

Summary of responses to pre-hearing modifications

May 2021

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Summary of responses on modifications to Strategic and Development Management Policies

Reg 19 ID	Pre hearing modification response ID (PHM)	Modification reference	Policy reference and name	Paragraph reference	Organisation (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
N/a	1	N/a	N/a			Resident	Respondent suggests restrictive policies are frustrating economic development of numerous properties and sites. Policies should encourage development.	Object	<p>This representation does not respond to the proposed modifications.</p> <p>The employment policies set out in the proposed Local Plan are underpinned by a vision to create an inclusive economy. In ensuring an adequate supply of business floorspace to meet employment growth projections, jobs in the borough can be created and sustained. Business floorspace policies allow flexibility for other uses where it can demonstrated that there is no demand for existing business uses. In addition, the introduction of class E will allow further flexibility of uses in existing commercial premises.</p>
N/a	3	N/a	N/a			Resident	Respondent makes reference to housing need and need for family accommodation as well as reference to acceleration of working from home trend resulting from the pandemic. Also attaches a document which provides various data on housing including occupancy, overcrowding, price and homeworking.	Object	Respondent has not responded to a specific pre hearing modification. Evidence for housing need is set out in the Strategic Housing Market Assessment. Two-bed units are considered the most suitable in general terms as they can accommodate a broad range of need including families. The size mix policy is flexible and can accommodate different mixes dependent on evidence of need. Two-bed units can provide important accommodation for families, even those with more than one-child. We note that the SHMA, in figure 63, shows that only 11% of Islington households have two or more dependent children.
N/a	3	N/a	N/a			Resident	Respondent makes reference to issues of wind blight in Archway in relation to site allocation ARCH1 and potential of site for tall building.	Object	This representation is not related to the proposed modifications. If there is a part of the redevelopment that has not been built according to submitted plans this is something that can be raised as a planning enforcement issue.

Reg 19 ID	Pre hearing modification response ID (PHM)	Modification reference	Policy reference and name	Paragraph reference	Organisation (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
N/a	7	SDM-MO732	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site			Landowner	The respondent finds that the text in Policy SP3 '... including Sui Generis uses akin to these industrial uses. Light industrial is now part of Class E and continues to be sought in the LSIS. For proposals involving light industrial floorspace, the Council will use conditions to limit Class E for this specific purpose and to protect the primary industrial function of the LSIS.' is not a lawful interpretation of the Use Class system. There are no subsections of Class E. Class E is its own use class and cannot be separated into further uses, as per the suggestion below in the Policy SP3. The policy is therefore not sound. Either Class E is permitted (allowing all former use classes now amalgamated into that class) or the policy should just be looking to secure General Industrial B2 and Warehouse B8 within the Vale Royal LSIS.	Object	The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the London Plan, including 'clean' industrial activities that provide for the expanding Central London business market. Light industrial uses are key to the functioning of the LSIS and are often found in combination with other more traditional industrial uses in B2 and B8 use classes, therefore, it is difficult to separate these. Other uses within Class E are not of industrial nature and their sudden increase in a well-established industrial cluster such as the LSIS as it can harm its principal economic function. The use of conditions in this context is considered to be proportionate and justified.
N/a	18	N/a	N/a			Resident	Respondent questions if a cycle route could be proposed from Highbury Corner to Canonbury/Old Street (down Canonbury Road) to potentially connect with Q2.	Neither	<p>Islington has been delivering a number of cycle routes and low traffic neighbourhoods since the start of the pandemic as part of the borough wide people-friendly streets programme.</p> <p>Currently there is a cycle route from Highbury Corner to Q2 and Old Street, delivered through the Canonbury West and Canonbury East low traffic neighbourhoods. It then connects onto the St Peter's and Amwell low traffic neighbourhoods, as well as the Hoxton West low traffic neighbourhood in Hackney.</p> <p>The low traffic neighbourhoods connect to create safe and enjoyable cycle routes. In addition, new cycle lanes such as Liverpool Road (Cycleway 38), Green Lanes and York Way provide new north/south connections.</p> <p>It is also worth noting that the Local Plan by itself will not deliver cycles routes, although key cycling connections are identified.</p>
R19.0161	25		N/a		Natural England	Statutory consultee	No comments	Neither	N/A
R19.0070	26		N/a		Highways England	Statutory consultee	Respondent has reviewed the three Local Plan documents and given the distance from the nearest SRN (strategic road network) they are satisfied that the outcome of the consultation will not materially effect their safety, reliability or operation.	Neither	N/A

