

Reg 19 ID	Development Plan Document	Site reference and address	Spatial Strategy area	Section/policy/paragraph number	Respondent name	Respondent group	Summary of comments	Support/object
R19.0001	Site Allocations	BC8: Old Street roundabout area	B & C: City Fringe Opportunity Area			Resident	Respondent objects to plans to remove the gyratory at Old Street and to provide more public space, referring to these plans as 'high foolishness'. 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.	Object
R19.0002	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			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 (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.	Object
R19.0003	Bunhill and Clerkenwell Area Action Plan			N/A - general comment		Resident	Believes that developers are destroying communities in a search for profit. Believes that there is no consideration for development on a human scale. Concedes 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.	Object
R19.0004	Bunhill and Clerkenwell Area Action Plan			N/A - general comment		Resident	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.	Not stated
R19.0005	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			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 (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.	Object
R19.0005	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury		Resident	Policy BC7 F 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.	Object
R19.0006	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0007	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0008	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0009	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0010	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0011	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Cllr Sue Lukes	Councillor	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.	Object

R19.0012	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Business	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.	Object
R19.0013	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Business	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.	Object
R19.0014	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Cllr Caroline Russell	Councillor	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.	Object
R19.0015	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0016	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0017	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0018	Strategic and Development Management Policies			Policy R3: Islington's Town Centres		Resident	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.	Object
R19.0019	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Strongly support allocation. The prison is a constant source of anti-social behaviour and is no longer fit for purpose due to its poor state of repair and overcrowding. There is a real need for more housing in the area, particularly larger flats (2 bedroom +) and small houses. Limiting car parking at the site will reduce pollution. Any new development should include large green areas and trees; retain the important heritage of the site and its buildings; have a commitment to education, youth inclusion and artistic endeavour - it could be a major educational/cultural space for Islington. The drainage in the area will need improvements.	Support
R19.0020	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support allocation. Prisons like Pentonville are no longer suitable in cities like London; it is a source of anti-social and criminal behaviour. Housing is urgently required.	Support
R19.0021	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Fully support allocation to replace the prison with housing. The prison building does not seem fit for purpose and holding long-term inmates in central London seems ridiculous. There is a desperate need for schemes which add more social and affordable housing to London.	Support
R19.0022	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. Believe the proposed uses would be ideal for the area although adding additional council housing could exacerbate the problems on Caledonian Road. The area needs investment from small businesses, who will only come if they feel safe and secure. The area needs a holistic approach to attract a diverse range of people to the Cally.	Support
R19.0023	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. The prison is noisy and a source of constant disturbance.	Support
R19.0024	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. Redevelopment will improve the inclusivity of Caledonian Road, and open up the site with a residential and community focused structure that can hopefully be enjoyed by all. The prison itself has very poor facilities, so it could benefit the prison infrastructure to have a modern, purpose built site that can more easily accommodate and rehabilitate the inmates.	Support
R19.0025	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites			Resident	Support the allocation. Islington Council should put pressure on the Ministry of Justice to bring forward a timetable for the development of the site, which should be planned and built in parallel with the Holloway Prison site. The development should include affordable housing and through routes and green space for Islington residents. The site should connect with Caledonian Estate considering the history of the estate with the prison.	Support

R19.0026	Site Allocations	ARCH3: Archway Central Methodist Hall, Archway Close	Archway		Flowervale UK Ltd	Landowner	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 viable 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.	Object
R19.0026	Strategic and Development Management Policies			Policy R10: Culture and the Night Time Economy	Flowervale UK Ltd	Landowner	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.	Object
R19.0027	Site Allocations	FP13: Tesco, 103-115 Stroud Green Road	Finsbury Park			Resident	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.	Not stated
R19.0026	Strategic and Development Management Policies			Policy SP7: Archway	Flowervale UK Ltd	Landowner	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.	Object
R19.0028	Site Allocations	FP13: Tesco, 103-115 Stroud Green Road	Finsbury Park			Resident	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). Dissatisfied with the way recent development around Finsbury Park Station has disregarded and inconvenienced residents and commuters. This does not inspire confidence in future plans and the council's ability to consider the views of residents.	Object
R19.0029	Site Allocations	AUS3: Electricity substation, 84-89 White Lion Street	Angel and Upper Street			Landowner	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 storeys on the site as it is currently low for the local area.	Not stated
R19.0030	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	Building on sports pitches is counter to Sport England's interests, and they will be lobbied 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.	Object
R19.0031	Site Allocations	FP14: Andover Estate	Finsbury Park			Resident	Suggests that the existing green space bounded by Roth Walk 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 Roth Walk, or if the plan is for residents of the new building to share the walkway with Roth Walk residents it could create grave danger in the event of fire or other emergency.	Not stated
R19.0032	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway			Resident	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.	Object
R19.0033	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway			Resident	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.	Object
R19.0034	Site Allocations	KC5: Belle Isle Frontage, land on the east side of York Way	King's Cross and Pentonville Road		HS1 Ltd	Landowner	Welcomes the site's allocation as a site suitable for a development of up to 15 storeys. 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.	Both

R19.0035	Site Allocations	KC6: 8 All Saints Street	King's Cross and Pentonville Road		BMO Real Partners	Developer	Suggest the allocation boundary is extended to include the adjacent building - Bacta House, 6 All Saints Street - or that Bacta House is referred to in the development considerations as having potential for limited intensification. It is not considered that Bacta House's locally listed status should necessarily prevent small scale/limited intensification to create additional employment floorspace.	Support
R19.0036	Site Allocations	AUS9: 10-14 White Lion Street	Angel and Upper Street		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
R19.0036	Site Allocations	AUS10: 1-9 White Lion Street	Angel and Upper Street		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
R19.0036	Site Allocations	AUS13: N1 Centre, Parkfield Street	Angel and Upper Street		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
R19.0036	Site Allocations	AUS1: Royal Bank of Scotland, Regents House, 40-42 Islington High Street	Angel and Upper Street		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
R19.0036	Site Allocations	NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road	Nag's Head and Holloway		National Grid	Statutory consultee	The site is crossed by, or in close proximity to, a National Grid high voltage electricity transmission underground cable. 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
R19.0037	Site Allocations	NH12: 379-391 Camden Road and 341-345 Holloway Road	Nag's Head and Holloway			Resident	Makes claim that an influx of migrants has changed the landscape of Holloway Road/Seven Sisters Road, the area where the respondent grew up. Concerned about the impact of development on: privacy, the environment, light, noise, dust, vibration, vehicle movements, sleep disturbance, health, quality of life and devaluation of property. Suggestion that quality of life in the area is poor and the proposed allocations will bring thousands of people to the area which will create more problems.	Object
R19.0038	Site Allocations	OIS4: 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green	Other Important Sites			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 Kingsland Road should be removed from the wider site allocation, as other uses would be more appropriate there.	Object
R19.0039	Site Allocations	AUS7: 1-7 Torrens Street	Angel and Upper Street			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 artisan centre and fit in very well with the Angel image.	Not stated
R19.0040	Site Allocations	BC10: 254-262 Old Street (east of roundabout)	B & C: City Fringe Opportunity Area		Chandler Bars Group Limited and Hornbee Limited	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 vitality of the area. There is no need for development of the premises, any development of adjacent properties should incorporate the public house.	Not stated
R19.0041	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway		London & New York Ltd	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
R19.0042	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road			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 requested 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
R19.0042	Site Allocations	KC7: All Saints Triangle, Caledonian Road	King's Cross and Pentonville Road			Resident	Reference 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 1-3 All Saints Street/Killick Street, Caledonian Road and Ice Wharf.	Not stated
R19.0043	Site Allocations	NH6: 11-13 Benwell Road	Nag's Head and Holloway		Clearwell Creek Properties Ltd	Landowner	Suggest the allocation wording is deleted and replaced with the wording from the 2013 Site Allocation (reference HC4). 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

R19.0044	Site Allocations	OIS15: Athenaeum Court, 94 Highbury New Park	Other Important Sites			Resident	Concerned about the impact development of the site may have on: residential properties to the south; trees; the living conditions of residents of Orwell Court; listed buildings and the Conservation Area; security; landscaping and amenity space.	Object
R19.0045	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway			Resident	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.	Both
R19.0046	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway			Resident	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.	Both
R19.0047	Site Allocations	ARCH11: Dwell House, 619-639 Holloway Road	Archway			Resident	Respondent's home overhangs the site and they are affected by its use on a daily basis. Any redevelopment of the site should be sensitive to this fact.	Not stated
R19.0048	Site Allocations	AUS1: Royal Bank of Scotland, Regents House, 40-42 Islington High Street	Angel and Upper Street		Prudential Retirement Income Limited	Landowner	Acknowledge the requirement for offices on the site but feel the allocation should be amended to allow for a wider range of uses, including residential and hotel development. This would accord with the Local Plan's aim to ensure that each development makes the most of every site and development opportunity.	Not stated
R19.0049	Site Allocations	AUS7: 1-7 Torrens Street	Angel and Upper Street		Chartered Institute of Architectural Technologists	Business	Welcome the review of the site, particularly the potential to develop the unsightly Angel Underground Station entrance. However, a number of things should be taken into consideration: the tube line runs directly underneath the site; the architectural integrity of the warehouse to the rear of Torrens Street; the structural impacts on nearby Georgian terrace properties which are built with no or limited foundations; all Party Wall Act requirements above and below ground; access both in construction and in use; light, noise and pollution both during and after construction; no overdevelopment; health, safety and fire prevention guidelines; the need to carry out an archaeological assessment prior to any construction.	Support
R19.0050	Site Allocations	BC7: 198-208 Old Street (petrol station)	B & C: City Fringe Opportunity Area		Shell U.K. limited	Business	Regarding – Shell Old Street Service Station, 198-208 Old Street, EC1V 9FR, Shell UK seeks reassurance that the Local Plan will allow the retention of the petrol filling station use, potentially supplemented by emerging technologies including EV charging.	Not stated
R19.0051	Site Allocations	BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	B & C: City Fringe Opportunity Area		UBS c/o Reef Group	Landowner	The allocation acknowledges the extant planning permission but states that if the site is subject to revised or new proposals the council will seek office development with affordable workspace and small-scale business uses. The allocation should not ignore the consented position in terms of alternative uses for the site. The council's position on over-concentration of hotel uses has not been evidenced and is contrary to London Plan policy. Also, presenting the site as one entity and not taking into account the differing land ownerships could represent delivery issues and result in no office development coming forward. The public benefits associated with a mixed-use development are greater than just a single office use, including public access to the listed vaults and public realm improvements.	Object
R19.0052	Site Allocations	BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street	B & C: Historic Clerkenwell		Omenport Developments Limited	Landowner	Please can the allocation record that planning permission P112478 has not lapsed, it has been implemented 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. The timescale should be amended to read 2021/22.	Not stated
R19.0053	Site Allocations	BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street	B & C: Central Finsbury			Resident	Residents consented to the scheme on the basis that it involved improvement works, not flat out development. The site designations/constraints section should state that the execution of improvement works should minimise negative impacts on existing residents. The development considerations should include the preservation of the architectural expression of existing buildings, security improvements and intensification 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.	Not stated
R19.0054	Site Allocations	BC47: Braithwaite House and Quaker Court, Bunhill Row	B & C: Central Finsbury			Resident	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 Quaker Gardens'. The proposed 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.	Both
R19.0055	Site Allocations	FP5: 1 Prah Road	Finsbury Park			Resident	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 site is close to the recent council housing development at Vaudeville Court and it would be great if something similar could be done at Prah Road.	Not stated

R19.0056	Site Allocations	FP9: 221-233 Seven Sisters Road	Finsbury Park		Alan Nagle	Landowner	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 NPPF 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'.	Support
R19.0057	Site Allocations	FP15: 216-220 Seven Sisters Road	Finsbury Park		Universal Church of the Kingdom of God	Landowner	Asks for the allocation to be removed from the DPD as there are plans for the site, which is in private ownership.	Object
R19.0058	Site Allocations	KC2: 176-178 York Way & 57-65 Randell's Road	King's Cross and Pentonville Road		Transeuropean Carriage Company	Landowner	Consider the site boundary should be amended to exclude 57-65 Randell's Road as it has an extant, 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 Randell'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 relieved 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.	Not stated
R19.0059	Site Allocations	HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner	Highbury Corner and Lower Holloway			Resident	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 be welcome.	Not stated
R19.0059	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway			Resident	Welcomes the allocation as parts of the site are very delapidated, and the station building provides an embarrassing gateway to a historic and lively area. Suggests the Marie Curie building could be demolished; the site boundary expanded to include the Victorian terrace up to the corner of St. Paul's Road and Corsica 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 Corsica Street would be interesting.	Support
R19.0059	Site Allocations	HC4: Dixon Clark Court, Canonbury Road	Highbury Corner and Lower Holloway			Resident	There is no justification for car parking spaces in such proximity to a tube station and goes against other borough policies in encouraging public transport use.	Not stated
R19.0060	Site Allocations	N/A - general comment	Nag's Head and Holloway			Resident	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 the conservation area. 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.	Object
R19.0061	Site Allocations	NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road	Nag's Head and Holloway		Kawal and Nancy International Limited	Landowner	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.	Both
R19.0062	Site Allocations	NH4: Territorial Army Centre, 65-69 Parkhurst Road	Nag's Head and Holloway		Fairview New Homes Ltd	Landowner	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
R19.0063	Site Allocations	OIS5: Bush Industrial Estate, Station Road	Nag's Head and Holloway		Royal Mail Group Limited	Business	Support the protection of industrial uses (B1c, B2 and B8) and the proposed intensification of the site for non-office based, traditional employment uses. The continued availability of suitable accommodation is essential in allowing Royal Mail to fulfil its statutory duty to collect and deliver letters six days a week. Their operation at Bush Industrial Estate involves long working days, seven days a week and requires a fleet of 53 delivery vehicles. They need to be accommodated within an industrial setting due to the potential for disturbance associated with this level of activity. The development considerations should be explicit that the estate should meet the parking needs of its occupiers and that encroachment of residential uses could reduce the ability of the site to provide accommodation to those who operate outside of standard working hours.	Support
R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	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 its 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 2030 net zero emissions target	Not stated

R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	FFI's primary concern is that the Local Plan refers to making all buildings in Islington net zero carbon by 2050. The Local Plan must reflect the motion passed by the Council on 27 June 2019 for the Council "to work towards making Islington net zero carbon by 2030". The Local Plan as currently drafted, in referring to a 2050 rather than a 2030 net zero target, is clearly inconsistent with the Council's own motion and therefore the Local Plan must be amended. Further, the net zero carbon target is only referred to in Chapter 6 "Sustainable Design" and only in relation to buildings. However, the net zero by 2030 motion passed on 27 June 2019 did not just relate to buildings, but referred to making Islington net zero carbon by 2030. Therefore, the 2030 target must be embedded in the entirety of the Local Plan, such as in the provisions relating to an inclusive economy, transport and sustainable design. The fact that the sustainability sections are towards the end of the Local Plan also suggests these issues have less importance, thus the order of the policies should be entirely reshuffled. As the Council has acknowledged we are in a climate emergency, it must put sustainability, fostering and protecting ecology, green economy issues and energy efficient housing at the forefront of the Local Plan.	Object
R19.0064	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process	Fossil Free Islington	Other	FFI questions whether the carbon impact of a development could be part of the site appraisal. It seems to not appear prominently enough. In relation to the key design principles, 'Sustainability' comes last and is not well developed. For example it does not state that projects should all be aligned with or contribute to achieving the net zero target.	Object
R19.0064	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Fossil Free Islington	Other	The Plan states "Refurbishment, conversion and extension of existing older buildings is preferred to demolition and redevelopment." This should apply generally, and not only for preserving the character of this particular area (the Vale Royal/Brewery Road LSIS). As the operational energy of buildings falls, the embodied energy becomes dominant; fair comparisons are difficult, but a study for RICS cited in Whole life carbon assessment for the built environment states that embodied energy typically amounts to between 35% and 51% of the energy over a 60 year life cycle.	Not stated
R19.0064	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	Fossil Free Islington	Other	Policy should mandate secure covered bike storage for every new development. The Plan should state that the Community Infrastructure Levy should be used to fund investments to meet the zero carbon target. If we are truly in a climate emergency then this kind of infrastructure must be top priority.	Object
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part C	Fossil Free Islington	Other	Only major developments and minor new-build residential developments are required to be net zero-carbon. We do not see a reason for making an exemption for minor non-residential new-build developments and would suggest they are subjected to the same requirement.	Object
R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	Some businesses (e.g. petrol stations, car dealerships) directly lead to higher fossil fuel consumption and associated carbon emissions 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 emissions-heavy 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.	Object
R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	We cannot see any provision for businesses to be monitored to see whether they pollute unnecessarily (i.e. commercial food businesses cooking with coal, pouring oil into drains, increasing traffic through delivery services). The Council should investigate introducing obligatory carbon accounting in Islington with businesses to be made to pay a carbon tax or similar charge to create an incentive to become more sustainable.	Not stated
R19.0064	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Fossil Free Islington	Other	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 NO ₂ and green space design should have as a priority mitigation – air quality, biodiversity, cooling (see https://bit.ly/315YdNI).	Object
R19.0064	Strategic and Development Management Policies			N/A - general comment	Fossil Free Islington	Other	The conservation guidelines are old and in need of major updates. The Plan is vague around the need to change the conservation guidelines to adapt to climate change. It states that they need to change but does not specify how they would adapt to the public's desire to reach carbon targets. Islington is 50% conservation area so retrofitting for low carbon is difficult if the business as usual conservation status is maintained.	Object

R19.0064	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design; Policy S5: Energy Infrastructure	Fossil Free Islington	Other	<p>Paragraphs 6.4, 6.5, 6.12, 6.50 and Policy S1B and S5K must be amended to reflect the 2030 net zero target rather than a 2050 target.</p> <p>FFI questions how the Council will drive the transition from natural gas CHP to waste heat. The plan does not set out in any detail how this will occur.</p> <p>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.</p> <p>Further, the Local Plan should set out the Council's strategy to promote retrofitting. While we understand there are financial limitations on the Council, FFI would like to see a commitment to seek funding through whatever mechanism the Council can to drive forward action on retrofitting, setting out what action they will take (a) with current funds (b) when new funds available, along with ideas on finding this funding. The Local Plan must recognise the importance of retrofitting and show a strategy for promoting it.</p> <p>To tackle the climate emergency, there must be a proactive rather than reactive planning system. For example, there should be street by street approved window replacement rather than individual properties applying which the system can't afford. There are many opportunities for replacement windows even in conservation areas but citizens are not encouraged to renovate under the current system.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	Fossil Free Islington	Other	<p>Policy S3C – As it stands this seems to ignore developments that combine refurbishments of 500 sq m with extensions of 500 sq m. Also, it says nothing about larger minor developments. Here and elsewhere (in 7.46, for example) it would be simpler, clearer and more in keeping with the needs of the 2030 deadline, to draw no distinction anywhere between major developments and larger minor developments: all relevant clauses would say "a major development or a larger minor development" or "a smaller minor development". A larger minor development would be a minor development of 100 sq m or more, whether it involved new building, refurbishment, extension or change of use. A smaller minor development would be any other minor development.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part B	Fossil Free Islington	Other	<p>Bearing in mind the 2030 deadline full FEES would be appropriate for applications submitted from 2020 onwards. The Zero Carbon Hub does not seem to mention having interim FEES before full FEES.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part D	Fossil Free Islington	Other	<p>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.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, paragraph 6.52	Fossil Free Islington	Other	<p>Residual carbon emissions offset payments need to be high enough to act as a genuine penalty for developments failing to achieve zero-carbon targets on-site. We consider the proposed flat fee of £1000/flat and £1500/house for minor new-build residential developments highly inadequate. An average house emits around 4 tCO2/year from heating and electricity. At the nationally recognized carbon price of £95/tonne quoted in the Local Plan, this fee would only compensate for emissions over approximately 4 years of the house or flat's operational period.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy S6: Managing heat risk, Part E	Fossil Free Islington	Other	<p>This should apply generally, not only to smaller minor extensions, the use of active cooling measures should not be accepted in any development except in very limited circumstances.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy T3: Car-free development	Fossil Free Islington	Other	<p>The Local Plan does not address removing parking spaces to make key roads better for cycling, for example on Hornsey Road; worryingly para 7.26 describes parklets and cycle storage as 'temporary use of existing under-utilised parking spaces'. Why are they temporary and what is the long term plan for these parking spaces?</p>	Object
R19.0064	Strategic and Development Management Policies			Policy T4: Public realm	Fossil Free Islington	Other	<p>Policy T4B is too weak. In pursuit of the objectives of reducing car transport and hard surfaces there should be a policy expressly intended to apply the highways and parking budget to making carriageways narrower and verges wider and more tree-lined. In particular, an appendix to the Streetbook SPD could identify streets where this policy would offer benefits most easily and economically.</p>	Object
R19.0064	Strategic and Development Management Policies			Policy T5: Delivery, servicing and construction	Fossil Free Islington	Other	<p>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 modes of transport is investigated, in our view this does not go far enough. 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/size of goods and materials.</p>	Object

R19.0064	Strategic and Development Management Policies			Policy DH2: Heritage assets	Fossil Free Islington	Other	The sections in the on conservation areas and heritage assets are very weak in relation to sustainability. Policy DH2 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 concerns about the buildings' appearance. Yet there is no mention of initiative to reduce carbon as a priority. Paragraphs 8.18 – 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 detriments to visible heritage (such as the installation of double glazing where draught proofing will not serve) may be justified by major improvements in energy consumption.	Object
R19.0064	Strategic and Development Management Policies			Policy DH4: Basement 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 4mx4mx3m 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
R19.0064	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
R19.0065	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	Islington Labour Environmental Forum	Other	The respondent states that policy B5 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
R19.0065	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part A	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Object
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated
R19.0065	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part G	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated
R19.0065	Strategic and Development Management Policies			Policy T3: Car-free development, Part H	Islington Labour Environmental Forum	Other	Same points as Islington Society - see R19.0072	Not stated
R19.0066	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
R19.0067	Strategic and Development Management Policies			Policy DH3: Building heights; Policy SP6: 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
R19.0067	Strategic and Development Management Policies			Policy G3: New public open space	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
R19.0067	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees	The Kings Cross Baptist Church	Resident	Support for the policy on biodiversity, landscape design and trees.	Not stated
R19.0067	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
R19.0068	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Sir Antony Gormley	Landowner	Support for policy SP3 on the restriction of land uses to business/industrial, building height parameters and protected vistas to avoid further encroachment of high-rise office and residential uses coming from York Way.	Support
R19.0068	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	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 to have blank frontages can bring different type of non-industrial building design.	Both
R19.0068	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	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/HGV. It is suggested that width of roads is protected and increased where possible.	Both
R19.0069	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

R19.0069	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 discourages 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
R19.0069	Strategic and Development Management Policies			Policy B4: Affordable workspace	Bayshore Estates Ltd	Landowner	Draft Local Plan Viability Study (2018) indicates that site 17 becomes unviable if the affordable workspace requirement is extended to 15 years and 20 years. Respondent suggests amended wording to policy B4, part A, which introduces that where development specific circumstances show that affordable workspace is not achievable, the proposals should be subject to an independent viability assessment. This approach will allow assessment on a case by case basis.	Object
R19.0070	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport; Policy T3: 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). 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. Based on the above, we are satisfied that the Islington Local Plan Proposed Submission (Regulation 19) policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109).	Support
R19.0071	Strategic and Development Management Policies			N/A - general comment	Environment Agency	Statutory consultee	We welcome the opportunity to comment on the Strategic and Development Management Policies, Site Allocations and the Bunhill 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.	Support
R19.0071	Strategic and Development Management Policies			Policy S8: 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 test 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.	Object
R19.0071	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Environment Agency	Statutory consultee	We are pleased to see the inclusion of a requirement for an appropriate SUDS maintenance plan. We welcome the addition of a contaminated land policy S9 point O and P. We have some concerns with wording of the final sentence of point O 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 groundworks for development. Amended wording suggested.	Object
R19.0071	Strategic and Development Management Policies			Policy S9: 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 is unlikely 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
R19.0071	Strategic and Development Management Policies			Policy S9: 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 reach and maintain good ecological status, in accordance with the recommendations of the Thames River Basin Management Plan (TRBMP).	Support
R19.0071	Strategic and Development Management Policies			Policy ST4: Water and wastewater infrastructure	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 water 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
R19.0071	Strategic and Development Management Policies			Policy G4: 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
R19.0072	Strategic and Development Management Policies			Policy DH2: Heritage assets	Islington Society	Local society	Refer to previous reg 18 comments. We welcome the rewording of policy DH2 Part I to strengthen the significance of Locally Listed Buildings and shopfronts. We welcome the inclusion of a definition of non-designated heritage assets in Appendix 9: Glossary and abbreviations.	Support
R19.0072	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	Islington Society	Local society	Based on the life-time use of existing stock, we continue to recommend a sustainable lifetime of greater than 75 years. Recommendation: Add Section I to Policy S3, "All Residential and nonresidential building should be capable of an expected life of greater than 75 years"	Object
R19.0072	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design	Islington Society	Local society	Policy S1 Part B does not differentiate between New Buildings and Existing Building Stock 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
R19.0072	Strategic and Development Management Policies			Policy H1: Thriving communities	Islington Society	Local society	Refer to previous reg 18 comments on H1 requesting inclusion of buy to leave policy. Note this is covered by Policy H2 Part H	Not stated

