd | Landowner | The respondent suggests that a new requirement is added to policy B4 (new part H), which considers lower proportions of affordable workspace provision where development is not viable (according to Viability SPD) and off-site contributions on a case-by-case basis where size or quality of affordable workspace from development is insufficient. |
| R19.0128 | Strategic and Development Management Policies | Policy B4: Affordable workspace Locally Significant Industrial Site | Noble House Projects Ltd | Landowner | The respondent proposes that supporting text in para 4.47 (policy B4) is amended so that affordable workspace provision is only applies to new floor space for proposals involving redevelopment or extension. |
| R19.0128 | Strategic and Development Management Policies | Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part A | Noble House Projects Ltd | Landowner | Respondent is landowner of site at 4 Blundell Street within LSIS. Objection is raised to Draft Policy SP3 as it is considered significant change in the eastern edge of the LSIS (Blundell Street/Caledonian Road) with the introduction of non-industrial uses falling outside B1c, B2 and BB, and considers that this demonstrates that the evidence base is out of date. The response makes reference to the development at 423-425 Caledonian Road a housing-led development scheme that introduced non-industrial uses, including residential. It is proposed that the LSIS boundary is amended and that the following sites which fall outside B1c, B2 and BB are removed, in line with SP3(A): -Peabody site - Housing -Cally Public House - A4 use class -Break out coffee sandwich bar - A3 use class -2 Blundell Street - A3 use class -4 Blundell Street - B2 offices Reference is made to the LSIS heights study which states that a mix of open B Use Classes could be supported in Brewery Road/Blundell Street for the future. It is evident that the draft local policies of the Regulation 19 Local Plan do not support a mix of employment uses within the LSIS. Therefore, the eastern part of the LSIS is no longer compatible with the LSIS. |
| R19.0128 | Strategic and Development Management Policies | Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part A | Noble House Projects Ltd | Landowner | None of the uses to the east of the LSIS fall within the uses identified in Part A. |
| R19.0128 | Strategic and Development Management Policies | Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part B | Noble House Projects Ltd | Landowner | In relation to SP3(B), the respondent suggests that the policy should acknowledge alternative options for sites that are not capable of delivering industrial use due to design, size or legal use constraints, and that BME space beyond the designated industrial uses is supported in the area. The council acknowledges that the main feature of hybrid space is that it straddles between different uses classes but the policy is restrictive in its definition of hybrid space, just recognising flexibility between industrial uses and considering office as ancillary space. The respondent suggests that industrial BME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment floor space through other uses. Policy SP3 restricts the ability of employment sites to be fully optimised and conflicts with section 11, paragraph 117 of the NPPF (2019): "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed/brownfield land". |
| R19.0128 | Strategic and Development Management Policies | Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part C | Noble House Projects Ltd | Landowner | In relation to SP3(C), the respondent defends that a landowner with a lawful use should not have uses withdrawn/imposed by the LPA and that the existing uses on site should be a material consideration for future redevelopment. It mentions that the Agent of Change policies protect existing industrial uses and neighbouring uses. |
The respondent states that the policy should allow flexibility where it is not appropriate to provide on-site owner of 250-254 Old Street

The respondent considers that the policy should consider single occupier scenarios and that it accepts in-lieu landowner

Policy H1 seeks to enhance the social value of development within the borough. The Methodist Church are Bunhill and Clerkenwell Area Action Plan

"The diagram appears to show the area at the front of our client's site as 'protected open space'. This land is designated as protected open space. The redevelopment of the site would use this space to make best use of the site and re-instate the historic building line which would have a townscape benefit. The diagram should be amended accordingly."— The Methodist Church

The respondent considers that for policy B4 to be deliverable, requirements for a 10% provision should be amended to provide greater flexibility and determined on a case-by-case basis subject to design constraints. The respondent considers that the amount and rent levels of AW is not justified or based on proportionate evidence. The affordable workspace lease term, for 20 years or longer if greater than 10,000sqm, would significantly harm the viability of future schemes and place risk on deliverability of office space. It is proposed that a 10 year term is more appropriate. The Methodist Church supports the anticipated growth of office floorspace in the area as well as the enhanced provision of retail and cultural floorspace. The allocation welcomed. Estimated delivery timescale of 2021/22 to 2025/26 in line with landowner's aspirations for the site. Feel that a more flexible approach to the range of uses possible at the site would allow effective development to come forward suitable to respond to the business needs of the area. The Methodist Church seeks to enhance the social value of development within the borough. The Methodist Church are supportive of part 5 and 6 of this policy which encourage the development of social and community infrastructure required to support the borough’s residents and the maximisation of social value on development sites. Community floorspace is essential for the maintenance of strong, vibrant and healthy communities and the council should be supporting the provision of these uses as part of a mixed-use development across the borough. Policy S3 states that all non-residential and mixed use developments proposing more than 500sqm net additional floorspace are required to achieve BREEAM 'Excellent' standards and must make reasonable endeavours to achieve 'Outstanding'. Although this approach is commendable, the policy wording should be amended to provide greater flexibility and determined on a case-by-case basis subject to design constraints and viability.
The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

The respondent supports the policy’s approach of prioritising office delivery in the BC AAP but recommends making reference to office-led mixed use development in the BC AAP.

The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unavoidable and a conflict of interest to lease to a particular organisation such as the council as the council is also the planning authority.

Respondent is concerned with how off-site financial contributions will impact on the viability of schemes. This policy hasn’t been properly tested and has the potential to harm development.

Policy B2: New business floorspace

The respondent is concerned with how off-site financial contributions will impact on the viability of schemes.

Policy B4: Affordable workspace

The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unavoidable and a conflict of interest to lease to a particular organisation such as the council as the council is also the planning authority.

Policy B4: Affordable workspace

The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unavoidable and a conflict of interest to lease to a particular organisation such as the council as the council is also the planning authority.

Policy BC1: Delivering business floorspace

The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

Policy BC1: Prioritising office use, Part B

The respondent supports the policy’s approach of prioritising office delivery in the BC AAP but recommends making reference to office-led mixed use development in the BC AAP.

Policy BC1: Prioritising office use, Part C

The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

Policy BC1: Prioritising office use, Part D

The respondent supports the inclusion of Part D of the policy which provides for the delivery of ‘office-led’ development, but recommends making amendment which removes specific percentage requirement and requires the majority of floorspace to be office floorspace. This amendment is necessary to ensure that employment-led development is not stymied by an arbitrary threshold and ensures that office-led development can continue to be delivered in the Borough.

Policy B4: Affordable workspace

The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unavoidable and a conflict of interest to lease to a particular organisation such as the council as the council is also the planning authority.

Policy BC1: Delivering business floorspace

The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

Policy BC1: Prioritising office use, Part B

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Policy BC1: Prioritising office use, Part C

The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

Policy BC1: Prioritising office use, Part D

The respondent supports the inclusion of Part D of the policy which provides for the delivery of ‘office-led’ development, but recommends making amendment which removes specific percentage requirement and requires the majority of floorspace to be office floorspace. This amendment is necessary to ensure that employment-led development is not stymied by an arbitrary threshold and ensures that office-led development can continue to be delivered in the Borough.

Policy B4: Affordable workspace

The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unavoidable and a conflict of interest to lease to a particular organisation such as the council as the council is also the planning authority.

Policy BC1: Delivering business floorspace

The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

Policy BC1: Prioritising office use, Part B

The respondent supports the policy’s approach of prioritising office delivery in the BC AAP but recommends making reference to office-led mixed use development in the BC AAP.

Policy BC1: Prioritising office use, Part C

The respondent states that maximisation of office floorspace is poorly defined in the policy and that this should be subject to design constraints and/or viability. The respondent suggests that in part B of policy B2, the word maximisation is replaced with ‘the majority of new/additional floorspace is business floorspace’.

Policy BC1: Prioritising office use, Part D

The respondent supports the inclusion of Part D of the policy which provides for the delivery of ‘office-led’ development, but recommends making amendment which removes specific percentage requirement and requires the majority of floorspace to be office floorspace. This amendment is necessary to ensure that employment-led development is not stymied by an arbitrary threshold and ensures that office-led development can continue to be delivered in the Borough.
819.0132 Strategic and Development Management Policies

Policy SPS: Vale Royal / Brewery Road Locally Significant Industrial Site; Policy B1: Delivering business floorspace; Policy B2: New business floorspace
Tileyard London Limited
Landowner

References the LSL which states that the area is suitable for intensification of hybrid uses through provision of hybrid/flexible space. Also references policies E2, E4, E6 and E7 of the London Plan.

Restricting the ability to create additional flexible B1-space, alongside industrial and warehouses uses, would simply place additional pressure on the existing (limited) building stock resulting in the conversion of existing floorspace to B1(a) under permitted development rights.

Draft Policy SPS of the draft blinding Local Plan fails to recognise the fundamental ingredients behind the significant success of the LSL to date despite the clear recommendations of its own Employment Land Study, and the prima facie economic and employment benefits that have resulted from the emergence of the Tileyard creative cluster. Tileyard supports the recommendations of the Employment Land Study, (and draft London Plan), that there should be no net loss of industrial floorspace capacity within the LSL. However, the consequence of draft Policy SPS (parts C and D), which presumptive against the introduction of additional flexible business space (within Class B1a), regardless of the existing use on a site, would unevenly limit any potential future growth of the creative cluster and the economic benefits arising, and represent an inefficient use of land.

Accordingly, the land-use policy framework (for the LSL as a whole, and certainly the southern part of it) should seek the retention of existing industrial and storage uses (on a floorspace basis, or on the basis of a 65% plot ratio, whichever is the greater), but also permit the introduction of flexible B1 business floorspace as part of mixed-use developments. This approach would enable the more efficient use of land in accordance with sustainable development objectives and would optimise economic outputs for the LSL, the borough and the wider economy.

819.0132 Strategic and Development Management Policies

Policy SPS: Vale Royal / Brewery Road Locally Significant Industrial Site
Tileyard London Limited
Landowner

Objection to arbitrary five storey building height limit. Area is not sensitive to townscape. Argues that area should accommodate transformational change envisaged in the draft London Plan for an economic base that exists and wants to grow.

819.0132 Strategic and Development Management Policies

N/A - general comment
Tileyard London Limited
Landowner

Respondents consider that the local planning authority is in breach of Section 19(3) of the Planning and Compulsory Purchase Act 2004 as the way in which the proposed LSS policy has been formulated does not accord with the standards set out in the Council’s SCI.

819.0132 Strategic and Development Management Policies

Integrated Impact Assessment
Tileyard London Limited
Landowner

Respondent has commissioned an independent review of the IIA, which considers that the IIA process for the draft Local Plan is deficient, particularly in respect of the assessment of ‘reasonable alternatives’, as well as substantial flaws in the application of the IIA methodology itself. Furthermore, the Council failed to prepare or consult on an IIA for the Regulation 18 draft Local Plan 2018, removing the opportunity for the authorities or the public to have early or effective consultation on the impacts of the emerging Plan, or to show how the IIA has influenced the emerging plan as it has evolved. As a result of the deficiencies identified, the respondent considers that the IIA has failed to comply with the Regulations and guidance to demonstrate that the chosen strategy is appropriate when considered against reasonable alternatives, as required by the text of soundness. The findings are not considered credible, justified or robust and, as a consequence, the IIA is neither fit for purpose, nor legally compliant, such that the draft Regulation 19 Local Plan cannot be considered sound.

819.0132 Burhill and Clerkenwell Area Action Plan

Policy B2: Culture, retail and leisure uses
The Methodist Church
Landowner

The Methodist Church supports the development of retail and leisure uses in predominantly commercial areas. We suggest, however, making it clearer that ‘predominantly commercial areas’ includes the City Fringe Opportunity Area.

Part D. (i) states that new A Class uses are permitted where they would not harm vitality, viability, character, function or amenity of the area. The Methodist Church would like to see further guidance on how the IFA defines ‘harm’ in these instances.

819.0133 Site Allocations

KTS: 4 Brandon Road

VDC Trading Limited
Landowner

The allocation (and other Vale Royal allocations) considered unnecessary in the context of the existing LSL designation and should be removed. There is no reason why these sites should be allocated above other sites in the LSL. Notwithstanding this, the proposed uses and heights are overly restrictive: greater flexibility should be provided in terms of B-class floorspace and the height restriction should be removed. Support the allocation is amended to state that flexible B-class floorspace will be permitted where there is no loss of B1(c), B2 or B8 floorspace. Given the existing 5-storey height of the site plus the proposed moratorium on flexible B-class uses, question how the objectives of intensification or modernisation could actually be achieved.

819.0133 Strategic and Development Management Policies

Policy B1: Delivering business floorspace
VDC Trading Ltd
Landowner

Proposed amendment of policy B1, part B to introduce the introduction of flexible B1 uses (e.g. through allocation of B1 with intensification of industrial uses) and Sui Generis uses akin to industrial uses, subject to the requirements of the specific LSS designation. Additions deemed to be substantial.

819.0133 Strategic and Development Management Policies

Policy B1: Delivering business floorspace
VDC Trading Ltd
Landowner

Proposed amendment of policy B1, part E to accept the introduction of flexible B1 uses (e.g. through allocation of B1 with intensification of industrial uses) and Sui Generis uses akin to industrial uses, subject to the requirements of the specific LSS designation. Additions deemed to be substantial.
Proposed amendment of policy B2, part C to accept the introduction of flexible B-uses, subject to the requirements of the specific LSIS designation. Additional amendments proposed to para B.2.3 in line with amendments proposed to para C, and removal of para 4.13 as design is prescriptive and prevents "

Proposed amendment of policy B4 to provide additional flexibility and recognise the viability implications of requiring affordable workspace in the LSIS, considering site constraints, scheme design and viability."

Proposed amendment of policy SP3, part A to allow co-location of non-industrial uses. The respondent proposes that loss of industrial floorspace should be permitted in exceptional circumstances where applicants can demonstrate continuous marketing of vacant floorspace for at least 2 years.

Removal of wording in policy SP3, part C. Criteria should allow flexible B1 floorspace to be permitted as part of new development/change of use where there is no loss of B1c, B2 or B8. The respondent refers to the land use outcome from the appeal decision at 22-23 Tileyard Road and 196-228 York Way to justify this change.

Site Allocations

Stroud Green Road

R19.0135

Removal of wording in policy SP3, part E. Considered overly prescriptive in restricting other uses.

Proposed amendment of policy B2, part C to accept the introduction of flexible B-uses, subject to the requirements of the sustainable design policies are detailed and multi-faceted and will need to be addressed specific locational requirements of different sectors and making provision for knowledge and tech-driven clusters.

Furthermore, a policy threshold which more realistically can deliver the policy expectations would be much more effective and this could cross-reference the site allocations document to identify appropriate known tech-driven clusters.

We suggest that this policy should beworded to allow for a site-specific assessment and exceptions and for the allocations will be inconsistent with the allocation and will not be permitted. The representation states that to include flexibility within the strategic allocations to be determined on a case by case basis. This is to generate less opportunities for social interaction between different groups.

We agree that the site is a strategic allocation but think it should be made clear that the developer should have flexibility to deliver the strategic allocation in its most optimised form. Support the aspirations of the allocation and continue to work on detailed designs for high quality public open space, genuinely affordable housing and affordable workspace.

The allocation should be clear that the suggested uses are not the only uses that may be appropriate for this important town centre site. This is an important opportunity to enhance this part of Stroud Green Road and there is scope for increased height, massing and density on the site. The re-provision of the food store offers an opportunity to deliver a more appropriate uses.

Support the allocation but consider the need to optimise the potential of the site is not clearly set out. Office is an appropriate town centre use but is not included in the allocation. The allocation should be clear that the suggested uses are not the only uses that may be appropriate for this important town centre site. This is an important opportunity to enhance this part of Stroud Green Road and there is scope for increased height, massing and density on the site. The re-provision of the food store offers an opportunity to deliver a more efficient layout and improved customer experience, at the same time as optimising opportunities for other appropriate uses.

The requirement of all major development to make provision for on-site publically accessible play space is not deliverable on constrained sites and smaller sites. Major developments include sites delivering 10 or more homes; this would include individual apartment blocks at the smallest scale and constrained sites at a range of scales. In many cases, it will be a far better outcome to improve existing community play spaces, in terms of the range and quality of play equipment and opportunities for play, than to try to impose a requirement for a large number of disconnected play spaces with limited play value, which may in reality generate less opportunities for social interaction between different groups.

We suggest that this policy should be worded to allow for a site-specific assessment and exceptions and for contributions to appropriate play spaces within the vicinity, where this achieves the most positive outcome. Furthermore, a policy threshold which more realistically can deliver the policy expectations would be much more effective and this could cross-reference the site allocations document to identify appropriate known sites where a valuable amount of publically-accessible play space can be accommodated. This should take account of child-poor on a per-unit basis, so that sites which would generate an on-site need for a meaningful amount of play space should be the focus for on-site provision.

The requirements of the sustainable design policies are detailed and multi-faceted and will need to be applied in tandem with London Plan requirements. Viability testing of the full extent of these requirements, particularly policy requirements which take effect at a later date, including the implementation of ‘Full’ Fabric Energy Efficiency Standards from 2022, must be considered problematic where the build cost implications cannot be fully known.
The requirement for all major developments to have a 'communal low-temperature heating system' is unnecessarily prescriptive and may not be the best approach on a given site; the technological means to achieve the policy targets should be left open to allow for flexibility. Decarbonisation of the National Grid should also be factored into the need for on-site energy generation over the plan period.

Under policy S5 G it is unreasonable that the LPA would be able to determine, at its discretion and without the need to provide evidence, that a future network is likely to be operational within three years of grant of planning permission. The policy should require the LPA to provide justification for its position in this respect.

The proposed policy, which excludes viability as a material consideration in all but exceptional circumstances, would severely hamper the ability of applicants to come forward with deliverable schemes and indeed to even reach application stage, given that no developer or funder would progress with a scheme which is not viable. This threatens delivery of the plan and conflicts with national policy. Respondent considers that Islington’s approach, based on exceptional circumstances, which are to be determined solely by the LPA, contradicts the NPPF. There are a range of legitimate circumstances in which viability would be a relevant consideration and, given Islington is proposing an ambitious affordable housing target, it is essential that a ‘safety valve’ is allowed for, to ensure that delivery is not prejudiced over the plan period. Sites with a high Existing Use Value, but where it is beneficial for redevelopment to come forward, to optimise the use of land, would be particularly challenged by the draft policy approach. Where viability is assessed in accordance with the approach set out in national policy and guidance, and in accordance with GLA and LBI policy and guidance, the council should accept such viability assessments as legitimate material planning considerations.

In addition, the multi-phased approach to viability review would place a further significant burden on developers, both in terms of procedural requirements and more fundamentally in terms of added risk, which would have a knock-on effect on funding and the cost of funding, and a circular impact upon viability. To require viability review of single-phase sites is contradictory to the currently adopted London Plan and it would not address relevant circumstances for review i.e. in relation to a multi-phased sites built over a long programme which spans economic cycles. It is also inconsistent that the draft policy only allows viability to be assessed in ‘genuinely exceptional circumstances’, whilst the supporting text (para. 3.15) requires a pre-implementation review mechanism for all schemes which include social housing, which presumably includes even those schemes which would deliver an amount of affordable housing compliant with the draft policy. Para. 2.52 then refers to an advanced-stage review mechanism for schemes delivering less than 50% affordable housing, again in spite of the fact that the draft policy all but excludes the submission of a viability assessment as a material planning consideration. Planning permissions are effective for three years and this period was reduced from five years in order to incentivise implementation within that period. It is notable that during the last recession it was necessary for the Government to introduce measures (in 2009) to allow the extension of this time period in order to prevent permissions unnecessarily lapsing. It is not necessary for an LPA to introduce measures to further restrict the operable time period of a planning permission, through the use of early review mechanisms on single phase schemes.

On the basis of the policy as worded, it is our view that the plan is unsound. Referring to the soundness tests set out in the NPPF, the plan would introduce requirements which would undermine the delivery against objectively assesses needs of the local authority, the strategy is not appropriate given that reasonable alternatives exist (i.e. a policy that would allow viability considerations and would not require onerous review mechanisms on single-phase sites), the plan would be inconsistent with national policy and would threaten the delivery of sustainable development. We therefore suggest that the policy should be re-worded so as not to discount site-specific viability as a legitimate material planning consideration and to restrict review mechanisms to multi-phased sites where they are not fully compliant with policy at the time of the planning decision.

Studio units, as a limited part of the mix of homes on a site, can provide valuable and high-quality homes which are more affordable and accessible for those with lower incomes and/or at earlier stages in their lives. Whilst it is helpful that the supporting text para. 3.34 refers to up to 5% provision, the requirement to provide evidence of exceptional circumstances to justify the provision of studio units is unreasonable. Furthermore, the suggestion that, in place of studio units, other units that already meet space standards should be enlarged, instead of providing studio units, is unjustified and would undermine housing delivery. We suggest that the policy should clearly allow for up to 5% of market homes to be studios, with justification only required for a high level of provision.
Strategic and Development Management Policies

Policy R32: Visitor accommodation
Embarkment Building and Development Ltd
Developer

Part A is too restrictive and inconsistent with regional policies. There should be increased locational flexibility, by taking into account the surrounding uses and local context. 392-394 Camden Road is therefore an appropriate site for serviced apartments. A clause should be added after A(ii) to read 'sustainable sites with high access to public transport will also be considered'.