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N/a	27	SDM-MO48	N/a	4.9		Resident	Respondent considers there will no longer be a life sciences link between Kings Cross and Moorfields once the eye hospital moves to Kings Cross.	Object	Paragraph 3.9 of the Bunhill and Clerkenwell AAP notes that the institutions are looking to relocate to alternative site north of King's Cross.
R19.007 1	29	SDM-MO124, SDM-MO126, SDM-MO127, SDM-MO128	S9 Integrated Water Manageme nt and Sustainable Drainage and S10 Circular Economy and Adapted Design	6.118 and 6.147	Environment Agency	Statutory consultee	Environment Agency welcomes the modifications made in response to their comments on the Strategic and Development Management Policies document submitted to the Planning Inspectorate in February 2020.	Support	Support noted.
R19.014 2	30	SDM-MO45	Policy B1: Delivering business floorspace		LaSalle Investment Management	Landowner	Respondent objects to reference to sui generis uses which are priority uses and considers this is not defined	Object	There is extensive evidence in support of the proposed policy approach which seeks to safeguard and intensify the designated LSIS for industrial uses. The wording makes clear that industrial uses are the priority in these specifically designated areas and enhances protection of these functions.
R19.014 2	30	SDM-MO50 SDM-MO53	Policy B2: New business floorspace		LaSalle Investment Management	Landowner	Respondent considers the inclusion in policy / supporting text repeats policy elsewhere in the local plan	Not stated	The new clause provides an important cross-reference and clarifications for specific proposals that involve significant increases in vehicle movement.
R19.014 2	30	SDM-MO56	Policy B3: Existing business floorspace		LaSalle Investment Management	Landowner	Respondent suggest that not all sites should be required to undertake marketing for all E class uses.	Object	Since the UCO changes, now most existing premises have the option of a range of class E rights, therefore, it is important to assess if there will be demand for class E more generally in the future, in addition to the specific use. The government introduced Class E to help commercial premises adapt to changing market conditions. The modification proposed in Appendix 1 provides flexibility if some class E uses aren't considered appropriate where this is justified.
R19.014 2	30	SDM-MO58	Policy B4: Affordable Workspace		LaSalle Investment Management	Landowner	Respondent supports that affordable workspace requirement does not apply to industrial development	Support	Support noted.

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R19.014 2	30	SDM-MO135	Policy T5: Delivery, Servicing and Construction		LaSalle Investment Management	Landowner	Respondent objects to inclusion of requirement for prioritisation of non-motorised sustainable transport modes as it could be applied to industrial uses which is considered onerous to restrict types of delivery vehicles and could be a disincentive to investment in industrial space.	Object	Further policy background is available in SDM-MO13. The policy applies to industrial developments as well. Applicants need to demonstrate they have maximised what trips can be done via sustainable, non-motorised and active travel modes. This will be part of the transport assessment. Investigating freight consolidation and non-motorised, sustainable transport can help to reduce transport related costs for businesses. Indeed, freight consolidation entails using less lorries, less time per delivery trips and less costs relating to multiple trips, making transport more efficient. Non-motorised and sustainable modes can also be exempt from parking permits and have much lower energy consumption, which can again reduce transport-related costs for businesses. Finally, using more nimble forms of transport such as cargo cycles for small deliveries is not only cost efficient, it is also a quicker transport mode, reducing journey times and associated transport costs.
R19.014 2	30	SDM-MO136 SDM-MO137	Policy T5: Delivery, Servicing and Construction		LaSalle Investment Management	Landowner	Respondent objects to the requirement to demonstrate opportunities to maximise more non-motorised transport modes for delivery and servicing as an unrealistic expectation for industrial operations, as the use of vehicles for deliveries and servicing is integral to their operations.	Object	The policy does not to preclude the use of vehicles for deliveries and servicing. Applicants are expected to set out how they have sought to facilitate sustainable freight movement and how opportunities for non-motorised forms have been explored and maximised, and the Council do not consider this constitute an 'unrealistic expectation'.
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent objects to the policy resistance to hot food takeaways within 200m of a school considering it an exclusion zone.	Object	Response does not address modifications. The 200m school HFT exclusion zone is not inconsistent with national policy and already features in the current Local Plan. The New London Plan implements a 400m school exclusion zone, making Islington's approach proportionate to Islington's small borough size. The policy uses different thresholds depending on the size of the LSA to ensure consistency and in town centres no specific restriction for HFT uses are deployed. The policy is based on extensive, comprehensive and locally defined evidence which seeks to take a positive approach to tackling the severe obesity problem in the borough and cultivating a vibrant and healthy urban environment.