R19.0072	Strategic and Development Management Policies			Policy DH4: Basement development	Islington Society	Local society	The Islington Society is sensitive to the significant adverse impacts that basement development has on neighbouring properties and the wider area. Reiterate suggested wording from Reg 18 response and note that wording remains unchanged. They do not agree with the comments in the consultation Statement p.91. There should be a presumption against basements. Recommendation: Change “The Council will only permit basement development where it is demonstrated” to “The Council will not permit basement development unless it can be demonstrated”	Object
R19.0072	Strategic and Development Management Policies			Policy DH3: Building heights	Islington Society	Local society	Refer to previous reg 18 comments requesting greater restriction of tall buildings in line with the Core Strategy approach. No further comment	Not stated
R19.0072	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Society	Local society	The most salient and welcome words in this section appear in paragraph 7.1: the reference to a reduction in travel distances. It conflicts with the Crossrail 2 project in the terms used in paragraph 7.10. The originally safeguarded scheme was designed to reduce the need to travel by reducing the distances travelled on routes between one place and another, by the provision of new interchange points. This interchange of passengers would free space on overcrowded trains and facilitate the use of existing services at stations close to central London. The Council should continue to press for a metro scheme between north-east and south-west London with a station at Essex Road, rather than an ever longer distance project as Crossrail 2 that will probably not be funded.	Not stated
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part A	Islington Society	Local society	The “negative impacts” of developments need to be prevented and those which have happened in the last ten years reversed. Mitigation is not sufficient.	Object
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Society	Local society	The reference to interchange is welcome but in practice the interchange at Archway and Highbury Corner is more difficult and unwelcoming, particularly for residents of Haringey and Hackney respectively. The same may happen at Old Street. Bus passengers from New North Road (four bus routes) wishing to transfer to the Underground will face a longer walk and the need to cross one of two major roads – at present no road crossing is necessary though the pavement width is inadequate	Not stated
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part F	Islington Society	Local society	They argue that the removal of gyratory systems has worsened modal interchange at stations, and increased traffic. Improving bus to rail interchange would make public transport more attractive than private cars.	Not stated
R19.0072	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part G	Islington Society	Local society	Welcome the emphasis on minimising non-sustainable modes, rather than maximising trips by sustainable mode. But there is a focus on cycling and walking instead of public transport. Even if cycling increases, public transport and non sustainable modes will still support most trips in London.	Not stated
R19.0072	Strategic and Development Management Policies			Policy T3: Car-free development, Part H	Islington Society	Local society	Journeys that could equally well be made by bus, or a combination of bus and rail should be promoted in preference to car clubs (policy T3H).	Not stated
R19.0073	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process		Resident	Paragraph 1.67 states that an 18 metre distance between windows of habitable rooms must be ensured to protect privacy for residential development. This does not however apply across a public highway. Respondent comments that Bunhill and Clerkenwell has many narrow streets of around 9m - 11m wide and the current clause would not require development to mitigate loss of privacy here. New commercial development increasingly operates for 24 hours and will have a greater impact on surrounding residential uses. Request made to amend the plan to acknowledge the consideration of possible loss of residential privacy specific to the context of Bunhill and Clerkenwell's narrow street urban form	Object
R19.0074	Strategic and Development Management Policies			Policy H1: Thriving communities, Part Q	Unite Students	Developer	The policy as drafted aims to prevent the delivery of any co-living schemes in the borough, as the policy states that “Largescale HMOs – such as co-living schemes – will generally be refused as they are not considered to make the best use of land and undermine efforts to deliver affordable housing and other land use priorities of the Local Plan”. This needs to be replaced by a policy which allows the delivery of co-living developments on suitably located sites including allocated housing sites. This is on the basis that the emerging London Plan recognises that co-living developments can provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. Allowing suitably located co-living developments in the borough would therefore help diversify the borough’s housing offer and provide a greater choice of homes for single person households.	Object
R19.0074	Strategic and Development Management Policies			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 H6, 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 bedspaces 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 demographic 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 demographic 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 demographic and differentiation from conventional housing, as sui generis rather than C3 use class.	Object

R19.0074	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs), Part C(iv)	Unite Students	Developer	The drafted policy requires large scale HMOs to provide on-site affordable housing, with cash in lieu payments not being acceptable in any circumstances. This policy opposes emerging London Plan Policy H18, section 8 which stipulates that co-living developments must deliver a cash on lieu contribution towards conventional C3 affordable housing. This policy should therefore be revised to be in accordance with the emerging London Plan policy.	Object
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part A	Unite Students	Developer	This policy is seeking to prevent the delivery of any new PBSA. This is directly contrary to the adopted and emerging London Plan policy. Policy should allow delivery of PBSA on suitably located sites including allocated housing sites.	Object
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(ii)	Unite Students	Developer	There is no evidence that 10% of bedspaces in PBSA should be wheelchair accessible and thus this policy is unsound. Requirement should not exceed 1% or not in excess of 5% in line with BR. Unite's experience in London is that only 0.07% of their portfolio is occupied by wheelchair users. Information provided in Appendix A of response to support this. Unite note their commitment to ensuring PBSA schemes are inclusive to all; adaptations can be made based on needs of individual user as there is a lead in time prior to individuals moving in. In order to meet the requisite design standards this results in larger student bedrooms and kitchens, thus fewer standard units per development can be provided. This has the knock on effect of reducing the overall supply of PBSA number of units; increasing the cost and rent levels of existing stock and placing more pressure on the supply of conventional homes. Consider that 10% requirement intended to target shortfall for older demographic, which has greater proportion of disability.	Object
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(iii)	Unite Students	Developer	There is no valid planning policy reason for seeking the provision of bursaries as part of new PBSA. There should be a requirement that the Council provides an annual monitoring report and a clawback mechanism if the money is not spent within 5 years. Also suggest that any referable applications should not include bursary requirement as it would affect viability in combination with the affordable rent requirement.	Object
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(vi)	Unite Students	Developer	Support criterion v and requirement for occupation by students but not the restrictions on use of PBSA as short term visitor accommodation set out in criterion vi. This is not consistent with the London Plan. The use of PBSA outside of term time for alternative uses, including short term accommodation, has a positive impact on housing supply as the property is in use as PBSA throughout the as it is needed for student use. Use of housing in Islington for short term accommodation is particularly acute in Islington through Air BnB for example which the Council has acknowledged. Criterion vi of this policy should therefore be deleted.	Object
R19.0074	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation, Part B(vii)	Unite Students	Developer	Object to the inclusion of a policy seeking 35% affordable rent as consider there is no evidence that this level of provision can be secured across London. Further object to the level of prescription in providing the maximum viable amount of affordable student accommodation due to the lack of evidence in securing such levels of affordable student accommodation in London. Consider the policy unsound and should be deleted.	Object
R19.0075	Strategic and Development Management Policies			N/A - general comment		Resident	The representation does not comment on specific Local Plan policies, but makes a number of comments and complaints about rough sleeping, trees removed and not replaced, the construction of substation near Calshot / Collier Street, the wellbeing of residents, the management of Islington Council, crime, dirty streets, loss of green space and plants, the behaviour of developers.	Not stated
R19.0076	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Backgrounds Prop Hire	Business	Support for policy SP3 in relation to protection/promotion of industrial uses in the Vale Royal/Brewery Road LSIS. Support on the provision of hybrid space in LSIS. The respondent suggests that further support from the council is needed on transition between B-uses on ancillary/hybrid space. The respondent changed existing ancillary space from office to storage to accommodate business needs but he still pays rent/business charges for office use.	Support
R19.0076	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Backgrounds Prop Hire	Business	Support for policy B1 in relation to protection/promotion of industrial uses in the Vale Royal/Brewery Road LSIS.	Support
R19.0077	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Brandon Road N7 Ltd	Landowner	Respondent is concerned about the restriction on B1(a) business space from policy SP3 which will result in an inefficient use of land and it is not consistent with the council's evidence. Proposes drafting policy SP3 in accordance to London Plan 65% plot ratio benchmark for retaining industrial/storage capacity, but without restrictions on the introduction of flexible B1 uses (including office).	Object
R19.0077	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Brandon Road N7 Ltd	Landowner	Respondent objects to blanket restrictions that buildings should not exceed more than 20m in height. The respondent defends that the character of Brandon Road (and wider LSIS) is not sensitive in townscape terms and is not justified in the council's evidence base.	Object
R19.0077	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Brandon Road N7 Ltd	Landowner	View of the Market Place Clocktower from Randell's Road to the south has no merit and should be removed.	Object
R19.0078	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	H.J Francis Ltd	Landowner	Respondent supports the general aim to maximise new office floorspace through policy B1, particularly for the inclusion of the SME sector.	Support

R19.0078	Strategic and Development Management Policies			Policy B2: New business floorspace	H.J Francis Ltd	Landowner	Owner of the site rear 2 Melody Lane, London N5 2BQ considers that the site provides a suitable location to maximise the level of office employment generation in accordance with the targets set out in the adopted London Plan and the emerging DLP. Therefore, we consider the LSIS designation restricts and jeopardises the development potential at the site and request that it is removed accordingly. It provides a negative response to the evolving character of this part of Melody Lane, which has become increasingly residential in recent years. In addition, the designation conflicts with the current planning application which seeks to deliver C3 residential use and B1 (a) office floorspace. This would provide a compatible mixed-use development which would deliver much needed housing as well as maximising the job creation at the site, in accordance with the main national and local policy aims. Furthermore, when assessed in tandem with draft Policy B3 'Existing business floorspace', (discussed in the next section) the site would not be able to be used to provide B1 office use Overall, it is evident that Melody Lane has undergone a significant transition over the last two decades. While the area 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.	Object
R19.0078	Strategic and Development Management Policies			Policy B2: New business floorspace	H.J Francis Ltd	Landowner	Part F(ii) should be deleted as it is overly restrictive and could result in innovative design solutions for new office development being refused planning permission. For example, there are many instances of office development within London which have made innovative and efficient use of vacant car parks of other basement floors which have little or no access to daylight or sunlight. However, these spaces can be well planned and designed to provide additional employment floorspace. Such spaces are well suited for meeting rooms and back of house functions or artificially lit office floors. Furthermore, new office development is generally not required to have adequate levels of daylight in terms of the relevant BRE guidance, unlike residential use.	Object
R19.0078	Strategic and Development Management Policies			Policy B1: Delivering business floorspace; Policy B3: Existing business floorspace	H.J Francis Ltd	Landowner	Consider B1 part E and B3 part C are overly restrictive in terms of promoting no net loss of existing industrial floorspace, which prevents the potential delivery of other suitable business floorspace. Suggest wording to allow for B1a floorspace where there is no net loss of employment floorspace.	Object
R19.0078	Strategic and Development Management Policies			Policy B4: Affordable workspace	H.J Francis Ltd	Landowner	The ambitious employment growth targets set out within this draft Local Plan could be jeopardised if too many financial burdens are placed on commercial development proposals. The additional burden of affordable workspace could make commercial proposals less viable (or unviable) and might therefore reduce the number of sites coming forward for new employment development. Whilst there may be a case for some form of affordable workspace (or a financial contribution towards it) on some very large schemes (e.g. 10,000 sq. m+) we do not consider that it is appropriate to apply this to any scheme of 1,000 sq. m+, which at the lower size threshold is still relatively small. On this basis, we consider that the requirement for affordable workspace should be removed to encourage commercial redevelopment schemes to come forward and in enhance their viability.	Object
R19.0078	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	H.J Francis Ltd	Landowner	Respondent objects to the extension and promotion of industrial uses in this site as these would be in direct conflict with residential uses due to increase in traffic/parking as well as noise and amenity. The majority of the Melody Lane site is contained within a mews and is accessed via a narrow passageway, which makes difficult for large vehicles to access/operate and unsuitable for LSIS designation.	Object
R19.0079	Strategic and Development Management Policies			Policy SP5: Nag's Head and Holloway	iQ Student Accommodation	Developer	Consider that Policy SP5 is inconsistent with policy H6 in respect of the part of the policy which permits redevelopment/intensification of PBSA on sites with existing student accommodation. SP5 restricts to solely to sites allocated for student accommodation and does not allow on sites with existing accommodation.	Object
R19.0079	Strategic and Development Management Policies			Policy H1: Thriving communities	iQ Student Accommodation	Developer	Consider that policy H1 part M is not positively prepared and does not conform with the NPPF or reflect the presumption in favour of sustainable development. Suggest that the policy should be amended with the inclusion of words 'other than on suitable sites in line with relevant policies'. Consider that this will contribute to meeting objectively assessed need and help deliver sufficient supply of homes to meet needs of different groups in line with Chapter 5 in NPPF. Reference the PPG which identifies that all student accommodation can be included towards Council's housing requirement. Identifies that if new student accommodation is not provided then funding for new bursaries and affordable student accommodation will not provided.	Object
R19.0079	Strategic and Development Management Policies			Policy H4: Delivering high quality housing; Policy H6: Purpose-built Student Accommodation	iQ Student Accommodation	Developer	Support intensification of existing PBSA sites and provision of accommodation which provides a high standard of amenity for occupiers. Consider that policy H6 by way of reference to H4 and application of space standards is not applicable because student accommodation is not considered a dwelling house but is considered sui generis so space standards should not apply as Building Regulations apply to new dwellings only.	Object

R19.0080	Strategic and Development Management Policies			Policy SC4: Promoting Social Value	Social Value Portal	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 (TOMs) Framework as the basis for developers to assess social value. This comprises 5 themes, 17 outcomes and 35 measures that were developed in collaboration with local government and private sector organisations. The TOMs 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.	Support
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	Respondent supports the creation of new B1a office in the Vale Royal/Brewery Road area, and argues 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.	Object
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	Respondent objects to the arbitrary five storey building height limit set out in the proposed policy and considers that there is no evidence base which supports these restrictions based on the area's sensitive townscape to the character of Blundell Street/Tileyard Road (and the wider LSIS).	Object
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	Proposed policy hasn't been drafted in conformity with the NPPF, para 82 (re addressing specific locational requirements of different sectors). The respondent states that there has not been a clear and obvious engagement from the council with Vale Royal/Brewery Road businesses to understand/assess the specific locational requirements of specialist or new sectors.	Object
R19.0081	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard Estates and Sand Catering	Landowner	View of the Market Place Clocktower from Randell's Road has no merit and should be removed from the draft plan because it restricts development and intensification.	Object
R19.0082	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tom Copley and Nicky Gavron	Councillor	Respondents are concerned with the shift from current policy to restrict broader business uses in the Vale Royal/Brewery Road LSIS. Current policy sustains the balance between the maintenance of the LSIS and supports the importance of Tileyard as a creative cluster in the area.	Object
R19.0082	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tom Copley and Nicky Gavron	Councillor	Respondent suggests that policy SP3 may be incompatible with the new London Plan policy HCS. The respondent encourages the council to consider Tileyard London as a Creative Enterprise Zone to provide a better long-term solution for the site and to create higher density quality jobs for residents.	Object
R19.0083	Site Allocations	NH10: 45 Hornsey Road and 252 Holloway Road	Nag's Head and Holloway		Ashburton Trading Limited	Landowner	Support allocation for a tall buildings however question why the limit has been set at 37m. States that the evidence is not clear and robust. Believe 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 37m.	Object
R19.0083	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees	Ashburton Trading Limited	Landowner	States that Part B of Policy G4 is very prescriptive and could preclude a beneficial scheme if it overshadowed one corner of a SINC for a small part of the year. States that Policy G4 should be more flexibly worded to avoid such consequences.	Object
R19.0083	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Ashburton Trading Limited	Landowner	States that DH1 is unsound and not in line with London Plan Policy. Ask that Policy be amended to reflect the sensitivity of different views to change, and that those views which are important and sensitive to change should be protected. A proposal that is visible within a protected view is not necessarily harmful.	Object
R19.0083	Strategic and Development Management Policies			Policy DH3: Building heights	Ashburton Trading Limited	Landowner	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. A amendment suggested to recognise instances where there may be opportunities for taller buildings which could deliver public benefits including enhancements to townscape.	Object
R19.0084	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Sky Studios	Business	Respondent supports policy SP3 and recommends the promotion and preservation of industrial uses in the area, recognising that the area's industrial function is being encroached by corporate offices.	Support
R19.0084	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Sky Studios	Business	The respondent objects to supporting text in paragraph 2.36 which relates to the building height limit of 20m considered for the Vale Royal/Brewery Road LSIS (supported in policy DH3). The restrictions that this policy may bring won't allow the respondent to build a rooftop studio that provides natural light in line with the production market needs because it reaches 22m and affects the viewing corridor between the Market Street Clocktower and the Randell Road bridge.	Object
R19.0085	Strategic and Development Management Policies			Policy G2: Protecting open space		Resident	Comments regarding Policy G2. States that it guarantee any protection of green spaces. States that improvements to be "investigated" where open space is lost is vague. Would like no net loss of open space.	Not stated
R19.0085	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees		Resident	Policy G4, section C, clause x could be expanded to "integration of food growing opportunities, especially community gardens and orchards."	Not stated
R19.0085	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design		Resident	Policy S1 has a target of 2050. Given the impact of the sector, this has to be in contradiction to the Council's Emergency Climate Change target of 2030.	Not stated
R19.0085	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions		Resident	S4 section G – What does "clearly demonstrated" mean in practice?	Not stated

R19.0086	Site Allocations	VR6: The Fitzpatrick Building, 188 York Way	Vale Royal/Brewery Road LSIS		Deepdale Investment Holdings	Landowner	Any further development, amendments to the planning permission or new planning applications should support the existing office use of the site. Any attempt to further intensify industrial uses could affect the viability and amenity of the implemented office scheme.	Not stated
R19.0086	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Deepdale Investment Holdings	Landowner	Respondent is the owner of the building at 188 York Way, currently being redeveloped following permission (P2017/2937/S73). Respondent supports the creation of new B1a office in the Vale Royal/Brewery Road area, and argues that limiting this use this would result in an inefficient use of land that is contrary to sustainable development objectives, which will damage the economic potential of the area. It is also contrary to the London Plan's objectives (policy E4) and to the council's evidence base for the draft Local Plan.	Object
R19.0086	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Deepdale Investment Holdings	Landowner	Respondent considers that proposed policy hasn't been drafted in conformity with the NPPF, para 82. The respondent states that there has not been a clear and obvious engagement from the council with Vale Royal/Brewery Road businesses to understand/assess the specific locational requirements of specialist or new sectors.	Object
R19.0087	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	1,067 set responses, received via https://startafire.co/tileyard/localplan/dont-let-islington-council-stop-the-future-growth-of-creative-industries . Responses express concern about the impact this proposal will have on the expansion of creative industries along with Tileyard London within this area.	Object
R19.0087	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	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 reconsiders the aim 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 SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	Respondents oppose to 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 SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Don't let Islington Council stop the future growth of creative industries	Other	Respondents support the development of a Creative Enterprise Zone, as per London Plan policy HC5, which will bring enhancement of the LSIS. They propose that council recognises two demarked areas to divide warehouse operations from creative industries in the Vale Royal/Brewery Road area, LSIS to the north and CEZ on the southern part of the LSIS (e.g. south of Brandon Road). This will help deliver the council's goals for employment and marginalised communities in line with priorities set by Fairness and Employment Commissions.	Object
R19.0088	Strategic and Development Management Policies			Policy B2: New business floorspace	Fitzpatrick Team Developments Ltd	Landowner	The respondent objects to the proposed designation of 440A 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 enclosed by residential uses.	Object
R19.0088	Strategic and Development Management Policies			Policy B2: New business floorspace	Fitzpatrick Team Developments Ltd	Landowner	Respondent suggests 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 SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	398 set responses, received via https://www.cleanairandgoodjobsforislington.co.uk/ . Responses express concern over the impact the Local Plan will have on air quality and traffic congestion in the area; and the impact on jobs creation in the area - especially the availability of good quality jobs in the creative industries with restrictions on the expansion of Tileyard London.	Object
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	We are deeply concerned about the impact on air quality by prioritising certain industrial uses over other uses in this area. We reject the focus on polluting factories, meat-packing, take away kitchens and storage depots, over alternative uses including creative studios, music studios and less polluting activities. We believe that the industrial capacity of the area can be retained and co-located alongside flexible business space. Caledonian Ward in Islington has some of the worst air quality in Europe. The proposals in the Local Plan would aggregate this situation, particularly if there is increased use of HGVs in the area. It's unbelievable that our children could be exposed to more air pollution under these new council plans. Unless there is a full air quality assessment into the extent to which the revised Local Plan could impact on air quality in the area, we believe the Council's Local Plan could be subject to legal challenge by way of judicial review.	Object
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	We are also deeply concerned for the future of the creative industries and the impact on employment creation for Islington residents. We strongly oppose the proposal on Policy SP3 concerning the Vale Royal / Brewery Road Locally Significant Industrial Site ('LSIS') that: "any proposal which introduces additional offices, regardless of whether there is existing office use on-site, and which does not result in the building being in predominantly industrial use, will be refused."	Object
R19.0089	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Good jobs, clean air in Islington	Other	We support the development of a Creative Enterprise Zone around the southern part of the LSIS (e.g. south of Brandon Road).	Object

R19.0090	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Grainger Plc	Developer	Background on Grainger Plc, a leading provider of private rental homes in the UK. Note they have a number of partnership with public sector organisations including TfL, but currently no business sinterest in Islington. LBI 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 and investment in local communities. Consider that H11 will reduce delivery of new homes and note LBI have not met the latest housing delivey test..Surprised to see that LBI do not consider there is a need for private rental accommodation, which is inconsistent with SHMA 2017. Suggest that policy and tax changes mean that buy-to-let investors will not be as prominent, and note that BtR can help to backfill this potential lessened supply. Council should assess an publish local need for private rented accommodation. Policy should allow for APR and DMR. Policy does not set out what form of AH is acceptable or state why APR/DMR is unacceptable. 50 year covenant prevents flexibility and will discourage investment; should be 15 years in line with London Plan. The clawback and covenant are both designed to ensure LPA can recoup AH if untis are sold privately, therefore it is unnecessary to include both. No evidence to justify Council's approach to restricting BtR.	Object
R19.0091	Strategic and Development Management Policies			Evidence base, IDP	Great Ormond Street Hospital and Puttinu Cares Foundation	Business	The Infrastructure Delivery Plan (IDP) (Update Report 2019) Chapter 8 "Health and Social Care" sets out the commitment for London Borough of Islington and Islington CCG to work together to deliver the Long Term NHS Plan. The IDP makes no reference to GOSH, despite listing other healthcare organisations operating in adjacent boroughs. There is an identified need for such accommodation to be provided within the borough of Islington and the draft London Plan policy acknowledges that this issue transcends borough boundaries and needs to be considered as a cross-boundary issue.	Object
R19.0091	Strategic and Development Management Policies			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 supports 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.	Object
R19.0092	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road	Grimaldi Holdings Limited	Business	Aspirations to improve levels of employment in this sustainable location are strongly supported, and it is agreed that Pentonville Road represents an excellent opportunity to improve its commercial offer to the benefit of London as a whole.	Support
R19.0092	Strategic and Development Management Policies			Policy B2: New business floorspace; Appendix 9: Glossary and abbreviations	Grimaldi Holdings Limited	Business	Reference to a variety of suitable business space including hybrid space is welcomed (with reference to Pentonville Road). Modern businesses require diverse types of employment space and support services to fit their needs. Development that directly supports commercial use can be equally important in creating a thriving business environment and in turn drives employment.The definition of hybrid space, included in the glossary is restrictive and refers to buildings that provide a supporting function to the central London economy. This definition would be more appropriate if it includes offices, industry, warehousing, retail, entertainment, etc. to nurture a flexible commercial area along Pentonville Road.	Object
R19.0092	Strategic and Development Management Policies			Policy B1: Delivering business floorspace; Policy B2: New business floorspace; Policy B3: Existing business floorspace	Grimaldi Holdings Limited	Business	Respondent is concerned with the explicit mention of 'no net loss' of business floorspace in policies B1 and B3, and the objective of policy B2 to maximise business floorspace. This is potentially contrary to the council's aims to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types/sizes, affordable for a range of occupiers, including start-ups. There should be greater flexibility to allow the loss of office floorspace through redevelopment, provided it is suitably replaced with alternative employment generating use that supports the function of Pentonville Road as a commercial corridor. The definition of employment floorspace could be used to fit this purpose.	Object
R19.0092	Strategic and Development Management Policies			Policy B4: Affordable workspace	Grimaldi Holdings Limited	Business	The respondent is concerned about the requirement of policy B4 to lease the affordable workspace directly to the council rather than directly to an approved provider. It is suggested that the Inspector reviews the Procurement Strategy and Grant of Under-Lease Agreements for Affordable Workspace Operators 2019-2023 as we are concerned that the approach is not the most appropriate strategy against reasonable alternatives; including approaches adopted by other boroughs.. The respondent doesn't consider this strategy to be the most appropriate in comparison to other boroughs.	Object
R19.0093	Strategic and Development Management Policies			Policy H4: Delivering high quality housing		Resident	Welcomes dual aspect requirement but questions the requirements for generous areas of glazing and direct sunlight and the requirement to ensure that flats should not be predominantly north facing. This could cause problems with overheating.	Both

R19.0093	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design		Resident	The target of being zero carbon by 2050 for all existing buildings is ambitious especially if you want to achieve it through energy reduction, rather than decarbonisation of the energy supply. My flat is all electric: I do not want to have air conditioning but high temperatures might force me into it.	Not stated
R19.0093	Strategic and Development Management Policies			Policy SP7: Archway		Resident	I note that some tall buildings are proposed near the tube station despite the conclusion in the appendix to the tall buildings report of 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 TfL land further north.	Object
R19.0093	Strategic and Development Management Policies			Policy SP6: Finsbury Park		Resident	Respondent welcomes paragraph 2.77 to improve capacity and access to Finsbury Park station	Support
R19.0093	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport		Resident	Pedestrian areas need to be kept clear of obstacles such as dockless bikes. Bus stands need to be positioned so as not to obstruct the pavement.	Not stated
R19.0093	Strategic and Development Management Policies			Policy T4: 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
R19.0094	Site Allocations	NH7: Holloway Prison, Parkhurst Road	Nag's Head and Holloway		Line Planning	Business	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 CIL 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
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities	Line Planning	Business	The thrust of this policy is supported. However, we recommend that in some areas the Council revisits the detail of its 2017 Housing evidence base (which relies on ORS report 2012 and 2014 data) to address evidence gaps, particularly with respect to more contemporary data on housing including homelessness and provision for older people. The Council should have the benefit of more up to date data so it can test the assumptions underlying the present and proposed policy approaches, to ensure that policy is sound and effective. The Plan should ensure that the housing needs of a range of groups and residents are being met. These policies could benefit from some modification to respond to current pressures on housing. Such modification could make the plan not only more deliverable but more visionary.	Object
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part D	Line Planning	Business	The wording of this over-arching policy is supported.	Support
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part G	Line Planning	Business	Small householder developers 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.	Object
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part J	Line Planning	Business	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
R19.0094	Strategic and Development Management Policies			Policy H1: Thriving communities, Part K	Line Planning	Business	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 'floorspace' but there is no guidance on floorspace dimensions (other than minimum sizes in other policy). The ORS SHMA evidence base shows that too many families are living in accommodation that is too small for their requirements. Islington proposes that 2b 4p 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 NPPF does 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	H1.K (specialist housing and vulnerable people) 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.	Both
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?	Not stated
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)?	Both
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.	Object
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. Housing policy should actively address overcrowding so that the policy is justified, effective and meets the NPPF. The relationship of space to occupants is relevant to Policy H4. It could be more logical to make H2 and H4 sequential so that 'size mix' is correlated with quality.	Object