Strategic and Development Management Policies

Policy R36: Finchbury Park
Grosveworlde Ltd
Developer

Policy SP6 notes residential uses will only be acceptable on upper floors in the town centre. Suggested that a clause should be specified that only applies to retail frontages and not back land sites, otherwise this could limit contributions to the housing supply. The relevance of site allocation policy should be made explicit due to acceptability of residential to be made on a case by case basis.

Site Allocations

Site selection process
Yale Royal/Brewery Road
C. Carnevale Limited
Landowner

Consider the strings attached to the site allocations are indicative of an ever more restrictive policy regime which will make future good management of their site more difficult and increase the possibility of 'bad neighbour'. The development considerations in the allocations are not flexible enough to terms of use class or building heights and should be amended.

Strategic and Development Management Policies

Policy SP3: Vale Royal / Brewery Road
Locally Significant Industrial Site
C. Carnevale Ltd
Landowner

The area is not "sensitive" from a visual impact or townscape perspective but represents a highly sustainable location to optimise redevelopment opportunities, and so should not be subject to an unqualified and mechanically-applied blanket policies (including those on height).

Strategic and Development Management Policies

Policy SP3: Vale Royal / Brewery Road
Locally Significant Industrial Site
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Landowner

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Strategic and Development Management Policies

Policy R12: New and existing conventional housing
Grosveworlde Ltd
Developer

With regards to market housing, developers are best placed to assess the appropriate mix within a scheme, with regards to both market demand and scheme deliverability. Flexibility is important in this, in order to undertake affordable housing provision. The higher priority for three-bedroom homes than one-bedroom homes is not reflective of market conditions, with regards to both demand and affordability considerations. Two-bedroom homes can be considered family homes and are clearly more accessible to a wider range of household incomes, they also tend to underdevelopment viability better and therefore support delivery. Furthermore, where para. 3.31 notes that the housing priorities table represents a 'snapshot in time' this is true of market housing just as much as for affordable housing, and para. 3.31 should not solely refer to a potential requirement to vary the affordable housing priorities over time.

It is helpful that the housing priorities table is broadly set out and avoids specific percentage requirements for each unit size and type; however, viability testing of the plan cannot therefore reflect the full range of housing mix that could be considered compliant with table 3.2 and this should be borne in mind with regards to the need for site-specific viability testing and the need to vary the housing mix, especially within the market tenure, in order to support affordable housing and other policy objectives. We suggest that a link between housing mix and viability is expressly acknowledged within the policy and that the market housing priorities allow equal weight to one and three bedroom homes.

Strategic and Development Management Policies

Policy SP6: Finsbury Park
Grosveworlde Ltd
Developer

Policy SP6 notes residential uses will only be acceptable on upper floors in the town centre. Suggested that a clause should be specified that only applies to retail frontages and not back land sites, otherwise this could limit contributions to the housing supply. The relevance of site allocation policy should be made explicit due to acceptability of residential to be made on a case by case basis.

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Site Allocations

Site selection process
Yale Royal/Brewery Road
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Landowner

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Yale Royal/Brewery Road
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The area is not "sensitive" from a visual impact or townscape perspective but represents a highly sustainable location to optimise redevelopment opportunities, and so should not be subject to an unqualified and mechanically-applied blanket policies (including those on height).
We welcome the amendments made to the development considerations in response to previous representations.

We note that point D requires the council conserve or enhance Islington's heritage assets including 'historic places and significant private open spaces, except where it facilitates their functional use as open space, for the benefit of Londoners and for the wider public.

We are sceptical that there would be capacity for 7 new permanent moorings on the main line of the canal. There is potentially scope for new permanent moorings within the water space at City Road Basin if an appropriate scheme for the reconfiguration could be developed, following consultation with relevant stakeholders.

We would welcome the inclusion of canals. States that this may prevent open space benefits from being realised. The policy should be amended to support schemes with net benefits in order to avoid unintended consequences. Suggest the policy is reworded to state: “A. Development is not ordinarily permitted on any public open space and significant private open spaces, except where it facilitates their functional use as open space, for example boater facilities”.

We note the addition of point 3.153 and welcome ongoing engagement with the council on the provisions and facilities required by our boaters. We have reviewed the Gypsy & Traveller Accommodation Assessment in the evidence base and advise there is a finite canal corridor that passes through Islington and we are sceptical that there would be capacity for 7 new permanent moorings on the main line of the canal.

We welcome the reference to point 5.60 to the role waterways can play in heating and cooling. Our waterway network was included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy) and it provides an overview of the opportunity that exists in London. The technology required to deliver cooling from canal water is already successfully used in London.

We welcome the reference in point 5.60 to the role waterways can play in heating and cooling. Our waterway network was included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy) and it provides an overview of the opportunity that exists in London. The technology required to deliver cooling from canal water is already successfully used in London.

We continue to allocate that the impact of overshadowing can have negative impacts in terms of air quality as our boaters will not be able to successfully use solar panels to power their boats. We recommend there be reference in policy SP7 to the impact of overshadowing and that the impact is mitigated through the provision of electric ballasts alongside development.

We are pleased to see the protection of the structural integrity and heritage value of the Islington Tunnel. We are pleased to see the protection of the structural integrity and heritage value of the Islington Tunnel. We are pleased to see the protection of the structural integrity and heritage value of the Islington Tunnel.

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We welcome the amendments made to the development considerations in response to previous representations.

We note point D requires the council conserve or enhance Islington’s heritage assets including ‘historic green spaces’, which we believe intends to include the Regent’s Canal, however we request that the canal be specifically included as a heritage asset to be conserved so that it is clear it is afforded protection under policy DH1. The Regent’s Canal is the principal historic waterway that passes through the Borough and we suggest that this should be recognised in the supporting text.

We note and welcome the additional point included in policy DH3, that unacceptable overshadowing be prevented (Fviii).

We are pleased to see at point 5.36 recognition that lighting can have a negative impact on bats, birds and amphibians and that it needs to be considered in development proposals.

We note that point D requires the council conserve or enhance Islington’s heritage assets including ‘historic green spaces’, which we believe intends to include the Regent’s Canal, however we request that the canal be specifically included as a heritage asset to be conserved so that it is clear it is afforded protection under policy DH1. The Regent’s Canal is the principal historic waterway that passes through the Borough and we suggest that this should be recognised in the supporting text.

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We welcome the amendments made to the development considerations in response to previous representations.
| P101.0139 | Strategic and Development Management Policies | Policy SP2: King’s Cross and Pentonville Road | Canal and River Trust | Statutory consultee | Welcome inclusion of cyclists in policy SP2 part II and reiterate suggestion that the Regent’s Canal should be included in Figure 2.3 as a location for improved cycle/pedestrian connections. SP2 does not adequately address the tension between the need for residential moorings and moorings for leisure use on Regent’s Canal. Consider that the policy, or supporting text, should state that some loss of long-term leisure moorings for the development of residential moorings may be acceptable where it leads to the provision of more appropriate facilities, better management of the network and local area and better conditions for all users. | Not stated |
| P101.0139 | Strategic and Development Management Policies | Policy SP1: Infrastructure Planning and Smarter City Approach | Canal and River Trust | Statutory consultee | Disappointed that none of previous representatives at Regulation 18 regarding enhancements to the Canal have been included in policy or the Infrastructure Delivery Plan update. | Object |
| P101.0139 | Burgh Hill and Clerkenwell Area Action Plan | Policy BC4: City Road | Canal and River Trust | Statutory consultee | We note that policy BC4 City Road includes wording that again, only allows residential moorings that do not impact on leisure moorings. This wording is not considered appropriate, as per our comments made in relation to SP2 above. We have concern that this wording would not allow for an individual site level, residential moorings to lead to a loss of long-term leisure moorings, for example, if this leads to the provision of more appropriate facilities, better management of the network and local area and better conditions for all users. We would suggest this policy be re-worded to provide more flexibility to read “(b) there is no adverse impact on leisure provision that cannot be adequately mitigated”. This wording would provide the flexibility for residential moorings that result in better outcomes for boaters on the network, on a site-specific basis and suggest that the current wording does not constitute the most appropriate strategy, as required by para 182 of the NPPF (2012) and a justified strategy required by para 35 of the NPPF (2019). | Object |
| P101.0140 | Strategic and Development Management Policies | Policy SF1: Burgh Hill & Clerkenwell | Corporation of London | Statutory consultee | We think it would be useful for the supporting text of Policy SF1 to acknowledge the importance of joint working between the Corporation of London and Islington. | Support |
| P101.0140 | Strategic and Development Management Policies | Policy SN2: Heritage assets | Corporation of London | Statutory consultee | Support the protection given to cross-boundary views of St Paul’s Cathedral in Policy SN2 and particularly welcome the guidance provided in Appendix F, which explains how the alignment and the heights of Islington’s Local Views relate to the City of London’s St Paul’s Heights policy and its Protected Views SPD | Support |
| P101.0140 | Burgh Hill and Clerkenwell Area Action Plan | Policy BC2: Culture, retail and leisure uses | Corporation of London | Statutory consultee | Support the identification of the Clerkenwell Farrington Cultural quarter which complements the City of London Corporation’s aspirations for the adjoining Cultural Mile area. Have asked for two words to be added to the text: ‘proposed’ relation of the Museum of London, and ‘possible’ movement of Smithfield Meat Market from its current location. | Support |
| P101.0140 | Burgh Hill and Clerkenwell Area Action Plan | N/A - general comment | Corporation of London | Statutory consultee | Support the recommendation of encouraging future cross-borough co-operation increase in pedestrian movements and cyclist and retail activity near the City of London. | Support |
| P101.0140 | Burgh Hill and Clerkenwell Area Action Plan | Policy BC2: Culture, retail and leisure uses | Corporation of London | Statutory consultee | Support the identification of Farrington and Whitecross Street as local Shopping Areas in the AAP. | Support |
| P101.0141 | Site Allocations | RE15: Car park at 11 Shire House, Whitbread Centre, Lamb’s Passage | B & C: City Fringe Opportunity Area | Landowner | Support the allocation but are unclear if the council is seeking comprehensive office development of the whole site. The part of the site in the respondent’s ownership is available and suitable for office development but what happens to the rest of the site is beyond their control. They should not be fettered by unreasonable restrictions requiring comprehensive development of the whole site. Assessment work carried out on the site suggests an office scheme can come forward that both maximises building footprint and the amount of office floorspace delivered. | Support |
| P101.0141 | Strategic and Development Management Policies | Policy PANKS: Site appraisal, design principles and process | Lamb’s Passage Real Estate Limited | Landowner | Support the allocation but are unclear if the council is seeking comprehensive office development of the whole site. The part of the site in the respondent’s ownership is available and suitable for office development but what happens to the rest of the site is beyond their control. They should not be fettered by unreasonable restrictions requiring comprehensive development of the whole site. Assessment work carried out on the site suggests an office scheme can come forward that both maximises building footprint and the amount of office floorspace delivered. | Support |
| P101.0141 | Strategic and Development Management Policies | Policy SPF2: Protecting open space | Landowner | Landowner | States that privately owned surface level car parks are not open space and should not be protected. This should be recognised in the policy wording. | Not stated |
| P101.0141 | Strategic and Development Management Policies | Policy B1: Delivering business floorspace | Landowner | Landowner | The requirement to deliver business floorspace (different types, sizes, affordability) must be appropriate and subject to viability of proposed schemes. | Not stated |
| P101.0141 | Strategic and Development Management Policies | Policy B1: Delivering business floorspace | Landowner | Landowner | The plan should recognise that a different standard should apply to the central area (CA2), where there is a requirement for greater intensity of land use activity/closer proximity between neighbouring buildings. This should justify a more realistic location of environmental and amenity standards that may otherwise constrain development and prevent the maximisation of new business floorspace. | Not stated |
| P101.0141 | Strategic and Development Management Policies | Policy B2: New business floorspace | Landowner | Landowner | Part II (c) of policy B2 to demonstrate cumulative contribution to a range of spaces is too onerous given that the primary delivery mechanism to deliver office space will be market led. This requirement is contradictory and creates tension with the policy objective to maximise office floorspace, considering the changing role of office occupation in the digital economy and the requirements of a dynamic market. | Object |
| P101.0141 | Strategic and Development Management Policies | Policy B2: New business floorspace | Landowner | Landowner | The respondent states that part II (d) is unnecessary as by definition an activity that is ancillary to the business function of the premises is lawful terms part of the overall business use. | Object |
| P101.0141 | Strategic and Development Management Policies | Policy B4: Affordable workspace | Landowner | Landowner | The respondent recommends that the affordability levels of the workspace provided should be subject to a financial viability assessment on a case-by-case basis. | Object |
Strategic and Development Management Policies

Policy B4: Affordable workspace
LaSalle Investment Real Estate Ltd
Landowner
Property owners should have the right to decide who and what organisations may occupy the affordable workspace premises. It is unsound and inequitable in a market economy for affordable workspace to be leased to the council, and for the council to have a responsibility for the selection of occupiers.

Support

Policy B4: Affordable workspace
LaSalle Investment Real Estate Ltd
Landowner
Criterion for off-site contributions under para 4.52 must also be subject to financial viability

Object

Policy B4: Affordable workspace
LaSalle Investment Real Estate Ltd
Landowner
The affordable workspace definition, contained in appendix 9 should be amended to reflect the above comments.

Object

Policy BC3: City Fringe Opportunity Area
LaSalle Investment Real Estate Ltd
Landowner
Support the policy assertion that office floor space is the clear priority land use across the entire Bunhill and Clerkenwell AAD area.

Support

Policy BC3: City Fringe Opportunity Area
LaSalle Investment Real Estate Ltd
Landowner
Support for the policy requirement to maximise new business floor space.

Support

LaSalle Investment Real Estate Ltd
Landowner
It must be for the owners and developers of new office floorspace to ensure that it meets the requirements of a dynamic market. Being sufficiently flexible and responsive to future market conditions in the context of delivering viable new office development schemes, with the risk that entails, demands that the overturning type of office floorspace delivery must be market driven.

Support

LaSalle Investment Real Estate Ltd
Landowner
Supportive of the policy seeking to ensure that the uses identified as appropriate for each site allocation are delivered, with the caveat that a site may have extant planning permission for alternative land uses which must be recognised by site specific policy.

Support

Part A of policy B2 contains duplication of objectives set out in part B of policy B1 regarding the maximisation of employment floorspace on employment locations but objects to policy criterion B 11 as it is too negative and would not result in new business/industrial floorspace that makes an effective use of previously developed 150 land to meet business needs (it makes reference to NPPF para 117 on safe and healthy living conditions and para 122 on efficient use of land). Proposed changes to part B of the policy include having regard to design constraints, the quality and type of employment space provided, as well as the needs of potential occupiers and viability.

Object

Support for the policy requirement to maximise new office floorspace.

Support

No amendment to the affordable workspace definition is proposed, however, job and apprenticeship requirements contained in parts A, B and supporting para 4.60 of policy B3 should apply to proposals that result in an uplift of 1,000 sqm GEA and should be subject to viability. Proposed changes to part B of the policy include having regard to design constraints, the quality and type of employment space provided, as well as the needs of potential occupiers and viability.

Object

Support for the policy requirement to maximise new business floor space.

Support

All site allocations in Part D: Bush Industrial Estate, Station Road, Other Important Area
LaSalle Investment Management
Business
The allocation should be expanded to include for Generics uses akin to industrial uses in line with other policies in the Plan. The future market demand and long term suitability of the site for industrial uses is uncertain, bearing in mind the site's location is isolated from other industrial clusters and adjacent to a residential area. There must be scope to consider alternative employment/commercial development and the co-location/mix of uses to ensure the site remains viable.

Object

Policy B2: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondent supports the maximisation of employment floorspace on employment locations but objects to policy criterion B 11 as it is too negative and would not result in new business/industrial floorspace that makes an effective use of previously developed 150 land to meet business needs (it makes reference to NPPF para 117 on safe and healthy living conditions and para 122 on efficient use of land). Proposed changes to part B of the policy include having regard to design constraints, the quality and type of employment space provided, as well as the needs of potential occupiers and viability.

Object

Object

Policy B4: Affordable workspace
LaSalle Investment Management
Landowner
Part F in has the potential to restrict innovative co-location and mixed use development and it conflicts with other parts of the plan in terms of permitted type of uses. The respondent proposes the introduction of non-industrial uses, considering exceptional circumstances such as: need to facilitate needs of modern industry; renewal or regeneration for employment-led schemes; or when proposals don't compromise operation of employment use in the area.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondent suggests that part F of policy B3 is amended to include SU uses akin to industrial.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondent proposes to include "in accordance with policy B5" to part F of policy B1.

Not stated

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
Part F of policy B2 contains duplication of objectives set out in part B of policy B1 regarding the maximisation of business floorspace and should be deleted. The NPPF requires local plans to avoid unnecessary duplication of policies that apply to a particular area.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
Part C of policy B2 prevents alternative employment floorspace to be brought forward to regenerate the site. The respondent suggests considering project viability and exceptional circumstances such as the ones the respondent proposed for part F of policy B3.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
Part F of policy B2 and supporting para 4.32 are too prescriptive and should not be expressed as a policy.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The marketing evidence required in Part B (i) and paragraph 4.33 for 24 months vacancy test is unreasonable, bearing in mind the site's location is isolated from other industrial clusters and adjacent to a residential area. There must be scope to consider alternative employment/commercial development and the co-location/mix of uses to ensure the site remains viable.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondents suggests that part E of policy B1 is amended to include SG uses akin to industrial.

Object

Policy B1: Delivering business floorspace
LaSalle Investment Management
Landowner
Part A of policy B2 contains duplication of objectives set out in part B of policy B1 regarding the maximisation of business floorspace and should be deleted. The NPPF requires local plans to avoid unnecessary duplication of policies that apply to a particular area.

Object

Policy B1: Delivering business floorspace
LaSalle Investment Management
Landowner
Part C of policy B2 prevents alternative employment floorspace to be brought forward to regenerate the site. The respondent suggests considering project viability and exceptional circumstances such as the ones the respondent proposed for part F of policy B3.

Object

Policy B1: Delivering business floorspace
LaSalle Investment Management
Landowner
Part F in has the potential to restrict innovative co-location and mixed use development and it conflicts with other parts of the plan in terms of permitted type of uses. The respondent proposes the introduction of non-industrial uses, considering exceptional circumstances such as: need to facilitate needs of modern industry; renewal or regeneration for employment-led schemes; or when proposals don't compromise operation of employment use in the area.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondent suggests that part F of policy B3 is amended to include SU uses akin to industrial.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondent proposes to include "in accordance with policy B5" to part F of policy B1.

Not stated

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
Part A of policy B2 contains duplication of objectives set out in part B of policy B1 regarding the maximisation of business floorspace and should be deleted. The NPPF requires local plans to avoid unnecessary duplication of policies that apply to a particular area.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
Part C of policy B2 prevents alternative employment floorspace to be brought forward to regenerate the site. The respondent suggests considering project viability and exceptional circumstances such as the ones the respondent proposed for part F of policy B3.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
Part F in has the potential to restrict innovative co-location and mixed use development and it conflicts with other parts of the plan in terms of permitted type of uses. The respondent proposes the introduction of non-industrial uses, considering exceptional circumstances such as: need to facilitate needs of modern industry; renewal or regeneration for employment-led schemes; or when proposals don't compromise operation of employment use in the area.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The marketing evidence required in Part B (i) and paragraph 4.33 for 24 months vacancy test is unreasonable, bearing in mind the site's location is isolated from other industrial clusters and adjacent to a residential area. There must be scope to consider alternative employment/commercial development and the co-location/mix of uses to ensure the site remains viable.

Object

Policy B3: Delivering business floorspace
LaSalle Investment Management
Landowner
The respondents suggests that part E of policy B1 is amended to include SG uses akin to industrial.

Object
Supportive of the revision which combines the Castle House and Fanny House allocations into one. However, feel that the Tall Building Study does not adequately detail why this location was discounted as unsuitable for a tall building. The potential for the site to accommodate a tall building should not be discounted at this stage. The site should be subject to a detailed appraisal to assess its suitability for a tall building.

In our view the integrated impact assessment accompanying the submission draft plan should have considered the approaches advocated above as “reasonable alternatives” to the proposals in the submission draft local plan.

The Tall Buildings Study is not sufficiently robust, is overly restrictive and could unnecessarily hinder potential development in the Borough. Key concerns about the methodology are: design as a means to mitigate impact not adequately considered, visual assessment not based on accurate visual representations, and does not account for change within the local search areas over the plan period. Analysis undertaken is too broad and too general to exclude individual sites. Policy D1 of the London Plan does not require identification of individual sites. The approach advocated in Draft London Plan policy D8 is not a wholly prescriptive that can rule out the potential for tall buildings outside of areas identified potentially suitable for tall buildings.

Suggest that proposals for tall buildings should be guided to the strategic search areas identified in the Tall Buildings Study then scrutinised on a site by site basis through the planning application process. This approach is in conformity with policy requirements and is one that has been considered appropriate for other existing and emerging local plans in London.

The details of the qualitative judgements that have been made about ruling out areas potentially suitable for tall buildings is not clearly detailed in the Tall Buildings Study. C.g. Conservation areas were not subject to automatic exclusion, but large areas were ruled out with details provided. Exclusion of views not based on verified views or detailed designs of potential tall buildings. Impacts on views should be based on accurate visual representations.

Our client is generally supportive of the spatial strategy policy, which identifies the Bunhill and Clerkenwell site (Allocation Site No. BC48) and this has not been considered by the TBS.

We support the strategic aim of an uplift of 400,000 sqm of B1 office floorspace in the borough over the plan period. Additionally, we are supportive of Islington's strategic aim to encourage the delivery of business floorspace and that this growth must be managed to secure a high quality and sustainable urban environment.

Both

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Object
Respondent cites the London Office Policy Review which notes that Islington will have a composite requirement for 375,000sqm of space between 2016 and 2041 and that a capacity of only 233,910 sqm equating to a 38% shortfall. The LDR also identifies a constrained submarket in the Tech City component of Islington. Losses through PDR cited in LBI ELS a worrying trend which is continuing and means that the delivery of B1 office floorspace is a pressing need across the borough. The LBI Employment Land Study (2016) does not identify where the delivery of the targeted 400,000sqm will be achieved. Within the draft Local Plan documents, the only indication of the locations in which the borough envisages this 400,000 sqm of B1 office floorspace coming forward is within the ‘site capacity assumptions’ which are indicative figures based on calculating the amount of floorspace the allocated sites could sustain, however, the individual quantum derived from each site is not specified. Instead, the quantum’s are prescribed to Spatial Strategy Areas, representing a very light touch approach to identifying land supply for the need of B1 office floorspace. Furthermore, there is no adequate explanation as to how the Council arrived at these figures, because the potential amount of floorspace that could be delivered from individual sites is not evidenced at all. Additionally, the site capacity assumptions for the Spatial Strategy Areas covered by the draft Local Plan equate to the provision of 136,100 sqm B1 office floorspace over the plan period. The site capacity assumptions for the Spatial Strategy Areas within the City Fringe Opportunity Area represents a very light touch approach to identifying land supply for the need of B1 office floorspace over the plan period, when compared to the 400,000 sqm requirement. AMR details losses of B1 in recent years. The redevelopment of Castle House and Fitzroy House (the site owned by the respondent) can deliver at least a year’s worth of targeted demand (27,000 sqm) or potentially more, however, we will be unable to do so without modifications to other unnecessarily restrictive policies. This is not a site-specific issue, and it is considered that a substantial number of other sites within the borough will also encounter this issue, culminating in a detrimental under-supply of B1 office floorspace against the predicted need. The impacts of this will be highly negative for the borough as a whole and indeed London given the national importance of this area. It will mean that existing rental rates are driven up due to a chronic lack of supply and an increasing demand, which over the plan period is likely to drive some businesses out of the borough, harmfully impacting on the borough’s economic well-being.

The respondent states that there is no planning justification to preclude other appropriate bodies from approaching the site-specific approach to affordable workspace from LB Hackney and City of Westminster.增加的挑战在于交付和供应。LBI引用：“更少的指导性”政策要求对至少20年的时间段租赁或转让空间给工作场所提供商应该制定标准,允许提供者管理有效的工作空间,以避免市场租金。慈善机构或商业空间的拥有者也能提供这种空间并管理它以配合需要的类似组织。有可预见的,它不明确LBI将如何确保合适的使用者在所有情况下获得40,000sqm的预算租赁,即一个价格。为了在计划期内增加供应,必须制定政策来推动“开发”工作空间。在重新确定后,该政策将相应地推动办公空间的建设,增加对可负担工作空间的需要。响应者表示,在至少10年的时期内,这将对专为不可负担工作空间的开发方案的可行性产生显著影响。由于LBI ELS中所列的办公室及办公空间的损失是一个持续的令人担忧的趋势,这意味着该政策可能不与CAZ和City Fringe Opportunity Area的规划一致。该政策的“更少的指导性”政策不明确将如何在B1类办公空间的开发中推动在Islington以外的地区。该政策的“更少的指导性”政策不明确将如何在B1类办公空间的开发中推动在Islington以外的地区。
Support an extension to the site boundary and suggest a separate adjoining site at Wellington Mews should be located for residential use. The site constitutes national, not local, infrastructure and it should not be necessary to justify the loss of social infrastructure at the site. Suggest it is not appropriate to refer to a ‘heritage-led’ scheme within the allocation and justification section as opposed to the development considerations. State that it is unnecessary to refer to ‘generously’ affordable housing, as affordable housing should be in accordance with the London Plan definition. Unreasonable to have an expectation for the provision in excess of 50% affordable housing without accepting the submission of viability evidence. Considering the heritage constraints at the site the allocation should explicitly acknowledge it is an exceptional case and that a viability assessment will be needed. Concerned that the requirement for active frontages along Caledonian Road will unduly constrain design options and should be released. In addition, requiring a new east-west and north-south axis through the site where possible could limit the development potential of the site. The reference to upgrading the wastewater network is onerous and unnecessary.

BC38: Moorfields Eye Hospital

The representation states that the plan should place more priority on the need for using the site as a new public space and the location of the tall buildings. The new public space could be provided on the junction of Peersless Street and Baldwin Street, and sets out the benefits of this arrangement. They suggest changing the wording to something more flexible such as: ‘A new public space must be provided as the focus of the development’.

BC38: Moorfields Eye Hospital

Supportive of the emphasis in the dBCAAP towards commercial uses in the area. It is understood from the developer that the erosion of office floorspace in the area has limited space for employment uses, a crucial consideration. We address elsewhere in the Plan).

Reiterate earlier representations regarding the development considerations (unnecessary as they are addressed elsewhere in the Plan).

BC38: Moorfields Eye Hospital

This should be clarified given the scheme is facilitating a new eye hospital and research facility. We also welcome the provisions within the GLA’s CFOAPF that this designation brings.

We note that the draft Policies Map Changes continue to propose the extension of the City Fringe Opportunity Area Planning Framework (OAPF). We still strongly support this amended designation and welcome the provisions within the GLA’s CFOAPF that this designation brings.

The level of affordable workspace provision is excessive and its application (indicated in supporting Paragraph 4.47) remains unjustified in the Council’s supporting evidence base. Furthermore, the respondent considers that the current requirements discourage the redevelopment of poor quality office buildings to meet the needs of modern office occupiers and undermines the Council’s target to deliver a net uplift of 400,000sqm of office floorspace by 2036.

BP4: Affordable workspace

Landowner

Regent’s Wharf Unit Trust

Support the allocation but consider the wording is overly restrictive and inconsistent with the aspiration to support economic growth and maximise the provision of business floorspace. The allocation for ‘limited intensification of business use floorspace’ should be changed to ‘intensification of business floorspace’.

Regent’s Wharf Unit Trust

Leaseholder

Regent’s Wharf Unit Trust

Support economic growth and maximise the provision of business floorspace. The allocation for ‘limited intensification of business use floorspace’ should be changed to ‘intensification of business floorspace’.

Regent’s Wharf Unit Trust

Leaseholder

Regent’s Wharf Unit Trust

The level of affordable workspace provision is excessive and its application (indicated in supporting Paragraph 4.47) remains unjustified in the Council’s supporting evidence base. Furthermore, the respondent considers that the current requirements discourage the redevelopment of poor quality office buildings to meet the needs of modern office occupiers and undermines the Council’s target to deliver a net uplift of 400,000sqm of office floorspace by 2036.
Reiterating suggestion made in Reg 18 representation that Edward Rudolf House, 69-85 Margery Street, WC1X should be allocated as a development site for business floorspace. The site is currently vacant, the last tenants having moved out in September 2019. The existing building has relatively poor quality office space and energy efficiency so does not meet modern occupier needs. The site is suitable for business and/or employment-led redevelopment, which can be delivered in the next 5 years. The principle of redevelopment has been agreed in pre-application discussions with council officers. Consider the council’s reasons for not allocating the site (limited scope for intensification and impact on heritage assets) are insufficient and the site presents a wholly deliverable and suitable development prospect.

The respondent states that policy B4 is not specific enough and requires more detailed guidance for fit-out requirements. The council acknowledges that there is no standard definition for Category A Fit Out and para B4 is very general.

Policy B4: Affordable workspace

Policy B4: Affordable workspace

Policy B4: Affordable workspace

Policy B4 doesn’t provide express evidence in respect to the 10% affordable workspace figure required and on the impacts that this may have on local markets including whether there is indeed clear demand for this type of space. The respondent considers that affordable workspace provision should be subject to necessary viability testing and this should be considered in the draft Local Plan Policy. In relation to this, the respondent makes reference to NPPF para 35 in relation to the soundness justification of the proposed strategy.

Policy Framework (NPPF). There should be a recognition that not all uses within these locations are similar. The current/previous use section should be amended to state ‘office B1 (a) and Warehousing B8’.

We support the general thrust of the policy, in particular the objective for intensification, renewal and modernisation of existing business floorspace. However, the current wording of the policy would preclude residential use coming forward in Priority Employment Locations. Whilst we acknowledge the importance of delivering employment uses in the Priority Employment Locations, residential use can act as enabling development providing value to deliver new and improved employment floorspace. Furthermore, a residential consent was granted for our client’s site (SPA Ref: P2013/3213/FUL). In order to ensure that the delivery of employment space is maximised we propose that the policy is amended to allow residential use as part of mixed use schemes where it is demonstrated that the maximum viable amount of employment floorspace is being delivered.

Concerns about viability of scheme with 10% proportion.

The 10% requirement for affordable workspace should be required on the uplift in employment floorspace only and it is recommended that the policy is clarified as such. There is also a concern that the amount of affordable workspace required and the requisite rent levels of the affordable workspace is not justified or based on proportionate evidence, as required by Paragraph 35 of the NPPF. The draft wording requires the affordable workspace to be leased to the council at a peppercorn rate for a period of at least 20 years. From our experience, this requirement is likely to significantly harm the viability of future schemes and place severe risk on the deliverability of developments in the borough. It is proposed that provision for a 10-year period would be more appropriate.

The wording of the policy should be amended to allow flexibility where it is not appropriate to provide on-site construction training opportunities a financial payment can be made towards training initiatives or similar. Not stated
Welcome the site allocation but suggest it is amended to include residential use. The site is adjacent to a public transport hub and represents an opportunity for a highly sustainable development providing significant amounts of business, retail and residential floorspace. The council's suggestion that the town centre is predominantly commercial is not seen as sufficient justification to completely preclude residential use.

Welcome the site allocation but suggest it is amended to include residential use. The site is adjacent to a public transport hub and represents an opportunity for a highly sustainable development providing significant amounts of business, retail and residential floorspace. The council's suggestion that the town centre is predominantly commercial is not seen as sufficient justification to completely preclude residential use.

Welcome the allocation, and support the aim to re-open the station with residential over-station development. This site has a PTAL of 6 and the potential to deliver significant residential development. The allocation should reference the future potential for redevelopment of the site, as discussed above, to make the most efficient use of land in line with paragraphs 122 of the NPPF. Making the most efficient use of available land is especially important in locations which have an identified land shortage such as the Bush Hill and Clerkenwell Area Action Plan (see paragraphs 5.12 of the Area Action Plan Document). In addition, surface level retail units could be better promoted in the site allocation to complement public realm improvements.

TfL CD will continue to explore development opportunities at Old Street Roundabout, which could enhance local context and potentially provide income to support wider redevelopment and much-needed upgrade of Old Street station. We suggest that this site allocation is altered to reflect that development proposals for the site may come forward in the future, depending upon changing market trends and demand, and therefore should not be precluded from consideration.

Welcome the site allocation but suggest it is amended to include residential use. The site is adjacent to a public transport hub and represents an opportunity for a highly sustainable development providing significant amounts of business, retail and residential floorspace. The council's suggestion that the town centre is predominantly commercial is not seen as sufficient justification to completely preclude residential use.

Support the allocation and will seek to bring forward development of a residential-led, mixed-use scheme designed new homes on small sites. This aligns with DLP policy H2 Small Sites which stipulates that boroughs should pro-actively support well-designed new homes on small sites.

TfL CD supports the objectives of this policy to increase the supply of new housing in suitable locations. However, the policy must acknowledge that development should be optimised in close proximity to transport nodes in order to unlock development in the most sustainable locations. This would be in line with DLP Policy H1 Increasing Housing Supply and NPPF Chapter 11 making effective use of land. TfL CD strongly supports the push for high-density housing development outlined in paragraph C. This aligns with DLP Policy D6 Optimising housing Density. However, we suggest that this policy explicitly acknowledge that development should be optimised in close proximity to transport nodes in order to unlock development in the most sustainable locations.

In the consultation statement it is noted that the Council considers the plan to support development close to transport nodes through objectives, a variety of policies and the spatial strategies; it would be useful for the Council to identify which policies these are. In addition, focusing high-density development in the most sustainable locations is a key theme in the NPPF and the draft London Plan. The allocation should not preclude residential-led development where this would still support the re-provision and enhancement of business space, in line with London Plan policy SDS part G.

This site has a PTAL of 6 and the potential to deliver significant residential development. The allocation should be amended to include residential use. This aligns with DLP policy H1 Increasing Housing Supply, Policy D6 Optimising housing Density and NPPF Chapter 11 making effective use of land. TfL CD supports paragraph 3.25 which highlights the boroughs support for delivering housing on small sites. This aligns with DLP policy H2 Small Sites which stipulates that boroughs should pro-actively support well-designed new homes on small sites.

Welcome the site allocation but suggest it is amended to include residential use. The site is adjacent to a public transport hub and represents an opportunity for a highly sustainable development providing significant amounts of business, retail and residential floorspace. The council's suggestion that the town centre is predominantly commercial is not seen as sufficient justification to completely preclude residential use.

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Support the allocation and will seek to bring forward development of a residential-led, mixed-use scheme designed new homes on small sites. This aligns with DLP policy H2 Small Sites which stipulates that boroughs should pro-actively support well-designed new homes on small sites.
Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

TfL Commercial Development

Landowner

TfL CD welcomes the objective to provide a minimum of 50% affordable housing across the borough over the plan period. TfL CD is committed to delivering 50% affordable housing (by habitable room) across its portfolio as instructed by the Mayor. TfL have significant landholdings in the borough and look forward to working collaboratively with Islington to deliver affordable housing on appropriate sites within our ownership, in line with DLP policy H5 delivering affordable housing.

However, Paragraph 3.44 states that Islington are not promoting a ‘portfolio approach’ to affordable housing delivery. It stipulates that each individual site must deliver affordable housing in line with the relevant part of DLP policy H5 and the Council will not accept lesser delivery to compensate for other sites. TfL CD follow a portfolio approach in line with DLP policy H5 which provides the flexibility for more complex sites to come forward where they would be unviable fulfilling the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. This policy conflicts with DLP policy H5 and as such the local plan as drafted is not sound.

Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

TfL Commercial Development

Landowner

Policy H11 is overly negative and inconsistent with the London Plan. The supporting text to this policy focuses on BfR being a way to deliver housing quickly but states that, due to supply and demand within the borough, houses for sale will be built just as quickly so BfR is not applicable to Islington. This is an over simplification of the purpose of BfR and does not acknowledge the wider benefits that BfR development can provide. Respondent sets out some key benefits of BfR. With regard to paragraph 6.146, in terms of affordable housing, Affordable Private Rent (or Discounted Market Rent - DMR) is an accepted tenure of affordable housing when provided as part of a BTR, as set out in the NPPF (Annex 2 and paragraph 64) and the draft London Plan policy H13. As such, part ii of this policy is not consistent with national policy and the local Plan as drafted is not sound. Table 3.2 in the draft Local Plan demonstrates that there is a high need for DMR 1-bed and medium need for DMR 2-bed housing – BTR developments which can provide DMR would have a big role to play in meeting this demand. As stated in the SHMA 2017 paragraph 6.146, private rented housing (which would be provided by a BfR product) offers a flexible form of tenure and meets a wide range of housing needs.

Furthermore, the draft London Plan requires that 30% of the affordable element of a BfR scheme be provided at London Living Rent (LLR) levels. LLR is a GLA mandated rented housing product, with rents strictly controlled by the Mayor of London and set yearly on a ward by ward basis, calculated using data from local earnings and house prices. The draft London Plan sets out that LLR has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public’s trust as being genuinely affordable, and will be backed by the GLA who will update it every year.

Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

TfL Commercial Development

Landowner

The Council’s response in the consultation statement noted the amendment to the draft London Plan which allows boroughs to require social rent as part of a Development Plan policy. Paragraph 4.13.5A of the draft London Plan states that “Where justified in a Development Plan, boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent….) on BTR schemes in accordance with Policy H17 A.” This DLP policy refers to the ability of development plans to require a “proportion” of affordable housing to be social rent rather than all of the affordable housing provision, and the policy and supporting text does not provide a justification for the complete restriction on Affordable Private Rent as required by the DLP policy. Therefore Policy H11 is not sound.

Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

TfL Commercial Development

Landowner

With regard to part a (iv) regarding covenants, committing to a 50-year covenant is in excess of the 15-year covenant period set out in policy H13 of the draft London Plan. There is no evidence within the draft policy to explain the justification for the significant extension of this period. Whilst it is acknowledged that policy H13 of the DLP does note in footnote 54 that covenant periods are expected to increase as the market matures, in the shorter term it is likely that a 50-year covenant will be unacceptable for investors or institutional lenders, with the result being that the product could not be supported. The policy should not purposely be worded to make it difficult to deliver BfR development; such as it should be reworded to ensure appropriate flexibility for an evolving market.
Rather than reinstate the wording of the adopted allocation as requested in previous representations, the respondent quotes NPPF para 103 on supporting sustainable transport objectives through limiting the need for travel, and para 1.0.8 from the draft London Plan on mixed-use developments to support London’s economy and to create stronger communities. This policy does not seem to take into account the findings of the LB Islington Strategic Housing Market Assessment 2017 (SHMA). The SHMA 2017 states that within Islington 28% of households are of the private rented tenure and paragraph 3.85 notes that “The major area of growth in the housing market in Islington and Camden is likely to continue to be in the private rented sector with more houses in multiple occupation and households who are meeting their own housing costs.” Rented accommodation therefore forms an important part of the housing make-up of the borough, and the SHMA sets out that there is a strong demand for this type of housing.

The provision of purpose built, professionally managed rented accommodation with a security of tenure for renters is a more appropriate way to meet rental demand in the borough than through unregulated individual private landlords. We note that the 2017 Islington SHMA establishes that the existing private rented sector in the borough has the highest proportion of housing with no heating (4%) and in disrepair (7%). TfL have recently entered into a joint venture to deliver Build to Rent homes across TfL sites within London. The vision of the partnership is to create high quality rental homes for London in sustainable communities, maximising affordable housing, driving speed of delivery, ensuring stable returns for TfL to invest back into transport infrastructure and leading innovation in the BtR sector. TfL is committed to the provision of this type of accommodation and believes that BtR will play an important role in both addressing housing demand and also providing a high-quality, professionally managed product in a market where quality of product and management is often poor.

Not stated

The blanket approach to protecting all views as out in Policy DH1 is inappropriate and not in line with the City, University of London Business and Commercial Strategy and the London Plan. Policy DH1: Fostering innovation and sustainable transport; Policy T3: Enhancing the public realm and sustainable transport; Policy T5: Car-free development. Intensification of industrial uses at the Old Street Roundabout is overly restrictive. TfL Commercial (TfL CD) believe that Policy BC3 Paragraph G, which resists built development in the centre of the Old Street Roundabout site, is overly restrictive. TfL Commercial (TfL CD) state that paragraph G unjustifiably assumes that an innovative economy and to create stronger communities. TfL are committed to the provision of this type of accommodation and believes that BtR will play an important role in both addressing housing demand and also providing a high-quality, professionally managed product in a market where quality of product and management is often poor.

Policy B1 is not clear if the provision of different workspace typologies requires the inclusion of employment floorspace. This is negatively worded and should be changed to ‘will be suitable where ...’ or removed. The respondent quotes NPPF para 103 on supporting sustainable transport objectives through limiting the need for travel, and para 1.0.8 from the draft London Plan on mixed-use developments to support London’s economy and to create stronger communities.

Policy R3 suggests the policy recognises that tall buildings, when located in highly accessible locations, are a prime opportunity to optimise housing delivery, particularly in a borough with limited land supply and high housing demand. Without this the policy is unsound. The fact that a proposal is visible within a view does not mean that it will be harmful. This policy is negatively worded and should be changed to ‘will be suitable where ...’. This is negatively worded and should be changed to ‘will be suitable where’...’ or removed in its entirety.