R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraphs 18-21: Quality in terms of size standards should not become a race to the bottom, i.e. the minimum. A dominance of 2b4p category could contribute to an over-crowding problem in future housing cycles. Moreover that model serves developers most in terms of housing profit margins. It is not pegged to quality or monitored in terms of housing outcomes (of which we are aware).</p> <p>For some families with 2 kids, it is likely that the 2b 4p model will be out grown. Many families want to expand into larger spaces as children grow but they should not have to move home to do this. The life cycle of a family home needs to be looked at over a number of years, not just the short term. Families need to stay close to schools and their registered GP Practice. Severing those ties can be harmful to family and community life.</p> <p>The Council should not make policy to encourage the lowest common denominator of size mix across the board. It should encourage developers go above and beyond national minimum standards. Policy D4 Housing quality and standards London Plan are minimum housing standards.</p> <p>The basis for the size mix housing priorities and its assumptions set out in Table 3.2 therefore need to be tested and justified. Our reading is that the Table on mix size priorities is too high level as a starting point although it is merely indicative. But it does not give certainty to developers or the community and the policy should be finer grain referring to local circumstances in some cases.</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraph 22: 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.</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>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 as 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.</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraph 24: Optimisation does not mean maximisation. Alternatively, the policy could for example include extra wording as follows:-</p> <p>B (i) the contribution to meeting need for particular types of housing that will include addressing the backlog of overcrowding;</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraph 25: H2 text 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.</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraphs 26-27: 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.</p> <p>Families with disabled family members also need more space. In this regard ‘disability’ should surely extend beyond the wheelchair definition. People with special needs often require more space than both able bodied and mentally able people. It would therefore strengthen policy to include text to this effect in H2 (e.g.):-</p> <p>“all new homes must meet people’s lifetime needs and be adaptable. New housing developments should provide a variety of sizes to respond to changing needs in terms of bedroom provision and avoid over crowding.”</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>Paragraph 28: We refer the Council to MHCLG’s newly published National Design Guidance (October 2019) – 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 need to go above minimum standards. This could be a policy preference.</p>	Object
R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	<p>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.</p>	Object

R19.0094	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Line Planning	Business	Paragraphs 30-31: The Council needs to mitigate risk by ensuring that there is housing variety in all locations. It should focus on keeping communities stable and secure, meeting needs for a variety of preferences. NPPF (paragraph 128) encourages Councils to work with applicants to bring proposals forward that take into account the views of the community. We are not aware that the Council have expressly consulted the community on borough wide housing choices and preferences.	Object
R19.0094	Strategic and Development Management Policies			Evidence base, SHMA	Line Planning	Business	The housing backlog also has to consider the number of 'concealed homes' in the approach to homelessness (SHMA page 67). 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 (51%).(SHMA page 68). 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 50+ homes but then providing an off site small site to help meet this type of need under a S106 or CIL obligation). The s106 "Community" heading in the SPD 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. <ul style="list-style-type: none"> • 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 NPPG test applies 	Object
R19.0094	Strategic and Development Management Policies			N/A - general comment	Line Planning	Business	Policy needs to ensure that forthcoming housing schemes are fit for purpose and address projected and existing need. The Council should be adopting policy that will 'contribute to meeting an unmet need for development in the area'. This is entirely consistent with para 120 and 121 of the NPPF. The Council should be actively working with a range of developers and community groups to explore policies that make more effective use of land in terms of housing choices and provision. This means widening the range of schemes available more proactively and getting feedback and ideas from the community with respect to housing market distortions and the best way to address them. Data sets and proposals for policy wording need review, otherwise the proposed policies are at risk of being unsound. The Council needs to introduce a further data set on KPIs to monitor that its services are providing the right kind of housing access, particularly with respect to overcrowding, homelessness and older people. Policy could be more joined up in terms of its coherence and evaluation of its expected outcomes.	Object
R19.0094	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people	Line Planning	Business	Considers that the ORS data may not be considered sufficiently robust and should be checked against latest Government PPG guidance produced in July 2019. In addition points to reports from Clinical Commissioning Group around quantum of care homes in Islington vs rest of North London. On this basis disagrees with policy which states that there is no need for market extra care in the borough.	Object
R19.0094	Strategic and Development Management Policies			Policy H9: Supported Housing	Line Planning	Business	Considers that further up to date data on levels of homelessness should be used as a basis to seek funds from S106 / CIL to address the insufficient funding available to deal with housing vulnerable people.	Object
R19.0094	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people; Policy H9: Supported Housing	Line Planning	Business	Seeking a policy trigger to be added to consider the potential for use of retail space for housing in recognition that high streets need to evolve.	Object
R19.0095	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	London & LA Ltd	Landowner	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.	Object
R19.0096	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs)	Pause Living	Developer	Pause develop and operate purpose-built shared housing (sometimes referred to as co-living). They are concerned about approach to this type of housing set out in the Local Plan; this conflicts with the London Plan. The NPPF, London Plan and Islington SHMA set out significant need for housing. Purpose built shared housing can make a contribution to this. The Local Plan should positively enable the assessment of applications for co-living, even if it still prioritises conventional accommodation.	Object
R19.0097	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Sensible Music Ltd	Business	The respondent supports the promotion and preservation of industrial uses in the Vale Royal/Brewery Road LSIS.	Support
R19.0098	Strategic and Development Management Policies			N/A - general comment		Resident	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.	Support

R19.0099	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	M & G Real Estate	Landowner	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 realistic to target only an increase in retail floor space.	Object
R19.0099	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	M & G Real Estate	Landowner	Paragraph 4.64 of the emerging local plan states 'there are significant structural challenges facing the retail sector from internet shopping to changing retailer and customer requirements and demand', yet Policy R1 maintains that retailing (A1) as the predominant town centre use. This protection will be even stronger in Primary Shopping Areas. This policy would be a backwards step and contrary to the NPPF para 85a that seeks to allow town centres to grow and diversify in a way that can respond to rapid changes in the retail market.	Object
R19.0099	Strategic and Development Management Policies			Policy R2: Primary Shopping Areas	M & G Real Estate	Landowner	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 CBI 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 60.8% 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 premises, 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.	Object
R19.0099	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	M & G Real Estate	Landowner	Policy R3 focuses on protecting A1-A5, D2 and Sui Generis main town centre use floorspace to designated centres. However, the policy should be updated such that it takes account of all main town centre uses as defined by the NPPF.	Object
R19.0099	Strategic and Development Management Policies			Policy R8: Location and Concentration of Uses	M & G Real Estate	Landowner	Respondent understands the aims of the policy but feels it is not appropriate to resist 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 no 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.	Object
R19.0100	Site Allocations	FP3: Finsbury Park Station and Island, Seven Sisters Road	Finsbury Park		LB Haringey	Statutory consultee	It is 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 Haringey side of Finsbury Park.	Support
R19.0100	Strategic and Development Management Policies			N/A - general comment	LB Haringey	Statutory consultee	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.	Support
R19.0100	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	LB Haringey	Statutory consultee	There is specific support for Policy H2 and Islington's commitment to meeting its share of London's growth by adopting the Housing Target set out within the draft London Plan for Islington.	Support
R19.0100	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	LB Haringey	Statutory consultee	Policy H12: Gypsy and Traveller Accommodation is supported and considered sound, specifically provision A(i) and A(iii), noting that is unlikely that Haringey 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.	Support
R19.0100	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	LB Haringey	Statutory consultee	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 A1 retail to those locations, which will enhance the vitality of these town centres.	Support

R19.0100	Strategic and Development Management Policies			Policy ST2: Waste	LB Haringey	Statutory consultee	It is welcomed that Policy ST2: Waste, safeguards the Hornsey Street Re-Use and Recycling centre, and Haringey will continue to work with Islington and the five other North London Boroughs in progressing the North London Waste Plan through to adoption. Support is therefore given to criterion B of this policy as the appropriate strategy for ensuring sufficient land to meet waste management needs is through the North London Waste Plan.	Support
R19.0101	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	GMS Estates Limited	Landowner	Respondent is concerned about the restriction on B1(a) business space from policy SP3 which will result in an inefficient use of land and it is not consistent with the council's evidence. Proposes drafting policy SP3 in accordance to London Plan 65% plot ratio benchmark for retaining industrial/storage capacity, but without restrictions on the introduction of flexible B1 uses (including office).	Object
R19.0101	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	GMS Estates Limited	Landowner	Respondent objects to blanket restrictions that buildings should not exceed more than 20m in height. The respondent defends that the character of Brandon Road (and wider LSIS) is not sensitive in townscape terms and is not justified in the council's evidence base.	Object
R19.0101	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	GMS Estates Limited	Landowner	Respondent states that view of the Market Place Clocktower from Randell's Road to the south has no merit and should be removed.	Object
R19.0102	Strategic and Development Management Policies			Policy B4: Affordable workspace	Studiomakers	Business	The respondent asks for further clarification about the definition of "peppercorn"; longer lease periods beyond 20 years that are more attractive to operators; to add cap per square foot to service charge requirements; to include lost community benefits in the formula for affordable workspace in lieu payments. The respondent also recommends a series of operational aspects such as marketing and agreeing the lease for the space early, and to vet and monitor eligible operators that will be managing the workspaces.	Not stated
R19.0103	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	British Property Federation	Business	BPF consider that policy H11 is extreme. The Council does not explain what is identified housing need in Islington? The mere fact it is willing to accept new developments with investors buying individual units would suggest there is a need for new Private Rented Sector (PRS) accommodation in the Borough, particularly as the Council pursues a number of policies that seek to ensure such new units are occupied. It cannot have it both ways. Either there is a need for PRS accommodation, or there is not? BPF also note that the policy contradicts the NPPF by restricting APR. BPF argue that some criteria is contradictory as the Council says there is no need but then requests a 50 year covenant (which is not justified). Clawback requirement is unnecessary alongside covenant. The Council argue there is no issue with housing delivery but they have failed the housing delivery test; excluding build to rent would therefore make policy unsound.	Object
R19.0104	Strategic and Development Management Policies			Policy R11: Public Houses	CAMRA North London Branch	Campaign	CAMRA fully support comments from Theatres Trust and GLA relating to marketing efforts to be a rent or sale price appropriate to the existing use and the supporting of new pub proposals in line with London Plan policy HC7. Welcome the addition of Appendix 1.	Both
R19.0104	Strategic and Development Management Policies			Policy R11: Public Houses	CAMRA North London Branch	Campaign	Additional pub protection should be given in line with the Agent of Change principle in London Plan policy D12. Other protective policies, especially relating to the viability of a pub once assets like the kitchen or beer garden are removed or reduced. Consider the approach Camden Council have taken in paragraph 4.71 of their local plan.	Both
R19.0104	Strategic and Development Management Policies			Policy R11: Public Houses	CAMRA North London Branch	Campaign	Islington should welcome ACV nominations for all public houses within the borough, similar to that stated in Camden Local Plan paragraph 4.73. The council should consider automatic ACV listings for a nominated list of pubs.	Object
R19.0105	Strategic and Development Management Policies			Policy H4: Delivering high quality housing, paragraph 3.80		Resident	Notes para 3.80 and requests that this applies to existing as well as new properties. Highlights quite a few issues relating to bins.	Object
R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	<p>HBF note viability studies produced to support the plan.</p> <p>Some costs are assumed to be already 'embedded' within BCIS costs. See paragraph 2.41 of the December 2018 report. This cannot be assumed. Up until now many schemes are not entirely 'policy compliant' across the full range of policy requirements. To ensure that the assessment provides a reliable indicator of what development can viability accommodate, it would be helpful if the Council provided an overview of the percentage of affordable housing supply across its schemes over the last four years since 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.</p> <p>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 expressed 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.</p> <p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	The report assumes a rate of 6%. We think this is a little low. The HBF recommends 6.5 to 7% as a more reliable rule of thumb reflecting the range of companies operating within the residential development sector. Homes England uses a range of between 5-7%.	Object

R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	The report assumes 3% for marketing. The HBF recommends a figure of between 3-5%. A higher figure would be more appropriate in weaker market areas.	Object
R19.0106	Strategic and Development Management Policies			Evidence base, Viability	Home Builders Federation	Business	<p>The report assumes a profit margin of 18% for private development. The Harman review had suggested a minimum return on capital employed (ROCE) of 25% but this would depend on the degree of site-specific risk. The PPG suggests that a figure in the range of 15-20% of GDV could be used, but like Harman, states that the figure used should reflect the risk profile of sites in the borough. As the PPG states:</p> <p><i>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.</i></p> <p>Compared to other areas in the UK, Islington is a relatively 'safe' market. However, given that the report assumes 6% return on GDV for affordable housing, and given that affordable housing will need to constitute 50% of the supply on each site, this assumption may pull-down the overall rate of profit to below 15% of GDV – i.e. below the minimum level recommended by the PPG. Our calculations indicate that this could pull profit down to 14.5% on schemes.</p>	Object
R19.0106	Strategic and Development Management Policies			Introduction	Home Builders Federation	Business	Policy H2 provides a housing target that runs to 2028/29. The plan period should end at 2028/29 if it is unable to identify a land supply that beyond this date. The Local Plan should extend one year beyond the 10 year housing target end date (2028/29) as it will be adopted after the London Plan.	Object
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part E	Home Builders Federation	Business	<p>The term genuinely affordable could be misleading as the general public may think this refers to affordable home ownership. The policy should be recast to reflect the 70/30 tenure split. Notwithstanding this, policy should allow for full range of affordable housing specified in the NPPF Annex 2. HBF refer to research from the Affordable Housing Commission which highlights support for affordable home ownership. HBF also refer to the SHMA which indicates that there is an appetite for home ownership and an ability to afford low-cost home ownership products. They note strong national and local public support for policies that support home ownership, and state that this could be supported further through local measures to prioritise existing Islington residents by providing 'first dibs' opportunities as some housing providers already operate. HBF recognise issues with realism of aspirations for home ownership, but consider that the Council should avoid adopting a stance on housing supply that could be considered somewhat paternalistic by their constituents, and that Policy H1 and H3, consequently, should be more supportive of other types of affordable housing product.</p> <p>HBF suggests some additional wording which would recognise other affordable home ownership products and allow for alternative tenure splits based on a consideration of local circumstances and in response to expressed preferences of local people.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part F	Home Builders Federation	Business	Part F should clarify tenure split sought. Notwithstanding this, there should be flexibility in the tenure split to allow for other affordable home ownership products.	Object
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part G	Home Builders Federation	Business	Seeking AH contributions from small sites is inconsistent with national policy. Different definitions of small sites are noted. HBF consider needs to do more work, in line with the Draft London Plan and national policy, to identify more specific sites to help sustain delivery against the small sites target. The Council needs to do more work to interrogate its housing land supply to justify the disapplication of the national policy.	Object
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part I	Home Builders Federation	Business	The Council needs to provide a SHLAA and Five Year Land Supply statement to support the delivery of the plan.	Object
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part J	Home Builders Federation	Business	Part J is unclear re: how policy will be used to determine applications. Definition of family sized housing should be provided or the policy should be deleted.	Object

R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part L	Home Builders Federation	Business	<p>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 3.18 is unsound and unjustified 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.</p> <p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H1: Thriving communities, Part V	Home Builders Federation	Business	<p>The policy is unclear about what is being required and how decision-maker can take policy into account. It is 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 deleted.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Home Builders Federation	Business	<p>Para. 3.22 of the Local Plan and table 3.1 suggests that the Council is relying on the GLA SHLAA 2017 for the identification of the housing land supply. This is unreliable. As the GLA itself recognises, the GLA SHLAA 2017 does not allocate land (para.1.5), site level information that the GLA draws upon is not publicly available (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).</p> <p>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".</p> <p>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 DILP states that a number of allocations have been made by the Plan but these will only address the large sites benchmark.</p> <p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Home Builders Federation	Business	<p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing, Part A	Home Builders Federation	Business	<p>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.</p> <p>HBF note need figure of 1,150 from SHMA 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).</p>	Not stated

R19.0106	Strategic and Development Management Policies			Policy H2: New and existing conventional housing, Part H	Home Builders Federation	Business	<p>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.</p> <p>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 was 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 marketed 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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part A	Home Builders Federation	Business	<p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part B	Home Builders Federation	Business	<p>Part B (ii) requires applicants to "exhaust all potential options for maximising the delivery of on-site affordable housing to reach and exceed the strategic 50% target..."</p> <p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part H	Home Builders Federation	Business	<p>The Plan is unsound in rejecting other forms of affordable housing defined in the glossary to the NPPF. Para. 62 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.</p> <p>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.</p> <p>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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing, Part J	Home Builders Federation	Business	<p>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 J and paragraph 3.61 should be deleted.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H4: Delivering high quality housing, Part B	Home Builders Federation	Business	<p>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 (iii). These additional requirements should be removed.</p> <p>Part B also fails to comply with national policy by failing to specify that the requirement for 10% of homes constructed to the M4(3) standard – wheelchair accessible homes – should, in the words of the PPG, "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.</p>	Object
R19.0106	Strategic and Development Management Policies			Policy H4: Delivering high quality housing, Part C	Home Builders Federation	Business	<p>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 is 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.</p>	Object

R19.0106	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people	Home Builders Federation	Business	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 DILP carries much less weight. Therefore, the decision by the Council to dis-apply Draft London Plan policy H15 (or 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.	Object
R19.0106	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process	Home Builders Federation	Business	LBI need to encourage homes on small sites of 0.25ha or lower in line with NPPF paragraph 68; 2/3 of housing target is formed from small sites and policy H2 incentivises small sites delivery. HBF acknowledge importance of good design and that quality should not be compromised in small schemes, but consider that Part C will have resource implications for many small developers, especially in conjunction with other policies, therefore it would be helpful if the Council provided more support in other areas, such as compliance with its design requirements. HBF suggests some additional wording which requires specific applicable elements of Part C to be identified through pre-app (in relation to certain small schemes).	Object
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part A	Home Builders Federation	Business	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.	Object
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part B	Home Builders Federation	Business	Similarly, Part B is a general statement of intent. It does not tell applicants what is expected from them.	Object
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part C	Home Builders Federation	Business	The hierarchy conflicts with national policy through promoting a energy hierarchy. The Building Regulations are not prescriptive. How energy efficiency targets are achieved should be a matter for the developer. The Council should not attempt to control the means. It must remain neutral in terms of the products and technology available and it must avoid using the planning system to give competitive advantage to the manufacturers and suppliers of specific products.	Object
R19.0106	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design, Part D	Home Builders Federation	Business	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.	Object
R19.0106	Strategic and Development Management Policies			Policy S2: Sustainable Design and Construction	Home Builders Federation	Business	The policy is unsound as it conflicts with national policy. The Council in asking for a Sustainable Design and Construction Statement is interfering with the work of the Building Regulations through planning. The WMS of March 2015 states that LPAs may also need to review their local information requirements (in light of the WMS) to ensure that technical detail that is no longer necessary is not requested to support planning applications. The policy should be removed from the Plan.	Object
R19.0106	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	Home Builders Federation	Business	Parts A and B conflict with national policy by requiring residential development to comply with BREEAM and the BRE Home Quality Mark. The WMS of March 2015, reflected the work of the Housing Standards Review, introduced a streamlined system of Building Control for housebuilders. Housebuilders are required to comply with the Building Regulations and the optional technical standards (if the latter are adopted by the Council through an update to its local plan, or in the case of London, through an update to the London Plan). From this it is apparent that the only standards that now relate to residential development comprise the Building Regulations plus the three optional technical standards. By requiring compliance with BREEAM and the BRE Homes Quality Mark the Council is clearly acting contrary to national policy. Parts A and B should be deleted.	Object
R19.0106	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part D	Home Builders Federation	Business	National policy allows plan-makers to adopt policies for energy efficiency in residential developments to go 19% beyond current Part L of the Building Regulations. This would take you to a level equivalent to about Level 4 of the withdrawn Code for Sustainable Homes. The Draft London Plan requires applicants for major schemes to achieve a 35% reduction beyond current Part L (Draft Policy SI2). By contrast the DILP requires applicants on large schemes to achieve a 39% improvement on Part L where they are able to connect to a heat network (Part D (ii)). This goes much further than either national or local policy, hence it is unsound. The DILP should be amended to align with the London Plan. Part D (iii) adheres to the national policy by requirement a 19% improvement on Part L.	Object
R19.0106	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part F	Home Builders Federation	Business	Part F is unsound in requiring compliance with an energy hierarchy. This is for the reasons we have already articulated in response to Policy S1.	Object
R19.0106	Strategic and Development Management Policies			Policy S4: Minimising greenhouse gas emissions, Part G	Home Builders Federation	Business	As discussed above, part G is contrary to national policy in seeking cash contributions for carbon offsetting from minor developments. The DILP should be amended to reflect this exemption.	Object

R19.0106	Strategic and Development Management Policies			Policy SC2: Play space	Home Builders Federation	Business	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 obstacles 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.	Object
R19.0106	Strategic and Development Management Policies			Policy SC3: Health Impact Assessment	Home Builders Federation	Business	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.	Object
R19.0106	Strategic and Development Management Policies			Policy SC4: Promoting Social Value	Home Builders Federation	Business	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 various 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.	Object
R19.0107	Strategic and Development Management Policies			Policy SC3: Health Impact Assessment	Kentucky Fried Chicken Ltd	Business	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 with (PPG53-005) requiring HIA only where significant impacts are expected. Propose amendment of Part A of Policy SC3 to delete “and developments where potential health issues are likely to arise,” and consequential amendment of the supporting text.	Object
R19.0107	Strategic and Development Management Policies			Policy R8: Location and Concentration of Uses	Kentucky Fried Chicken Ltd	Business	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.	Object
R19.0108	Strategic and Development Management Policies			N/A - general comment	LB Hackney	Statutory consultee	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 fulfill duty-to-cooperate requirements.	Not stated

R19.0108	Strategic and Development Management Policies			Policy DH3: Building heights	LB Hackney	Statutory consultee	<p>Whilst 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 DH3 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 that are outside of the Islington borough boundary and within Hackney.</p> <p>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 Brownswood area in early 2020, which will directly adjoin the Finsbury Park strategic area.</p> <p>Hackney would therefore request that the current policy DH3 be amended to include consideration of the impact on local character and in particular the adjoining borough conservation areas.</p> <p>Hackney are also concerned that policy DH3 could potentially restrict development opportunities on adjacent sites that are outside of the Islington borough boundary. Hackney would therefore request 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.</p>	Object
R19.0109	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Legal and General UK Property Fund	Developer	<p>Respondent comments 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'.</p>	Object
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	<p>The respondent states that the policy raises the proportion of affordable workspace from 5% to 10%. In relation to viability, the respondent states that the viability evidence base doesn't discuss the impact of this policy on redevelopment or extension to buildings. This evidence suggest that not all sites would be able to accommodate additional affordable workspace.</p> <p>In the response it is proposed that wording of the policy changes to consider the following:</p> <ul style="list-style-type: none"> - "net additional" as opposed to overall proposed floorspace; - development should "normally" incorporate 10% of affordable workspace; - the affordable workspace proportion should be considered "additional proposed" B1a/B1b 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. 	Object
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	<p>The respondent states that the requirement for the proportion of affordable workspace to be within the development building could lead to issues regarding costs of service charges. Discounted service charges would be easier to apply if the developer manages the space directly.</p>	Object
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	<p>The respondent suggests that additional detail concerning the implications of the council's lease of the affordable workspace is provided as part of the supporting text (e.g. handover process, management, service charge costs, lease agreement terms).</p>	Object
R19.0109	Strategic and Development Management Policies			Policy B4: Affordable workspace	Legal and General UK Property Fund	Developer	<p>The respondent asks that provision of SME floorspace is supported and recognised in the new proposed policies, to enable a more flexible approach to addressing this need in more financially or physically constrained sites.</p>	Object
R19.0110	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London First	Business	<p>BtR is playing an important role in London's housing market, including increasing the overall supply and accelerating the construction of new homes; supporting greater choice for tenants in the rental market; delivering a better quality of rental product that is professionally managed; and providing boroughs with an opportunity to generate a long-term income stream to invest in local priorities. Reference 2019 report which explains BtR; encourage Council to review this. Policy H11 fails to appreciate the broader benefits that build to rent provides and there is a danger that the policy will deter new investment into housing in the borough. BtR would help the council to meet its housing targets whilst also improving the quality of the private rented sector accommodation. Policy H11 is inconsistent with NPPF and London Plan, including with regard to suitable AH tenures. Encourage LBI to reconsider Policy H11 so that it provides a framework to support build to rent development which would help to deliver several benefits to Islington as an area and to its existing and future residents</p>	Object
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	<p>Welcome and support policies H1 and H12 as a positive step in acknowledging traveller communities in the borough and the need to provide culturally suitable accommodation.</p>	Support
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	<p>Support the target for 10 pitches in Policy H12 but needs to be monitored in the AMR to ensure accountability.</p>	Object

R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	The Local Plan needs to provide more detail on the sites being assessed as part of housing provision and requirements to demonstrate a 5 year supply of land as set out in the NPPF and PPTS.	Object
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Consider that site allocations are being excluded at this stage which is not compliant with the boroughs public sector equality duty. Also response considers that if left for a further 5 years the supply of land will be even scarcer. Given that 8 pitches need to be delivered in the first five years of the Plan, Policy H12 as it currently stands is not positively prepared and effective. Respondent considers that at this advanced stage of plan preparation the Council should have information including ; a detailed and realistic appraisal of the sites in the council housebuilding programme, a list of potential sites on which the council can work jointly with the GLA, and an assessment of site allocations which could identify where it is possible to include a small number of pitches as part of larger development or small sites. Strongly recommend that the Council consults with Gypsies and Travellers in the Borough on site options for accommodating the identified need, before submitting the Local Plan for examination.	Object
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Consider that the potential for working with the GLA and neighbouring boroughs to be highly unlikely given the stage of neighbouring boroughs' Local Plans and their own unmet need for Gypsy and Travellers. Suggests collaboration with the GLA to consider provision of pitches in other development planned on land owned by the GLA group, for example land owned by Transport for London.	Object
R19.0111	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	London Gypsies & Travellers	Campaign	To ensure that Gypsy and Traveller accommodation is of equally high standards, point A should be modified to include 'specialist housing identified in policies H6 to H12'	Object
R19.0111	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	London Gypsies & Travellers	Campaign	Recommends that the council should consider making reference to negotiated stopping as a meanwhile use and adding as part of policy H12 and R9 in line with the evidence base.	Object
R19.0112	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	N7 Collective	Campaign	<p>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.</p> <p>The respondent particularly supports paragraphs SP3 para 2.30 on recognising employment benefits of SME creative industries; paras 2.33-35 for the promotion and preservation of industrial uses; para 2.37 on the protection of industrial buildings which reflect the history/heritage of the area; para 2.39 on the outwards redirection of the frontages and encouragement of building-street interfacing; and para 2.40 on delivery and servicing capacity.</p>	Support
R19.0113	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Quod	Business	<p>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 and 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.</p> <p>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.</p> <p>The NPPF 2019 does not promote the prioritisation of one type of housing provision over another, rather it is based on a response to evidence of need. Islington represents one of the smallest geographical council's areas in the country and the market for housing will inevitably not respect borough boundaries. Each of the adjoining Councils (Camden, Hackney and Haringey) all exhibit market characteristics not dissimilar to Islington and each of these Councils (along with regional policy) encourage BtR or PRS as a part of a policy response to dealing with evidenced housing needs in their area. There is no evidence presented which justifies this approach to resolving housing need and nothing which sufficiently differentiates Islington from surrounding Councils to warrant their proposed approach to private rented schemes.</p>	Object

R19.0113	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Quod	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
R19.0113	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Quod	Business	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. Requiring developers to commit to a 50-year covenant is far in excess of the 15-year convent 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 not 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 BTR schemes uninvestable and undeliverable. The wording of part (iv) should be amended to state that PRS units are held in a covenant of no less than 15 years, consistent with London policy.	Object
R19.0114	Site Allocations	N/A - general comment	N/A		Sunnyside Road Land Limited	Landowner	Consider the council is unjustified in choosing not to allocate 87 Sunnyside 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. Intensification 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 Elthorne 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 Royal / Brewery Road Locally Significant Industrial Site	Tileyard 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 lower levels.	Object
R19.0116	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Tileyard 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 SP5: 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 understood in terms of vehicular access.	Object
R19.0118	Site Allocations	Site capacity assumptions	N/A		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 ST4 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 ST4: 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 S9: 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	N/A		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 advocating loss of sports facilities/D2 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 boroughs' 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: Elthorne 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	ARCH7: 207A Junction Road	Archway		Sport England	Statutory consultee	State the existing D2 floorspace must be reprovided as part of any development to align with national policy.	Not stated

R19.0119	Site Allocations	AUS8: 161-169 Essex Road	Angel and Upper Street		Sport England	Statutory consultee	Suggest that other D2 uses are considered for the site to address need identified in the Council's Sports Facilities Update 2018.	Not stated
R19.0119	Site Allocations	BC11: Longbow House, 14 20 Chiswell Street	B & C: City Fringe Opportunity Area		Sport England	Statutory consultee	Sport 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.	Not stated
R19.0119	Site Allocations	BC15: Richard Cloudesley School, 99 Golden Lane	B & C: Central Finsbury		Sport England	Statutory consultee	Recommend that the new sports facilities address local community needs.	Not stated
R19.0119	Site Allocations	BC3: Islington Boat Club, 16-34 Graham Street	B & C: City Road		Sport England	Statutory consultee	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.	Not stated
R19.0119	Site Allocations	FP2: Morris Place/Wells Terrace (including Clifton House)	Finsbury Park		Sport England	Statutory consultee	Object to the potential loss of a yoga studio on site. This is not in accordance with the NPPF, paragraph 97 or Sport England's Policy unless there is a robust assessment that identifies the D2 facility as surplus to the boroughs' needs.	Not stated
R19.0119	Site Allocations	NH1: Morrison's supermarket and adjacent car park, 10 Hertslot Road, and 8-32 Seven Sisters Road	Nag's Head and Holloway		Sport England	Statutory consultee	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.	Not stated
R19.0119	Site Allocations	NH13: 166-220 Holloway Road	Nag's Head and Holloway		Sport England	Statutory consultee	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.	Not stated
R19.0119	Site Allocations	NH14: 236-250 Holloway Road and 29 Hornsey Road	Nag's Head and Holloway		Sport England	Statutory consultee	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.	Not stated
R19.0119	Site Allocations	OIS16: Harvist Estate Car Park	Other Important Sites		Sport England	Statutory consultee	Any redevelopment of the site should retain the existing MUGA/sports pitch.	Not stated
R19.0119	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Sport England	Statutory consultee	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.	Not stated
R19.0119	Strategic and Development Management Policies			Policy G2: Protecting open space	Sport England	Statutory consultee	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 space 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(b). Consideration should be had to inserting such provision.	Not stated
R19.0119	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Sport England	Statutory consultee	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.	Support
R19.0119	Strategic and Development Management Policies			Policy SC2: Play space	Sport England	Statutory consultee	Supportive of the policy which will provide physical and mental wellbeing benefits.	Support
R19.0119	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Sport England	Statutory Consultee	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.	Support
R19.0119	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Sport England	Statutory Consultee	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.	Support
R19.0119	Strategic and Development Management Policies			Policy T4: Public realm	Sport England	Statutory Consultee	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.	Support
R19.0119	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Sport England	Statutory consultee	Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active 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

R19.0119	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use; Policy BC2: Culture, retail and leisure uses	Sport England	Statutory consultee	SE 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.	Object
R19.0120	Site Allocations	BC20: 50 Farringdon Road	B & C: 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.	Not stated
R19.0120	Site Allocations	BC28: Angel Gate, Goswell Road	B & C: City Road		Picton Property Income Ltd	Landowner	State the allocation should be amended to allow for residential use as part of a mixed-use scheme to promote viability and deliverability. This was encouraged by the Inspector assessing the original allocation of the site through the Finsbury Local Plan (2013). The development considerations should be altered to support residential use and make it clear that the buildings to the north of the site within the Duncan Terrace/Colebrooke Row Conservation Area and the listed building at 320-324 City Road would not form part of any redevelopment.	Not stated
R19.0120	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.	Object
R19.0120	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.	Object
R19.0120	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Picton Property Income Ltd	Landowner	The respondent supports the council's general aim to maximise the amount of business floorspace.	Support
R19.0120	Strategic and Development Management Policies			Policy B1: 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
R19.0120	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 prioritise 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
R19.0120	Strategic and Development Management Policies			Policy B2: New business floorspace	Picton Property Income Ltd	Landowner	The respondent recommends that part F (ii) of policy B2 is deleted because it restricts innovative design and efficient use of vacant car parks of other 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 BRE guidance.	Object
R19.0120	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
R19.0120	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 it being a centre for employment and business and the increased activity that will result from the Elizabeth Line.	Support
R19.0120	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
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Consider that policy BC1 part B, which requires developments of 500sqm or more of any use class to be 80 or 90% office use, to be unreasonable, and that it might act as a deterrant 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 50%.Amended wording suggested.	Object

R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Suggest amended wording for Part C to make specific reference to B1a office development only. For example, small-scale development by non-commercial office developers (e.g. a retail unit) should not be required to adhere to this policy requirement (as currently drafted) and we consider that this would be an unreasonable requirement.	Object
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Picton Property Income Ltd	Landowner	Consider that part D(iv) should be made more flexible to allow residential development in more areas, in particular not just wholly residential areas such as housing estates, but also predominantly residential areas and semi residential areas.	Object
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Picton Property Income Ltd	Landowner	Generally supportive of the aims of this policy.	Support
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Picton Property Income Ltd	Landowner	Picton state that while they support the aim to optimise employment provision in redevelopment proposals they also state that the City Road area is a less established office location. They therefore suggest amending the policy to state that residential uses will be supported in this area, especially where it improves the viability of commercial led mixed use schemes.	Both
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Picton Property Income Ltd	Landowner	Concerned that the policy wording under BC4 part D which states 'Goswell Road / City Road junction' to be more suitable for smaller offices they do not wish for this policy to restrict the ability of our client to promote large Grade A office floorplates as part of any potential redevelopment of Angel Gate.	Not stated
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon	Picton Property Income Ltd	Landowner	Support the aim of predominantly office uses in the Farringdon area but also would like to clarify that this could include an element of residential use.	Not stated
R19.0120	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon	Picton Property Income Ltd	Landowner	Suggest a number of changes to BC5 part H to allow and encourage the decking of the railway line in this area. Picton have submitted detailed material in support of the concept of decking over the railway line. They believe they can develop in this area in order to support London Plan aims to as Farringdon as an area of intensification. They also state that the local viewing corridor should not be stringently applied and that LV1 may be seen as viewing plane rather than a corridor. They also state that roof terraces in this area could provide new views to St Paul's. A new development here could also provide a new public square.	Not stated
R19.0121	Site Allocations	BC50: Queen Mary University, Charterhouse Square Campus	B & C: Historic Clerkenwell		Islington Living Streets	Campaign	Strongly agree that 'development should prioritise a new pedestrian route through the site from Charterhouse Buildings to Rutland Place'.	Support
R19.0121	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	Islington Living Streets	Campaign	Add: 'Enhance town centres and shopping areas, by reducing traffic, improving the public realm, widening pavements and removing on-street parking spaces, eg on Islington High Street, near Duncan St. eg remove parking spaces on Upper Street.'	Object
R19.0121	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Living Streets	Campaign	Key concerns are about the commitment to sustainable transport. Respondent mentions a number of approaches and initiatives to achieve this, including Low Traffic Neighbourhoods; Clean Air Walking Routes; developing and improving accessibility; creating new walking routes; removing parking spaces, especially where this would lead to public realm improvements and add to the vibrancy of areas, eg on Islington High St.; offering a parking permit scrappage scheme where a free two-year membership to a car club is provided (cf Camden Council's proposal); and encouraging parklets on the road in place of parking places	Not stated
R19.0121	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Islington Living Streets	Campaign	Concerned that large hotels will be accessed by coaches, adding pollution and congestion; the Council policies should seek to prevent this.	Object
R19.0121	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Islington Living Streets	Campaign	Add 'The Council will take every opportunity in new developments to create walking and cycling routes (cf Charterhouse Sq complex)	Object
R19.0121	Strategic and Development Management Policies			Policy T3: Car-free development	Islington Living Streets	Campaign	7.24: states 'For residential development, on-street accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed.' This figure seems very high considering the low level of car ownership among disabled people in Islington. Surely it should be proportionate to the percentage of disabled people in the borough who own cars.	Object
R19.0121	Strategic and Development Management Policies			Policy T3: Car-free development	Islington Living Streets	Campaign	7.26 - describes parklets and cycle storage as 'temporary use of existing under-utilised parking spaces'. Why are they temporary? Islington already has an excessive number of parking spaces in many areas, and they will become even more redundant with the predicted fall in car ownership.	Object
R19.0121	Strategic and Development Management Policies			Policy T3: Car-free development, Part J	Islington Living Streets	Campaign	Add: 'On street charging points must not be erected on the pavement.'	Object
R19.0121	Strategic and Development Management Policies			Policy T4: Public realm, paragraph 7.43	Islington Living Streets	Campaign	Planters do not need to be on the pavement. Therefore add after 'pavement planters' 'planters in the road in place of parking spaces'. At end add 'We will work with local people and community groups to encourage them to develop ideas for planters and take responsibility for them.'	Object
R19.0121	Strategic and Development Management Policies			Policy T4: Public realm, Part D	Islington Living Streets	Campaign	D. Privately Owned Public Spaces (POPS) Insert. 'The Council will not permit these to be used for private car parking as it encourages an unsustainable mode to transport'.	Object
R19.0121	Strategic and Development Management Policies			Policy T5: Delivery, servicing and construction, Part B	Islington Living Streets	Campaign	Add a statement in (iii) the section on Construction: 'Every effort should be made to ensure the pavement and cycle lanes are not blocked during construction. Where this is unavoidable, space must be taken from the road way to make provision for footways and cycle lanes.'	Object
R19.0121	Bunhill and Clerkenwell Area Action Plan			Challenges	Islington Living Streets	Campaign	Suggestion of adding: 'This will be achieved by a range of measures, in particular the introduction of Low Traffic Neighbourhoods and Clean Air Walking routes.' to paragraph 165.	Not stated
R19.0121	Bunhill and Clerkenwell Area Action Plan			Challenges	Islington Living Streets	Campaign	Climate change: Para 1.69-72; insert 'reduction in motor vehicle use, whether by diesel, petrol or electric vehicles'	Not stated

R19.0121	Bunhill and Clerkenwell Area Action Plan			Challenges	Islington Living Streets	Campaign	Open space etc. 1.73, add 'The Council will press ahead with improvements to Clerkenwell Green, and will come forward with proposals for Faringdon Square.'	Not stated
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Islington Living Streets	Campaign	Para 2.15 states 'The Council has designated four local shopping areas in Bunhill and Clerkenwell. Add 'The Council will semi-pedestrianise the other 3 areas in the same way it has Exmouth Market'	Not stated
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Islington Living Streets	Campaign	Policy BC3, F states 'The Council will also explore ways to improve the busy Old Street and Clerkenwell Road for pedestrians and cyclists'. This is too feeble. It should say: 'The council will remove through motor traffic, except buses, to improve the busy Old Street and Clerkenwell Road for pedestrians and cyclists'.	Not stated
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC4: City Road	Islington Living Streets	Campaign	3.31 states 'City Road Basin and Graham Street Park are places of recreation and relaxation, and should be enhanced by ensuring pedestrian access is provided on all sides of the basin'. We strongly support this policy.	Support
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon	Islington Living Streets	Campaign	Add in this section: 'reduce traffic on Cowcross St and establish a public space at south end of St John St, including closing the road to motor traffic. Remove EV charging points from Cowcross St and ensure EVCPs are not installed in areas to be designated for shopping or improvement.'	Not stated
R19.0121	Bunhill and Clerkenwell Area Action Plan			Policy BC6: Mount Pleasant and Exmouth Market	Islington Living Streets	Campaign	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'.	Not stated
R19.0122	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Bee Midtown	business	The respondent supports policy B1 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
R19.0122	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Bee Midtown	business	The respondent supports policy B3 to protect existing business floorspace in the borough.	Support
R19.0122	Strategic and Development Management Policies			Policy B2: New business floorspace	Bee Midtown	business	The respondent supports policy B2, part A(i) to prioritise business space and the provision of a range of workspaces to suit the needs of different occupiers. The respondent is keen to see the introduction of measures which could encourage new developments to provide workspaces with a range of affordability and sizes.	Both
R19.0122	Strategic and Development Management Policies			Policy B2: New business floorspace	Bee Midtown	business	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
R19.0122	Strategic and Development Management Policies			Policy B2: New business floorspace	Bee Midtown	business	The response includes the respondent's own research of EC1 to demonstrate that within the last five years architecture and design, and advertising sectors have grown in the area, alongside the creative and media.	Not stated
R19.0122	Strategic and Development Management Policies			Policy B4: Affordable workspace	Bee Midtown	business	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.	Both
R19.0122	Strategic and Development Management Policies			Policy B4: Affordable workspace		business	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.	Object
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury	Islington Living Streets	Campaign	3.58 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	Object
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use; Policy BC2: Culture, retail and leisure uses	Bee Midtown	Business	The respondent supports policy B1 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
R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Bee Midtown	Business	We concur with proposals which would allow new retail, food, drink and entertainment venues to open up in the Clerkenwell area, where it is shown that it will improve its character. We believe it's important that Islington Council maintain a more flexible approach on the Clerkenwell cumulative impact policy and encourage a diversification towards non-vertical drinking establishments. We believe that a policy which increases these types of premises, whilst respecting the local neighbourhood can help increase dwell time of those who work in the area and consequently could trigger economic growth in the area through the provision of more local jobs and services. Policy BC2D provides an opportunity to transform the evening economy within Farringdon and Clerkenwell. Members are keen for their employees to be able to socialise within the area and believe that it is possible to achieve a regulatory balance which supports the evening and night-time economy whilst respecting the local residents. We welcome Policy BC2, which seeks to encourage active frontages for ground floor space – such as retail and leisure uses. We believe that this would be an effective way to ensure that ground floor space is efficiently used for a purpose which can help boost the local economy as well as improving it for all those who work, visit and live in the area. Such a policy helps create a vibrant atmosphere in the local area and establishes it as a key central London destination. In particular we welcome the priority given to entertainment uses within Farringdon around the station as it is set to expand.	Support

R19.0122	Bunhill and Clerkenwell Area Action Plan			Policy BC5: Farringdon; Policy BC8: Historic Clerkenwell	Bee Midtown	Business	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 unrivalled 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
R19.0123	Site Allocations	FP9: 221-233 Seven Sisters Road	Finsbury Park		Muslim Welfare House	Landowner	Support the allocation but are concerned that the requirement to deliver a significant amount of business floorspace may not provide sufficient cross-subsidy to deliver their goal of an enhanced community facility. Request that the allocation is amended to enable community use to be provided alongside 'business floorspace and/or residential use'. The allocation should acknowledge that the site is in multiple ownership and may not be delivered as a whole.	Both
R19.0124	Site Allocations	BC22 Vine Street Bridge	B & C: Mount Pleasant and Exmouth Market		Bendenis Properties Limited	Landowner	Support for the introduction of new public realm through the conversion of Vine Street Bridge to public open space. Also states that a substantial development opportunity exists to create a more unified public realm by encompassing the land to the north of Vine Street Bridge, in between Farringdon Road and Farringdon Lane. Site Allocation BC22: Vine Street Bridge should be replaced with a larger allocation encompassing the land edged red (see plan) with an allocation for a mixed-use, high density development comprising a new public open space.	Both
R19.0124	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Bendenis Properties Limited	Landowner	DH1 is unsound and unjustified and conflicts with the London Plan in its policy to protect all views, including strategic views, local views, and views of local landmarks. The policy should be amended to reflect the sensitivity to change of different views. A proposal that is visible is not necessarily harmful.	Object
R19.0125	Site Allocations	FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street	Finsbury Park		Dawnelia Developments One Limited	Landowner	The amendment to this existing site allocation to remove the potential for 'an element of residential use' renders it unviable. This is unjustified and the inclusion of residential accommodation is necessary to make a mixed-use development scheme deliverable.	Object
R19.0125	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Dawnelia Developments One Limited	Landowner	Respondent claims there is no evidence of traders on Fonthill Road wanting to start or could viably reinvigorate clothing manufacturing again as all goods are now imported from overseas (e.g. Asia) where prices/wages are lower. The council cannot control the different A1 uses that may seek to establish on Fonthill Road and there is no evidence other A1 uses e.g. electrical goods store would need workshop/maker space. It is suggested that all text in paragraph 2.69 from 'Fonthill Road used to be...' onwards should be deleted.	Object
R19.0125	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Dawnelia Developments One Limited	Landowner	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
R19.0126	Site Allocations	BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 & 21-23 Leonard Street; BC48: Castle House, 37-45 Paul Street; and Fitzroy House, 13-17 Epworth Street and 1-15 Clere street	B & C: City Fringe Opportunity Area		EMA Textiles Ltd	Business	The representation states that the site allocations surrounding the representors site, BC41 and BC48, compliment their site and are supported. The representation also supports the Local Plan which will proactively meet both its residential and employment floorspace targets.	Support
R19.0127	Site Allocations	BC11: Longbow House, 14 20 Chiswell Street	B & C: City Fringe Opportunity Area		Metropolitan (Chiswell) Limited	Developer	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 DH3: Building heights	Metropolitan (Chiswell) Limited	Landowner	Respondent is owner of site BC13: Longbow House. Objection is raised to Draft Policy DH3 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 Finsbury Local Plan. The City Fringe Area section of the Tall Buildings Study defines the sifting 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 34.6m 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.	Object
R19.0127	Strategic and Development Management Policies			Policy B4: Affordable workspace	Metropolitan (Chiswell) Limited	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 paras 4.51 and 4.52).	Object
R19.0127	Strategic and Development Management Policies			Policy B4: Affordable workspace	Metropolitan (Chiswell) Limited	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.	Object
R19.0127	Strategic and Development Management Policies			Policy B4: Affordable workspace	Metropolitan (Chiswell) Limited	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 floorspace for proposals involving redevelopment or extension..	Object
R19.0128	Strategic and Development Management Policies			Policy B2: New business floorspace; Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Noble House Projects Ltd	Landowner	Respondent is landowner of site at 4 Blundell Street within LSIS. Respondent notes that there has been 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 B8, 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 B8 are removed, in line with SP3(A): -Peabody site - Housing -Cally Public House - A4 use class -Break out café sandwich bar - A3 use class -2 Blundell Street - A1 use class -6 Blundell Street - B1 offices Reference is made to the LSIS heights study which notes that a mix of open B Use Classes could be supported in Brewery Road/Blundell Street for the future. It is evident that the drafted 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.	Object
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	Object
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 SME space beyond the designated industrial uses is supported in the area. The council acknowledge 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 SME space is unlikely to be feasible/appropriate above first floors but that the sites could deliver employment floorspace 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'.	Object
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.	Object

R19.0128	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site, Part E, F and G	Noble House Projects Ltd	Landowner	In relation to building height limit in the LSIS, the respondent recommends that parts E, F and G are removed from SP3 and dealt with in the design policy. The response makes reference to surrounding developments of 11 storey (Peabody housing), including 7 and 8 storeys on Brewery Road and Market Road, which are not in accordance to the height limit of five storeys that is proposed for the area.	Object
R19.0129	Site Allocations	BC10: 254-262 Old Street (east of roundabout)	B & C: City Fringe Opportunity Area		Owner of 250-254 Old Street	Landowner	The approach taken by the allocation is supported. 250-254 is an underutilised site given that it is currently a two-storey building set back from the road. It is considered to present an excellent development opportunity for optimisation and recognition should be given to this in the allocation. The allocation does not refer to suitable heights for the site although the adjacent building, Albert House, is identified in the Tall Buildings Study as potentially an appropriate location for a local landmark building. The site is not affected by any strategic viewing corridors, falls largely outside of a conservation area, and has a limited number of residential properties close by which limits the potential daylight/sunlight impacts of development.	Support
R19.0129	Strategic and Development Management Policies			Policy DH3: Building heights	Owner of 250-254 Old Street	Landowner	Policy should be amended to also state that buildings above 30m in height will be acceptable where it can be demonstrated through design, townscape and heritage analysis that the site is suitable for heights of 30m or more.	Object
R19.0129	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Owner of 250-254 Old Street	Landowner	The respondent supports policy aim to deliver business floorspace in the CAZ and BC AAP, and for refusal of proposals that do not demonstrate maximisation of new business floorspace.	Support
R19.0129	Strategic and Development Management Policies			Policy B4: Affordable workspace	Owner of 250-254 Old Street	Landowner	The respondent considers that for policy B4 to be deliverable, requirements for a 10% provision should be only based on the uplift of employment floorspace and asks for this to be clarified in the policy. Respondent considers that the amount and rent levels of AW is not 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.	Object
R19.0129	Strategic and Development Management Policies			Policy B4: Affordable workspace	Owner of 250-254 Old Street	Landowner	The respondent considers that the policy should consider single occupier scenarios and that it accepts in-lieu payment or off-site delivery where feasible.	Object
R19.0129	Strategic and Development Management Policies			Policy B4: Affordable workspace	Owner of 250-254 Old Street	Landowner	The respondent recommends that part F of policy B4 is applied where viable and necessary because some occupiers may not require a high standard fit-out, and this will have an impact on the viability of the scheme.	Object
R19.0129	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	Owner of 250-254 Old Street	Landowner	The respondent states that the policy should allow flexibility where is not appropriate to provide on-site construction training, allowing for a financial payment instead.	Object
R19.0129	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Owner of 250-254 Old Street	Landowner	Question why precise heights are listed for Inmarsat and Albert House, when the client's property offers an opportunity to mediate between the two sites with height. States that it should be included as a tall buildings site.	Object
R19.0129	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Owner of 250-254 Old Street	Landowner	"The diagram appears to show the area at the front of our client's site as 'protected open space'. This land is within our client's ownership and currently comprises an area of hard standing. It should therefore not be 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."	Object
R19.0130	Site Allocations	NH7: Holloway Prison, Parkhurst Road	Nag's Head and Holloway		Peabody Group	Landowner	Supportive of the allocation for residential-led development. Request that the allocation is amended to allow for buildings taller than 30m outside of the local viewing corridor. In addition, suggest that the requirement for development to be phased so that essential infrastructure such as open spaces and community facilities is completed prior to residential occupation is impractical and overly onerous.	Both
R19.0130	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Peabody Group	Landowner	Refer to CBRE representation (on behalf of Peabody, R19.0178) in Appendix 4.	Object
R19.0131	Site Allocations	BC33: Oliver House, 51-53 City Road	B & C: City Fringe Opportunity Area		The Methodist Church	Landowner	Allocation welcomed. Estimated delivery timescale of 2021/22 to 2025/26 is 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. Intensification of office uses at the site could easily be achieved at the same time as the delivery of other uses such as retail and community facilities at basement and ground floor levels. Request allocation is amended to allow for 'office-led mixed-use development'.	Both
R19.0131	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	The Methodist Church	Landowner	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 of Oliver House (Policy BC33) will be a strong contributor to this strategic objective and would be able to deliver a mix of uses in accordance with Policy SP1.	Support
R19.0131	Strategic and Development Management Policies			Policy H1: Thriving communities	The Methodist Church	Landowner	Policy H1 seeks to enhance the social value of development within the borough. The Methodist Church are supportive of part S and V 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.	Support
R19.0131	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards	The Methodist Church	Landowner	Policy S3 states that all non-residential and mixed use developments proposing more than 500sqm net additional floorspace are required to achieve BREEM '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.	Object