The SHMA 2017 states that within Islington 28% of households are of the private rented tenure and paragraph 3.85 notes that “The major area of growth in the housing market in Islington and Camden is likely to continue to be in the private rented sector with more houses in multiple occupation and households who are meeting their own housing costs.” Rented accommodation therefore forms an important part of the housing make-up of the borough, and the SHMA sets out that there is a strong demand for this type of housing. Furthermore, Policy BC3 Paragraph G assumes that built development on the site will negatively impact upon the future legibility of the open space and public realm. Suggest that Policy BC3 Paragraph G is removed or altered to encourage future development on the Old Street Roundabout site as part of overall area improvements.

The SHMA 2017 states that within Islington 28% of households are of the private rented tenure and paragraph 3.85 notes that “The major area of growth in the housing market in Islington and Camden is likely to continue to be in the private rented sector with more houses in multiple occupation and households who are meeting their own housing costs.” Rented accommodation therefore forms an important part of the housing make-up of the borough, and the SHMA sets out that there is a strong demand for this type of housing.

Policy B1: Delivering business floorspace is not clear if the provision of different workspace typologies requires the inclusion of employment floorspace. This is negatively worded and should be changed to ‘will be suitable where ...’ or removed. The respondent quotes NPPF para 103 on supporting sustainable transport objectives through limiting the need for travel, and para 1.0.8 from the draft London Plan on mixed-use developments to support London’s economy and to create stronger communities.

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<tr>
<th>Object</th>
<th>Policies</th>
<th>Site Allocations</th>
<th>Business</th>
<th>Other Important Sites</th>
<th>Contact</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Object</td>
<td>Strategic and Development Management Policies</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
<td>Business</td>
<td>Historic England</td>
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<td>We note and welcome the amendments to the Plan made in response to our comments in the previous round of consultation. Indeed, we welcome the Plan as a whole and consider that it offers an excellent platform for the effective conservation and enhancement of the Borough's historic environment. As such, we only have very minor comments in relation to this document.</td>
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<td>Support</td>
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<td>Not opposed to the principle of development of the site but concerned that there has not been any analysis of the heritage significance of the Grade II listed Caledonian Road station, and whether this significance would be affected by development within the parameters set out in the allocation, which includes the possibility of a 12 storey building. Strongly urge some analysis of the likely impacts on the historic environment.</td>
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<td>We would suggest the inclusion of a footnote at paragraph 8.32 with a weblink to the Archaeological Priority Advisory Service (Historic England) for all development sites over 0.5 hectares and for smaller development sites in Archaeological Priority Areas – see GLASS consultation guidelines at <a href="https://historicengland.org.uk/services-skills/planning-services/greater-london-archaeology-advisory-service/our-advice/">https://historicengland.org.uk/services-skills/planning-services/greater-london-archaeology-advisory-service/our-advice/</a></td>
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<td>We suggest adding at the end: 'We recommend pre-application consultation with the Greater London Archaeological Advisory Service (Historic England) for all development sites over 0.5 hectares and for smaller development sites in Archaeological Priority Areas – see GLASS consultation guidelines at <a href="https://historicengland.org.uk/services-skills/planning-services/greater-london-archaeology-advisory-service/our-advice/">https://historicengland.org.uk/services-skills/planning-services/greater-london-archaeology-advisory-service/our-advice/</a></td>
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Strategic and Development Management

Policies

Chapter 3 Thriving Communities of the Regulation 19 Plan recognises the need for housing in the borough. It states that Islington faces an “extreme set of circumstances when it comes to need and land supply”. It notes that land supply in Islington is constrained and that local evidence demonstrates that the need for new housing in the borough is “significant”. In this context land supply for conventional housing and genuinely affordable housing is considered “the top priority” because it is the most sustainable use of land in Islington. In line with strategic policy, proposed developments in Islington which result in the reduction of land supply for housing which could reasonably be expected to be suitable for conventional housing (such as an allocated site) will be refused. This statement emphasises the importance of housing to the Council. Given the identified housing need, and limited land supply it remains unclear why residential uses have been excluded from AUS6, certainly when site AUS6 is the kind of site that offers a good supply of land, and is a low density retail warehouse site. The Council accepts that housing is the top priority and sustainable use of land in Islington. National policy and the London Plan seeks ambitious growth targets for the Capital. Regulation 19 Policy H2: New housing states that Islington aims to meet “and exceed” the housing target of 7,750 units by 2028/29, which equates to an annualised target of 775 per annum and that housing proposals must demonstrate that use of the site is “optimised”. Removing residential uses from AUS6 would compromise the Council’s policy to meet and exceed its minimum housing target. The plan lacks clarity as to how this target will be met. The September 2019 Housing Delivery Test Action Plan 2018 Table 3 confirms that the Council’s housing delivery record is poor (71% of its minimum target across the last 3 years). This would not support the exclusion of residential uses at AUS6.

Policy H3:1: Purpose Built Private Rented Sector development

Policy H3:1 seeks to restrict the provision of purpose built private rental accommodation over the plan period. Proposals in the Borough will not be permitted unless an applicant can demonstrate to the council’s satisfaction that a range of provisions and tests can be met. This represents a new policy direction for the Council as the adopted plan does not include any provisions which seek to restrict the tenure of market housing coming forward. We consider that the proposed policy fails to conform to the National Planning Framework and Guidance and is inconsistent with the local plan evidence and the London Plan. As a consequence, a range of policy amendments are necessary to make the policy effective and justified. The policy is driven by the suggestion that in order to deliver the target levels of ‘Genuinely Affordable Housing’ the draft local plan should prioritise the delivery of ‘conventional housing’. The draft plan does not define the term ‘conventional housing’ and this term does not feature in the current 2014 – 2019 housing strategy nor does it feature in the principle evidence base namely the SHMA 2017. As currently drafted what constitutes ‘conventional housing’ can only be deduced by exception i.e. by identifying the types of housing which are considered by the Regulation 1 plan to not be generally supported. These are variously referenced as comprising extra care market housing (para 3.17) build to rent (paragraph 3.15 & 5.137) and student housing (paragraph 3.16). The plan should provide clear links to the how the evidence base for housing relates to the concept of ‘conventional housing’ being prioritised by the current plan policy proposals. The current mix of tenure across the Borough shows owner occupied (c.28%), rented affordable (c.42%), private rent (c.26%) and relatively small elements of rent free and shared ownership.
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<td>The NPPF identifies at paragraph 59 that the Government’s objective is to significantly boost the supply of homes. Paragraph 81 adds further context by identifying that council’s must, in formulating local plans and policies, assess the particular size, type and tenure of housing needed for a range of different groups who need housing including (but is not limited to) those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own. The NPPG provides guidance on these particular groups and how their needs might be identified as well as being explicit that this assessment is distinct from the standard method of assessment housing numbers. The 2017 SHMA prepared on behalf of the Council by ORS considers the role of the private rented sector as part of section 7. This identifies its importance as a core component of the local housing market with its proportion of the overall market growing in response to demand from a range of households who either can’t, or don’t wish to, enter the owner-occupied sector as well as its role (with the support of housing benefit) as an alternative form of affordable housing. Respondent cites figure 37 from the SHMA 2017 shows that between 84% and 97% of the private rented accommodation (depending on whether you consider single family households or multi adult households) occupy private rented accommodation without recourse to housing benefit. This illustrates the sector is not for the most part acting as an ‘alternative’ to the affordable housing sector and is consequently providing a core component of the overall market housing offer. The growth in size of this sector in conjunction with generally rising rents is a strong indicator of unsatisfied demand for this accommodation and as identified on the Council’s private rented sector part of their web service “Islington is a popular place to rent so there is very high demand for rented properties.”</td>
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<td>The household survey which accompanied the 2017 SHMA identified a number of key financial parameters for those households living within the Borough. Of those in rented or shared ownership accommodation 82% of these households have no savings for a deposit. (ref Question D7a) Of those who had savings over 50% had less than £30k (for use as a deposit). (ref Question D7) 85% of households who pay rent or a mortgage say it is either ‘well within budget’, ‘about right’ or ‘just manageable’ (D9). 88% of the same group say they are not considering the prospect of falling into arrears. (D10a) These headlines illustrate that many households in rented accommodation have limited capacity to afford to purchase in an expensive Borough like Islington where market sale products generally require significant deposits or existing equity. Whilst the provision of shared ownership could target some of these households it will not be accessible to or appropriate for all households currently residing in the private rented sector. (Evidently there will be households on incomes above those which would prioritise them for the range of rented affordable products (including London Living rent Affordable) and who still have insufficient savings for an open market or shared ownership purchase. Respondent provides CACI income profile (figure 2 of response) which illustrates the extent of these middle-income households (45k to 90k) who could be “frozen out” of the housing market where only open market sale or rented affordable products come forward.</td>
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<td>By implication where demand in the private rented sector is not met then these households will either be displaced from the Borough or will look to the affordable waiting list to resolve their housing need. This is an important dynamic to understand in light of the identified need for affordable housing. Evidently additional demand from those who could meet their needs within the private rented sector will limit the ability of the council to meet their identified backlog and newly arising affordable need. To this end and the role of the Private rented sector, particularly where this provides quality new units, should be recognised as providing a resource which meets needs and which reduces the pressure on the existing and planned affordable housing stock. The 2017 SHMA identifies at figure 98 that market rent is comparatively more accessible than owner occupation, shared ownership at a 50% share and only slightly below that for shared ownership at 25% share. In the context of a policy which appears to prioritise owner occupation schemes over private rented it is hard to justify the Regulation 19 policy supporting tool at 3.16 which states that “conventional residential development is by far the most sustainable form of residential development as it meets the broadest spectrum of housing need”. This assertion is not cross referenced to any evidence base and it is not clear how this is supported as the 2017 SHMA appears to conclude that the private rented sector offers affordability to self-contained households well above that of the owner-occupied sector.</td>
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| 819.0153 | Strategic and Development Management Policies | Policy H11: Purpose Built Private Rented Sector development | Lothbury Investment Management | Landowner | Part A of Policy H11 details the criteria for private rented schemes to meet as part of an application. Part II identifies that Affordable Private Rent (APR) is not considered to be an acceptable affordable housing tenure. No evidence is presented to support this save for a short reference at paragraph 3.54 of the Regulation 15. Plan. This implies that the only obstacle to this type of provision is the level of rent and whether this is sufficiently discounted from the market rent level to meet identified affordable housing need. It is inappropriate for the policy to remove the opportunity for APR in the absence of any understanding about its relative rent pricing point and understanding how this relates to the market rent and other affordable products. An APR product, for instance, set at a % of open market rent which delivers a starting rent equivalent to London Living rent is manifestly affordable housing in the context of the evidence base, the London plan and the NPPF. This sort of provision should not be prevented from coming forward by the policy wording. Part A.II should be amended as per suggested wording. | Object |

| 819.0153 | Strategic and Development Management Policies | Policy H11: Purpose Built Private Rented Sector development | Lothbury Investment Management | Landowner | Policy H11 (A)(iv) proposes that private rented sector units are held under a restrictive covenant for the lifetime of the building which is expressed as ‘generally no less than 50 years’ with sales to the open market (individually or as a group) not to be allowed during this period. Part V of the policy however, identifies that if this covenant is ‘broken’ then a clawback mechanism will be applied to maximise affordable housing. The application of a 50 year covenant is unreasonable and does not reflect the normal maximum covenant period for this type of provision of c.15 years. Applying a 50 year timescale will adversely affect the ability to fund this type of provision and prevent the scheme from remaining flexible to allow for market changes over its lifespan. It is not clear why the council have opted for a 50 year timescale and why this length of time is considered necessary or appropriate. The key requirement is for a Private Rented Scheme to provide an appropriate clawback in respect of affordable provision where it reverts to open market sale either in part or as a whole. Proceeded the level of clawback reflects the level of obligation required were the scheme to have come forward at planning stage as an open market sale. Proposal then the integrity of the plan remains intact. Adding a further provision which makes a commitment for an initial period for the private rented proposal of 15 years ensures that this clawback will not normally be triggered in the early stages following delivery. Adjustments to Part V are necessary to align with the proposed amendments to Part V where a part release of the covenant is taken forward as an option. | Object |

| 819.0153 | Strategic and Development Management Policies | Policy H11: Purpose Built Private Rented Sector development | Lothbury Investment Management | Landowner | Adjustments are considered appropriate to part vi to reflect that a range of tenancy lengths and options will be appropriate for schemes of this type but it is prescriptive to require that all tenancies will be offered tenancies of at least three years. | Object |

| 819.0153 | Strategic and Development Management Policies | Policy Sp.4: Angel and Upper Street | Lothbury Investment Management | Landowner | Policy fails to recognise the extensive residential floor space at upper floors in Angel Town Centre. Incorrectly inferring a perception of character and role. Policy Sp.4 refers to site AU5 but does not include residential uses for the site which the respondent objects to. Policy Sp.4 Part I should also recognise the ability for the site to deliver residential as well as business uses. Excluding residential uses on site AU5 is overly restrictive given the capacity improvements expected with Crossrail2. | Object |

| 819.0153 | Strategic and Development Management Policies | Policy R2: Retail, leisure and services, culture and visitor accommodation | Lothbury Investment Management | Landowner | Part I and paragraph 4.11 makes an unsubstantiated statement which the respondent opposes and should instead read ‘Residential uses should also prevent/mitigate risk of future impacts through design and the agent of change principal’. | Object |

| 819.0153 | Strategic and Development Management Policies | Policy R2: Primary Shopping Areas | Lothbury Investment Management | Landowner | Respondent seeks clarification as to whether 60% AS mix benchmark refers to net ground floor or all floor space. It should be related to ground floor only. | Not stated |
R19.0153 Strategic and Development Management Policies

Policy B3: Islington’s Town Centres
Lotbury Investment Management

Landowner

Part H states applications for residential uses not involving a change of use of existing A1-A5, D2, Sui Generis uses must be located on upper floors. Residential uses will require a ground floor entrance/exit which will be a residential use so the policy should be amended to clarify this.

Not stated

R19.0153 Strategic and Development Management Policies

Policy B2: New business floorspace
Lotbury Investment Management

Landowner

Notes that the draft Local Plan takes a different approach to the adopted plan by seeking business floorspace as an absolute priority. The evidence base to support this approach is now dated and should be updated for purposes of the policy review. Expresses surprise that inflexible recommendations of evidence have been taken forward without taking into account wider development plan policies.

The policy states that the introduction of uses that could undermine the primary economic function of that particular area will not be allowed. The policy refers to the “specific role and function” of the Angel and Upper Street locations suggesting that this is solely a business location, akin to the City of London or Canary Wharf. It is not. It is a mixed use town centre which includes residential development, as acknowledged by the adopted Islington Core Strategy. The approach taken within Policy B2 is inflexible.

Part E states that all development proposals involving business floorspace (including affordable workspace provided in line with policy B4) must have regard to the following: (i) (iv). These policies are excessive and have not been viability tested.

Object

R19.0153 Strategic and Development Management Policies

Policy D13: Building heights
Lotbury Investment Management

Landowner

Buildings of more than 30 metres are only acceptable in principle: (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or (ii) within specific sites identified in relevant strategic policy.

Not stated

R19.0153 Strategic and Development Management Policies

Policy B4: Affordable workspace
Lotbury Investment Management

Landowner

Policy not supported by viability evidence.

Object

R19.0154 Strategic and Development Management Policies

Appendix 4: Cycle parking standards
Cycle Islington

Campaign

Support the remap of the cycle parking space numbers. The increase in accessible spaces is particularly welcome, but want to understand the logic behind it. Would like to see amendments:

- The rules must clearly state how applicants should provide space for two-tier racks. LCDS has clearance standards.
- Circulation and clearance requirements should refer to LCDS requirements rather than case by case to maximise utility.
- LBI should also create a specific cycle parking design guide as Hackney and Camden have done/ TfL also has a useful document on Workplace Cycling Requirements which could serve as a model.
- Meanwhile it’s good that the council is encouraging Sheffield stands (appendix 4, pg 55), we recommend parking requirements which allow for (at the very least) strongly discourage known poor rack types
- The Council should require applicants to be explicit about what type of stores (with manufacturer if possible) and where exactly each rack will go.
- Social safety concerns need to be taken into account when determining where to put cycle parking: overhanging, lighting, CCTV …
- New developments should put cycle parking on the ground floor elsewhere possible. If in the basement, ramps must be accessible. Lift is a last resort, and should meet LCDS requirements for size.

Support

R19.0154 Strategic and Development Management Policies

Policy T2: Enhancing the public realm and sustainable transport, Part C
Cycle Islington

Campaign

Businesses should use cargo cycles for their delivery and transportation needs, as they offer a clean air and cheap alternative to motor vehicles. The Council should take a proactive approach to working with businesses to find delivery solutions which eliminate as many motor vehicle journeys as possible.

Not stated

R19.0154 Strategic and Development Management Policies

Policy T2: Enhancing the public realm and sustainable transport, Part C
Cycle Islington

Campaign

Support the Council’s scepticism of shared space schemes. However, the most important element of any scheme which involves cars is the volume of traffic. For example, a “shared space” high street scheme which excludes cars entirely for all but essential deliveries at quiet times of the day could work well. In such a scenario, a non-existent kerbline might very well be the best solution for pedestrians and cyclists the rest of the time. It’s important to spell out the essential criterion for a successful pedestrian-friendly street environment: removing non-essential car traffic

Both

R19.0154 Strategic and Development Management Policies

Policy T2: Sustainable Transport Choices, Part E
Cycle Islington

Campaign

Line and jump bikes could be transformative, and are currently meeting a need for ebikes which TfL and the Council have been unable to meet—especially in the north of the borough. Even though street clutter is an issue, Islington should rather instead develop a set of guidelines for responsible operators, making it easy for a new entrant how to minimise disruption and maximise utility. Since a large number of cycle journeys start and end in different boroughs, Islington should work with TfL to come up with common standards to simplify governance and remove regulatory uncertainty for dockless cycle hire operators.

Object

R19.0154 Strategic and Development Management Policies

Policy T2: Sustainable Transport Choices, Part E
Cycle Islington

Campaign

Alternatively possible, remove cycle and pedestrian permeability barriers when planning new developments. Redevelopment is a chance to fix issues of impermeability and design for a future which prioritises carbon-free modes. Developments must not install barriers which exclude cargo cycles and wheelchairs, or aggressive rumble strips or speed bumps. Kerb cuts must be added where necessary. There must be gaps between buildings to enable through routes for cycles, especially when such access will link residential streets beyond the development to existing or planned cycle routes.

Not stated
Strategic and Development Management Policies

Policy B3: Existing business floorspace

The MPS wishes to record its support for the amended glossary definitions and in particular the inclusion of builders’ merchants within the glossary definition of industrial floorspace.

In addition, TP wishes to record their support of the amended glossary definitions and in particular the inclusion of builders’ merchants within the glossary definition of industrial floorspace.

Strategic and Development Management Policies

Policy SC1: Social and Community Infrastructure

The MPS is requesting that the emerging Islington Local Plan include a section highlighting the importance of the delivery of District Ward Offices in schemes referable to the Mayor. The MPS is already having success in securing DWOs with developers (through planning applications) and Local Planning Authorities (through planning policy). In many cases, Local Authorities and developers consider the requirement to have a positive impact on development proposals.

Strategic and Development Management Policies

Appendix I: Glossary and abbreviations

Trans Perkins Plc

Typical representatives have been taken into consideration. Support the allocation as currently drafted.

Strategic and Development Management Policies

Policy B9: Meanwhile/temporary uses

Respondent supports approach. However, the time allowed for temporary uses is not of sufficient time to attract potential occupants. The time period should be extended to two years which will ensure large sites are not unduly impacted by the policy. The two-year period represents a common period for pre-submission discussions and determination of large planning applications reflecting a desire for land owners to avoid the under-utilisation of sites.

Strategic and Development Management Policies

Policy B5: Infrastructure Planning and Smarter City Approach

The MPS wish to recommend that the site allocation should be made in the context of the development of District Ward Offices in schemes referable to the Mayor. The MPS is already having success in securing DWOs with developers (through planning applications) and Local Planning Authorities (through planning policy). In many cases, Local Authorities and developers consider the requirement to have a positive impact on development proposals.

Strategic and Development Management Policies

ARCH3: Archway Central

The respondent supports policy B3 which ensures that there is not net loss of industrial business uses, and the cost for associated infrastructure including staff set up costs, vehicles and technology. This represents a legitimate infrastructure requirement that should be accounted for within Islington Council’s Section 106 Agreement and/or Community Infrastructure Levy. We consider that until such time as CIIL is collected for police infrastructure, funding should be collected through Section 106 contributions from individual developments to ensure that the necessary funding is accounted for in the meantime.

Strategic and Development Management Policies

ARCH4: Whittington Road

Relocating the portacabins which block the tube station entrance would be an important improvement that could obstruct cycle routes.

Support

Strategic and Development Management Policies

ARCH5: Archway Campus, Highgate Hill

Removing public transport access to the hospital would be a significant benefit. Buses terminating from the south could turn in the Magdala Avenue forecourt. Highgate Hill buses 4, 143, C11 and W5 terminating at Archway could continue to turn at Upper Holloway Station.

Support

Strategic and Development Management Policies

Site Allocations

R19.0156

Applicant

TP wish to record their support of the amended glossary definitions and in particular the inclusion of builders’ merchants within the glossary definition of industrial floorspace.

Support

Strategic and Development Management Policies

Site Allocations

R19.0157

Applicant

consider the site allocation is superfluous. The site has been constructed, the vast majority of it has been completed and the residential accommodation is occupied. There are existing and emerging policies protecting commercial and theatre uses so the allocation will not bring forward another additional protection. If the council does wish to allocate the site they should formalise the site as a cultural use, and not specifically a theatre as policy R1 does not differentiate between specific cultural uses. The whole of the site, including the completed residential use, should be included in the allocation.

Support
One of the best ways of achieving public safety is to ensure 'eyes on the street'. For this reason it may be better to reopen Junction Road station on the Gospel Oak to Barking Line, to improve public transport accessibility in that area. There has been an apparent reduction of traffic on main roads, but also a degree of displacement of secondary road, such as St John's Grove, which is negative. Not stated

It would be useful to reopen Junction Road station on the Gospel Oak to Barking Line, to improve public safety. Work here could be made dependent on the re-opening of Junction Road Station, providing a clear and effective plan for the area. Not stated

There is an increase in vehicle speed on main roads, especially Holloway Road and Junction Road. Public transport accessibility in that area. Not stated

A Quietway around Archway for cycling is desirable, away from heavy HGVs and polluted roads, away from buses. Not stated

The cycle hangars are great but too expensive. As hangars accommodate 6 cycles on one parking space the fee per head should be one sixth of a parking fee. Support

Given LB Islington's steps to make the borough more cycle friendly, there is still considerable scope for improvement. Not stated

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The cycle hangars are great but too expensive. As hangars accommodate 6 cycles on one parking space the fee per head should be one sixth of a parking fee. Support

There is much else that we could commend so please take it as read that we are supportive of what the Plan sets out. The following are suggestions where we believe there is scope for increasing the effectiveness of the proposals. We appreciate that some of the points here are strictly speaking matters for TfL but include them as part of the local picture. Not stated

There is much else that we could commend so please take it as read that we are supportive of what the Plan sets out. The following are suggestions where we believe there is scope for increasing the effectiveness of the proposals. We appreciate that some of the points here are strictly speaking matters for TfL but include them as part of the local picture. Not stated

The cycle hangars are great but too expensive. As hangars accommodate 6 cycles on one parking space the fee per head should be one sixth of a parking fee. Support

There is much else that we could commend so please take it as read that we are supportive of what the Plan sets out. The following are suggestions where we believe there is scope for increasing the effectiveness of the proposals. We appreciate that some of the points here are strictly speaking matters for TfL but include them as part of the local picture. Not stated
Policy S1: Delivering Sustainable Design

Local society

This policy is of course vital given the concerns regarding global warming, but in monitoring planning applications we have seen two issues:

- Applicants who meet the required standards by providing only tiny windows, resulting in a G4S prison van appearance. High quality double or even triple glazing provides excellent insulation and the active frontage and eyes on the street should not be impeded by attempts to reach BREEAM standards on the cheap.
- Applicants promise green elements to the scheme which never actually materialise. Green roofs are a classic example of this, for example at Archway Heights on the Archway Road. There is little benefit to be had from policy which is not or cannot be enforced, so whatever standards are required, there must be a way of ensuring that the promises at the planning stage are met.

Even the Evening Standard is reporting that to improve sustainability there needs to be a reduction in demolition of existing buildings. Inclusion of a requirement that the carbon footprint of demolition and rebuilding is included in any eco calculation would result in more genuine carbon reduction rather than simple box ticking.

While there are areas in the borough which are specifically at flood risk, the floods in Blackstock Road and Upper Street have made it clear that with under investment by Thames Water, floods can happen anywhere in the borough and cause extensive damage and disruption. Sustainable drainage is imperative and should be required as widely as possible.

Policy S7: Improving Air Quality

Local society

Improvement of air quality is vital. The work carried out by Tufnell Park Parents monitoring walking routes to local schools and nurseries found that the only place which did not breach EU air quality standards was Dalmeny Park – a space surrounded by tall Victorian houses and full of mature trees. The situation is clearly very serious and for this reason, as well as encouraging walking and cycling, it will be important to reduce parking spaces as availability of parking prompts trips by car.

Policy G1: Green Infrastructure

Local society

We note point 5.2 protecting green areas. Given the vital role these play not just in providing health-giving greenery for residents but supporting insect and bird life and the wider eco system, it would be helpful to include in the recognised green spaces for example the smaller surroundings of community buildings like Caxton House, Harry Rice Hall, Hargrave Hall and other ‘public’ areas such as the space around schools, churches, in playgrounds and so on. Although not very clear, it does appear that the map of green spaces in the Plan does not include any of these, notably excluding the extensive garden downhill from St Joseph’s on Highgate Hill. Given that this includes trees which are subject to TPOs this really should be shown.

Given their importance ideally policy would require that new green spaces provided in developments be made over to public ownership to prevent for example play spaces only being made available to children living in privately owned accommodation. This would also ensure that the greenery could not then be clawed back at any later stage but becomes a permanent public benefit.

Also useful would be to recognise the combined value of back gardens, for example between Whitehall Park and Harberton Road. Recognising the greenery as effectively one green space, rather than garden by garden, could offer greater grounds for refusing excessive extensions where a sustained programme of rear extensions can gradually erode what was originally a relatively significant area of greenery. Again, if this were to be shown on the map of green space that would be helpful.

Point 5.2 states that loss of some green space ‘may be acceptable where specific criteria are addressed’. This will be used upon by any developer, whether appropriate or not. For this reason it is not helpful to include it. If genuine, LB Islington may obviously negotiate such a loss in exceptional circumstances.

That greenery is of course important for managing heat risk and on point S6 Managing heat risk, it would be helpful for policy to actively require more trees, together with care for those trees in the first four years of life, ensuring that they are watered during what are increasingly hot summer months.
Strategic and Development Management Policies

Policy DH1: Fostering innovation and conserving and enhancing the historic environment; Policy DH3: Building heights
Better Archway Forum Local society

Recent reports by Savills show that pre-1900 buildings are particularly appreciated across London and neighbouring boroughs protect far more of their older building stock than Islington, generally with extensive Conservation Areas. Without more CAs than currently exist in Islington there is significant danger that many of the older buildings will be gradually lost to the detriment of the borough as a whole. If more Conservation Areas are not considered desirable a blanket protection for pre 1945 or at least pre 1900 properties would be extremely helpful as these are not just attractive but generally offer highly flexible and dense, street-based housing. In terms of preserving specific buildings of interest, there has been an up date of the locally Listed buildings for the borough as a whole but this updated list does not appear to have been adopted as yet. It would be to the benefit of the wider built environment for that to be dealt with as a matter of urgency – as we discovered at the appeal regarding the Methodist Hall. A key feature of successful design in Islington is the importance accorded to the ground floor of buildings, which are generally taller than upper floors and more ornate. Without this feature, the part of the building most visible to the public looks compressed and ‘mean’. A requirement to reflect that quality would be extremely helpful. In ensuring decent quality new builds and would have the benefit of reflecting a successful element of earlier design.

Policy DH2: Heritage assets
Better Archway Forum Local society

Conservation Areas. Without more CAs than currently exist in Islington there is significant danger that many of the older buildings will be gradually lost to the detriment of the borough as a whole. If more Conservation Areas are not considered desirable a blanket protection for pre 1945 or at least pre 1900 properties would be extremely helpful as these are not just attractive but generally offer highly flexible and dense, street-based housing. In terms of preserving specific buildings of interest, there has been an up date of the locally Listed buildings for the borough as a whole but this updated list does not appear to have been adopted as yet. It would be to the benefit of the wider built environment for that to be dealt with as a matter of urgency – as we discovered at the appeal regarding the Methodist Hall. A key feature of successful design in Islington is the importance accorded to the ground floor of buildings, which are generally taller than upper floors and more ornate. Without this feature, the part of the building most visible to the public looks compressed and ‘mean’. A requirement to reflect that quality would be extremely helpful. In ensuring decent quality new builds and would have the benefit of reflecting a successful element of earlier design.

Policy DH3: Building heights
Better Archway Forum Local society

In consideration of the Historic Environment we note the reference to contextual area. Given that in Archway developers use the existence of three tall buildings as ‘context’ to build more, we would suggest that the term should be ‘wider contextual area’. The majority of Archway for example is not made up of tall buildings and planning decisions should be able to take into account the bigger picture which is predominantly 19th century terracing.

Policy DH6: Advertisements
Better Archway Forum Local society

The acknowledgement of the problem of advertising hoardings masquerading as phone kiosks is very helpful. Given the pressure to approve these it may be useful to make the position even firmer. In a borough where mental health is a significant concern it may be helpful to acknowledge that advertising is known to add an additional stress to those with mental health issues, and of course is particularly so to those on low incomes.

Policy DH6: Advertisements
Better Archway Forum Local society

In terms of basement applications outside Conservation Areas it would be very helpful to also require that unless a lower ground floor / front area forms part of the original design, this will not be permitted because of the impact on the continuity of frontages and integrity of the neighbouring streetscape.

Policy R1: Retail, leisure and services, culture and visitor accommodation
Better Archway Forum Local society

Respondent welcomes support given to retail and other uses including pubs and other small businesses. Respondent also makes comment that specific uses that are to be supported should be stated instead of the broad term ‘addition’.

Policy R2: Primary Shopping Areas
Better Archway Forum Local society

Respondent is puzzled that the map indicates that Archway town centre primary frontage is not designated as extending down Holloway Road to the branches of Sainsbury’s and Tesco’s, but that there is a proposal that the retail frontages should extend up Highgate Hill, behind the Archway Tavern, where there would be no retail continuity. This makes no sense, particularly as the creation of retail frontages on the Holborn Union site would have the effect of adding additional, unnecessary mass to a site where the proposed height of new buildings is already unpopular. The aim, especially in the current retail environment, should be to consolidate not dissipate the retail frontages, and the map should be adjusted to take account of the actual situation and extend the town centre down Holloway Road.
Respondent suggests it would be helpful to set out some examples of how to robustly demonstrate social value. Archway Tavern has been closed for so long there is no clientele, while the Whittington and Cat had its designation as an Asset of Community Value ignored by the owners.

Not stated

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

Not stated

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Not stated

Policy DHS B describes new development being located close to sensitive uses – but does not reflect the fact that new sensitive uses may try to be developed alongside existing noise generating uses. Under the agent of change approach and in particular, this policy it is the developer introducing the sensitive use into the existing environment – and so if they require planning permission to be granted they should ensure that the users of their proposed development are properly mitigated from the existing noise environment of businesses such as CEMEX. As such Clause C and D need amending to reflect that the agent of change approach may be a developer trying to introduce a use into an existing environment which needs to be mitigated to ensure that such occupied – the owners or residential tenants are not adversely impacted by the existing operations. Existing established businesses need to ensure that they are allowed to continue to operate. Paragraph 8.66 reflects the principle that new noise sensitive developments in proximity to an existing noise generating uses must follow the agent of change principle – but this to needs to be written into the actual policy to carry weight. This carries less weight when written as supporting text. As such CEMEX would like to see Policy DHS changed to address this and have a clause/s which reflect more closely the draft Policy set out in the London Plan Policy D12.

Not stated

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

Not stated
635.0162 Strategic and Development Management Policies Policy R3: Retail, leisure and services, culture and visitor accommodation Theatres Trust Statutory consultee Support the strong protection of existing facilities and venues through Part L to P. However, paragraph 4.80 conflicts with Policy R3 as the requirement to locate cultural and MCE uses to be within CAZ, Town Centres or Cultural Quarters is not present in Policy R3. Such inflexibility is inappropriate as theatres and other cultural uses can operate successfully outside of town centre locations, particularly at a smaller and community scale without compromising the viability of nearby centres. Text should be removed


635.0162 Strategic and Development Management Policies Policy R3: Meanwhile/temporary uses Theatres Trust Statutory consultee Support the amendment in line with Regulation 18 comment

635.0162 Strategic and Development Management Policies Policy R3: Islington’s Town Centres Theatres Trust Statutory consultee We previously wrote in support of this policy, this remains the case.

635.0162 Strategic and Development Management Policies Policy R3: Meanwhile/temporary uses Theatres Trust Statutory consultee We welcome that this policy has been amended in line with our previous recommendation.

635.0162 Strategic and Development Management Policies Policy R3.1: Public Houses Theatres Trust Statutory consultee We continue to support this policy.


635.0162 Strategic and Development Management Policies Policy R3: Culture and the Night Time Economy Theatres Trust Statutory consultee We support this policy, and particularly welcome reference to Deeds of Easement being in place within part of these policies.

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635.0163 Site Allocations BLS: London College of Fashion, Golden Lane

635.0163 Site Allocations BLS: London College of Fashion, Golden Lane B & L: Central Tendency

635.0163 Site Allocations BLS: London College of Fashion, Golden Lane

635.0163 Site Allocations BLS: London College of Fashion, Golden Lane University of the Arts London Business Please that the London College of Fashion site has been included as a draft allocation but would prefer the ability to promote a variety of uses on the site. Request that the allocation is amended to include residential and hotel uses as acceptable alternative uses to office development. The allocation does not reflect the possibility of increasing the height of the existing building. It should be amended to state that any increase in height or massing would require a thorough assessment to ensure there are no major adverse impacts on surrounding heritage assets.

635.0163 Site Allocations BLS: London College of Fashion, Golden Lane University of the Arts London Business Previous representations have been taken into account to the extent that the supporting text has been amended to include higher education institutions in the list of organisations that may seek to justify a loss/reduction in social infrastructure as part of an estates rationalisation programme. UAL do not consider this provides sufficient comfort as they do not fall under the generic public sector definition and request that the wording of policy SC1 Part O(l) is amended to include specific reference to higher educational/university institutions.

635.0164 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road

635.0164 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road

635.0164 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road

635.0164 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road Nexson Solutions Ltd Landowner Consider the strings attached to the site allocation are indicative of an ever more restrictive policy regime which will make future good management of their site more difficult and increase the possibility of ‘bad neighbours’. The development considerations in the allocations are not flexible enough in terms of use class or building heights and should be amended.

635.0164 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road Nexson Solutions Ltd Landowner The area is not marked ‘sensitive’ from a visual impact or townscape perspective but represents a highly sustainable location to optimise redevelopment opportunities, and so should not be subject to an unqualified and mechanically-applied blanket policies (including those on height).

635.0164 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road Nexson Solutions Ltd Landowner The strengthening of policies will hinder their future ability to develop at this location, of intend to raise secured finance on normal commercial terms. Respondent provides information and context re: the LSIS and industrial uses. It is clear from both the Council’s own evidence base and the Mayor’s emerging London Plan that protecting appropriate land for industrial and warehouse uses can be justified. However, it is equally clear that a rigid and inflexible preservation of the LSIS for solely industrial and warehouse uses without any flexibility would completely disregard the recommendations of the Council’s own evidence base, and would fail to comply with the Mayor’s objective to make more efficient use of land through the co-location of industrial activity with other uses. As currently drafted Policy SP3 of the draft Islington Local Plan therefore fails to recognise the fundamental shift which has already taken part in this part of the LSIS, despite the observations of its own Study. In this context, my clients support the recommendation of the Study, (and draft London Plan) that there should be no net loss of industrial floorspace within the LSIS. However, the consequence of draft Policy SP3 (parts C and D), which presume against the introduction of additional office space, would serve to artificially limit potential future growth and prosperity, to no good planning purpose. A more appropriate policy framework (for the southern part of the LSIS) would seek the retention of the existing amount of industrial and storage use (based on quantitative floorspace), but with a flexibility to enable the introduction of B1 business floorspace (including offices), as part of mixed-use developments that would enable the more efficient use of land in accordance with sustainable development objectives. My clients therefore object to Policy SP3 as currently drafted

635.0165 Site Allocations US: 230-238 York Way Noble Royal/Brewery Road Nexson Solutions Ltd Landowner Support the exploitation of references in VR1 to the acceptability of class B8 uses within the LSIS. VR1 states that building heights should not exceed five storeys. There is no townscape assessment to evidence this assertion, but even if there were it is unclear how such an assessment could come to the conclusion that an arbitrary height restriction is justifiable.

Both
Strategic and Development Management

- Request that as a matter of soundness more explicit reference is made to seeking education contributions in Dominvs Group.

As a result of the increase in residential schemes on the surrounding area (e.g. Maiden Lane), the respondent supports the aim of policy SP3 to retain and intensify land for industrial uses (B1c, B2 and B8), particularly the acceptability of B8 uses within this LSG.

- Not stated

Strategic and Development Management

- Site Allocations: NH7: Holloway Prison, Parkhurst Road

Not stated

Strategic and Development Management

- Site Allocations: Dominvs Group

Not stated

Strategic and Development Management

- Site Allocations: Other Important Sites

Not stated

Strategic and Development Management

- Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site

Landowner

The respondent supports the aim of policy SP3 to retain and intensify land for industrial uses (B1c, B2 and B8), particularly the acceptability of B8 uses within this LSG.

- Support
Respondent requests 1 Elthorne Road should be removed from the Archway Town Centre boundary as its inclusion is unsound and is inconsistent with para 85 of the NPPF and new London Plan policy SD7 part B. The Employment Land Study 2016 identifies this part of Archway Town Centre retail gives way to other uses, including G3 and C4 uses. The surrounding context of 1 Elthorne Road comprises residential use and other non-retail/commercial uses, as such the site holds limited economic and social value.

Supportive of the site's inclusion in the allocations but concerned with the allocation for business-led mixed-use development. Archway Town Centre has an over-provision of financial services and above average provision of retail and leisure services as set out in the Islington retail and leisure survey (2011). Given this over-provision and the site's location within a predominantly residential area, the allocation should be amended to exclude business uses and require residential-led development. The site ownership details are incorrect. The site should also be considered an appropriate location for a tall building given its high PTAL rating; limited topography constraints; it is not in a conservation area; it is not listed; and it does not fall within protected vistas or strategic views. Suggests that allocations should provide an indicative minimum development capacity.

Hondo Enterprises though supportive of site’s inclusion in the allocations for business-led mixed-use development. Archway Town Centre has an over-provision of financial services and above average provision of retail and leisure services as set out in the Islington retail and leisure survey (2011). Given this over-provision and the site's location within a predominantly residential area, the allocation should be amended to exclude business uses and require residential-led development. The site ownership details are incorrect. The site should also be considered an appropriate location for a tall building given its high PTAL rating; limited topography constraints; it is not in a conservation area; it is not listed; and it does not fall within protected vistas or strategic views. Suggests that allocations should provide an indicative minimum development capacity.

The respondent suggests that a flexible approach is applied to supporting uses/multi-use schemes which include ancillary commercial and community uses are required to support the economy and create a sense of place. The respondent requests that 1 Elthorne Road should be removed from the Archway Town Centre boundary as its inclusion is unsound and is inconsistent with para 85 of the NPPF and new London Plan policy SD7 part B. The Employment Land Study 2016 identifies this part of Archway Town Centre retail gives way to other uses, including G3 and C4 uses. The surrounding context of 1 Elthorne Road comprises residential use and other non-retail/commercial uses, as such the site holds limited economic and social value.

The prioritisation of office floorspace within the area is supported but it should be acknowledged that other ancillary commercial and community users are required to support the economy and create a sense of place. The respondent suggests that a flexible approach is applied to supporting uses/multi-use schemes which include office floorspace.
Resident: The allocation is not consistent with NPPF paragraphs 96 and 97 as it allocates housing on the Finsbury leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The Council's Open Space, Sport and Recreation assessment (2020) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2030 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.

839.0172 Bunhill and Clerkenwell Area Action Plan
Policy BC7: Central Finsbury
Resident: States that APP policy BC7T does not comply with NPPF Policies 96 and 97 due to the loss of open space, sport and recreating facilities. Also states that the additional housing is not required in accordance to the Bunhill and Clerkenwell Urban Design Study 2010 page 45.

839.0173 Site Allocations
Policy BC7: Central Finsbury
JPA Investments: Landowner: Consider the allocation should be amended to allow mixed use development including flexible commercial units (83/88) and state that residential use is acceptable where there is not net loss of business floorspace.