R19.0131	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	The Methodist Church	Landowner	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'.	Object
R19.0131	Strategic and Development Management Policies			Policy B2: New business floorspace	The Methodist Church	Landowner	The respondent supports the aim to prioritise office delivery in the BC AAP but recommends making reference to office-led mixed use development in the BC AAP.	Both
R19.0131	Strategic and Development Management Policies			Policy B4: Affordable workspace	The Methodist Church	Landowner	The respondent asks that the council removes the policy requirement to lease affordable workspace to the council. It is unreasonable and a conflict of interest to lease to a particular organisation such as the council who is also the planning authority.	Object
R19.0131	Strategic and Development Management Policies			Policy B4: Affordable workspace	The Methodist Church	Landowner	The 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.	Object
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use, Part B	The Methodist Church	Landowner	The Methodist Church support the strategic objective to deliver 400,000sqm office floorspace. However, at present, the Plan does not meet the Council's own strategic objectives to deliver high quality office floorspace, maintaining and developing business and job growth. The Oliver's House site (proposed allocation BC33) is located within the City Fringe Opportunity Area. Part B. (i) identifies that new development proposals providing 500sqm or more net increase in floorspace in the City Fringe Opportunity Area must comprise at least 90% office floorspace. Whilst the Methodist Church appreciate the primary objective of providing office floorspace in the City Fringe Opportunity Area, the policy should introduce more flexibility by ensuring that development viability is considered, and the individual circumstances of each development proposal is taken into consideration in the policy wording. Suggest an 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 ensure that office-led development can continue to be delivered in the borough. As currently drafted, the policy is unjustified and is contrary to the emphasis in the National Planning Policy Framework (2019) that mixed use developments should be encouraged in appropriate locations.	Object
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use, Part C	The Methodist Church	Landowner	Part C. seeks to ensure that new development proposals in the Bunhill and Clerkenwell area which are not compliant with Part B. are office-led. Even though the policy identifies the meaning of 'office-led', it remains unclear which other uses are acceptable and what the Policy defines as 'majority' of floorspace. Suggest amendment to allow other uses explicitly. Without this added flexibility, the Council will not be able to deliver their required employment floorspace and this would render the Plan unsound.	Object
R19.0131	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use, Part D	The Methodist Church	Landowner	The Methodist Church supports the inclusion of Part D of the policy which provides exceptions for sites where circumstances may prevent them from providing the quantum of floorspace currently prescribed by Parts B and C of the policy. However, a further circumstance should be included in the list which refers to: "vi. proposals for mixed use development that would provide enhanced social value and enhanced provision of community facilities." An addition should also be made to circumstance iii. which recognises the importance of non-residential institutions as serving a public service. "iii. where a proposal is publicly funded or serves a public service, such as educational, medical, or research institutions and non-residential institutions." These additions enable the delivery of mixed-use, employment-led schemes and ultimately supports the Council in meeting their identified office floorspace need within the plan period.	Object
R19.0132	Strategic and Development Management Policies			N/A - general comment	Tileyard London Limited	Landowner	Respondent sets out Introduction to Tileyard; and the economic benefits of the Tileyard Cluster	Not stated
R19.0132	Strategic and Development Management Policies			N/A - general comment	Tileyard London Limited	Landowner	Respondnet sets out the case for continued growth of the Tileyard Cluster. The continued growth of the Tileyard economic cluster is strongly supported by the NPPF, which states at paragraph 80 that, planning policies should help to create the conditions in which businesses can invest, expand and adapt, and that significant weight should be placed on the need to support economic growth and productivity. Following on from this, paragraph 82 states that planning policies should recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries. Further guidance is provided in the Planning Practice Guidance in terms of ensuring there is sufficient land available to meet the needs of specialist, or new, economic sectors, which underlines the importance of the local planning authority working positively with the businesses that have established at Tileyard.	Object

R19.0132	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site; Policy B1: Delivering business floorspace; Policy B2: New business floorspace	Tileyard London Limited	Landowner	<p>References the ELS 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.</p> <p>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.</p> <p>Draft Policy SP3 of the draft Islington Local Plan fails to recognise the fundamental ingredients behind the significant success of the LSIS 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 LSIS. However, the consequence of draft Policy SP3 (parts C and D), which presume against the introduction of additional flexible business space (within Class B1a), regardless of the existing use on a site, would severely limit any potential future growth of the creative cluster and the economic benefits arising, and represent an inefficient use of land.</p> <p>Accordingly, the land-use policy framework (for the LSIS 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 greatest), 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 LSIS, the borough and the wider economy.</p>	Object
R19.0132	Strategic and Development Management Policies			Policy SP3: 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.	Object
R19.0132	Strategic and Development Management Policies			N/A - general comment	Tileyard London Limited	Landowner	Respondents consider sthat 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 LSIS policy has been formulated does not accord with the standards set out in the Council's SCI.	Object
R19.0132	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 IAA 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 process 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 test of soundness. The findings are not considered credible, justified or robust and, as a consequence, the IIA is nether fit for purpose, nor legally compliant, such that the draft Regulation 19 Local Plan cannot be considered sound.	Object
R19.0132	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	The Methodist Church	Landowner	<p>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.</p> <p>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 LPA defines 'harm' in these instances.</p>	Object
R19.0133	Site Allocations	VR5: 4 Brandon Road	Vale Royal/Brewery Road LSIS		VDC Trading Limited	Landowner	The allocation (and other Vale Royal allocations) considered unnecessary in the context of the existing LSIS designation and should be removed. There is no reason why these sites should be allocated above other sites in the LSIS. 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. Suggest 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.	Object
R19.0133	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	VDC Trading Ltd	Landowner	Proposed amendment of policy B1, part B to introduce greater flexibility in maximising new business floorspace, through recognition of design constraints, and quality and type of employment space provided.	Object
R19.0133	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 B-uses (e.g. through colocation of B1 with intensification of industrial uses) and Sui Generis uses akin to industrial uses, subject to the requirements of the specific LSIS designation. Additional amendments proposed to para 4.14 to reflect part E amendments and to allow the release of industrial land to manage issues of vacancy/to meet wider planning objectives through industrial intensification, co-location and substitution.	Object

R19.0133	Strategic and Development Management Policies			Policy B2: New business floorspace	VDC Trading Ltd	Landowner	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 4.23 in line with amendments proposed to part C, and removal of para 4.31 as design is prescriptive and prevents intensification. The respondent states that that part C is contrary to NPPF section 6, paras 80-82 on addressing specific locational requirements of different sectors and making provision for knowledge and tech-driven clusters.	Object
R19.0133	Strategic and Development Management Policies			Policy B4: Affordable workspace	VDC Trading Ltd	Landowner	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.	Object
R19.0133	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	VDC Trading Ltd	Landowner	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 applicant can demonstrate continuous marketing of vacant floorspace for at least 2 years.	Object
R19.0133	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	VDC Trading Ltd	Landowner	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.	Object
R19.0133	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	VDC Trading Ltd	Landowner	Removal of wording in policy SP3, part E. Considered overly prescriptive in restricting other uses.	Object
R19.0133	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	The Methodist Church	Landowner	The Methodist Church supports the 'maximisation' of business floorspace as well as the importance of providing a range of business floorspace in the City Fringe Opportunity Area as encouraged by Part C of this policy. However, as set out previously at BC1 above, this policy aspiration should not be overly prescriptive, in terms of the amount of floorspace required to be offices, and instead a focus on 'office-led' development should be prioritised.	Object
R19.0134	Site Allocations	BC25: Land adjacent to the Mount Pleasant Sorting Office	B & C: Mount Pleasant and Exmouth Market		Taylor Wimpey Central London	Developer	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.	Support
R19.0134	Bunhill and Clerkenwell Area Action Plan			Policy BC6: Mount Pleasant and Exmouth Market	Taylor Wimpey Central London	Developer	The allocated site is also covered by Policy BC6: Mount Pleasant and Exmouth Market. We support the policy initiatives to encourage public realm improvements and further development in the area with the regeneration of the Clerkenwell Police Station. Part B of the Policy seeks to preserve and enhance Exmouth Market as a destination for food, drink, retail and entertainment uses. The retail offer provided within the Mount Pleasant Sorting Office Site will support and enhance the current offer.	Support
R19.0134	Bunhill and Clerkenwell Area Action Plan			Policy AAP1: Delivering development priorities	Taylor Wimpey Central London	Developer	Proposes that the wording of policy AAP1 is loosened. It currently states that uses which are not specified in 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 take account of changing market needs and the longer view development cycle of the strategic sites.	Object
R19.0135	Site Allocations	FP13: Tesco, 103-115 Stroud Green Road	Finsbury Park		Groveworld Limited	Developer	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.	Both
R19.0135	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Groveworld Ltd	Developer	It appears that there is a minor error in the residential cycle parking standards, in Table A4.1: where it sets out '1.5 per bedroom' we believe, following the draft London Plan, that this should state '1.5 spaces per 2 person 1 bedroom dwelling'.	Not stated
R19.0135	Strategic and Development Management Policies			Policy SC2: Play space	Groveworld Ltd	Developer	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 yield 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.	Object
R19.0135	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design; Policy S4: Minimising greenhouse gas emissions	Groveworld Ltd	Developer	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.	Object

R19.0135	Strategic and Development Management Policies			Policy S5: Energy Infrastructure	Groveworld Ltd	Developer	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.	Object
R19.0135	Strategic and Development Management Policies			Policy S5: Energy Infrastructure	Groveworld Ltd	Developer	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.	Object
R19.0135	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing; Evidence base, Viability	Groveworld Ltd	Developer	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.	Object
R19.0135	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing; Evidence base, Viability	Groveworld Ltd	Developer	In addition, the multi-faceted 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.	Object
R19.0135	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Groveworld Ltd	Developer	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 an 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.	Object

R19.0135	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Groveworld 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 underpin 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-bed homes can be considered family homes and are clearly more accessible to a wider range of household incomes, they also tend to underpin development 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 mix 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.	Object
R19.0135	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Groveworld Ltd	Developer	Policy SP6 notes residential uses will only be acceptable on upper floors in the town centre. Suggested that it should be specified this 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.	Object
R19.0136	Site Allocations	Site selection process	Vale Royal/Brewery Road LSIS		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 neighbours'. The development considerations in the allocations are not flexible enough in terms of use class or building heights and should be amended.	Object
R19.0136	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 unjustified and mechanistically-applied blanket policies (including those on height).	Object
R19.0136	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	C Carnevale Ltd	Landowner	The strengthening of policies will fetter their future ability to develop at this location, or indeed 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	Object
R19.0137	Site Allocations	NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road	Nag's Head and Holloway		Embankment Building and Development Ltd	Landowner	Landowner wishes to redevelop the site for serviced accommodation. Supports the allocation as the site is available, suitable and viable for development. However, is concerned about the allocated uses (mixed-use residential and business). Given the site's high PTAL and the predominantly residential nature of the surrounding area it could accommodate a range of uses including C1 serviced apartments. The existing buildings on the site are in a poor state of repair and it would not be viable to re-provide the existing level of business-use floorspace. This was acknowledged in a 2005 planning permission for the residential-led development of the site and a reduced amount of commercial floorspace. The site allocation should provide an indicative minimum development capacity, including height and density. Concerned with the requirement for a consistent design approach between the sites, this is restrictive and it is not always possible to align differing development aspirations. The allocation should be amended to require a consistent design approach where possible.	Both
R19.0137	Strategic and Development Management Policies			Policy R12: Visitor accommodation	Embankment 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'.	Object

R19.0138	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	The allocation does not comply 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 which are all in undersupply in the area. The 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area's share of the new homes targets.	Object
R19.0139	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road		Canal and River Trust	Statutory consultee	Welcome the amendments made to the development considerations in response to previous representations.	Not stated
R19.0139	Site Allocations	N/A - general comment	Angel and Upper Street		Canal and River Trust	Statutory consultee	Welcome the amendments made to the development considerations of draft allocations AUS1-7, AUS9, AUS10, AUS13, AUS16 and AUS18 in response to previous representations.	Not stated
R19.0139	Strategic and Development Management Policies			Policy S5: Energy Infrastructure	Canal and River Trust	Statutory consultee	We welcome the reference in point 6.60 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.	Support
R19.0139	Strategic and Development Management Policies			Policy S7: Improving Air Quality	Canal and River Trust	Statutory consultee	We continue to advocate 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 S7 to the impact of overshadowing and that the impact is mitigated through the provision of electric bollards alongside development.	Not stated
R19.0139	Strategic and Development Management Policies			Policy S9: Integrated Water Management and Sustainable Drainage	Canal and River Trust	Statutory consultee	We welcome the addition of point L to policy S9, requiring development where feasible, utilise adjacent waterways for non-potable water and point P requiring all development protect water quality and demonstrate there will be no negative impact on the quality and point Q, protect and improve the benefits provided by the water environment.	Support
R19.0139	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	Canal and River Trust	Statutory consultee	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 would 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. There is potentially scope for new permanent moorings within the water space at City Road Basin if an appropriate scheme for its reconfiguration could be developed, following consultation with relevant stakeholders. However, it is unclear to us whether such an approach would be acceptable under the terms of policy SP2 and G2, as drafted. Our online mooring policy sets out our policy on new moorings.	Not stated
R19.0139	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part C	Canal and River Trust	Statutory consultee	The Canal towpaths provide excellent opportunities for physical activity, accommodating both pedestrians and cyclists	Not stated
R19.0139	Strategic and Development Management Policies			Policy T4: Public realm	Canal and River Trust	Statutory consultee	We continue to recommend microclimate and levels of sunlight available and heritage value should be included as considerations in public realm design.	Not stated
R19.0139	Strategic and Development Management Policies			Policy T5: Delivery, servicing and construction	Canal and River Trust	Statutory consultee	Support waterborne freight	Support
R19.0139	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	Canal and River Trust	Statutory consultee	We are pleased to see the protection of the structural integrity and heritage value of the Islington Tunnel has been included in this policy (point P).	Support
R19.0139	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Canal and River Trust	Statutory consultee	We welcome policy G1 C now requiring development assess the value and benefits of existing green infrastructure on-site and adjacent to sites. We note that (point 5.1) for the purposes of the Local Plan 'green infrastructure' includes 'blue infrastructure' and that the definition of blue infrastructure is provided in the glossary, referring to canals and their multi-functional role.	Support
R19.0139	Strategic and Development Management Policies			Policy G2: Protecting open space	Canal and River Trust	Statutory consultee	State that the policy is not sufficiently flexible as it does not allow any development on public open space which includes 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".	Object
R19.0139	Strategic and Development Management Policies			Policy G4: Biodiversity, landscape design and trees	Canal and River Trust	Statutory consultee	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 carefully considered in development proposals.	Support
R19.0139	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Canal and River Trust	Statutory consultee	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.	Not stated
R19.0139	Strategic and Development Management Policies			Policy DH3: Building heights	Canal and River Trust	Statutory consultee	We note and welcome the additional point included in policy DH3, that unacceptable overshadowing be prevented (F(viii)).	Support

R19.0139	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 H 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
R19.0139	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Canal and River Trust	Statutory consultee	Disappointed that none of previous representations at Regulation 18 regarding enhancements to the Canal have been included in policy or the Infrastructure Delivery Plan update.	Object
R19.0139	Bunhill 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 at 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: "G.(iv) 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
R19.0140	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Corporation of London	Statutory consultee	We think it would be useful for the supporting text of Policy SP1 to acknowledge the importance of joint working between the Corporation of London and Islington.	Support
R19.0140	Strategic and Development Management Policies			Policy DH2: Heritage assets	Corporation of London	Statutory consultee	Support the protection given to cross-boundary views of St Paul's Cathedral in Policy DH2 and particularly welcome the guidance provided in Appendix 6, 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
R19.0140	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Corporation of London	Statutory consultee	Support the identification of the Clerkenwell Farringdon Culatural 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 Musesum of London, and 'possible' moving of Smithfield Meat Market from its current location.	Support
R19.0140	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Corporation of London	Statutory consultee	Want reference to encouraging future cross-borough co-operation increase in pedestrian movements and visitor and retail activity near the City of London.	Support
R19.0140	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Corporation of London	Statutory consultee	Support the identification of Farringdon and Whitecross Street as Local Shopping Areas in the AAP.	Support
R19.0141	Site Allocations	BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	B & C: City Fringe Opportunity Area		Lambs 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
R19.0141	Strategic and Development Management Policies			Policy PLAN1: Site appraisal, design principles and process	Lambs Passage Real Estate Ltd	Landowner	B (i) Contextual – the definition of 'site' should be appropriate and proportionate to the realistic scope of an applicant to deliver development on land within their control. B (ii) Connected & (iii) Inclusive– 'mix of uses' should be considered in the physical land use context and not be an encumbrance on bringing forward future development of a site if its proposal is limited to a single land use.	Object
R19.0141	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell; Policy B1: Delivering business floorspace; Policy B2: New business floorspace	Lambs Passage Real Estate Ltd	Landowner	Support for development within the Bunhill and Clerkenwell AAP area delivering office use and that the AAP should prioritise and support the office function of the area.	Support
R19.0141	Strategic and Development Management Policies			Policy G2: Protecting open space	Lambs Passage Real Estate Ltd	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
R19.0141	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lambs Passage Real Estate Ltd	Landowner	The requirement to deliver business floorspace (different types, sizes, affordability) must be appropriate and subject to viability of proposed schemes.	Not stated
R19.0141	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lambs Passage Real Estate Ltd	Landowner	The plan should recognise that a different standard should apply to the central area (CAZ), where there is a requirement for greater intensity of land use activity/closer proximity between neighbouring buildings. This should justify a measured relaxation of environmental and amenity standards that may otherwise constrain development and prevent the maximisation of new business floorspace.	Not stated
R19.0141	Strategic and Development Management Policies			Policy B2: New business floorspace	Lambs Passage Real Estate Ltd	Landowner	Part F (iv) 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
R19.0141	Strategic and Development Management Policies			Policy B2: New business floorspace	Lambs Passage Real Estate Ltd	Landowner	The respondent states that part F (v) is unnecessary as by definition an activity that is ancillary to the business function of the premises is in lawful terms part of the overall business use..	Object
R19.0141	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lambs Passage Real Estate Ltd	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

R19.0141	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lambs Passage 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.	Object
R19.0141	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lambs Passage Real Estate Ltd	Landowner	Criterion for off-site contributions under para 4.52 must also be subject to financial viability	Object
R19.0141	Strategic and Development Management Policies			Appendix 9: Glossary and abbreviations	Lambs Passage Real Estate Ltd	Landowner	The affordable workspace definition, contained in appendix 9 should be amended to reflect the above comments.	Object
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Lambs Passage Real Estate Ltd	Landowner	Supports the policy assertion that office floorspace is the clear priority land use across the entire Bunhill and Clerkenwell AAP area.	Support
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Lambs Passage Real Estate Ltd	Landowner	Support for the policy requirement to maximise new business floorspace.	Support
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Lambs Passage 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 that entails, demands that the overriding type of office floorspace delivery must be market driven.	Support
R19.0141	Bunhill and Clerkenwell Area Action Plan			Policy AAP1: Delivering development priorities	Lambs Passage 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
R19.0142	Site Allocations	OISS: Bush Industrial Estate, Station Road	Other Important Sites		LaSalle Investment Management	Business	The allocation should be expanded to include Sui Generis 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
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	The respondent supports the maximisation of employment floorspace on employment locations but objects to policy criterion B as it is too negative and would not result in new business/industrial floorspace that makes an effective use of previously developed LSIS 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
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	Part E has the potential to restrict innovative co-location and mixed use development and it conflicts with other parts of the plan in terms of 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
R19.0142	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	LaSalle Investment Management	Landowner	The respondent suggests that part E of policy B1 is amended to include SG uses akin to industrial.	Object
R19.0142	Strategic and Development Management Policies			Policy B1: 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
R19.0142	Strategic and Development Management Policies			Policy B2: New 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
R19.0142	Strategic and Development Management Policies			Policy B2: New 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 E of policy B1.	Object
R19.0142	Strategic and Development Management Policies			Policy B2: New business floorspace	LaSalle Investment Management	Landowner	Part F (ii) of policy B2 and supporting para 4.31 are too prescriptive and should not be expressed as a policy.	Object
R19.0142	Strategic and Development Management Policies			Policy B3: Existing 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 and unnecessary. The respondent suggests that the usual marketing period of industrial premises is 6 months prior to the existing lease expiring to minimise gaps in occupation. The respondent proposes deleting references to vacant floorspace and to vacancy.	Object
R19.0142	Strategic and Development Management Policies			Appendix 1: Marketing and vacancy criteria	LaSalle Investment Management	Landowner	The requirements of marketing and vacancy go beyond what is usually undertaken by commercial agents. The respondent objects to points b) and c) to erect advertisement board as it attracts squatters/travellers and it is unnecessary. The respondent has also concerns about points e) and H) because they are too prescriptive in terms of the marketing exercise and on the requirement of valuation from three agents.	Object
R19.0142	Strategic and Development Management Policies			Policy B4: Affordable workspace	LaSalle Investment Management	Landowner	Part B of policy B4 should be subject to viability. Part C of policy B4 should be reduced to 10 years because it is not justified by evidence. The reference to space being leased to the council to 20 years and in perpetuity should be removed from the policy and supporting paras 4.44 and 4.51.	Object
R19.0142	Strategic and Development Management Policies			Policy B4: Affordable workspace	LaSalle Investment Management	Landowner	Part F of policy B4 should not include fit out requirements because it onerous, prescriptive and unlikely to be viable. The respondent objects to supporting paras 4.54 and 4.55 and has requested to remove these from the plan.	Object
R19.0142	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	LaSalle Investment Management	Landowner	Job and apprenticeship requirements contained in parts A, B and supporting para 4.60 of policy B5 should apply to proposals that result in an uplift of 1,000sqm GEA and should be subject to viability. The respondent states that the policy provides no justification as to why training and job opportunities would be sought for an uplift of 500sqm employment floorspace which falls under "minor" category of development.	Object

R19.0143	Site Allocations	BC48: Castle House, 37-45 Paul Street; and Fitzroy House, 13-17 Epworth Street and 1-15 Clere street	B & C: City Fringe Opportunity Area		Lion Portfolio Ltd	Landowner	Supportive of the revision which combines the Castle House and Fitzroy 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.	Both
R19.0143	Strategic and Development Management Policies			Integrated Impact Assessment	Lion Portfolio Ltd	Developer	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.	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	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.	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	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	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	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. E.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.	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	The Tall Buildings Study uses basic 3D modelling that does not include landscaping of other existing details.	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	TBS conclusions are not based on detailed and up to date townscape analysis and do not consider all potential impacts of tall buildings at the specific sites identified.	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	The allocation sites of Castle House and Fitzroy House have now been combined as a single allocation site (Allocation Site No. BC48) and this has not been considered by the TBS.	Object
R19.0143	Strategic and Development Management Policies			Policy DH3: Building heights	Lion Portfolio Ltd	Developer	Respondent suggests a number of amendments to policy DH3.	Object
R19.0143	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Lion Portfolio Ltd	Developer	Our client is generally supportive of the spatial strategy policy, which identifies the Bunhill and Clerkenwell area as the area in the borough expected to see the most significant levels of growth, particularly business floorspace and that this growth must be managed to secure a high quality and sustainable urban environment.	Support
R19.0143	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Lion Portfolio Ltd	Developer	Suggest change of wording to allow sufficient scrutiny of development proposals for tall buildings to be considered on a site by site basis, in line with comments on the TBS.	Object
R19.0143	Strategic and Development Management Policies			Policy DH2: Heritage assets	Lion Portfolio Ltd	Developer	Change DH2 B to 'conserve or enhance' not 'conserve and enhance' to bring in line with the legislation	Object
R19.0143	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lion Portfolio Ltd	Developer	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 new business floorspace to enable this figure to be achieved. The employment land study was undertaken in 2016 and therefore the demand for business floorspace is now likely that over 400,000sqm for office floorspace is now required. The respondent suggests adding this target into policy text of B1. As referenced within supporting paragraph 4.7 quoted above, the borough is significantly constrained in terms of land supply, and we are concerned that this, combined with certain restrictive emerging policies, will depress the delivery of this 400,000 sqm and suppress the economic growth of the borough overall. The restrictive policies include policies concerned with tall buildings, and affordable workspace, both of which are addressed in detail within this letter.	Object

R19.0143	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Lion Portfolio Ltd	Developer	Respondent cites the London Office Policy Review which notes that Islington will have a composite requirement for 373,000sqm of space between 2016 and 2041 and a capacity of only 233,910 sqm equating to a 189% shortfall. The LOPR also identifies a constrained sub-market 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 Bunhill and Clerkenwell represents an unaccounted shortfall of 62,500 sqm 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 undersupply 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.	Object
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	The respondent states that there is no planning justification to preclude other appropriate bodies from operating the space. Policy E3 notes that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents. Charities or developers/owners of commercial space could also provide such space and manage it to co-locate like-minded organisations. Additionally, it is unclear exactly how LBI will source appropriate occupiers to fill the targeted 40,000sqm of affordable workspace or what is considered a peppercorn rate. For instance, does this include or exclude Service charges and Insurance. These points require further clarification.	Object
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	With a targeted quantum of 400,000 sqm of B1 office floorspace over the plan period, the 10% affordable workspace requirement equates to 40,000 sqm of affordable workspace provision overall, which is a very large amount. The provision of 40,000 sqm of affordable workspace could create a market in which the majority of new B1 office offers in the borough comprise either affordable workspace, or grade A office offers.	Object
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	Restrictive policies limiting the development of office floorspace will consequently drive up office rental values, increasing the overall need for affordable workspace. The respondent states that the lease requirement for a period of at least 20 years is likely to significantly harm the viability of future schemes and increase the challenges of delivering development in Islington. The respondent quotes "less prescriptive" approaches to affordable workspace from LB Hackney and City of Westminster.	Object
R19.0143	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lion Portfolio Ltd	Landowner	The council's own viability evidence base suggests that office intensification within areas of the CAZ and the Opportunity Area would not be viable with policy B4 in place.	Object
R19.0143	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Lion Portfolio Ltd	Developer	Our client remains generally supportive of the policy, which encourages proposals for the redevelopment/intensification of sites with existing business floorspace to look to maximise business floorspace provision as far as possible in line with the council's priority for the City Fringe Opportunity Area. The Spatial Strategy diagram (Figure 3.2) identifies five sites where tall buildings (30 metres and above) may be appropriate in the City Fringe Opportunity Area Spatial Strategy area. The Castle House and Fitzroy House (BC48) allocation site is not included. This approach and the map identifying the five specific sites potentially suitable for tall buildings is not supported by our client. We suggest that the sitespecific identification approach is reconsidered and that the scope for the Castle House and Fitzroy House (BC48) allocation site to potentially accommodate a tall building is reconsidered, having regard to detailed site appraisal and analysis.. Amended wording suggested.	Both