839.0173 Strategic and Development Management Policies
Policy B2: New business floorspace
JPA Investments: Landowner: The respondent suggests that residential uses are recognised in PELs and to remove restrictions contained in policy B2 (4) for residential uses. The respondent considers that employment land outside the CAZ should encourage and capitalise opportunities enabled by residential led schemes to meet Islington’s growing employment needs. The response includes reference to recommendations made by the council on historic planning applications between 2016-2017 on employment designated sites outside the CAZ at Hornsey Road and Fairbridge Road; and makes reference to recommendations contained in the London Plan policy 87 and Islington’s ELU (2016) on recognising mixed use development. In addition, the respondent states that Islington has sufficient employment floorspace capacity according to the London Employment Sites Database which identifies additional 24,100sqm up to 2041.

839.0174 Site Allocations
Policy H1: Thriving communities
London Centric Ltd: Landowner: Part A of response concerns allocation FP5. Respondent provides a lot of background information and a novel analysis of small sites in the area which they consider supports the view that commercial allocation has stopped smaller sites coming forward. Although the revised allocation is more streamlined, with less varied uses, it is not practical to deliver. The allocation should state that the existing land uses are sui generis on the ground floor (not 'sui generis main town centre use') and residential above. Purely commercial, or commercial/led schemes with some residential use, are not viable at this small site. Suggest that a purely residential scheme would be viable, or a large HMO/build-to-rent type scheme could possibly provide a small component of SME workspace. Concerned that the inappropriate land use allocation will render the site underdeveloped and undeveloped throughout the Plan period.

839.0174 Strategic and Development Management Policies
Policy H2: Thriving communities
London Centric Ltd: Landowner: Background info on landowner, site and context. Not stated

839.0174 Strategic and Development Management Policies
Policy H3: Thriving communities
London Centric Ltd: Landowner: We agree with Part A, that Islington needs to be a place that supports a range of different incomes, tenures and backgrounds, as this contributes the London Mayors fulfilment of widening housing choice (Policy, 5.8 of the Adopted London Plan, 2016), however, we feel that this policy is undermined in later policy chapters which seek to prioritise the provision and role of self contained housing over other housing type tenures for all sects of society (Policy H7: Meeting Needs of Vulnerable People and the restriction placed on Purpose Built Private Rental Sector development as not being allowed or recognised as being a priority over self contained accommodation, Policy H11). Self contained housing caters for some people better than others, there are a range of wider housing needs that should be taken into account such as those living alone, wanting flexible lease types or business visitors seeking mid to longer term flexible leased accommodation.

839.0174 Strategic and Development Management Policies
Policy H3: Thriving communities
London Centric Ltd: Landowner: Under Part B, that the Council is committed to providing conventional housing that meets identified needs, however, there are wider housing needs which remain totally undetected such as those needing interim accommodation (i.e. sofa surfers - a lost generation) and new comers to London who all need spaces that are fit for purpose, affordable and unconventional. This concept of private sector rental accommodation should also be reflected in Part C, as it asserts the need for conventional housing to meet the needs of people throughout its lifetime, but what about the need for non-conventional housing as a product to meet the needs of people throughout their lifetime?

839.0174 Strategic and Development Management Policies
Policy H3: Thriving communities
London Centric Ltd: Landowner: The Council is committed to meeting and exceeding the Borough’s minimum housing target as set out in the London Plan; however, we ask that better acknowledgment is taken into account on the role that the Build to Rent or HMO sectors play in helping to tackle the housing problem and going some way to help tackle housing targets.

839.0174 Strategic and Development Management Policies
Policy H3: Thriving communities
London Centric Ltd: Landowner: The Council supports high density housing development under Part C of the Policy, and to some degree do agree that proposed developments which could result in the reduction of land supply expected to be suitable for conventional housing, would otherwise be refused. However, in the latter scenario we ask that Islington acknowledge that in providing a housing solution that wider notions of housing delivery, other than conventional forms, be officially considered, as they too help to deal to abate the Housing problem.
Whilst we are happy to see under Part S the retention of social and community infrastructure we would request that Islington fully takes account that private clubs come under a Sui Generis use, which would not render them as being a D2 use (Assembly and Leisure).

London Centric Ltd would prefer that the Policy wording in key parts takes into account the following:

i) Under Part F (tenure split) London Centric would prefer that Islington better acknowledge that in some instances there should be better leeway to allow for a "private: intermediate" housing tenure splits, where it is not possible to provide social rent on site, if physical site constraints make it almost impossible to deliver all three tenures in one project, due to design restrictions and scheme viability problems.

ii) Under Part D (affordable housing target) be amended and the Policy justification reworded so as to take account of the fact that the affordable housing target of 50% remains a target aspiration, but, that cases will be determined on a case by case basis, where scheme viability will dictate what is actually achievable (as supported by the London Plan, 2016).

iii) London Centric are particularly unhappy that Policy N seeks to resist the prospect of Purpose Built Private Rented accommodation. This is too restrictive and does not allow for a diverse housing supply with adequate choice. This would also restrict smaller developers from helping to contribute to alleviating the wider housing problem, there is a growing demand for PSR products, which can satisfy an affordable housing element, if agreed with the developer (i.e. below market rent options).

iv) We are disappointed to see that under Part D that largescale HMO's, such as co-living schemes will be refused as they are not considered to make the best use of land and undermine efforts of affordable housing and other land use priorities of the Plan. This is because the Council’s view of “best use of land” may be in conflict with the market’s ability to provide its “best use of land” at the time. London Centric are keen to promote a Co-Living, HMO scheme in the context of considering an affordable rent for units or rooms and in the form of “cluster flats”, high-quality accommodation.

Policy H2: New and existing conventional housing

London Centric Ltd

We think that Islington are short-sighted in that wider housing products in the form of co-living, Build to Rent or sui generis HMO schemes do help to tackle the housing problem. This is by widening housing choice, fulfilling a specialist need (a specific "time of life" requirement for "economical", small-spaced living), which, if designed to a good standard, can offer the opportunity for an affordable housing product (in a private sector context). More specifically, we support:

i) Islington’s aim to exceed the housing target of 7,750 units by 2028/2029, which equates to an annualised target of 775 per annum.

ii) Islington’s scheme to promote the optimisation of sites; however, we ask that building height and scheme viability be used to help justify raising the density of some sites, which is on enabling development grounds especially. This is especially important for town centre or near to town centre sites such as 1 Prah Road, with local heights reaching over 5 storeys should allow for new proposed developments to reach similar heights.

London Centric disagree that:

i) Under Part C the loss of existing self-contained housing will be resisted unless, at least an equivalent floor space is provided; especially in the light of proposals satisfying wider Local Plan objectives and being seen as widening housing choice and fulfilling a specific need for non-conventional housing, and in offering Londoners alternative affordable residential products.

ii) Under Part D, we would ask that the housing mix priorities as referred to in Table 3.2 that local heights reaching over 5 storeys should allow for new proposed developments to reach similar heights.

iii) London Centric are particularly unhappy that Policy N seeks to resist the prospect of Purpose Built Private Rented accommodation. This is too restrictive and does not allow for a diverse housing supply with adequate choice. This would also restrict smaller developers from helping to contribute to alleviating the wider housing problem, there is a growing demand for PSR products, which can satisfy an affordable housing element, if agreed with the developer (i.e. below market rent options).

Policy H3: Genuinely affordable housing

London Centric Ltd

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

i) The 50% target be treated as an aspiration, which, if it may be demonstrated this is not deliverable, that the appropriate level of affordable housing be provided.
In relation to Islington’s Draft Policy on HMO’s, we ask that:

1. Under Part B that for sites capable of delivering 10 or more conventional housing units and/or look to provide 1,000 sqm (GIA residential floorspace or more) – exception of full or part public ownership – that a 95% on site provision is desired, without public subsidy; while a 50% provision is required with public subsidy. We would like some acknowledgement that some developers may find it hard to access public funds, and, to better understand the problem site constraints may have in delivering these exceptionally high affordable housing targets, as well as the role scheme viability plays in satisfying these affordable housing thresholds.

2. Under Part F, that any proposal not looking to provide the minimum affordable housing level of housing as listed in part B, will be refused. This is very restrictive and will stifle the speed at which homes will be brought forward. This goes against national guidance which is seeking to speed up housing delivery, adopting policies that are properly justified, and will strangle the prospect of smaller developers trying to grow and reduce the over dependence of house building from major builders. This is unrealistic.

3. London Centric finds it unacceptable to learn that under Part G, that site specific viability information will only be accepted in exceptional circumstances, determined by the Council. How can a council develop blanket policies which are not sensitive to market forces (which are liable to flux) be allowed to dictate the future development patterns on a purely policy driven process? This is not realistic or supported by adopted national or regional planning guidance (NPPF, 2019 and The London Plan, 2016).

4. Under Part H (tenure split) it is evident, Islington have put forward a requirement for a 70:30 affordable housing tenure split (social rent: intermediate). London Centric require that Islington better acknowledge that in some instances there should be better leeway to allow for a purely “private: intermediate” housing tenure split, where it is not economically viable to provide social rent in particular cases, especially if physical site constraints make it almost impossible to deliver all three tenures in one project, due to design restrictions and market aspirations are wanting separate cores for each tenure.

5. In relation to schemes delivering less than 10 residential units or below 1,000sqm of residential floorspace (GIA), that a commuted sum of £50,000 per net additional unit is applied, that Islington consider the possibility of a lower commuted sum payments for some schemes if scheme viability remains to be a problem.

London Centric is unhappy to learn that:
- Under Part B that for sites capable of delivering 10 or more conventional housing units and/or look to provide 1,000 sqm (GIA residential floorspace or more) – exception of full or part public ownership – that a 95% on site provision is desired, without public subsidy; while a 50% provision is required with public subsidy. We would like some acknowledgement that some developers may find it hard to access public funds, and, to better understand the problem site constraints may have in delivering these exceptionally high affordable housing targets, as well as the role scheme viability plays in satisfying these affordable housing thresholds.

- Under Part F, that any proposal not looking to provide the minimum affordable housing level of housing as listed in Part B, will be refused. This is very restrictive and will stifle the speed at which homes will be brought forward. This goes against national guidance which is seeking to speed up housing delivery, adopting policies that are properly justified, and will strangle the prospect of smaller developers trying to grow and reduce the over dependence of house building from major builders. This is unrealistic.

- London Centric finds it unacceptable to learn that under Part G, that site specific viability information will only be accepted in exceptional circumstances, determined by the Council. How can a council develop blanket policies which are not sensitive to market forces (which are liable to flux) be allowed to dictate the future development patterns on a purely policy driven process? This is not realistic or supported by adopted national or regional planning guidance (NPPF, 2019 and The London Plan, 2016).

- Under Part H (tenure split) it is evident, Islington have put forward a requirement for a 70:30 affordable housing tenure split (social rent: intermediate). London Centric require that Islington better acknowledge that in some instances there should be better leeway to allow for a purely “private: intermediate” housing tenure split, where it is not economically viable to provide social rent in particular cases, especially if physical site constraints make it almost impossible to deliver all three tenures in one project, due to design restrictions and market aspirations are wanting separate cores for each tenure.

- In relation to schemes delivering less than 10 residential units or below 1,000sqm of residential floorspace (GIA), that a commuted sum of £50,000 per net additional unit is applied, that Islington consider the possibility of a lower commuted sum payments for some schemes if scheme viability remains to be a problem.

London Centric disagrees with the view that the need for accommodation for older people must primarily be met via the delivery of conventional housing, as there are other housing models such as non-self contained accommodation (in the form of cluster flats) which have capacity to cater well for elderly people. Many elderly people live alone and in larger housing formats, which from a care and wellbeing perspective can be isolating. Co-living or extra care accommodation should be identified as acceptable wellbeing housing solutions.

London Centric contests the wording of Part C which refuses the prospect of large-scale HMO’s coming forward in the form of ‘cluster flats’, which offer some self contained format in the provision of typically non-self contained accommodation. Also, while we agree with the need to comply with Draft Policy H4 (design standards), we do not agree with the need to comply with Policy H2 which requires sites by first considered for self contained housing, rather, London Centric would prefer that the market should dictate what is provided, as further supported by scheme viability testing, as well as a better appreciation that non-conventional may help to widen housing choice. We are of the belief this is too short sighted. We part agree with the need to fulfil a genuinely affordable housing product under Part C is however, the client team would prefer to see something which takes account of what is feasible and a wider appreciation of what is deemed affordable.
Strategic and Development Management

Policy H11: Purpose Built Private Rented Sector development

London Centric Ltd

Landowner

London Centric disagree with Part A in that Islington considers that purpose built Private Rented Sector (PRS) development models do not have a role in meeting housing need in Islington. This is very short-sighted especially in the understanding that London is a generation of renters, which is only set to increase (according to one forecast, on current trends, the private rented sector could grow to accommodate some 40% of all London households by 2040-quote from Housing in London, GLA (2017)). We believe a wider appreciation of housing products should be entertained in order to let market forces speak for themselves and that viability appraisals allow for PRS on enabling development grounds (if this is the case), otherwise Councils run the risk of slowing housing delivery, land banking or worse, nothing taking place. At a basic level, regardless of whether more conventional models are preferred by Islington, that purpose-built PRS is seen as part of widening housing choice (Policy 3.8 of the Adopted London Plan, 2016).

R19.0174

893.0174

Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

London Centric Ltd

Landowner

Other comments we have in relation to any “accepted” PRS schemes, which, relates to any wider compliance:

v) In relation to the clawback mechanism related to part v) which ensures that the maximum amount of expense of the PSR, which is not acceptable.

vi) London Centric Ltd has no objection in the unified management and ownership of the development is agreed to for a minimum period of 50 years, and the non-applicability to sell the units at a market rent for the length of the covenant period, however we do ask that this need not prevent the owner/developer to apply for an alternative land use at any point, should the market dictate there not to be a need for a PSR scheme. As such, we request that any such covenant run with the planning use and not land. This means it might be better dealt with via a planning condition.

vii) Whilst we agree with part vii) which signifies that longer tenancies (of three years or more) are available for a minimum period of 50 years, and the non-applicability to sell the units at a market rent for the length of the covenant period, however we do ask that this need not prevent the owner/developer to apply for an alternative land use at any point, should the market dictate there not to be a need for a PSR scheme. As such, we request that any such covenant run with the planning use and not land. This means it might be better dealt with via a planning condition.

R19.0174

893.0174

Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

London Centric Ltd

Landowner

We believe a wider appreciation of housing products should be entertained in order to let market forces speak for themselves and that viability appraisals allow for PRS on enabling development grounds (if this is the case), otherwise Councils run the risk of slowing housing delivery, land banking or worse, nothing taking place. At a basic level, regardless of whether more conventional models are preferred by Islington, that purpose-built PRS is seen as part of widening housing choice (Policy 3.8 of the Adopted London Plan, 2016).

R19.0174

893.0174

Strategic and Development Management Policies

Policy H11: Purpose Built Private Rented Sector development

London Centric Ltd

Landowner

Policy H11 relates to “conventional”, self contained housing definitions and types of accommodation. The Client team therefore asks for a greater degree of flexibility to enable a meaningful discussion with the Council to work through a justified methodology of any “affordable” private rent put forward. The Mayor is still trying to regulate an “industry standard” for this type of housing, which includes an understanding of the right application of an affordable rent. At present, our client anticipates the use of average wage data as well as the use of London living rent data, and, although the latter is typically applied for self contained, conventional housing, will be used in the calculation of an appropriate “below market rent” rental value per room.

vi) Under A(iii) we ask the requirement for self contained units to include the prospect of cluster flats, which may allow for anything from 2-5 bed occupancies, which will maybe let separately, but that the revenue be reflected the number of occupants inside them (per capita/at a room rent value).

v) In relation to A (iv) with the request for genuinely affordable housing to be provided on-site, in line with the definitions listed in policy H3, the client team believes this policy to be too restrictive. This is because Policy H3 relates to “conventional”, self contained housing definitions and types of accommodation. The Client team therefore asks for a greater degree of flexibility to enable a meaningful discussion with the Council to work through a justified methodology of any “affordable” private rent put forward. The Mayor is still trying to regulate an “industry standard” for this type of housing, which includes an understanding of the right application of an affordable rent. At present, our client anticipates the use of average wage data as well as the use of London living rent data, and, although the latter is typically applied for self contained, conventional housing, will be used in the calculation of an appropriate “below market rent” rental value per room.

v) In relation to A (v) we understand the need to covenant to safeguard the retention of the PSR use for a minimum period of 50 years, and the non-applicability to sell the units at a market rent for the length of the covenant period, however we do ask that this need not prevent the owner/developer to apply for an alternative land use at any point, should the market dictate there not to be a need for a PSR scheme. As such, we request that any such covenant run with the planning use and not land. This means it might be better dealt with via a planning condition.

v) In relation to the clawback mechanism related to part v) which ensures that the maximum amount of affordable housing is provided on-site where the covenant is broken (notwithstanding criterion iv), we ask that scheme viability is taken into account and; to quote Paragraph 3.77 of the Mayors Housing Strategy (2018) that the following also be considered: “The draft London Plan, supported by the Affordable Housing and Viability SPG, sets out new a pathway through the planning system for Build to Rent schemes. This pathway is designed to help both applicants and councils guide Build to Rent schemes through the planning system by acknowledging their distinct economics when compared with mainstream build for sale housing schemes. This is normally taken to mean two separate but connected factors: first, Build to Rent relies on a revenue stream secured through rent rather than upfront return on sales; and, second, Build to Rent schemes often cannot therefore compete to buy land on an equal footing with speculative build for sale schemes."

vi) London Centric has no objection in the unified management and ownership of the development is guaranteed through the covenant period, however, we ask for there to be flexibility for allow for best value in the management and delivery of the PSR, this means the need for sub clauses which would allow for “management” reviews in the duration of the covenant.

v) Whilst we agree with part vi) which signifies that longer tenancies (of three years or more) are available to all tenants, we also note the need for shorter/ flexible tenancies in order to meet the needs of the market as well. London Centric Ltd ask for shorter tenancies be allowed to co-exist, which may end with a month’s notice or less, if agreed with the PSR provider. In relation to upfront fees during the letting process which dates this not be charged, except for security deposits and upfront rent payments, we ask for this to be changed to in line with industry standards. This would prevent any onerous fees from being purely at the expense of the PSR, which is not acceptable.
Site Allocations

London Centric Ltd

Support the site allocations but consider they are unnecessarily restrictive. The allocations should support the council's strategy which aims to ensure the adequate supply of business space is delivered via a mix of business, office, and industrial uses on sites of all sizes. We disagree with the council's assertion that the site allocations need to be more restrictive.

In relation to Social and Community infrastructure, we would ask that the council appreciate that private developers are best placed to deliver this type of infrastructure.

We agree with Part B which states that future business expansion is to be directed at the City of London and the main road networks. We do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

BC36: London Metropolitan Archives

While London Centric Ltd agree with the requirement to provide 10% affordable workspace on schemes providing in excess of 1,000 sqm of office space, this should be applied flexibly to account for site characteristics and scheme viability. We disagree with the council's assertion that the site allocations need to be more restrictive.

The team believe SME type spaces are better delivered in the context of much larger mixed use schemes, where lower rental yields are more appropriate.

Policy: B1: Delivering business floorspace

London Centric Ltd

Landowner

We agree with Part B which states that future business expansion is to be directed at the City of London and the main road networks. We do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

Support the council's strategy which aims to ensure the adequate supply of business space is delivered via a mix of business, office, and industrial uses on sites of all sizes. We disagree with the council's assertion that the site allocations need to be more restrictive.

In relation to Social and Community infrastructure, we would ask that the council appreciate that private developers are best placed to deliver this type of infrastructure.

We agree with Part B which states that future business expansion is to be directed at the City of London and the main road networks. We do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

Policy: B2: New business floorspace

London Centric Ltd

Landowner

While we agree that new business floorspace is to be primarily directed at the City of London and the main road networks, we do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

BC36: London Metropolitan Archives

While London Centric Ltd agree with the requirement to provide 10% affordable workspace on schemes providing in excess of 1,000 sqm of office space, this should be applied flexibly to account for site characteristics and scheme viability. We disagree with the council's assertion that the site allocations need to be more restrictive.

The team believe SME type spaces are better delivered in the context of much larger mixed use schemes, where lower rental yields are more appropriate.

Policy: B4: Affordable workspace

London Centric Ltd

Landowner

While London Centric Ltd agree with the requirement to provide 10% affordable workspace on schemes providing in excess of 1,000 sqm of office space, this should be applied flexibly to account for site characteristics and scheme viability. We disagree with the council's assertion that the site allocations need to be more restrictive.

The team believe SME type spaces are better delivered in the context of much larger mixed use schemes, where lower rental yields are more appropriate.

Policy: SC1: Social and Community Infrastructure

London Centric Ltd

Landowner

In relation to Social and Community infrastructure, we would ask that the council appreciate that private developers are best placed to deliver this type of infrastructure.

While London Centric Ltd agree with the requirement to provide 10% affordable workspace on schemes providing in excess of 1,000 sqm of office space, this should be applied flexibly to account for site characteristics and scheme viability. We disagree with the council's assertion that the site allocations need to be more restrictive.

The team believe SME type spaces are better delivered in the context of much larger mixed use schemes, where lower rental yields are more appropriate.