R19.0144	Site Allocations	OIS24: Pentonville Prison, Caledonian Road	Other Important Sites		Ministry of Justice	Landowner	Request an extension to the site boundary and suggest a separate adjoining site at Wellington Mews should be allocated for residential use. State the prison 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 'genuinely' affordable housing, as affordable housing should be in accordance with the London Plan definition. Unreasonable to have an expectation for the provision of 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 relaxed. In addition, requiring a new east-west and north-south access through the site where possible could limit the development potential of the site. The reference to upgrading the wastewater network is onerous and unnecessary.	Both
R19.0145	Site Allocations	BC38: Moorfields Eye Hospital	B & C: City Fringe Opportunity Area		Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Developer	Concern that the wording of the site allocation is too prescriptive in relation to the location of the public realm and the location of the tall buildings. The new public space could be provided on the junction of Peerless 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'.	Object
R19.0145	Site Allocations	BC38: Moorfields Eye Hospital	B & C: City Fringe Opportunity Area		Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Developer	Suggest more flexible wording regarding the location of tall buildings: Instead of 'The northwest corner of the site (corner of Cayton St/Bath St) could potentially accommodate a building of up to 50 metres (approximately 12 commercial storeys). A tall building of up to 70 metres (approximately 17 commercial storeys) could be accommodated on Peerless Street, north of the junction with Baldwin St' they suggest: 'The northwest quadrant of the site (around the corner of Cayton St/Bath St) could potentially accommodate a building in the order of 50 metres (approximately 12 commercial storeys). A tall building in the order of 70 metres (approximately 17 commercial storeys) could be accommodated on the western part of Peerless Street'. This is based on further work especially on views undertaken by the developer since the previous pre application meeting.	Object
R19.0145	Site Allocations	BC38: Moorfields Eye Hospital	B & C: City Fringe Opportunity Area		Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Developer	The representation states that the plan should place more priority on the need for using the site as facilitating development for construction of a new eye hospital, rather than an opportunity for provision of affordable workspace. This has been set out in detail in the previous (regulation 18) representation	Not stated
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	Supportive of the emphasis in the dBCAAP towards commercial uses in the area. It is understood from the dBCAAP that the erosion of office floorspace in the area has limited space for employment uses, a crucial part of any functioning city. 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.	Support
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	The policy seeks the Site to be redeveloped as a high-quality business quarter. We continue to welcome this position. We would also question what is meant by the term 'substantial amount of affordable workspace'. This should be clarified given the scheme is facilitating a new eye hospital and research facility. We also welcome the emphasis on active uses but again question what is meant by 'necessary social infrastructure'. The policy would benefit from clarity on what these mean.	Both
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	Welcome to recognition of Oriel at paragraph 3.9. Would like added that receipts from the sale of the Site will be used exclusively to fund the new hospital, education and research facility at Kings Cross.	Not stated
R19.0145	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology (Project Oriel)	Business	Strongly support the principle of locating two or more tall buildings on the site.	Support
R19.0146	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road		Regent's Wharf Unit Trust	Landowner	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'. Reiterate earlier representations regarding the development considerations (unnecessary as they are addressed elsewhere in the Plan).	Both
R19.0146	Strategic and Development Management Policies			Policy B4: Affordable workspace	Regent's Wharf Unit Trust	Landowner	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 discourages 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.	Object

R19.0147	Site Allocations	N/A - general comment	N/A		Royal UK Properties III LLC	Landowner	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.	Not stated
R19.0147	Strategic and Development Management Policies			Policy B4: Affordable workspace	Royal UK Properties III LLC	Landowner	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 4.54 is very general.	Object
R19.0147	Strategic and Development Management Policies			Policy B4: Affordable workspace	Royal UK Properties III LLC	Landowner	Policy B4 is written broadly suggesting there is no differentiation in terms of conventional workspace and affordable workspace. Invariably this will impact on the viability and deliverability of a scheme, and on construction and build costs. The respondent makes reference to policy E3(C) for defining specific locations and areas for affordable workspace provision of certain kinds.	Object
R19.0147	Strategic and Development Management Policies			Policy B4: Affordable workspace	Royal UK Properties III LLC	Landowner	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.	Object
R19.0147	Strategic and Development Management Policies			Policy T3: Car-free development, Part G	Royal UK Properties III LLC	Landowner	Comment on blue badge accessible parking. They think that non residential accessible parking requirements are too high, and could compromise servicing arrangements. Parking standards could be instead decided on a case by case basis. They want to understand the calculator of 1 in 33 for non resi uses.	Object
R19.0148	Site Allocations	NH3: 443-453 Holloway Road	Nag's Head and Holloway		Skylla Properties Limited	Landowner	Request that the draft allocation is amended to reflect the uses supported in the adopted site allocation - housing, business uses including offices and warehousing, and commercial uses along Holloway Road. A previous planning permission demonstrated that residential use was suitable on the site alongside commercial uses. Residential use may also play an important enabling role in delivering new employment space. The current/previous use section should be amended to state 'office B1 (a) and Warehousing (B2/B8)'.	Object
R19.0148	Strategic and Development Management Policies			Policy B2: New business floorspace	Skylla Properties Ltd	Landowner	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 (LPA 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. The current approach to this policy is not considered to be in consistent with the National Planning Policy Framework (NPPF). There should be a recognition that not all uses within these locations are optimally located, and that flexibility should be allowed to reflect the precise nature of the existing uses and the site circumstances.	Object
R19.0148	Strategic and Development Management Policies			Policy B4: Affordable workspace	Skylla Properties Ltd	Landowner	Concerns about viability of scheme with 10% proportion.	Object
R19.0148	Strategic and Development Management Policies			Policy B4: Affordable workspace	Skylla Properties Ltd	Landowner	It is considered that in order for this policy to be deliverable, 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.	Object
R19.0148	Strategic and Development Management Policies			Policy B5: Jobs and training opportunities	Skylla Properties Ltd	Landowner	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.	Object

R19.0149	Site Allocations	BC8: Old Street roundabout area	B & C: City Fringe Opportunity Area		TfL Commercial Development	Landowner	TfL CD acknowledges and welcomes the continuation of site allocation BC8 'Old Street Roundabout Area'. TfL CD also accept the currently proposed land uses on the site, including commercial and retail along with public realm improvements as part of the gyratory improvement works. However, TfL CD believe that 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 Bunhill and Clerkenwell Area Action Plan (see paragraphs 1.52 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.	Object
R19.0149	Site Allocations	ARCH2: 4-10 Junction Road	Archway		TfL Commercial Development	Landowner	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.	Both
R19.0149	Site Allocations	ARCH7: 207A Junction Road	Archway		TfL Commercial Development	Landowner	Welcome the allocation and agree that any redevelopment of the site would look to re-provide the D2 community use.	Support
R19.0149	Site Allocations	AUS12: Public Carriage Office, 15 Penton Street	Angel and Upper Street		TfL Commercial Development	Landowner	Welcome the allocation but consider that proposed uses should be more balanced to allow more housing, where this would still support the re-provision and enhancement of business space, in line with London Plan policy SD5 part G.	Both
R19.0149	Site Allocations	AUS7: 1-7 Torrens Street	Angel and Upper Street		TfL Commercial Development	Landowner	This site has a PTAL of 6 and the potential to deliver significant residential development. The allocation should be amended to include residential use.	Both
R19.0149	Site Allocations	FP3: Finsbury Park Station and Island, Seven Sisters Road	Finsbury Park		TfL Commercial Development	Landowner	Support the idea of over-station development but think a residential-led mixed-use development would accord with the draft London Plan. The allocation should not preclude residential-led development where this would still allow for ample business floorspace.	Both
R19.0149	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway		TfL Commercial Development	Landowner	Support the allocation and agree there is potential for decking over the railway land. However, consider that development should be residential-led given the site's highly accessible location and strong PTAL. The allocation should be amended to say residential development is prioritised above the station.	Both
R19.0149	Site Allocations	KC4: Former York Road Station	King's Cross and Pentonville Road		TfL Commercial Development	Landowner	Welcome the allocation, and support the aim to re-open the station with residential over-station development that preserves and enhances the listed building. Feel that the allocation should focus more on the potential for residential development and less on business uses as the site is not in the CAZ, has a high PTAL level and potential for improved transport connections in the future.	Both
R19.0149	Site Allocations	OIS21: Former railway sidings adjacent to Caledonian Road Station	Other Important Sites		TfL Commercial Development	Landowner	Support the allocation and will seek to bring forward development of a residential-led, mixed-use scheme with retail uses at ground level that protects the station.	Support
R19.0149	Strategic and Development Management Policies			Policy H1: Thriving communities	TfL Commercial Development	Landowner	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 acknowledges 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. As such, this should be reflected in Local Plans and it is considered that this should be referenced in Policy H1 which is currently a broad focusing policy.	Both
R19.0149	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	TfL Commercial Development	Landowner	TfL CD supports part B of this policy which states that development proposals must demonstrate that the use of the building/site is optimised. 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.	Support

R19.0149	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	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 land holdings 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 H3 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 providing 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.	Object
R19.0149	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 BtR 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 BtR is not applicable to Islington. This is an over simplification of the purpose of BtR and does not acknowledge the wider benefits that BtR development can provide. Respondent sets out some key benefits of BtR. With regard to paragraph 3.140, 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 6.138, private rented housing (which would be provided by a BtR 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 BtR 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.	Object
R19.0149	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 4.13.9A 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 H7 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 doesn't provide a justification for the complete restriction on Affordable Private Rent as required by the DLP policy. Therefore Policy H11 is not sound.	Object
R19.0149	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 BtR development; as such it should be reworded to ensure appropriate flexibility for an evolving market.	Object

R19.0149	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	TfL Commercial Development	Landowner	Paragraph 35 of the NPPF requires that policies are positively prepared. It is not considered that, as currently drafted, the policy is positively worded and seeks to meet the area's objectively assessed needs. 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 3.81 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.	Object
R19.0149	Strategic and Development Management Policies			Policy DH3: Building heights	TfL Commercial Development	Statutory consultee	We suggest this 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.	Not stated
R19.0149	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	TfL Commercial Development	Statutory consultee	Policy B1 is not clear if the provision of different workspace typologies requires the inclusion of employment floorspace.	Object
R19.0149	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	TfL Commercial Development	Statutory consultee	The plan appears to put more weight on business floorspace. Residential and employment uses can coexist, an inclusion of residential may make a scheme viable and enable provision of business floorspace. 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.	Object
R19.0149	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport; Policy T3: Car-free development	TfL Commercial Development	Statutory Consultee	Support car free development	Support
R19.0149	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	TfL Commercial Development	Statutory consultee	TfL CD believe that Policy BC3 Paragraph G, which resists built development in the centre of the Old Street Roundabout, is overly restrictive. TfL CD state that Paragraph G unjustifiably assumes that an innovative development which combines high density development and a greatly improved public realm cannot be achieved. 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.	Object
R19.0150	Site Allocations	VR10: 34 Brandon Road	Vale Royal/Brewery Road LSIS		Christine Humphreys and Matthew Marchbank	Landowner	Consider previous representations have not been taken into account. Intensification of industrial uses at the site difficult due to delivery/servicing/parking issues. This could be eased if Brandon Road were made one-way and parking bays added. As it stands the industrial use of the site should be minimised and residential/office 'hybrid' use increased.	Object
R19.0151	Site Allocations	BC12: Cass Business School, 106 Bunhill Row	B & C: City Fringe Opportunity Area		City, University of London	Business	Rather than reinstating the wording of the adopted allocation as requested in previous representations, the council has sought to constrain the allocation further by suggesting that 'increased teaching facilities may be suitable where ...'. This is negatively worded and should be changed to 'will be suitable where ...' or removed in its entirety.	Object
R19.0151	Site Allocations	BC46: City, University of London, 10 Northampton Square	B & C: Central Finsbury		City, University of London	Business	Rather than reinstating the wording of the adopted allocation as requested in previous representations, the council has sought to constrain the allocation further by suggesting that 'increased teaching facilities may be suitable where ...'. This is negatively worded and should be changed to 'will be suitable where ...' or removed in its entirety.	Object
R19.0151	Strategic and Development Management Policies			Introduction; Vision and objectives	City, University of London	Landowner	Pleased that Council is committed to working with local universities and recognises the role they play, as per paragraphs 1.3 and 1.38. However, they consider that the detailed policy wording does not reflect and does not offer enough flexibility for the objectives to be achieved.	Not stated
R19.0151	Strategic and Development Management Policies			Policy DH1: Fostering innovation and conserving and enhancing the historic environment	City, University of London	Business	The blanket approach to protecting all views as out in Policy DH1 is inappropriate and not in line with the emerging London Plan approach. The policy should be amended to reflect the sensitivity of different views to change. The fact that a proposal is visible within a view does not mean that it will be harmful. This policy is unsound.	Object
R19.0151	Strategic and Development Management Policies			Policy DH2: Heritage assets	City, University of London	Business	The emerging Local Plan seeks to resist substantial harm to conservation areas and listed buildings. They consider that this is not consistent with national policy, and should be drafted according to paragraph 195 of the NPPF which states that substantial harm will be resisted unless there are substantial public benefits.	Object
R19.0151	Strategic and Development Management Policies			Policy DH3: Building heights	City, University of London	Business	It is inappropriate to have a blanket policy against tall buildings, the policy should include flexibility. The evidence base does not study the whole borough on a site by site basis. The policy should recognise that tall buildings can deliver public benefits including enhancements to the townscape. Without this the policy is unsound.	Object

R19.0151	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	City, University of London	Business	The council has a restrictive approach to business and employment floorspace. Para 4.6 makes distinction between the two terms 'business' being B-use classes and 'employment' being a broader term which includes office and education. The respondent states that the majority of jobs come from a few larger businesses, as well as local universities, hospitals and the council itself, as per para 4.10. The respondent proposes that part B of policy B3 welcomes proposals for higher educational use/research facilities that create employment. The respondent also suggests that these proposals should not require marketing evidence.	Object
R19.0152	Site Allocations	OIS21: Former railway sidings adjacent to Caledonian Road Station	Other Important Sites		Historic England	Statutory consultee	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.	Both
R19.0152	Strategic and Development Management Policies			N/A - general comment	Historic England	Statutory consultee	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.	Support
R19.0152	Strategic and Development Management Policies			Policy DH2: Heritage assets	Historic England	Statutory consultee	We would suggest the inclusion of a footnote at paragraph 8.32 with a weblink to the Archaeological Priority Area review document (https://historicengland.org.uk/content/docs/planning/apa-islington/)	Not stated
R19.0152	Strategic and Development Management Policies			Policy DH2: Heritage assets	Historic England	Statutory consultee	Please note that St John's Gate was de-scheduled some time ago (although it remains a Grade I listed building). This comment also applies to para 3.66 in the Bunhill & Clerkenwell Area Action Plan.	Not stated
R19.0152	Strategic and Development Management Policies			Policy DH2: Heritage assets, Paragraph 8.35	Historic England	Statutory consultee	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 GLAAS consultation guidelines at https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/	Not stated
R19.0152	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury	Historic England	Statutory consultee	Please note that St John's Gate was de-scheduled some time ago (although it remains a Grade I listed building). This comment also applies to para 3.66 in the Bunhill & Clerkenwell Area Action Plan.	Not stated
R19.0153	Site Allocations	AUS6: Sainsbury's, 31-41 Liverpool Road	Angel and Upper Street		Lothbury Investment Management	Landowner	The exclusion of residential use from AUS6 does not comply with national and regional policy. There is no evidence to support the requirement for a significant amount of business floorspace at the expense of housing in this location. The viability appraisal does not take into account abnormal costs impacting on the site, without the higher land values associated with residential development the policy objectives for the site will not be deliverable. The scale of development envisaged in the viability study does not optimise the true capacity of the site or the objectively assessed needs for the borough.	Object
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	The Islington Draft Local Plan Viability Study produced by BNPP considers a scale of development (29,788m ² (GIA)) which does not optimise the true capacity of the site or the objectively assessed needs for the borough. Given the location of the Islington Tunnel, innovative and possibly expensive ground solutions will be required to deliver the policy objectives for the site. This should be recognised in the site allocation AUS6. Quod requested at regulation 18 stage the working appraisals undertaken within the Islington Draft Local Plan Viability Study produced by BNPP. These have yet to be sent to Quod.	Object
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	Background provided on the Sainsbury's site. Respondent considers the site represents an excellent opportunity for Islington Council and Angel Town Centre to improve vitality and viability. It represents an excellent opportunity to achieve enhanced permeability, enhanced economic activity, new homes and a substantial improvement to the urban realm. Improved place-making along Tolpuddle Street can be achieved through active and animated road frontages and an appropriate sense of place.	Not stated

R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Object
R19.0153	Strategic and Development Management Policies			N/A - general comment	Lothbury Investment Management	Landowner	<p>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.</p>	Object
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	<p>Policy H11 seeks to restrict the provision of purpose built private rented 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.</p> <p>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 & 3.137) 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.</p> <p>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.</p>	Object

R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development, Evidence base	Lothbury Investment Management	Landowner	<p>The NPPF identifies at paragraph 59 that the Government’s objective is to significantly boost the supply of homes. Paragraph 61 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.</p> <p>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 97 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”.</p>	Object
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development, Evidence base	Lothbury Investment Management	Landowner	<p>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</p> <ul style="list-style-type: none"> - 81% 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) - 81% of households who pay rent or a mortgage say it is either ‘well within budget’, ‘about right’ or ‘just manageable’ (Q D9). - 86% of the same group say they are not considering the prospect of falling into arrears. (Q D10a) <p>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) but 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.</p>	Object
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	<p>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 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 supply.</p> <p>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 text 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.</p>	Object

R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	The provisions of Policy H11 places a test on the provision of purpose built private rented sector development which is not justified by the evidence base. 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 NPPF 2019 Paragraph 61 does not promote the prioritisation of one type of housing provision over another rather it is based on a response to evidence of need. It is instructive to note that Islington represents one of the smallest geographical council's areas in the country and the market for housing will inevitably not respect borough boundaries. Each of the adjoining Councils (Camden, Hackney and Haringey) all exhibit market characteristics not dissimilar to Islington and each of these Councils encourage Build to Rent or Private Rented Schemes as a part of a policy response to dealing with evidenced housing needs in their area. There is no evidence presented which justifies this approach to resolving housing need and nothing which sufficiently differentiates Islington from surrounding Councils to warrant their proposed approach to private rented schemes. 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.	Object
R19.0153	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 19 Plan. 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 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
R19.0153	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 timeframe 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. Provided 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 vi 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
R19.0153	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	Lothbury Investment Management	Landowner	Adjustments are considered appropriate to part vii 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 tenants will be offered tenancies of at least three years.	Object
R19.0153	Strategic and Development Management Policies			Policy SP4: 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 influencing a perception of character and role. Policy SP4 refers to site AUS6 but does not include residential uses for the site which the respondent objects to. Policy SP4 Part I should also recognise the ability for the site to deliver residential as well as business uses. Excluding residential uses on site AUS6 is overly restrictive given the capacity improvements expected with Crossrail2.	Object
R19.0153	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	Lothbury Investment Management	Landowner	Part F and paragraph 4.71 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 principle'.	Object
R19.0153	Strategic and Development Management Policies			Policy R2: Primary Shopping Areas	Lothbury Investment Management	Landowner	Respondent seeks clarification as to whether 60% A1 mix benchmark refers to just ground floor or all floor space. It should be related to ground floor only.	Not stated

R19.0153	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Lothbury 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	Lothbury 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 location suggesting that 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 DH3: Building heights	Lothbury 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 spatial strategy policy.	Not stated
R19.0153	Strategic and Development Management Policies			Policy B4: Affordable workspace	Lothbury 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 revamp 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: <ul style="list-style-type: none"> • 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. • While it's good that the council is encouraging Sheffield stands (Appendix 4, ppg 5), we recommend setting requirements which disallow or (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: overlooking, lighting, CCTW.... • New developments should put cycle parking on the ground floor wherever 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 T1: 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 T1: Enhancing the public realm and sustainable transport, Part C	Cycle Islington	Campaign	Support the Council's skepticism 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	Lime 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	Wherever 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

R19.0154	Strategic and Development Management Policies			Policy T3: Car-free development, Part E	Cycle Islington	Campaign	T3E: We support the direction that all on-street electric vehicle charging points are to go in the parking spaces themselves - However, new on-street charging points must not interfere with future cycle infrastructure. As such, the planning process must disallow EVCPs which would need to be removed or relocated in order to build cycle infrastructure. The Local Plan should disallow EVCPs on streets with more than 2000 PCU per day which do not have cycle tracks yet. The keblines here should be safeguarded for future cycle tracks. When the tracks are installed with space for car parking, then the EVCPs can be installed at the same time. Only low-traffic residential streets should qualify for EVCPs without cycle ways. The Council must also refer to the network of planned cycle routes before approving new EVCPs, even on quieter streets, to ensure there is no conflict.	Object
R19.0154	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Cycle Islington	Campaign	Recommends safeguarding future kerblines from infrastructure providers construction of new equipment which could obstruct cycle routes	Object
R19.0155	Site Allocations	FP7: Holloway Police Station, 284 Hornsey Road	Finsbury Park		Metropolitan Police Service	Statutory consultee	The loss of Holloway Police Station is part of the MPS' estate rationalisation programme so the loss of social infrastructure is compliant with draft policy SC1. As such the reference to 'justifying the loss of social infrastructure' should be removed from the allocation. The MPS do not agree that the location of the site lends itself to ground floor offices/ workspace. Given the residential nature of the area around the site a wholly residential scheme is appropriate.	Both
R19.0155	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Metropolitan Police Service	Statutory consultee	The proposed growth in homes, offices and other uses will significantly increase the need for policing 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 CIL 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.	Not stated
R19.0155	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Metropolitan Police Service	Statutory consultee	The MPS is requesting that the emerging Islington Local Plan includes 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.	Object
R19.0156	Site Allocations	BC31: Travis Perkins, 7 Garrett Street	B & C: Central Finsbury		Travis Perkins Plc	Landowner	Previous representations have been taken into consideration. Support the allocation as currently drafted.	Support
R19.0156	Strategic and Development Management Policies			Appendix 9: Glossary and abbreviations	Travis Perkins Plc	Landowner	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
R19.0156	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Travis Perkins Plc	Landowner	Draft Policy B3 ('Existing Business Floorspace') relates to all business floorspace, where existing business uses are industrial in nature (i.e. B1(c), B2, B8 or sui generis uses which are akin to industrial uses). It states that there must be at least no net loss of industrial uses as part of development proposals. Employment generating sui Generis uses are therefore protected. TP wish to record their support for this policy.	Support
R19.0156	Strategic and Development Management Policies			Policy B2: New business floorspace	Travis Perkins Plc	Landowner	The respondent supports policy B2 to ensure that industrial, business and Sui Generis uses such as builders' merchants are protected in Employment Priority Areas.	Support
R19.0156	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Travis Perkins Plc	Landowner	The respondent supports policy B3 which ensures that there is not net loss of industrial business uses, and that employment generating Sui Generis uses are protected.	Support
R19.0156	Strategic and Development Management Policies			Appendix 9: Glossary and abbreviations	Travis Perkins Plc	Landowner	The respondent supports the definitions of industrial floorspace and business floorspace, in particular the inclusion of Builders' Merchants (SG use)	Object
R19.0157	Site Allocations	AUS11: Proposed Collins Theatre, 13-17 Islington Green	Angel and Upper Street		Berjaya UK Investment and Development Limited	Landowner	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 any 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.	Object
R19.0157	Strategic and Development Management Policies			Policy R9: Meanwhile/temporary uses	Berjaya UK Investment and Development Limited	Landowner	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.	Object
R19.0158	Site Allocations	ARCH1: Vorley Road/Archway Bus Station	Archway		Better Archway Forum	Local society	A 15-storey building will overshadow housing and be contrary to studies on energy use and overall densities.	Object
R19.0158	Site Allocations	ARCH2: 4-10 Junction Road	Archway		Better Archway Forum	Local society	Relocating the portacabins which block the tube station entrance would be an important improvement that boosts the retail frontage.	Not stated
R19.0158	Site Allocations	ARCH3: Archway Central Methodist Hall, Archway Close	Archway		Better Archway Forum	Local society	The address is 11 St John's Way, N19 3QS	Not stated
R19.0158	Site Allocations	ARCH4: Whittington Hospital Ancillary Buildings	Archway		Better Archway Forum	Local society	Improving 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.	Not stated
R19.0158	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway		Better Archway Forum	Local society	These fully functional buildings could have been used to shelter homeless people. Would use of the s215 procedure be appropriate?	Not stated