Policy: SRF: Finsbury Park

London Centric Ltd

Landowner

Respondent supports the role of town centres and stimulating activity and vitality but consider the policy too restrictive by solely requesting commercial, retail and service uses at ground floor, with residential only supported on upper floors. Such land use formats should be applied flexibly to account for site characteristics and scheme viability and assessed on a case by case basis. Paragraph 35b of NPPF 2017 states planning policy needs to be achievable and evidenced. If an applicant can prove the council's allocation is not achievable then wider land uses should be allowed that meets the plans objectives.

Respondent disagrees with Part D that Finsbury Park can act as a CAZ satellite location because it is not the CAZ and if there is no existing use to retain or there is no market demand then the policy should be abandoned.

No formal evidence exists to support the theory that Finsbury Park has the capacity to develop as a satellite CAZ location. Finsbury Park is not specifically prioritised as a future hub in any of the formal literature, rather it is the south of the borough as well as other priority business areas.

Affordable business space expansion does not yield a viable expansion plan as the CAZ's success is based on high yield office rents. B1 office space is not in deficit as there has been a net expansion in the last three years.

Policy: R3: Islington's Town Centres

London Centric Ltd

Landowner

Respondent states the council should acknowledge that there are many town centres sites that are not located in traditional town centre environments and so should allow non-main town centre uses at ground floor level. This is supported by para 85f NPPF 2018. If there is no pre-existing town centre use on the site, the landowner should not be forced to provide such a use. Respondent contends use of term 'sui generis use classes' does not denote to be Social Infrastructure (D2 use class).

Local significant Industrial Sites (Part A, i-iii), with any wider proposals for B1(a) and B1(c) to be directed in AAP, the CAZ Fringe Spatial Strategy Areas of Upper Street, Kings Cross and Pentonville Road, PELs and Locally significant Industrial Sites and town centre sites, where we believe the fundamental basis of this policy should be based on market economics and demand. This means that for schemes capable of delivering this level quantun, it may be proven that scheme viability will be compromised and/or if market demand for does not dictate for affordable workspace, then this should not be provided.

The team believe SME type spaces are better delivered in the context of much larger mixed use schemes, where lower rental yields are more appropriate.

Policy: BC36: London Metropolitan Archives and Finsbury Business Centre

London Metropolitan Archives

Business

The City of London Corporation support the added text relating to the London Metropolitan Archives (BC36) and its importance in terms of being a heritage asset and visitor attraction.

Support the site allocations but consider they are unnecessarily restrictive. The allocations should support university related development including refurbishment of existing buildings, infill development and redevelopement of existing buildings. The allocations should also be amended to specifically support the development of student housing.

Support the city's strategy to focus business expansion in the City of London and the main road networks. We do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

Policy: BC6: Mount Pleasant and Exmouth Market

London Metropolitan Archives

Business

The City of London Corporation is pleased that the significance of the London Metropolitan Archives site (BC36) and its importance in terms of being a heritage asset and visitor attraction is acknowledged in the proposed plan, especially in the Bunhill and Clerkenwell Area Action Plan.

Support the site allocations but consider they are unnecessarily restrictive. The allocations should support university related development including refurbishment of existing buildings, infill development and redevelopement of existing buildings. The allocations should also be amended to specifically support the development of student housing.

Support the city's strategy to focus business expansion in the City of London and the main road networks. We do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

Policy: BC7: Mount Pleasant and Exmouth Market

London Metropolitan Archives

Business

The City of London Corporation is pleased that the significance of the London Metropolitan Archives site (BC36) and its importance in terms of being a heritage asset and visitor attraction is acknowledged in the proposed plan, especially in the Bunhill and Clerkenwell Area Action Plan.

Support the site allocations but consider they are unnecessarily restrictive. The allocations should support university related development including refurbishment of existing buildings, infill development and redevelopement of existing buildings. The allocations should also be amended to specifically support the development of student housing.

Support the city's strategy to focus business expansion in the City of London and the main road networks. We do not support the council's proposal to direct business expansion to Faber and Catford because this would be inconsistent with the council's strategy.

Policy: BC12: 190-210 Holloway Road

London Metropolitan Archives

Landowner

Support the site allocations but consider they are unnecessarily restrictive. The allocations should support university related development including refurbishment of existing buildings, infill development and redevelopement of existing buildings. The allocations should also be amended to specifically support the development of student housing.
Strategic and Development Management Policies

Policy H6: Purpose Built Student Accommodation
London Metropolitan University
Landowner

Background information provided, including details of the Estates Strategy and One Campus One Community project; in particular, they claim there is a need for on-site affordable accommodation for its high number of economically disadvantaged students, and the private student accommodation elsewhere in the area is too expensive to meet these needs. As the Holloway campus has significant surplus space for the reasons described above, this presents an ideal opportunity for the University to include specifically supporting student housing at the Holloway Road campus.

Not stated

Policy SP5: Nags Head and Holloway
London Metropolitan University
Landowner

The plan has not been informed by an objective assessment of the development needs of the Higher Education sector (including LMU) and fails to plan positively to meet such needs

Object

Policy DH13: Building heights
London Metropolitan University
Landowner

The University welcomes the new approach that the Council is taking to tall buildings following the Tall Buildings Study and the identification of a range of locations across the borough where buildings of more than 30m are acceptable in principle. It is noted that the LMU Tower site is one such site (CS – up to 75m) and Site Allocation NH13 also refers to this. 45 Hornsey Road (SA ref. NH10) has also been identified as suitable for a building of up to 57m. It is considered that the part of the LMU campus which immediately adjoins NH10 should also be considered as a site for a tall building as this has very similar locational characteristics as the NH10 site and could form a townscape feature with this site. In addition, other parts of the University’s campus that are outside the strategic viewing corridor may also be suitable for taller elements and it is requested that the policy allows for this. The existing context in the immediate area around Holloway Road station and the Emirates stadium sets a precedent for tall buildings. The buildings within NH14 offer potential opportunities for tall buildings. The raised railway viaduct running the length of the site on the north-west edge provides a buffer zone reducing the potential visual impact of any tall building(s) on residential neighbours to the north, and the site further benefits from the orientation with the railway viaduct sited to the north-west reducing potential overshadowing impacts. The depth of the site is sufficient to allow for setbacks and provision of an appropriate scale of buildings to Hornsey Road. The masterplan opportunity to create a new pedestrian route from Holloway Road station to the stadium has the potential for tall building(s) to act as gateway markers. The draft policy identifies 45 Hornsey Road as a suitable site for a tall building and the redevelopment of the adjacent site has the potential to respond to this by creating an enhanced gateway and setting to the approach to the stadium. The University welcomes the opportunity for the local plan to reflect the surrounding context of the LMU sites and campus in identifying further potential for tall buildings. Indeed we consider this necessary to ensure its soundness.

Object

Policy H6: Purpose Built Student Accommodation
London Metropolitan University
Landowner

The plan has not been informed by an objective assessment of the development needs of the Higher Education sector (including LMU) and fails to plan positively to meet such needs

Object

Policy H6: Purpose Built Student Accommodation
London Metropolitan University
Landowner

Has not been informed by an objective assessment of the needs for PBIA (including specifically for needs associated with LMU) and fails to plan positively to meet such needs

Object

Site Allocations

N/A - general comment

Greater London Authority/Mayor of London
Statutory consultee

It is clear that the proposed allocations within the Harewood Road/Bowery Road (SA) are for the retention and intensification of industrial uses which is supported by the Mayor and is closely aligned with draft new London Plan Policies 4.4 and 15.

Support

Site Allocations

N/A - general comment

Greater London Authority/Mayor of London
Statutory consultee

A number of the sites identified in the site allocations are home to industrial uses and an approach to their future intensification should be applied in a consistent and methodical manner and in accordance with the draft new London Plan. It should be noted that between 2001 and 2015 more than 1,300 hectares of industrial land was released to other uses, well in excess of previously established London Plan monitoring benchmarks. In 2015, 35% of industrial land in London was located on non-designated sites which contributes significantly to the effective functioning of London’s economy as a whole. While a number of the borough’s site allocations have an element of industrial uses the sites that they lie within are not designated as such. Binnington’s intention to protect the industrial uses on many of these non-designated sites is welcomed and the Mayor would support consideration for their designation as locally significant industrial sites where this was justifiable and followed a methodical and consistent approach.

Object

Site Allocations

N/A - general comment

Greater London Authority/Mayor of London
Statutory consultee

The Mayor welcomes the inclusion of indicative capacity figures for each spatial strategy area in Table 2.2. There is a typo in paragraph 1.30. Suggest it would be useful to include maximum height limits for those allocated sites located within a protected viewing corridor. Welcome recognition of the borough’s cultural assets and the protection of these uses through allocations such as AU52 and NH5, in line with the approach set out in London Plan policy RC3. Where industrial uses exist on non-designated industrial sites e.g. BC36 London Metropolitan Archives and Finsbury Business Centre, the approach should follow the guidance in London Plan policy E70

Support
<table>
<thead>
<tr>
<th>ID</th>
<th>Strategic and Development Management Policies</th>
<th>N/A - general comment</th>
<th>Greater London Authority/Mayor of London</th>
<th>Statutory consultee</th>
<th>The Mayor welcomes the overall approach to growth and development in Islington’s Draft Local Plan and considers that on the whole the plan is positive and, as drafted, in general conformity with the London Plan. Notes new London Plan and need to reflect the Mayor’s Intend to publish version of the new London Plan which will be published following receipt of the Examination Panel Report. Welcomes seven principle objectives that underpin the Local Plan, and the strategy to deliver growth over the plan period. Pleased that much of the advice contained in earlier response to the emerging Local Plan has been positively incorporated into this Regulation 19 version. Especially welcomes Islington’s ambitious declaration at paragraph 1.52 to become net zero carbon by 2030, which sets the standard for London as a whole and will make a significant contribution in meeting the Mayor’s target for London to become a zero carbon city by 2050.</th>
<th>Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy D13: Building heights</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>The Mayor welcomes Islington’s approach to tall buildings by setting out a clear definition and through the identification of specific locations where tall buildings, over 25m in height might be suitable, subject to other Local Plan requirements. This approach is aligned with draft new London Plan Policy DB and is underpinned by Islington’s Tall Buildings Study 2018. A single image which combines both figure 8.2 Strategic and local seaviews and figure 8.3 locations suitable (in principle) for tall buildings over 25m would be useful and is recommended to illustrate that locations for tall buildings have been strategically chosen in order to avoid impacts on strategic and local views and that there are clear overlaps, maximum heights set out in Table B.3 will ensure that impacts are avoided.</td>
<td>Support</td>
</tr>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H2: New and existing conventional housing</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>Welcome commitment to exceed new London Plan housing target and positive intention to achieve this through optimisation of land and buildings. Note intention to roll-forward target beyond 2028/29 if targets have not been updated. Consider this acceptable but draw attention to paragraph 4.1.8D of new London Plan which states that account should be taken of additional capacity that may result from any committed transport infrastructure improvements, with the small sites target rolled forward. Paragraph 3.29 of the draft Local Plan seeks to protect against the loss of existing affordable housing and this is welcome. It should be noted, however, that Policy H20BA of the draft new London Plan makes it a requirement that all schemes invoking the demolition and replacement of affordable housing must follow the Viability Tested Route and should seek to provide an uplift in affordable housing. This should be reflected in Islington’s Local Plan.</td>
<td>Support</td>
</tr>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H2: Genuinely affordable housing</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>As noted in our original response to Islington’s draft Local Plan, the approach to affordable housing delivery is more rigorous than that set out in Draft New London Plan Policy H6 as it limits the application of the Viability Tested Route to those development proposals where there are exceptional circumstances only. This approach is in line with Draft New London Plan Policy D1 and the revised National Planning Policy Framework / Planning Practice Guidance which limits site specific viability to exceptional circumstances where there are genuine barriers to delivery. The approach is considered to be consistent and in line with the draft new London Plan. However, Islington should monitor market conditions to ensure the continued delivery of housing and commercial development. On reviewing the draft Local Plan approach to affordable housing the Mayor strongly encourages Islington to base affordable housing requirements on gross residential development as set out in draft new London Plan Policy H6, as opposed to net additional housing as currently worded in the draft Local Plan in Policy H3, in order to optimise affordable housing delivery.</td>
<td>Both</td>
</tr>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H4: Delivering high quality housing</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>The Mayor welcomes Islington’s intention at paragraph 3.65 to ensure the integration of affordable housing as that is tenue-deh and builds on the principles laid out in the Mayor’s Good Growth Policy GG1 and paragraph 3.4.58 of the draft new London Plan with the ambition of building stronger and more inclusive communities.</td>
<td>Support</td>
</tr>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H5: Purpose-built Student Accommodation</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>The Mayor welcomes Islington’s requirement that 35% of new student accommodation to be affordable and that achieving this will ensure the threshold for the fast track route is met in accordance with the latest consolidated version of draft new London Plan Policy H5.44. Boroughs are encouraged to maximise the delivery of affordable student accommodation and Islington should recognise that this might be jeopardised through the prioritisation of buranary over and above affordable accommodation.</td>
<td>Both</td>
</tr>
<tr>
<td>0183</td>
<td>Strategic and Development Management Policies</td>
<td>N/A - general comment</td>
<td>TL City Planning</td>
<td>Statutory consultee</td>
<td>TL City Planning have provided a table with their Regulation 18 comments on SDM and Sites, with an additional row which elaborates further on these comments or confirms where they have no further comments. The row below relates to those comments which elaborate further where TL have outstanding comments/approval.</td>
<td>Not stated</td>
</tr>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy B2: New business footspace</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>Policy B2 directs office use to the CAZ, Barthol and Clerkenwell area, Spatial strategy areas within the CAZ / PIAs and Town Centres, not to the borough’s industrial areas. This approach is in line with new London Plan policies E1 and SD4 and welcomed by the Mayor.</td>
<td>Support</td>
</tr>
<tr>
<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>The protection of designated industrial land, especially the largest remaining concentration at Vale Royal/Brewery Road, is welcomed and aligns with London Plan policy E4. London Plan policy SD4M recognises the importance of industrial locations strategically positioned near the CAZ such as this one, for the provision of ‘last mile’ distribution/logistics ‘just in time servicing’, waste management and recycling as well as land to support transport functions.</td>
<td>Support</td>
</tr>
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<td>0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>In addition, the Mayor recommends that B2 and B6 uses are permitted over B2A, to support these types of essential industrial activity.</td>
<td>Not stated</td>
</tr>
<tr>
<td>R35 0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy B2: New business floorspace</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>While the Mayor supports the new LSS designations (Melody Lane, North Road, Offord Road, Pemberton Gardens and Station Road) and protection assigned to these. It is noted that these were previously EGAs. The council should clearly set out, with supporting evidence, the rationale for selecting these sites, as per requirements contained in Local Plan Policy E6.</td>
<td>Support</td>
</tr>
<tr>
<td>R35 0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy B4: Affordable workspace</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>The council should consider extending affordable workspace requirements to B1c uses, to recognise the turnover of businesses and industries across the borough.</td>
<td>Not stated</td>
</tr>
<tr>
<td>R35 0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H32: Gypsy and Traveller Accommodation</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>Greater London Authority/Mayor of London</td>
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<tr>
<td>R35 0177</td>
<td>Strategic and Development Management Policies</td>
<td>Policy H12: Gypsy and Traveller Accommodation</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>Greater London Authority/Mayor of London</td>
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<tr>
<td>R35 0177</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
<td>N/A - general comment</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>Figure 2.1 is welcome, which sets out clearly, the extent of the AAP boundary and so too is Figure 2.2 which sets the context of the AAP area in relation to the CAZ, City Fringe DA and the Elizabeth Line.</td>
<td>Support</td>
</tr>
<tr>
<td>R35 0177</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
<td>N/A - general comment</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>The AAP responds positively to the opening of the Elizabeth Line station at Farringdon and plans for the Station interchange are welcome.</td>
<td>Support</td>
</tr>
<tr>
<td>R35 0177</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
<td>Policy B2: Culture, retail and leisure uses</td>
<td>Greater London Authority/Mayor of London</td>
<td>Statutory consultee</td>
<td>Culture, retail and leisure uses are Islington's second level priority for the area and as such this is in line with the approach set out in the draft new London Plan Policy SD4 which promotes the unique roles of the CAZ which are listed under paragraph 2.4.4 of the draft new London Plan and includes arts, culture, leisure and entertainment among many others.</td>
<td>Support</td>
</tr>
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<td>N/A - general comment</td>
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<td>Statutory consultee</td>
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</tr>
<tr>
<td>R35 0178</td>
<td>Site Allocations</td>
<td>ARECA: Archway Campus, Highgate Hill</td>
<td>Archway</td>
<td>Peabody</td>
<td>Landowner</td>
<td>Welcome the allocation which aligns with landowners proposals for a residential-led, mixed use development. Consider the allocation should not be subject to justification against Policy SC1 and reference to such should be removed from the allocation. Request that the allocation be amended to state that a tall building is potentially acceptable on site subject to justification against policy DHR3 and a detailed townscape and heritage assessment.</td>
</tr>
<tr>
<td>Reference</td>
<td>Strategic and Development Management Policies</td>
<td>Policy SP7: Archway</td>
<td>Peabody</td>
<td>Landowner</td>
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<tr>
<td>R19.0178</td>
<td>Our client is generally supportive of the spatial strategy policy for Archway but having regard to the need to be sufficiently flexible and allow thorough scrutiny of development proposals for tall buildings to be considered on a site-by-site basis within the key area. Since Peabody’s representations to the Regulation 18 consultation in January 2018, the forthcoming development proposals on the Archway Campus site have advanced through pre-application discussions with Officers at LB. The current proposals for the site include the “Apex” building at 14 and 7 storeys, which exceeds the tall building definition of 30m and above. This proposed “Apex” building is considered appropriate within the wider context of Archway Town Centre and neighbouring Archway Tower, and the townscape benefits and high-quality design of this building have been demonstrated during pre-application discussions. As currently written, Part M of the policy states “three sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres”. This approach is considered restrictive and is not considered to align with the approach taken on a lot of sites within the key area. Whilst we recognise that tall buildings may not appropriate on many sites within Spatial Strategy area, it is considered that this approach is restrictive and could limit future development within the area. Peabody would suggest that a site-specific identification approach be recognised. It is suggested that the wording of Part M is amended to state “tall buildings are only supported within the Archway Spatial Strategy area on a site-by-site basis subject to justification against Policy DH3 and other relevant policies, or where identified within the relevant Site Allocation”.</td>
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</tbody>
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<table>
<thead>
<tr>
<th>Reference</th>
<th>Strategic and Development Management Policies</th>
<th>Policy H4: Delivering high quality housing</th>
<th>Peabody</th>
<th>Landowner</th>
</tr>
</thead>
<tbody>
<tr>
<td>R19.0178</td>
<td>Peabody support this policy as it aligns with their aspirations to deliver a high-standard of accommodation. In relation to Part H of the policy, it is requested that the explanatory text provides clarity on how the provision of dual aspect can be demonstrated to be impossible or unfavourable. In some cases, it should be recognised that where there are competing policy objectives on constrained sites, a high-quality design may not allow for true dual aspect units. The change of use and restoration of existing buildings often limits opportunities to provide dual aspect units as new residential layouts are required to work within the existing building envelope and block orientation. Site topography and shape are also key considerations that may limit the amount of dual aspect units that can be provided. In some cases, it is considered that a scheme which provides 100% dual aspect will radically alter the character and nature of the site and restrict compliance with policy objectives such as a suitable unit mix, family housing, density, and could ultimately have a negative impact on the urban character of an area. This could limit delivery and the provision of much needed, high-quality housing throughout the borough. Furthermore, it should be recognised within the explanatory text that in some cases the provision of single aspect units will be acceptable where it can be demonstrated that these units will have adequate passive ventilation, daylight and privacy, and avoid overheating, in line with Draft London Plan Policy D4 (Housing quality and standards).</td>
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</tbody>
</table>

| Object | | | | |
Policy H2: New and existing conventional housing, Part F
Peabody
Landowner

 Whilst studios would only constitute a small proportion of the housing mix of any development scheme within the borough, there is demand for studio units. In some circumstances, the provision of smaller private sale units, in particular studio units, can make private sale units accessible for first time buyers. We therefore welcome recognition that some such units may be acceptable. Peabody would like to see the policy worded more flexibly to allow for the provision of some studios in residential schemes where they are proposed to a high-quality. Peabody consider that an "or" approach would be more flexible and allow for a small number of high-quality studio units to be provided in scheme, where it is considered appropriate. We therefore request the policy is amended to read as follows:

i. "Studios/bedsits would constitute a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable elements; or

ii. The delivery of additional higher priority unit sizes and/or proposed higher priority units of an increased size is not possible; and

iii. Provision of studios/bedsits would result in a high-quality dwelling in accordance with Policy H4 and other relevant design policies."

In the same vein, Peabody request that the following sentence "this is considered to be no more than 5% of units, as a percentage of units overall and as a percentage of each of the affordable and market elements of a proposal" is removed from the explanatory text. An acceptable quantum of studio units is likely to vary on a site-by-site basis.

Lastly, Peabody request that more clarity is provided in the explanatory text as to how part F(ii) of policy could be demonstrated to Officers.

Policy H3: Genuinely affordable housing
Peabody
Landowner

As a Registered Provider, Peabody support the delivery high-quality, affordable homes within the Borough. Peabody would like to re-iterate the point made in their previous representations that whilst their priority is to deliver high-quality affordable homes, they must also compete with the rest of the market for land. Peabody must contend with the same development considerations and constraints that any other developer would be expected to address. These can include the site being unsuitable for a certain type of housing i.e. family housing. If this were the case, a second site would be used to deliver the family housing that cannot be delivered. Together, both sites would allow policy aims regarding the mix of dwellings to be satisfied which would be in the interests of achieving mixed and balanced communities. This would allow more family housing to be delivered on the second site than it ordinarily would if delivered on it's own, bringing significant benefits to the local community.

Where there are cost-related delivery issues, it may be necessary to justify lower amounts of affordable housing via a viability tested route. It may not be possible to provide at least 50% on-site affordable housing (by net additional unit) without a public subsidy, pursuant to part D(i) of the proposed policy. For example, the Archway Campus site is highly constrained and complex site where development costs are expected to be high. In order to deliver high-quality affordable housing on this site, a public subsidy is likely to be required to achieve a policy compliant level of affordable housing.
<table>
<thead>
<tr>
<th>R13.0178</th>
<th>Strategic and Development Management Policies</th>
<th>Policy H3: Genuinely affordable housing</th>
<th>Peabody</th>
<th>Landowner</th>
<th>At Paragraph 3.44 the draft plan states that &quot;the portfolio approach is not considered acceptable for any schemes in Islington. Each site must deliver affordable housing in line with the relevant part of policy H3. The Council will not accept lesser delivery to compensate for other sites, either elsewhere in the borough or outside the borough.&quot; Further, to our previous representations, Peabody would like to reiterate that in some cases, due to cost-related delivery issues, there are sites which Peabody will deliver where it is necessary to justify lower amounts of affordable housing subject to viability testing. Large landowners such as Peabody may be able to use assets elsewhere that they may not otherwise prioritise for development in order to deliver an overall package that will meet policy aims. By taking such a portfolio-based approach the overall supply of housing can be further increased and the delivery of affordable housing can be maximised. As a Strategic Partner to the Mayor of London, Peabody aim to deliver at least 60% affordable housing across their portfolio, in accordance with Draft London Plan Policy H5 (Delivering affordable housing). If taken in isolation, many sites Peabody develop, are likely to only deliver less than the required 60%, requiring a portfolio approach to be utilised in order to achieve this target. Whilst Peabody recognise that in general terms the Council may not wish a portfolio approach to be taken in order to deliver affordable housing, Peabody request that exceptions are made for the Mayor's Strategic Partners. Such a restriction is considered contrary to Draft London Plan policy and in the long-term, could limit the delivery of affordable housing in the borough. We therefore respectfully request that Paragraph 2.44 is amended to allow the Mayor's Strategic Partners to utilise a portfolio approach within the borough where appropriate.</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13.0179</td>
<td>Strategic and Development Management Policies</td>
<td>Policy SC1: Social and Community Infrastructure</td>
<td>Peabody</td>
<td>Landowner</td>
<td>Peabody consider that future land uses at their Archway Campus site should not be subject to justification against this policy. The site's previous D1 occupier vacated in 2013, and the services previously provided on site were relocated. Policy SC1 part D, or its explanatory text, should make it clear that the policy will not apply to sites where the council has allocated land for alternative uses. Application of this policy has the potential to limit delivery of housing and other infrastructure secured through site allocations.</td>
</tr>
<tr>
<td>R13.0179</td>
<td>Site Allocations</td>
<td>BC4: Finsbury Leisure Centre</td>
<td>B &amp; C: Central Finsbury</td>
<td>Resident</td>
<td>Overdevelopment will affect residents' physical and mental health, and put much of Bunhill House into fuel poverty. The allocation is not consistent with NPPF paragraphs 98 and 99 as it allocates housing on the Finsbury Leisure Centre site, reducing open space, space for sports and recreational facilities and green space. The council's Open Space, Sport and Recreation assessment (2009) states that there is an undersupply of these facilities in the area, which has increased due to the large increase in homes built in the interim. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.</td>
</tr>
<tr>
<td>R13.0180</td>
<td>Strategic and Development Management Policies</td>
<td>Policy T3: Enhancing the public realm and sustainable transport</td>
<td>The Canonbury Society</td>
<td>Local society</td>
<td>Support the allocations and proposed uses for HC1 and HC3. Would be best for the community and passengers if these allocations could be looked at holistically. Unconvened the Highbury gyratory works represent an improvement and consider the works should have been delayed until a comprehensive scheme including HC1 and HC3 could be delivered. Hope this lost opportunity can be recovered in time so the station and its environs are redesigned and reconfigured for the benefit of residents and visitors.</td>
</tr>
<tr>
<td>R13.0180</td>
<td>Site Allocations</td>
<td>HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner; HC3: Highbury and Islington Station, Holloway Road, N1 1RA</td>
<td>The Canonbury Society</td>
<td>Local society</td>
<td>Highbury Corner and Lower Holloway</td>
</tr>
<tr>
<td>R13.0180</td>
<td>Site Allocations</td>
<td>NC6: Short Clerk Court, Canonbury Road</td>
<td>The Canonbury Society</td>
<td>Local society</td>
<td>Highbury Corner and Lower Holloway</td>
</tr>
<tr>
<td>R13.0180</td>
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<tr>
<td>R13.0180</td>
<td>Strategic and Development Management Policies</td>
<td>Policy T3: Car-free development</td>
<td>The Canonbury Society</td>
<td>Local society</td>
<td>Support the allocations and proposed uses for HC1 and HC3. Would be best for the community and passengers if these allocations could be looked at holistically. Unconvened the Highbury gyratory works represent an improvement and consider the works should have been delayed until a comprehensive scheme including HC1 and HC3 could be delivered. Hope this lost opportunity can be recovered in time so the station and its environs are redesigned and reconfigured for the benefit of residents and visitors.</td>
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<tr>
<td>R13.0180</td>
<td>Strategic and Development Management Policies</td>
<td>Integrated Impact Assessment</td>
<td>The Canonbury Society</td>
<td>Local society</td>
<td>Support the allocations and proposed uses for HC1 and HC3. Would be best for the community and passengers if these allocations could be looked at holistically. Unconvened the Highbury gyratory works represent an improvement and consider the works should have been delayed until a comprehensive scheme including HC1 and HC3 could be delivered. Hope this lost opportunity can be recovered in time so the station and its environs are redesigned and reconfigured for the benefit of residents and visitors.</td>
</tr>
<tr>
<td>R13.0180</td>
<td>Strategic and Development Management Policies</td>
<td>Policy D3: Heritage assets</td>
<td>The Canonbury Society</td>
<td>Local society</td>
<td>We support the council’s proposed policies and its commitment &quot;to conserve and enhance the significance of heritage assets and their settings and the wider historic and cultural environment&quot;. As a group dedicated to preserving the Canonbury Conservation Area, we are concerned at the impact of any new policies which seek to limit the current protection afforded to conservation areas (CAs). We are also concerned at the pre-empting any new development which will negatively impact on the local character of a CA. We appreciate that different CAs have different local characteristics which is why the Islington Council Conservation Area Design Guidelines dated in 2002 are so useful. We urge the Conservation Department of the Council to update these local guides to be read in conjunction with the more general but comprehensive SPD Urban Design Guide issued in 2010. We are pleased to see that throughout the draft Local Plan, the importance of conservation areas is highlighted.</td>
</tr>
</tbody>
</table>
Strategic and Development Management

Policy DH4: Basement development
The Canonbury Society, local society
We are encouraged by the council's determination that any developments involving basements will be strictly controlled. Policy DH4, which regulates the development of basements, is vital in this regard.

Support

Policy S1: Delivering Sustainable Design
The Canonbury Society, local society
We support the council's proposed policies S1 to S10. To reduce pollution and maximise air quality, we think the borough should undertake another round of tree-planting and encourage other owners to do the same. The council should also maintain its policy of actively managing Tree Preservation Orders.

Support

Site Allocations

R15: Highbury and Islington Station, Holloway Road
Highbury Corner and Lower Holloway
The Upper Street Association, local society
The suggested timeline of 2021/22-2025/26 is far away, but the Association would like to be kept informed of any proposals for a new station. At present the station is overloaded with its link to the underground to help the disabled. This should be screened in dealings with TfL.

Not stated

Strategic and Development Management Policies

Appendix A: Marketing and vacancy criteria
The Upper Street Association, local society
We note controls proposed in advertising property Marketing and Vacancy criteria. We would like to see a wider new general Policy requiring estate agents to rely primarily on advertising by internet, as is the real case today. In our view estate agents' image on properties is disfiguring and unnecessary. We believe that in certain London Boroughs and indeed in some Scottish cities agents' hoardings are banned, restricted or time-limited.

Object

We welcome this introduction as a sensitive description of the importance of the Borough.

Support

Policy S15: Thinning communities
The Upper Street Association, local society
Para 3.1. “Islington’s residential population is expected to increase significantly over the plan period.” Again we believe that the Draft Plan should refer to the fact that the Borough is the most densely populated in the UK. Para 3.4 Strategic Housing Land Assessment Process (SHLAA) has highlighted that there is dwindling capacity for new residential development in Islington, insufficient to meet local housing need. The Plan needs to make reference to the needs of long-term future residents.

Not stated

Policy S7: Improving Air Quality
The Upper Street Association, local society
We particularly support the Draft Plan in reference to the environment. We note that Para 6.93 stresses that “the whole of Islington is covered by an Air Quality Management Area (AQMA), where national air quality objectives in relation to NO2, PM10 and PM2.5 are not likely to be achieved.” We recognise that Islington and Camden were among the first London Boroughs to accept the need to improve air quality.

Support

Policy DH4: Basement development
The Upper Street Association, local society
We welcome this Policy entirely.

Support

Policy SP4: Angel and Upper Street
The Upper Street Association, local society
Respondent welcomes strong protection of Chapel Market and that the night time economy should be strictly controlled. Policy DH4, which regulates the development of basements, is vital in this regard.

Both

Policy R5: Retail, leisure and services, culture and visitor accommodation
The Upper Street Association, local society
We ask that there should be express reference to the need around Highbury Corner for a) public lavatories, where provision was removed some years ago. A sign in the station says that there are no facilities here, and points to the lavatories at the top of Highbury Fields, a long way away. b) restoration of Post offices at Highbury & Islington station to serve the many thousands who pass the hub each week. These were removed in 2014.

Not stated

Comments on the IIA and welcome the baseline comments on townscape and cultural heritage, notes the degradation, however notes that some of the environmental and pollution data may need updating.

Object

Policy DH4: Basement development
The Upper Street Association, local society
We ask that there should be express reference to the need, in our view, to monitor the effects of the reconfiguration of Highbury Corner, and the effects in not-running in surrounding local roads.

Not stated

Second, we ask that there should be express reference to the need around Highbury Corner for a) public lavatories, where provision was removed some years ago. A sign in the station says that there are no facilities here, and points to the lavatories at the top of Highbury Fields, a long way away. b) restoration of Post offices at Highbury & Islington station to serve the many thousands who pass the hub each week. These were removed in 2014.

Not stated

Support

Policy SP8: Highbury Corner and Lower Holloway
The Upper Street Association, local society
We ask that there is express reference to the need, in our view, to monitor the effects of the reconfiguration of Highbury Corner, and the effects in not-running in surrounding local roads.

Not stated

Para 3.1. ‘Islington’s residential population is expected to increase significantly over the plan period.’ Again we believe that the Draft Plan should refer to the fact that the Borough is the most densely populated in the UK. Para 3.4 Strategic Housing Land Assessment Process (SHLAA) has highlighted that there is dwindling capacity for new residential development in Islington, insufficient to meet local housing need. The Plan needs to make reference to the needs of long-term future residents.

Not stated

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Object

Support
<table>
<thead>
<tr>
<th>Page</th>
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<tbody>
<tr>
<td>815.0182</td>
<td>Strategic and Development Management Policies</td>
</tr>
<tr>
<td>815.0182</td>
<td>Queen Mary University of London</td>
</tr>
<tr>
<td>815.0182</td>
<td>Landowner</td>
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<tr>
<td>815.0182</td>
<td>The Charterhouse Square Campus is located within the Bunhill and Clerkenwell area for which a separate Area Action Plan (&quot;AAP&quot;) is currently being consulted on. Further detailed comments on the overall strategy for the Bunhill and Clerkenwell Area are set out in these representations.</td>
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<td>815.0182</td>
<td>Not stated</td>
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<tr>
<td>815.0182</td>
<td>Strategic and Development Management Policies</td>
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<tr>
<td>815.0182</td>
<td>Policy B2: New business floorspace</td>
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<td>Queen Mary University of London</td>
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<td>815.0182</td>
<td>Landowner</td>
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<td>815.0182</td>
<td>QRRL supports the principle of the uses outlined in part A (i) of policy B2, and requests that clarity medical research uses (B1b) are captured within this policy and explicitly referenced.</td>
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<tr>
<td>815.0182</td>
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<td>815.0182</td>
<td>Policy B4: Affordable workspace</td>
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<td>815.0182</td>
<td>QRRL would seek to ensure that the requirement to provide 10% affordable workspace is limited to developments comprising B1a office floorspace only. The requirement to provide affordable workspace may impact on the overall delivery of wider schemes and this industry does not necessitate provision of workspace as it is already supporting critical functions of the local plan. QRRL states that there are clear differences in the validity of delivering workspace between B-class categories and that policy should consider these.</td>
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<td>815.0182</td>
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<td>Policy H8: Purpose-built Student Accommodation</td>
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<td>815.0182</td>
<td>Have queried that the policy is contrary to London Plan policy on ‘meanwhile use’.</td>
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<td>815.0182</td>
<td>Object</td>
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<tr>
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<td>Landowner</td>
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<tr>
<td>815.0182</td>
<td>Supportive of the requirement for affordable student accommodation but would like to ensure that this is only sought on the 38 weeks of the year when the accommodation is open to students, which would be in line with the London Plan definition of affordable student accommodation.</td>
</tr>
<tr>
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<td>Object</td>
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<tr>
<td>815.0182</td>
<td>Policy B2: New and existing conventional housing</td>
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<td>Landowner</td>
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<tr>
<td>815.0182</td>
<td>Seeks support for the re-purposing of Dawson Hall student accommodation to postgraduate teaching and research with the student accommodation moving elsewhere in their portfolio.</td>
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<td>Object</td>
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<tr>
<td>815.0182</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
</tr>
<tr>
<td>815.0182</td>
<td>Policy B2: Prioritising office use</td>
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<td>Queen Mary University of London</td>
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<td>815.0182</td>
<td>Business</td>
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<tr>
<td>815.0182</td>
<td>Support B2 part D which sets out exceptions for uses that are publicly funded or serve a public purpose including education and research uses. They are concerned that the Policy B2C, if applied to the QRRL site would compromise the ability to provide education and research facilities. QRRL request an amendment to state that other medical and research uses (B1b) be included within the policy wording of B1 part D on the basis that medical research is a key employer in the area and plays a vital role in the operation of the Charterhouse Square campus.</td>
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<tr>
<td>815.0182</td>
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<tr>
<td>815.0182</td>
<td>Bunhill and Clerkenwell Area Action Plan</td>
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<tr>
<td>815.0182</td>
<td>Policy B2: Historic Clerkenwell</td>
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<td>Business</td>
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<td>815.0182</td>
<td>As with previous representations QRRL object to the potential north south pedestrian route through the Charterhouse Square campus. They state the proposed route would materially impact the operation of the WWRI and create a public thoroughfare through a closed research centre. The site needs to be locked down due to the nature of the research that takes place there.</td>
</tr>
<tr>
<td>815.0182</td>
<td>Both</td>
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<tr>
<td>815.0183</td>
<td>Site Allocations</td>
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<tr>
<td>815.0183</td>
<td>N/A - general comment</td>
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<td>815.0183</td>
<td>N/A</td>
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<td>815.0183</td>
<td>TfL City Planning</td>
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<td>Statutory consultee</td>
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<td>815.0183</td>
<td>TfL City Planning has confirmed that the queries they raised regarding a number of site allocations in response to the Regulation 18 consultation have been resolved in the Regulation 19 draft documents.</td>
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<td>815.0183</td>
<td>Not stated</td>
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<td>815.0183</td>
<td>Strategic and Development Management Policies</td>
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<tr>
<td>815.0183</td>
<td>Appendix 3: Transport Assessments and Travel Plans</td>
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<td>815.0183</td>
<td>TfL City Planning</td>
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<td>Statutory Consultee</td>
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<tr>
<td>815.0183</td>
<td>Travel Plans - please use this URL as Appendix 3 footnote: <a href="https://gl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants">https://gl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants</a>. TfL request contact details of an officer to attend travel plan guidance working group.</td>
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<td>815.0183</td>
<td>Not stated</td>
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<tr>
<td>815.0183</td>
<td>Strategic and Development Management Policies</td>
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<tr>
<td>815.0183</td>
<td>Appendix 4: Cycle parking standards</td>
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<td>TfL City Planning</td>
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<td>Statutory Consultee</td>
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<td>815.0183</td>
<td>Innovative spatial approach is welcome, but would welcome further discussion on how this is calculated and related to the LCDS. Request to change GIA to GEA, which would increase the provision. Strongly support accessible parking standard</td>
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<td>815.0183</td>
<td>Strategic and Development Management Policies</td>
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<tr>
<td>815.0183</td>
<td>Policy B3: Enhancing the public realm</td>
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<tr>
<td>815.0183</td>
<td>The Mayor’s Transport Strategy (B3) to targets should be included upfront and referenced. The Mayor recognises Islington’s potential to achieve higher mode share targets. Islington will need 83 per cent of residents’ journeys to be on foot, cycle and public transport mode in 2021 and 80 per cent in 2041. This could be referenced in section 7.1 or 7.6. It is difficult to see how citing the exact numbers as recommended above would worsen the policy document given that the qualitative principles expressed throughout it elsewhere clearly target very similar outcomes for Islington. We therefore again request for the MTS targets to be added to the T1 supporting text.</td>
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<td>Not stated</td>
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<td>815.0183</td>
<td>Strategic and Development Management Policies</td>
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<tr>
<td>815.0183</td>
<td>Policy B2: Sustainable Transport Choices, Part E</td>
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<td>815.0183</td>
<td>Statutory Consultee</td>
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<tr>
<td>815.0183</td>
<td>It would be appreciated if TfL could be explicitly referenced in the policy wording so: ‘relevant guidance and/or best practice standards, especially by TfL or “relevant TfL guidance and/or best practice standards”</td>
</tr>
<tr>
<td>815.0183</td>
<td>Not stated</td>
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<td>815.0183</td>
<td>It states that the section on Shared space in supporting text has been removed</td>
</tr>
<tr>
<td>815.0183</td>
<td>Not stated</td>
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<tr>
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<td>Statutory Consultee</td>
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<tr>
<td>815.0183</td>
<td>Happy with the new shared space policy. However would like to add ‘uniformly flat’ for the single surface, as it involves a single uniformly flat surface’.</td>
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<td>815.0183</td>
<td>Not stated</td>
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<tr>
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<tr>
<td>815.0183</td>
<td>Please add E (c) supporting the maintenance and expansion of the T1 Cycle hire network, at a level proportionate to the size of the development! This would align with the critique of dockless bikes sometimes housing street clutter at Paragraph 7.20.</td>
</tr>
<tr>
<td>815.0183</td>
<td>Not stated</td>
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<tr>
<td>815.0183</td>
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<tr>
<td>815.0183</td>
<td>Policy B3: Car-free development, Part E</td>
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<tr>
<td>815.0183</td>
<td>Disabled parking bays outlined in Islington’s plan comply with the standards set out in the Planning Obligations SPD and Inclusive Design SPD. These should be amended to reflect the residential parking standards in Policy B1.1 (15% available from the outset, the remaining 7% provided in the future via a Parking Design and Management Plan) and non-residential disabled persons parking standards (5-6%) in Table 10.5. The temporary use of bays as parklets or cycle storage is supported.</td>
</tr>
<tr>
<td>815.0183</td>
<td>Both</td>
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<tr>
<td>815.0183</td>
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<tr>
<td>815.0183</td>
<td>TfL does not support car clubs in the GAC, which have impacts in terms of road danger and congestion, and number of trips. Car clubs should only be acceptable in area of low PTI4 (less than 4). Any car club spaces should have active charging facilities.</td>
</tr>
<tr>
<td>815.0183</td>
<td>Object</td>
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<tr>
<td>R19.0183</td>
<td>Strategic and Development Management Policies</td>
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<td>R19.0185</td>
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