R19.0158	Site Allocations	ARCH7: 207A Junction Road	Archway		Better Archway Forum	Local society	Work here could be made dependent on the re-opening of Junction Road Station, providing a clear and immediate public benefit.	Not stated
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	Adopt the Healthy Street policy	Not stated
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	It would be useful to reopen Junction Road station on the Gospel Oak to Barking Line, to improve public transport accessibility in that area	Not stated
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	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
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	There is an increase in vehicle speed on main roads, especially Holloway Road and Junction Road. Public realm interventions, such as narrowing the carriageway with build outs and trees could help in that respect	Not stated
R19.0158	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	Better Archway Forum	Local society	Islington should talk to TfL to terminate buses to stop at points of demand, such as Whittington Hospital and Upper Holloway, this would free up 2 lanes of traffic on Archway Road for housing over a combined heat and power facility overlooking the footway at Hornsey Lane. 26. Better interchange, not worse, was a starting aspiration for the welcome removal of the gyratory, and if re-introduced by simple re-organisation of bus stops, would encourage travel via Archway, to the benefit of businesses and greater safety on the street.	Not stated
R19.0158	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Better Archway Forum	Local society	Given LB Islington's steps to make the borough more cycle friendly, there is still considerable scope for improvement and in particular it would be desirable to have a target for modal shift of more than 5% in 21 years – the lowest of any inner London borough. A Quietway around Archway for cycling is desirable, away from heavy HGVs and polluted roads, away from buses	Not stated
R19.0158	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	Better Archway Forum	Local society	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	Not stated
R19.0158	Strategic and Development Management Policies			N/A - general comment	Better Archway Forum	Local society	We warmly welcome the generation principles of the Plan including among other issues the commitment to young people, to protecting the environment and the active designation of Archway as a cultural quarter. 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.	Support
R19.0158	Strategic and Development Management Policies			N/A - general comment	Better Archway Forum	Local society	One of the best ways of achieving public safety is to ensure 'eyes on the street'. For this reason it may be helpful to specify that all development, whether residential or business, must feature a clear sense of connection with the public space with doors directly from the street and windows large enough to clearly signal active use of the building. Point 8.72 proposes improving permeability. However, the Space Syntax study of the Girdlestone Estate in 2008 found that one of the key underlying problems with the estate was that there is too much permeability, so those responsible for anti-social behaviour can easily evade detection. Policy favouring permeability should ensure that integral to that is an assessment of potential impact on crime and anti-social behaviour and where permeability is sought, it is only with measures which will keep the space safe. Simple cut-throughs such as proposed on the Holborn Union site may prove a great deal more problematic than helpful. In effect permeability needs to be across what has been called 'defensible space' and/or what the Rowntree Foundation called LOTS (Living Over The Shop), ie spaces which are actively overlooked and/or in a clear sense of ownership.	Not stated
R19.0158	Strategic and Development Management Policies			Policy H1: Thriving communities	Better Archway Forum	Local society	We are all too well aware of the on-going housing problems for many in the borough and welcome the expectation that new housing will take account of the needs of families. We welcome also the requirement for dense design but note that this is best achieved through low and medium rise, parallel 'streets' and inward-looking 'courts' rather than high rise - as in the paper by Professor Steadman of UCL - https://journals.sagepub.com/doi/10.1068/b39141 . We are disappointed to understand that LB Islington does not support co-housing projects. Because these offer shared facilities they often encourage residents to live in smaller accommodation than otherwise, and the social support they provide leads to significant savings in support services. Their success in countries like the Netherlands is proof that they can be highly effective.	Both

R19.0158	Strategic and Development Management Policies			Policy S1: Delivering Sustainable Design	Better Archway Forum	Local society	<p>This policy is of course vital given the concerns regarding global warming, but in monitoring planning applications we have seen two issues:</p> <ul style="list-style-type: none"> - 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. <p>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.</p> <p>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.</p>	Not stated
R19.0158	Strategic and Development Management Policies			Policy S7: Improving Air Quality	Better Archway Forum	Local society	<p>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.</p>	Not stated
R19.0158	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Better Archway Forum	Local society	<p>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.</p> <p>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.</p> <p>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.</p> <p>Point 5.2 states that loss of some green space 'may be acceptable where specific criteria are addressed'. This will be seized 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.</p> <p>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.</p>	Not stated

R19.0158	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	Point 8.55 of the draft plan includes a number of issues regarding tall buildings, not least wind blight and the Tall Building Study carried out for LB Islington noted that nowhere in the borough was suited to tall buildings so it is clear that there is considerable reason not to permit these. In addition we would highlight the report by Professor Philip Steadman of UCL on the very questionable sustainability of tall buildings. He finds that those above 20 storeys have a carbon footprint two and a half times those of six storeys or under - www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results and www.tandfonline.com/doi/full/10.1080/09613218.2018.1479927 offer information on his research. This refers to office buildings. Professor Steadman says they also looked at residential buildings but without access to actual energy consumption data. However, a statistical approach again showed a steep increase in the intensity of energy use with height. The high energy cost is a particular concern for social housing where the cost of running the building must be paid for out of public money. Professor Steadman has also found that tall buildings are not the densest form of housing – see link above. Given that they are widely unpopular with potential tenants, there does not appear to be good reason to build them other than for private profit. We therefore believe Policy DH1 F, if kept, should be amended. Tall buildings do not make the best use of land because they do not optimise the amount of development on a site, and policy should make that clear so that planning decisions can be made in the light of that knowledge. We note also that tall buildings are particularly expensive in terms of maintenance so are liable to become much more run down than properties where maintenance is easier and more affordable. And of course they now require a great deal of investment in fire safety. Tall buildings do not appear to offer long term value, whatever the short-term return.	Object
R19.0158	Strategic and Development Management Policies			Policy DH2: Heritage assets	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.	Object
R19.0158	Strategic and Development Management Policies			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.	Object
R19.0158	Strategic and Development Management Policies			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 act as an additional stress to those with mental health issues, and of course is particularly so to those on low incomes.	Not stated
R19.0158	Strategic and Development Management Policies			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.	Not stated
R19.0158	Strategic and Development Management Policies			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 name of the business.	Support
R19.0158	Strategic and Development Management Policies			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, particular 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.	Object

R19.0158	Strategic and Development Management Policies			Policy DH7: Shopfronts	Better Archway Forum	Local society	The prevention of solid shuttering on shop fronts should be specified. Solid shuttering creates an intimidating townscape and can facilitate burglars by allowing them to enter the rear of the premises unobserved. Shops will also lose the promotional advantage of window displays at night.	Object
R19.0158	Strategic and Development Management Policies			Policy R10: Culture and the Night Time Economy	Better Archway Forum	Local society	Archway cultural quarter designation is welcome, however, it should be clarified that the cultural offer here is more than the conventionally 'arty'. Such night time activities should terminate at midnight to avoid anti-social behaviour. Designating Archway Tavern as an active element of the cultural quarter may be helpful in prompting either a sale or arrival of a more capable manager to start running the building.	Not stated
R19.0158	Strategic and Development Management Policies			Policy R11: Public Houses	Better Archway Forum	Local society	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
R19.0159	Site Allocations	KC1: King's Cross Triangle Site	King's Cross and Pentonville Road		CEMEX	Business	Reference to Cemex and the agent of change policy (DH5) should be made in the constraints and development considerations section to state that development will need to mitigate against the noise from this existing concrete batching plant site.	Not stated
R19.0159	Site Allocations	KC2: 176-178 York Way & 57-65 Randell's Road	King's Cross and Pentonville Road		CEMEX	Business	Reference to Cemex and the agent of change policy (DH5) should be made in the constraints and development considerations section to state that development will need to mitigate against the noise from this existing concrete batching plant site.	Not stated
R19.0159	Strategic and Development Management Policies			Policy DH5: Agent-of-change, noise and vibration	CEMEX	business	<p>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 living 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.</p> <p>Policy DH5 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 once 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 DH5 changed to address this and have a clause/s which reflect more closely the draft Policy set out in the London Plan Policy D12.</p>	Object
R19.0159	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road	CEMEX	Business	CEMEX would like to see their site included within the CAZ boundary. Three of the four tall building sites identified in the policy neighbour the CEMEX site. In promoting these sites Islington should consider the existence of the CEMEX site and also the 'agent of change' policy, which may influence the use and design of any development on these sites. Figure 2.3 identifies the potential for improved connections in the vicinity of Randell's Road. Any improvements for cyclists and pedestrians must consider HGV movements associated with the CEMEX operations. CEMEX would like to be involved in any discussions regarding transport improvements around its site.	Not stated
R19.0160	Site Allocations	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	King's Cross and Pentonville Road			Resident	The development considerations should state that any development should respect the amenity of Treaty Street to the north of the site, having consideration to the amplification of sound over water.	Not stated
R19.0160	Strategic and Development Management Policies			Policy SP2: King's Cross and Pentonville Road		Resident	Policy SP2 part H should be amended to read 'access to the canal should be improved, although increased access must not cause detrimental impacts, particularly for biodiversity or for residents'	Not stated
R19.0161	Strategic and Development Management Policies			N/A - general comment	Natural England	Statutory consultee	No comment	Not stated
R19.0162	Site Allocations	AUS11: Proposed Collins Theatre, 13-17 Islington Green	Angel and Upper Street		Theatres Trust	Campaign	Support the allocation and welcome that it refers applicants to the Theatres Trust.	Support
R19.0162	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Theatres Trust	Statutory consultee	Support the policy, especially Parts G, H, I and M	Support
R19.0162	Strategic and Development Management Policies			Policy SP6: Finsbury Park	Theatres Trust	Statutory consultee	We remain supportive of this spatial policy, in particular parts G., H. and I and M.	Support
R19.0162	Strategic and Development Management Policies			Policy SP8: Highbury Corner and Lower Holloway	Theatres Trust	Statutory consultee	We are supportive of this policy and in particular the explicit reference within part E. to protecting the Garage and Union Chapel venues.	Support

R19.0162	Strategic and Development Management Policies			Policy R1: 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 NTE 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	Both
R19.0162	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Theatres Trust	Statutory consultee	Support the policy.	Support
R19.0162	Strategic and Development Management Policies			Policy R9: Meanwhile/temporary uses	Theatres Trust	Statutory consultee	Welcome amendment in line with Regulation 18 comment	Support
R19.0162	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.	Support
R19.0162	Strategic and Development Management Policies			Policy R9: Meanwhile/temporary uses	Theatres Trust	Statutory consultee	We welcome that this policy has been amended in line with our previous recommendation.	Support
R19.0162	Strategic and Development Management Policies			Policy R11: Public Houses	Theatres Trust	Statutory consultee	We continue to support this policy.	Support
R19.0162	Strategic and Development Management Policies			Policy DH5: Agent-of-change, noise and vibration	Theatres Trust	Statutory consultee	We support this policy, and particularly welcome reference to Deeds of Easement being in place within part C.	Support
R19.0162	Strategic and Development Management Policies			Policy R10: Culture and the Night Time Economy	Theatres Trust	Statutory consultee	Support protections from loss this policy offers but is in conflict with Policies R3 and R9 as it restricts cultural uses to the CAZ and town centres, whereas other policies afford greater flexibility in certain circumstances. Policy should read 'should be located' or 'must be located.... unless the tests set out in Policies R3 or R9 are met', instead of 'must be located'. The policy could also undermine the objectives of policy R9.	Both
R19.0162	Strategic and Development Management Policies			Policy R11: Public Houses	Theatres Trust	Statutory consultee	Support the policy	Support
R19.0163	Site Allocations	BC5: London College of Fashion, Golden Lane	B & C: Central Finsbury		University of the Arts London	Business	Pleased 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 refer to the possibility of increasing the height of the existing building. It should be amended to state that any increase in height or massing would require a thorough assessment to ensure there are no major adverse impacts on surrounding heritage assets.	Both
R19.0163	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	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 D(iii) is amended to include specific reference to higher educational/university institutions.	Not stated
R19.0164	Site Allocations	VR2: 230-238 York Way	Vale Royal/Brewery Road LSIS		Nexcon Solutions Ltd	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 neighbours'. The development considerations in the allocations are not flexible enough in terms of use class or building heights and should be amended.	Object
R19.0164	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Nexcon Solutions 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 unjustified and mechanistically-applied blanket policies (including those on height).	Object
R19.0164	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Nexcon Solutions Ltd	Landowner	The strengthening of policies will fetter their future ability to develop at this location, or indeed 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	Object
R19.0165	Site Allocations	VR1: Fayers Site, 202-228 York Way, 22-23 Tileyard Road, 196-200 York Way	Vale Royal/Brewery Road LSIS		Big Yellow Self Storage Company Ltd	Landowner	Support the explicit 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

R19.0165	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Yellow Self Storage Company Ltd	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 LSIS.	Support
R19.0165	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Yellow Self Storage Company Ltd	Landowner	As a result of the increase in residential schemes on the surrounding area (e.g. Maiden Lane), the respondent has identified a growing demand for both self-storage space and flexible office space within the proximity of the Fayers site. In relation to hybrid space, the respondent states that it has a track record of integrating flexible office space that is distinct but connected to their self-storage facilities, generally speaking of ranges from 10-50sqm.	Not stated
R19.0165	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Big Yellow Self Storage Company Ltd	Landowner	There is not townscape assessment assertion from the LSIS Height Study to impose a height limit of 20m as per reference in para 3.1.(1). Nonetheless, the respondent recommends to incorporate para 2.36 from the SDM DPD to part E of SP3, to clarify that a subjective townscape analysis will be adopted for the area.	Not stated
R19.0166	Site Allocations	NH7: Holloway Prison, Parkhurst Road	Nag's Head and Holloway		Department for Education	Statutory consultee	NH7 refers to delivering significant residential capacity, which may generate school place demand. It may be useful to include within the development considerations that where there is a need for school places brought about by a proposed development, the development must contribute towards the provision of those places.	Not stated
R19.0166	Strategic and Development Management Policies			Policy S3: Sustainable Design Standards; Policy S4: Minimising greenhouse gas emissions	Department for Education	Statutory consultee	In the context of the need to maximise value for money in education spending and make efficient and effective use of public funds, we question if a requirement for schools to achieve BREEAM 'Excellent' rather than 'Very Good' is justified; and note that elements of S4 may be challenging to meet. The policy should reflect some flexibility in relation to school and community buildings, especially in regard to expansions of existing buildings.	Object
R19.0166	Strategic and Development Management Policies			Policy G3: New public open space	Department for Education	Statutory consultee	Concern over the requirement for open space as it could apply to new schools. Schools have a number of issues with providing publicly accessible open space.	Object
R19.0166	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Department for Education	Statutory consultee	The policy should require that new developments which generate additional school place demand have to contribute towards meeting such demand. This includes on-site provision or financial contributions secured through CIL/planning obligations.	Not stated
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request to add minor amendment which clarifies that developer contributions may be secured retrospectively when it is necessary to forward fund infrastructure projects in advance of housing growth.	Object
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request that as a matter of soundness more explicit reference is made to seeking education contributions in case of changing circumstances and a policy requirement for offsite contributions from all sites which do not provide an on site school where there is insufficient school capacity to absorb the demand created by the school is added.	Object
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request that as a matter of soundness more explicit reference is made to seeking education contributions in case of changing circumstances and that where on site schools are required that the free transfer of land to the council and necessary construction costs is made clear.	Object
R19.0166	Strategic and Development Management Policies			Policy ST1: Infrastructure Planning and Smarter City Approach	Department for Education	Statutory consultee	Request that as a matter of soundness more explicit reference is made to seeking education contributions in case of changing circumstances and that clear references to the funding mechanism to be applied, either S106 or CIL, is made as well as cross references to the evidence that justifies whichever approach.	Object
R19.0167	Site Allocations	OIS12: 202-210 Fairbridge Road	Other Important Sites		Dominvs Group	Landowner	Consider that the site allocation should be withdrawn as the site has planning permission and development is due to commence. If it is retained the allocation should be amended to ensure maximum flexibility of the floorspace in future so as to avoid unnecessary vacancy periods, and not be restricted to the prioritisation of business floorspace only. The timescales set out in the allocation are inaccurate - the scheme will be delivered by 2020/21.	Object
R19.0167	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Dominvs Group	Landowner	Para 4.41 of policy B3 indicates that proposals for non-business uses should demonstrate that proposed non business uses are compatible with existing uses and do not impact on the economic function of the wider area. If marketing period criterion is met, as permitted by B3 (B), this will contain residential uses on upper floors. Therefore, the site allocation should not be restricted to the prioritisation of business floorspace only	Object
R19.0167	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Dominvs Group	Landowner	The policy (B3) wording "other business uses as a potential option" needs to be accompanied by a definition of what other business uses constitute and should be widened to include D1 in locations such as this, where there is a prevailing mix of uses, including residential.	Object
R19.0167	Strategic and Development Management Policies			Policy B3: Existing business floorspace	Dominvs Group	Landowner	Criterion in policy B3 (C) is too inflexible and restrictive in terms of potential future uses, depending on site specific circumstances. The respondent suggests that the policy should include a pathway to alternative use other than industrial via vacancy and marketing evidence because industrial space that is not taken up could remain vacant for long periods.	Object
R19.0167	Strategic and Development Management Policies			Appendix 1: Marketing and vacancy criteria	Dominvs Group	Landowner	Part 4 of Appendix 1 should not include the words "The examples provided are not an exhaustive list." because this means that the policy is not clear and concise in line with NPPF para 16 (2019 version).	Object
R19.0168	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			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 (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. Overdevelopment will blight residents' physical and mental health, and put much of Burnhill House into fuel poverty.	Object

R19.0169	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			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 (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.	Object
R19.0169	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury		Resident	States that AAP policy BC7F 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.	Object
R19.0170	Site Allocations	ARCH6: Job Centre, 1 Elthorne Road	Archway		Gladquote Ltd	Landowner	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 Study (2017). Given this overprovision 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.	Both
R19.0170	Strategic and Development Management Policies			Policy SP7: Archway	Gladquote Ltd	Landowner	Gladquote Ltd considers this policy to be restricting and inconsistent with national and regional policies that seek to significantly boost the supply of new homes. Gladquote Ltd request that the policy is amended to allow for increased flexibility when considering sites for residential-led redevelopment. It is requested that a design led approach is employed when considering proposals for residential led schemes. Paragraph 59 of the NPPF sets out the Government's objective of significantly boosting the supply of homes. Paragraph 85 of the NPPF lists housing as a suitable use to aid in promoting the long-term vitality and viability of town centres. Residential uses in town centres is further supported by National Planning Practice Guidance which recognises residential development can play an important role in ensuring the vitality of town centres. Draft London Plan Policy H1 states that boroughs should 'optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites within existing of planned public transport access level 3-6 or which are located within 800m distance of a station or town centre boundary'. It is considered that the site is an appropriate location for a residential/residential-led mixed-use development.	Object
R19.0170	Strategic and Development Management Policies			Policy DH3: Building heights	Gladquote Ltd	Landowner	1 Elthorne Road is considered to be an appropriate location for a tall building over 30 metres given the several noted characteristics of the site.	Object
R19.0170	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	Gladquote Ltd	Landowner	Respondent requests 1 Elthorne Road should be removed from the Archway Town Centre boundary as its inclusion is unsound and is inconsistent with para 85b 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 D1 and C3 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.	Object
R19.0171	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Hondo Enterprises	Business	Note that policy sets strategic objectives for B & C area and that AAP sets out policies. Further comments provided on these.	Not stated
R19.0171	Strategic and Development Management Policies			Policy G1: Green Infrastructure	Hondo Enterprises	Business	Support for the main objectives of Policy G1.	Support
R19.0171	Strategic and Development Management Policies			Policy G2: Protecting open space	Hondo Enterprises	Business	Policy G2 should recognise that some development on open space can have an important role in enhancing the use and function of that space.	Not stated
R19.0171	Strategic and Development Management Policies			Policy G3: New public open space	Hondo Enterprises	Business	Support for the objectives of Policy G3 part C which require new public open spaces to accommodate and encourage physical activity for all, promoting walking, cycling, and social interaction.	Not stated
R19.0171	Strategic and Development Management Policies			Policy G3: New public open space	Hondo Enterprises	Business	Regarding Policy G3 part B should require an assessment of the quality, flexibility, and usability of open spaces so that their use and capacity can be maximised. Spaces should not only cater for limited groups. The SDM policies should favour delivery of multi use open space.	Not stated
R19.0171	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	Hondo Enterprises	Landowner	The prioritisation of office floorspace within this area is supported but it should be acknowledged that other ancillary commercial and community uses 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.	Both
R19.0171	Strategic and Development Management Policies			Policy B2: New business floorspace	Hondo Enterprises	Landowner	The respondent supports the flexible workspace typologies introduced by policy B2.	Support
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Hondo Enterprises	Business	Supportive of policy B2 as it is flexible and allows employment floorspace to respond to market demands.	Support
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Hondo Enterprises	Business	Support element of policy related to Finsbury Square improvements.	Support
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Hondo Enterprises	Business	In line with previous representations part B of BC1 sets and inflexible and prescriptive office space contribution. The policy wording has not changed since the last consultation and is still too prescriptive and does not afford any flexibility for changing market demand. Strongly suggest that BC1 is amended to provide more flexibility. The limited circumstances set out in part D are still too restrictive.	Object
R19.0171	Bunhill and Clerkenwell Area Action Plan			Policy BC3: City Fringe Opportunity Area	Hondo Enterprises	Business	Part J of BC3 is supportive of the improvement of Finsbury Square subject to no net loss of open space.	Not stated

R19.0172	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			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 (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.	Object
R19.0172	Bunhill and Clerkenwell Area Action Plan			Policy BC7: Central Finsbury		Resident	States that AAP policy BC7F 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.	Object
R19.0173	Site Allocations	OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road	Other Important Sites		JPA Investments	Landowner	Consider the allocation should be amended to allow mixed use development including flexible commercial units (B1/B8) and state that residential use is acceptable where there is no net loss of business floorspace.	Object
R19.0173	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 B1 (A), criterion (iii) 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 E7 and Islington's EL5 (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.	Object
R19.0174	Site Allocations	FP5: 1 Prah Road	Finsbury Park		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 uses') 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 viably provide a small component of SME workspace. Concerned that the inappropriate land use allocation will render the site un-optimised and undeveloped throughout the Plan period.	Object
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	Background info on landowner, site and context.	Not stated
R19.0174	Strategic and Development Management Policies			Policy H1: 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, 3.8 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 (in 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, and, 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.	Object
R19.0174	Strategic and Development Management Policies			Policy H1: 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 K, 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?	Object
R19.0174	Strategic and Development Management Policies			Policy H1: 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.	Object
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	The Council support's 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	Object

R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	Part D discusses how new homes should be “made adaptable over their lifetime” to accommodate changing needs, we disagree, as free movement and market choice are also in a position to offer what people need in different moments of time (i.e. extra care accommodation is able to meet the needs of the elderly under a C2 or HMO type uses, and/or, co-living housing for single people wishing to take advantage of the social benefits of living with other singletons, under HMO or build to rent building typologies). Islington need to better acknowledge this fact in this Policy as well as other policies in the plan (namely the role of non-self contained accommodation in meeting housing needs for vulnerable older people under Policy H7, people in need of supported housing under Policy H9 and better prioritising the role of shared and non self contained accommodation may play in the market in delivering purpose built private rental sector development, under Policy H11).	Object
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	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).	Object
R19.0174	Strategic and Development Management Policies			Policy H1: Thriving communities	London Centric Ltd	Landowner	London Centric 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) Part E (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 abating 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 Q 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.	Object
R19.0174	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	London Centric Ltd	Landowner	Whilst London Centric support the need to protect and promote new and existing conventional housing, we do 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) That Islington promotes the optimisation of sites; however, we ask that building height and scheme viability be used to help justify raising the density of some sites, this 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 floorspace 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, better appreciate the role that site area, physical site constraints and scheme viability play in the delivery of these aspirations. That Table 3.2 be understood as an aspiration, which should be adopted flexibly on a case by case basis so long as market evidence justifies a departure from the preferred housing mix and scheme deliverability/viability to allow for this departure. iii) Under Part F that Studio or bedsit units be better tolerated if market evidence dictates this is what the market wants, regardless of whether the “exceptional circumstances” apply. Moreover, that Studio or bedsit accommodation be considered as part of helping to tackle the housing problem as previously stated.	Object
R19.0174	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	London Centric Ltd	Landowner	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.	Object

R19.0174	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	London Centric Ltd	Landowner	<p>London Centric is unhappy to learn that: i) Under Part B that for sites capable of delivering 10 or more conventional housing units/and or look to provide 1,000 sqm (GIA residential floorspace or more)-exception of full or part public ownership) - that a 45% 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.</p> <p>ii) 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.</p> <p>iii) 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).</p> <p>v) 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 splits, 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.</p> <p>iv) 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.</p>	Object
R19.0174	Strategic and Development Management Policies			Policy H7: Meeting the needs of vulnerable older people	London Centric Ltd	Landowner	<p>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.</p>	Object
R19.0174	Strategic and Development Management Policies			Policy H10: Houses in Multiple Occupation (HMOs)	London Centric Ltd	Landowner	<p>In relation to Islington's Draft Policy on HMO's, we ask that:</p> <p>Under Part A, that Islington support the loss of larger family housing if the development proposal seeks to satisfy wider policy targets listed in the plan (such as seeking to widen housing choice or satisfying a particular need). In this instance we ask that part A (ii) be re-worded and/or the policy justification be rewritten to reflect this.</p> <p>London Centric contests the wording of Part C which refuses the prospect of large-scale HMO's coming forward if they limit capacity to deliver conventional housing. On the contrary, the market should dictate what is brought forward, scheme viability as well as an appreciation of wider Londoners needs (of which market evidence suggests that PSR is on the rise, with potential for this to be made affordable, as discussed previously).</p> <p>London Centric are disappointed to see the latter section of Part C (under the previous Regulation 18 consultation), which once discussed the notion of potential of Sites in which the Council would consider appropriate for larger scale HMO development, is now gone. In the fulfilment of sites deemed appropriate for HMO development, London Centric consider that Town Centre sites would be the most appropriate locations sequentially, in line with current adopted Policy (Policy DM4.4, Development Management Policies, 2013) which states that HMO's larger than 80sqm should be located in Town Centres.</p> <p>Moreover, part C also which also states that large-scale HMOs will generally be refused as they limit capacity for conventional housing should be reconsidered as there are variations of HMO which may be brought 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 be 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 of 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 iii, 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.</p>	Object

R19.0174	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London Centric Ltd	Landowner	<p>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-upte from Housing in London, GLA ,2017).</p> <p>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 Council's 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 PSR is seen as part of widening housing choice (Policy 3.8 of the Adopted London Plan, 2016).</p>	Object
R19.0174	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London Centric Ltd	Landowner	<p>Other comments we have in relation to any "accepted" PRS schemes, which, relates to any wider compliance:</p> <p>i) In relation to A (ii) 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.</p> <p>ii) Under A(iii) we ask the requirement for self contained units to include the prospect of cluster flats, which may allow for anything from 2-6 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).</p> <p>iii) We agree under part A (iii) that high quality housing is provided in H4 as much as can be possible, however, please be aware that on occasion site constraints may cause a shortfall in some desired design features. Also, in relation to the requirement that all units be self-contained, again we ask that cluster flats be allowed to act as a "self-contained" unit, with a certain number of occupants residing within this.</p> <p>iv) In relation to part A (iv) 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 covenanted 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.</p>	Object
R19.0174	Strategic and Development Management Policies			Policy H11: Purpose Built Private Rented Sector development	London Centric Ltd	Landowner	<p>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:</p> <p>"The draft London Plan, supported by the Affordable Housing and Viability SPG, sets out a new 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."</p> <p>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 to 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.</p> <p>vii) Whilst we agree with part vii) 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 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 states this not be charged, except for security deposits and upfront rent payments, we ask for this to be changed to be in line with industry standards. This would prevent any onerous fees from being purely at the expense of the PSR, which is not acceptable.</p>	Object

R19.0174	Strategic and Development Management Policies			Policy B1: Delivering business floorspace	London Centric Ltd	Landowner	We agree with Part B which states that future business expansion is to be directed be focussed in the CAZ, Bunhill and Clerkenwell AAP, the CAZ Fringe Spatial Strategy Areas of Upper Street, Kings Cross and Pentonville Road, PELs and Locally significant Industrial Sites. We agree with the Council's strategy which aims to ensure the adequate supply of business space is delivered via no net loss of commercial space in planning permissions and via the use of article 4 directions where necessary. This is already the case. We disagree with Part D which states that the council wish to blindly secure space for start-ups and small businesses, this needs to be validated with appropriate market evidence (must be proof of a need in order to force this).	Object
R19.0174	Strategic and Development Management Policies			Policy B2: New business floorspace	London Centric Ltd	Landowner	While we agree that new business floorspace is to be primarily directed to the CAZ, Bunhill and Clerkenwell AAP, the CAZ Fringe Spatial Strategy Areas of Upper Street, Kings Cross and Pentonville Road, PELs and Locally significant Industrial Sites (Part A, i-iii), with any wider proposals for B1(a) and B1 (c) to be directed in town centre environments. We do ask however, that market demand should form the fundamental basis for any desired B1(a) space in town centre environments, and that any restrictive SME requirement policy, is backed up by the Council with a proper evidence base in order to prove there is a justified demand for this, this is especially in the light of Council driven allocation sites (i.e. sites not chosen by the owners themselves).	Object
R19.0174	Strategic and Development Management Policies			Policy B4: Affordable workspace	London Centric Ltd	Landowner	While London Centric part agree with the requirement to provide 10% affordable workspace on schemes providing in excess of 1,000 sqm of office space for sites in the CAZ, Bunhill and Clerkenwell 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, we believe the fundamental basis of this policy should be based on sound market economics and demand. This means that even for schemes capable of delivering this level quantum, if it may be proven that scheme viability will be compromised and/or if market demand levels for do 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 yielding uses are counter balanced with more profitable land uses. We support Part C of the policy which looks for a 10% affordable workspace target for schemes proposing in excess of 10,000 sqft.	Object
R19.0174	Strategic and Development Management Policies			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 club (Sui Generis use classes) does not denote to be Social Infrastructure (D2 use class).	Not stated
R19.0174	Strategic and Development Management Policies			Policy SP6: 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 only aspirational. 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 yielding office rents. B1 office space is not in deficit as there has been a net expansion in the last three years.	Object
R19.0174	Strategic and Development Management Policies			Policy R3: Islington's Town Centres	London Centric Ltd	Landowner	Respondent states the council should acknowledge that there are many town centre 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 contests use of term 'sui generis town centre use' as sui generis uses may be placed anywhere. Town centre boundaries should be reviewed periodically and 1 Prah Road should not be included in the boundary as it occupies a sui generis use site, on a residential street, largely detached from the wider town centre boundary. Respondent disagrees that residential uses have potential to cause adverse harm to the vitality and viability of town centres and whilst should be located away from core areas they shouldn't be limited to upper floors if the local environment is residential in character.	Object
R19.0175	Site Allocations	BC36: London Metropolitan Archives and Finsbury Business Centre	B & C: Mount Pleasant and Exmouth Market		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
R19.0175	Bunhill and Clerkenwell Area Action Plan			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 (3.45) are acknowledged in the proposed plan, especially in the Bunhill and Clerkenwell Area Action Plan.	Support
R19.0176	Site Allocations	NH13: 166-220 Holloway Road; NH14: 236-250 Holloway Road, N7 6PP and 29 Hornsey Road, N7 7DD	Nag's Head and Holloway		London Metropolitan University	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 redevelopment of existing buildings. The allocations should also be amended to specifically support the development of student housing.	Object

R19.0176	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 incorporate student accommodation as part of its master plan, creating a well-balanced campus that offers students a residential campus experience, where they will have the best access to teaching and support facilities and the best chance to integrate with fellow students and staff. This is the best outcome for students and central to London Mets' mission to transform lives through excellent education.	Not stated
R19.0176	Strategic and Development Management Policies			Policy SP5: Nag's Head and Holloway	London Metropolitan University	Landowner	In line with comments on site allocations NH13 and NH14, SP5 should be amended to be much more positive about the University to include specifically supporting student housing at the Holloway Road campus.	Object
R19.0176	Strategic and Development Management Policies			Policy DH3: 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 (C5 – up to 76m) 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 37m. 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
R19.0176	Strategic and Development Management Policies			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
R19.0176	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	London Metropolitan University	Landowner	Has not been informed by an objective assessment of the needs for PBSA (including specifically for needs associated with LMU) and fails to plan positively to meet such needs	Object
R19.0177	Site Allocations	N/A - general comment	N/A		Greater London Authority/Mayor of London	Statutory consultee	It is clear that the proposed allocations within the Vale Royal/Brewery Road LSIS 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 E4 and E6.	Support
R19.0177	Site Allocations	N/A - general comment	N/A		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, 36% 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. Islington'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 justified and followed a methodical and consistent approach.	Object
R19.0177	Site Allocations	N/A - general comment	N/A		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. Welcomes recognition of the borough's cultural assets and the protection of these uses through allocations such as AUS11 and NH9, in line with the approach set out in London Plan policy HC5. 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 E7D	Support

R19.0177	Strategic and Development Management Policies			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	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, is 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 1.57 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.	Support
R19.0177	Strategic and Development Management Policies			Policy DH3: Building heights	Greater London Authority/Mayor of London	Statutory consultee	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 30m in height might be suitable, subject to other Local Plan requirements. This approach is aligned with draft new London Plan Policy D8 and is underpinned by Islington's Tall Buildings Study 2018. A single image which combines both Figure 8.2 Strategic and local views and Figure 8.3 Locations suitable (in principle) for tall buildings over 30m 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 where there are clear overlaps, maximum heights set out in Table 8.1 will ensure that impacts are avoided.	Support
R19.0177	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Greater London Authority/Mayor of London	Statutory consultee	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 H10BA of the draft new London Plan makes it a requirement that all schemes involving 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.	Support
R19.0177	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	Greater London Authority/Mayor of London	Statutory consultee	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 DF1 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.	Both
R19.0177	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes Islington's intention at paragraph 3.65 to ensure the integration of affordable housing so that it is tenure-blind and builds on the principles laid out in the Mayor's Good Growth Policy GG1 and paragraph 3.4.5B of the draft new London Plan with the ambition of building stronger and more inclusive communities.	Support
R19.0177	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes Islington's requirement that 35% of new student accommodation is 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 H17A4. Boroughs are encouraged to maximise the delivery of affordable student accommodation and Islington should recognise that this might be jeopardised through the prioritisation of bursaries over and above affordable accommodation.	Both
R19.0183	Strategic and Development Management Policies			N/A - general comment	TfL City Planning	Statutory consultee	TfL 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 relate to those comments which elaborate further where TfL have outstanding comments/objections.	Not stated
R19.0177	Strategic and Development Management Policies			Policy B2: New business floorspace	Greater London Authority/Mayor of London	Statutory consultee	Policy B2 directs office use to the CAZ, Bunhill and Clerkenwell area, Spatial Strategy areas within the CAZ, PELs 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.	Support
R19.0177	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Greater London Authority/Mayor of London	Statutory consultee	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.	Support
R19.0177	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Greater London Authority/Mayor of London	Statutory consultee	In addition, the Mayor recommends that B2 and B8 uses are prioritised over B1c, to support these types of essential industrial activity.	Not stated

R19.0177	Strategic and Development Management Policies			Policy B2: New business floorspace	Greater London Authority/Mayor of London	Statutory consultee	While the Mayor supports the new LSIS 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 rational for selecting these sites, as per requirements contained in Local Plan Policy E6.	Support
R19.0177	Strategic and Development Management Policies			Policy B4: Affordable workspace	Greater London Authority/Mayor of London	Statutory consultee	The council should consider extending affordable workspace requirements to B1c uses, to recognise the breadth of businesses and industries across the borough.	Not stated
R19.0177	Strategic and Development Management Policies			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	Office floorspace should be directed to Islington's town centres and the CAZ, in line with London Plan policy E1. Islington could consider whether any development pressure in the LSIS merits preparing a masterplan to ensure the retention, intensification and increase in industrial floorspace in line draft new London Plan E7.	Not stated
R19.0177	Strategic and Development Management Policies			Policy H12: Gypsy and Traveller Accommodation	Greater London Authority/Mayor of London	Statutory consultee	The Mayor welcomes that the Council is using the new definition for gypsies and travellers, notes the need identified and encourages the Council to review its own estate and and work with neighbouring boroughs to meet that need. Also notes that Mayoral funding is available through the Homes for Londoners Affordable Homes Programme.	Support
R19.0177	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	Figure 1.1 is welcome, which sets out clearly, the extent of the AAP boundary and so too is Figure 1.2 which sets the context of the AAP area in relation to the CAZ, City Fringe OA and the Elizabeth Line.	Support
R19.0177	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Greater London Authority/Mayor of London	Statutory consultee	AAP ambition for the provision of office floorspace (policy BC1) is in line with London Plan policy E1.	Support
R19.0177	Bunhill and Clerkenwell Area Action Plan			Policy BC2: Culture, retail and leisure uses	Greater London Authority/Mayor of London	Statutory consultee	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.	Support
R19.0177	Bunhill and Clerkenwell Area Action Plan			N/A - general comment	Greater London Authority/Mayor of London	Statutory consultee	The AAP responds positively to the opening of the Elizabeth Line station at Farringdon and plans for significantly greater levels of pedestrian movement with measures to facilitate ease of movement and modal interchange are welcome.	Support
R19.0178	Site Allocations	ARCH5: Archway Campus, Highgate Hill	Archway		Peabody	Landowner	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 DH3 and a detailed townscape and heritage assessment.	Support
R19.0178	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	Peabody	Landowner	Peabody request that the residential cycle parking standards are in line with those identified in the Draft London Plan. It can lead to prioritisation of quantity over quality, and result in wasted, underused cycle parking facilities. 20% accessible is excessive, will take more space than standard parking, and oversized bike stores. As cycle facilities are often at ground floor level (where there is no basement facility), it will lead to a reduced amount of active frontage with negative impact on the urban realm. They recommend - Long stay: 1 space per studio or 1 person 1-bed, 1.5 spaces per 2-person 1 bed dwelling, 2 spaces per all other dwellings - Short Stay: 5 to 40 : 2 spaces Thereafter: 1 space per 40 dwellings - Accessible Provision: 5% accessible cycle parking spaces must be provided, keeping the 25% - 75% split	Object
R19.0178	Strategic and Development Management Policies			Policy DH3: Building heights	Peabody	Landowner	As set out in Peabody's previous representations, it is considered that the strategic search approach detailed in Section 5 of the Tall Building Study has enabled areas that may potentially be suitable for tall buildings to be identified across the Borough. The methodology and approach is generally supported, acknowledging that much of the Borough consists of areas of relatively mid-low rise residential townscape likely to be unsuitable for tall buildings and that areas potentially suitable for tall buildings are typically identified centres, opportunity areas and/or areas with high levels of public transport accessibility with a character that in principle could accommodate tall buildings and meaningfully contribute to a legible townscape (as per London Plan Policy 7.7). However, we consider the assessment and identification of site specific locations potentially suitable for tall buildings to be less robust, overly-restrictive and it could unnecessarily hinder potential development in the Borough and in doing so constitute a hurdle to meeting identified development needs. 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 LBI. 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. It is considered that the proposed policy, as it is currently worded, does not recognise that there may be sites other than those specifically stated where tall buildings would be an appropriate response to the surrounding townscape. We therefore suggest that the wording of the part F of this policy is amended to read as follows: "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) on sites within the Spatial Strategy areas where tall buildings are considered appropriate on a site-by-site basis subject to justification against Policy DH3 and other relevant policies"	Object

R19.0178	Strategic and Development Management Policies			Policy SP7: Archway	Peabody	Landowner	<p>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.</p> <p>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 LBI. 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 be 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.</p> <p>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".</p>	Object
R19.0178	Strategic and Development Management Policies			Policy H4: Delivering high quality housing	Peabody	Landowner	<p>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.</p> <p>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).</p>	Object

R19.0178	Strategic and Development Management Policies			Policy H2: New and existing conventional housing, Part F	Peabody	Landowner	<p>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 particularly studio units, can make private sale units accessible for first time buyers. We therefore welcome recognition that some such units may be acceptable.</p> <p>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:</p> <p>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</p> <p>ii. The delivery of additional higher priority unit sizes and/or proposed higher priority units of an increased size is not possible; and</p> <p>iii. Provision of studios/bedsits would result in a high-quality dwelling in accordance with Policy H4 and other relevant design policies."</p> <p>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.</p> <p>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.</p>	Object
R19.0178	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	Peabody	Landowner	<p>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.</p> <p>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.</p>	Object

R19.0178	Strategic and Development Management Policies			Policy H3: Genuinely affordable housing	Peabody	Landowner	At Paragraph 3.44 the draft plan states that “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.” Again, further to our previous representations, Peabody would like to re-iterate 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 viably 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.	Object
R19.0178	Strategic and Development Management Policies			Policy SC1: Social and Community Infrastructure	Peabody	Landowner	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.	Object
R19.0179	Site Allocations	BC4: Finsbury Leisure Centre	B & C: Central Finsbury			Resident	Overdevelopment will blight residents’ physical and mental health, and put much of Burnhill House into fuel poverty. 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 2010 Urban Design Study suggested that development already planned for Bunhill and Clerkenwell would cover the area’s share of the new homes targets.	Object
R19.0180	Site Allocations	HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner; HC3: Highbury and Islington Station, Holloway Road, N5 1RA	Highbury Corner and Lower Holloway		The Canonbury Society	Local society	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. Unconvinced 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.	Support
R19.0180	Site Allocations	HC4: Dixon Clark Court, Canonbury Road	Highbury Corner and Lower Holloway		The Canonbury Society	Local society	Have followed the planning application for the site and look forward to works commencing.	Not stated
R19.0180	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	The Canonbury Society	Local society	Agree with car free, although note that the increase in vehicular trips supplants the reduction in car ownership. They think that cyclists should not be prioritised over public transport users	Both
R19.0180	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	The Canonbury Society	Local society	Agree with policy to extend congestion charge zone to the North circular	Support
R19.0180	Strategic and Development Management Policies			Policy T3: Car-free development	The Canonbury Society	Local society	The Council should embrace ‘smart technology’, setting out a more ambitious objective and policy. This should refer to driverless cars. EVCH could also be made redundant if cars in the future are charged differently	Not stated
R19.0180	Strategic and Development Management Policies			Integrated Impact Assessment	The Canonbury Society	Local society	Broad support with comments on the IIA objectives, baseline information, and assessment of likely effects of Local Plan objectives and GI policies.	Support
R19.0180	Strategic and Development Management Policies			Policy DH2: Heritage assets	The Canonbury Society	Local society	We support the council’s proposed policies and its commitment “to conserve and enhance the significance of heritage assets and their settings and the wider historic and cultural environment”. 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 encroachment 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 2016. We are pleased to see that throughout the draft Local Plan, the importance of conservation areas is highlighted.	Support

R19.0180	Strategic and Development Management Policies			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
R19.0180	Strategic and Development Management Policies			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
R19.0181	Site Allocations	HC3: Highbury and Islington Station, Holloway Road	Highbury Corner and Lower Holloway		The Upper Street Association	Local society	The suggested timescale of 2031/32-2035/36 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 no lifts to the underground to help the disabled. This should be stressed in dealings with TfL.	Not stated
R19.0181	Strategic and Development Management Policies			Appendix 1: 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' signage 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
R19.0181	Strategic and Development Management Policies			Islington in context, paragraph 1.6	The Upper Street Association	Local society	We particularly welcome this introduction as a sensitive description of the importance of the Borough.	Support
R19.0181	Strategic and Development Management Policies			Islington in context, paragraph 1.19	The Upper Street Association	Local society	We ask that there is an express reference to density of population in the beginning of the Draft Plan, to inform the whole. The Office for National Statistics estimated that in 2018 the density of population per square kilometre for Islington was 15817, ahead that is of Tower Hamlets and others. In our view that fact, an unchanged ranking, should inform basic policy decisions, and should be clearly stated early on in the proposed submission.	Not stated
R19.0181	Strategic and Development Management Policies			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 rat-running in surrounding local roads. 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 there, and points to the lavatories at the top of Highbury Fields, a long distance away. b) restoration of Post boxes at Highbury & Islington station to serve the many thousands who pass the hub each week. These were removed in 2014.	Not stated
R19.0181	Strategic and Development Management Policies			Policy H1: Thriving 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
R19.0181	Strategic and Development Management Policies			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
R19.0181	Strategic and Development Management Policies			Policy DH3: Building heights	The Upper Street Association	Local society	Para 8.45. Islington is historically a low-rise but densely built area. We note and accept that policy should optimise development while providing a form of development at a human scale. 'There are significant opportunities to optimise development while providing a form of development at a human scale which is responsive to the surrounding contextual heights across much of the borough.'	Support
R19.0181	Strategic and Development Management Policies			Policy DH4: Basement development	The Upper Street Association	Local society	We welcome this Policy entirely.	Support
R19.0181	Strategic and Development Management Policies			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 demonstrate that there will be no significant adverse effect on local amenity. However, additional pedestrian crossing provision on Liverpool Road is unnecessary and it should be stated there is no provision to close off Liverpool Road or to divert traffic elsewhere.	Both
R19.0181	Strategic and Development Management Policies			Policy R1: Retail, leisure and services, culture and visitor accommodation	The Upper Street Association	Local society	Increased footfall as the result of promoting the night time economy and pubs requires more adequate provision of public toilets. Future licensing of pubs and bars should be expressly linked to adequate provision of in-house facilities.	Object
R19.0181	Strategic and Development Management Policies			Integrated Impact Asssment	The Upper Street Association	Local society	Comments on the IIA and welcome the baseline comments on townscape and cultural heritage, notes the deprivation, however notes that some of the environmental and pollution data may need updating.	Object
R19.0181	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices	The Upper Street Association	Local society	Prioritisation of pedestrians and public transport is welcome	Support
R19.0182	Site Allocations	BC50: Queen Mary University, Charterhouse Square Campus	B & C: Historic Clerkenwell		Queen Mary University of London	Landowner	Welcome the allocation in principle and are supportive of the proposed uses. Given the constraints on the site it is considered that allowing the expansion of research activity at the campus is more important than retaining student accommodation on site. QMUL feel that the creation of a pedestrian link through the campus is not deliverable, mainly due to safety concerns for their staff, and request that this is removed from the development considerations.	Support

R19.0182	Strategic and Development Management Policies			Policy SP1: Bunhill & Clerkenwell	Queen Mary University of London	Landowner	The Charterhouse Square Campus is located within the Bunhill and Clerkenwell area for which a separate Area Action Plan ('AAP') is currently being consulted on. Further detailed comments on the overall strategy for the Bunhill and Clerkenwell Area are set out in these representations.	Not stated
R19.0182	Strategic and Development Management Policies			Policy B2: New business floorspace	Queen Mary University of London	Landowner	QMUL supports the principle of the uses outlined in part A (i) of policy B2, and requests clarity that medical research uses (B1b) are captured within this policy and explicitly referenced.	Both
R19.0182	Strategic and Development Management Policies			Policy B4: Affordable workspace	Queen Mary University of London	Landowner	QMUL 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. QMUL states that there are clear differences in the viability of delivering workspace between b-class categories and that policy should consider these.	Not stated
R19.0182	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	Queen Mary University of London	Landowner	Have queried that the policy is contrary to London Plan policy on 'meanwhile use'.	Object
R19.0182	Strategic and Development Management Policies			Policy H6: Purpose-built Student Accommodation	Queen Mary University of London	Landowner	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.	Object
R19.0182	Strategic and Development Management Policies			Policy H2: New and existing conventional housing	Queen Mary University of London	Landowner	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.	Object
R19.0182	Bunhill and Clerkenwell Area Action Plan			Policy BC1: Prioritising office use	Queen Mary University of London	Business	Support BC1 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 BC1, if applied to the QMUL site would compromise the ability to provide education and research facilities. QMUL request an amendment to state that other medical and research uses (B1(b)) be included within the policy wording of BC1 part Dii 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.	Both
R19.0182	Bunhill and Clerkenwell Area Action Plan			Policy BC8: Historic Clerkenwell	Queen Mary University of London	Business	As with previous representations QMUL 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 WHRI and create a public thoroughfare through a closed research centre. The site needs to be able to be locked down due to the nature of the research that takes place there.	Both
R19.0183	Site Allocations	N/A - general comment	N/A		TfL City Planning	Statutory consultee	TfL City Planning have 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.	Not stated
R19.0183	Strategic and Development Management Policies			Appendix 3: Transport Assessments and Travel Plans	TfL City Planning	Statutory Consultee	Travel Plans - please use this URL in Appendix 3 footnotes: https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants . TfL request contact details of an officer to attend travel plan guidance working group.	Not stated
R19.0183	Strategic and Development Management Policies			Appendix 4: Cycle parking standards	TfL City Planning	Statutory Consultee	Innovative spatial approach is welcome, but would welcome further discussions 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	Both
R19.0183	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport, Part D	TfL City Planning	Statutory Consultee	The Mayor's Transport Strategy (MTS) targets should be included up front and referenced. The Mayor recognises Islington's potential to achieve higher mode share targets. Islington will need 83 per cent mode of residents' journeys to be on foot, cycle and public transport mode in 2021 and 89 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.	Not stated
R19.0183	Strategic and Development Management Policies			Policy T1: Enhancing the public realm and sustainable transport	TfL City Planning	Statutory Consultee	Please use a capital 'A' for approach and cross-reference the Healthy Streets wheel diagram as previously requested.	Not stated
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part B	TfL City Planning	Statutory Consultee	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'	Not stated
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part C	TfL City Planning	Statutory Consultee	It seems that the section on Shared space in supporting text has been removed	Not stated
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part C	TfL City Planning	Statutory Consultee	Happy with the new shared space policy. However would like to add 'uniform flat' for the single surface, as 'where it involves a single uniformly flat surface'.	Not stated
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part E	TfL City Planning	Statutory Consultee	Please add that cycle stores and parking must be highly visible	Not stated
R19.0183	Strategic and Development Management Policies			Policy T2: Sustainable Transport Choices, Part E	TfL City Planning	Statutory Consultee	Please add E. (v) supporting the maintenance and expansion of the TfL Cycle Hire network, at a level proportionate to the size of the development' This would align with the critique of dockless bikes sometimes causing street clutter at Paragraph 7.20.	Not stated
R19.0183	Strategic and Development Management Policies			Policy T3: Car-free development, Part G	TfL City Planning	Statutory Consultee	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 T6.1 G (3% 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 10.6. The temporary use of bays as parklets or cycle storage is supported.	Both
R19.0183	Strategic and Development Management Policies			Policy T3: Car-free development, Part H	TfL City Planning	Statutory Consultee	TfL does not support car clubs in the CAZ, which have impacts in terms of road danger and congestion, and number of trips. Car clubs should only be acceptable in area of low PTAL (less than 4). Any car club spaces should have active charging facilities.	Object

R19.0183	Strategic and Development Management Policies			Policy T3: Car-free development, Part J	TfL City Planning	Statutory Consultee	Clarify that on street charging points for existing on street parking should be located on the main carriageway and not on the footway, in a safe and convenient place that does not impede pedestrian or cycle movements and desire lines as demonstrated in section 7.28. Please add that 'charging points should ideally be located off the main footway, in safe convenient places that do not impede pedestrian or cycle movements or desire lines.'	Not stated
R19.0183	Strategic and Development Management Policies			N/A - general comment	TfL City Planning	Statutory Consultee	Paragraph 2.4, now on page 23, remains negatively worded despite now acknowledging the need for joint working with Hackney in relation to Dalston town centre and other areas. Specifically, Tfl requests this amendment: <i>'Some parts of Islington, particularly those areas adjacent to the borough boundary, may experience change by virtue of significant development in other boroughs. Islington is committed to working with other boroughs and relevant stakeholders to deliver such development while preventing/mitigating impacts for both Islington residents and businesses and other Londoners and the rest of London. Of particular relevance is joint working with the London Boroughs of Hackney (with regard to Dalston Town Centre, Finsbury Park Town Centre and the City Fringe/Shoreditch area), Camden (with regard to King's Cross) and Haringey (with regard to Finsbury Park Town Centre).'</i>	Object
R19.0183	Strategic and Development Management Policies			Policy SP4: Angel and Upper Street	TfL City Planning	Statutory Consultee	Paragraph 2.52 still states that Crossrail 2 'will not be delivered until the end of the plan period at the earliest'. We therefore again suggest this is rephrased, as: 'Crossrail 2 is due to open in the 2030s'.	Object
R19.0183	Strategic and Development Management Policies			Policy ST3: Telecommunications, communications and utilities equipment	TfL City Planning	Statutory Consultee	Can the following text please be added to ST3 sub-section C: 'Applications for mobile phone network development must demonstrate that they have followed and are in accordance with the Code of Best Practice on Mobile Network Development in England or subsequent similar guidance, and the latest TfL Streets toolkit guidance.'	Object
R19.0184	Strategic and Development Management Policies			Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Resident	Business	The respondent has been a long term homeowner in Islington and set up two businesses in the borough. Now lives in Camden, within near proximity to the Vale Royal/Brewery Road LSIS. The respondent supports the council's decision to protect the area against Tileyard who are seeking to exploit this space by claiming to be a creative industry and not putting back very much in hope of taking out.	Support
R19.0185	Site Allocations	AUS8: 161-169 Essex Road	Angel and Upper Street		Resurrection Manifestations	Landowner	Landowner welcomes some of the amendments to the allocation, which allow more flexibility in terms of acceptable land uses, but objects to the priority given to business, and particularly office, uses on the rear part of the site. State the site sits outside of any of the areas prioritised for business uses in SDMP policy B1, and that residential use would be more in keeping with the surrounding context. Consider D1 uses should be included alongside D2 uses in the allocation, and that the commercial reality is that residential use is necessary to make the refurbishment of the listed building viable. Allocating the site as employment land will significantly constrain the development potential of the site.	Object