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N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent cites practical impacts, variability of school rules, negative land use consequences and limitation in Local Shopping Areas as well as lack of support in NPPF framework.	Object	<p>Response does not address modifications.</p> <p>Planning policy is not able to influence school rules and it would be inappropriate to put all the onus on schools to tackle health issues when planning has the ability to influence this too. Furthermore, although some schools rightly allow their students out at break/lunch a major part of the fast food consumption is after school. It is unlikely many students within Islington will be driving to school. Based on the evidence, policies that restricts the opening of new hot food takeaways within 200m of schools (a distance considered to be equivalent to a five-minute walk), tackling overconcentration of hot food takeaways, and requiring robust health impact assessments for applications of hot food takeaways near to sensitive uses would be helpful in supporting the wide range of programmes that aim to tackle overweight and obesity among residents. The 4% of total units in HFT use seeks to restrict HFT uses to maintain their predominant retail function and because LSAs are more susceptible to impacts where HFTs are clustered.</p>
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent suggests that the approach is not positive and does not seek to meet the development needs of the area.	Object	<p>Response does not address modifications.</p> <p>The 200m school A5 exclusion zone is not inconsistent with national policy and already features in the current Local Plan. The Draft New London Plan 2018 implements a 400m school exclusion zone, making Islington's approach proportionate to Islington's small borough size. The policy uses different thresholds depending on the size of the LSA to ensure consistency and in town centres no specific restriction for A5 uses are deployed. The failure of other boroughs policies is no reason for Islington not to attempt getting this policy through due to it being based on locally distinctive evidence and part of a package of measures. The policy is based on extensive, comprehensive and locally defined evidence which seeks to take a positive approach to tackling the severe obesity problem in the borough and cultivating a vibrant and healthy urban environment.</p>

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N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent considers that there is a lack of evidence produced to demonstrate the link between fast food, school proximity and obesity.	Object	<p>Response does not address modifications.</p> <p>We note Paragraph 91 of the NPPF states that 'planning policies should enable and support healthy lifestyles especially where this would address identified local health and wellbeing needs'. National PPG provides clarity on paragraph 91, noting that local planning authorities could limit the proliferation of certain use classes in identified areas, including in proximity to locations where children and young people congregate such as schools, community centres and playgrounds. PPG also advocates consideration of over-concentration and clustering of certain use classes within a specified area.</p> <p>A 200m school exclusion zone is not a blanket ban across the whole borough but is instead a restriction on sensitive locations. The adopted Local Plan includes this policy requirement, hence providing a direct local example that such a policy can be adopted as part of a sound plan, consistent with national policy. We note that the London Plan advocates a 400m restriction. Due to Islington's context and size, we have taken a pragmatic approach to this threshold, as a 400m restriction would be an effective ban.</p>
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent considers that the approach is a blanket ban on hot food takeaways which discriminates against proposals for hot food takeaways and not other premises which sell foods, also notes that food can be delivered.	Object	<p>Response does not address modifications.</p> <p>We recognise that non-HFT Sui Generis uses can provide unhealthy products. Focusing on Sui Generis HFT uses means it is crystal clear how the policy would be implemented; extending the policy to Class E uses would create difficulties with implementation envisaged by the respondent, due to the broadness of these use classes. Policy R8C explicitly requires Healthy Catering Commitment for non-Sui Generis HFT uses selling food and drink.</p> <p>The tests of soundness set out in the NPPF (Feb 2019) paragraph 35 states that plans will be justified if they are an appropriate strategy; the wording cited by the respondent (most appropriate strategy) is from the NPPF 2012 although they have cited the correct paragraph number from the NPPF2019.</p> <p>Schools are open for a significant part of the year, certainly enough to generate unhealthy lifestyle choices that would be likely to continue during those times pupils are not at school.</p> <p>A 200m school exclusion zone is not a blanket ban across the whole borough but is instead a restriction on</p>

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									<p>sensitive locations. The adopted Local Plan includes this policy requirement, hence providing a direct local example that such a policy can be adopted as part of a sound plan, consistent with national policy.</p> <p>We note that the London Plan advocates a 400m restriction. Due to Islington's context and size, we have taken a pragmatic approach to this threshold, as a 400m restriction would be an effective ban.</p> <p>Appendix 2 of the respondents submission references various pieces of research purportedly in support of McDonalds views. We note that this is taken verbatim from the McDonalds response to the SPD submitted in September 2015. The SPD consultation statement provides a detailed response to these points. We note that the respondent has not cited any additional research produced in the intervening 5 year period.</p>
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent considers that there is a lack of evidence produced to demonstrate the link between fast food, school proximity and obesity.	Object	<p>Response does not address modifications.</p> <p>The 200m school HFT exclusion zone is not inconsistent with national policy and already features in the current Local Plan. The Draft New London Plan implements a 400m school exclusion zone, making Islington's approach more lenient and proportionate to Islington's small borough size. The policy uses different thresholds depending on the size of the LSA to ensure consistency and in town centres no specific restriction for HFT uses are deployed. The policy is based on extensive, comprehensive and locally defined evidence which seeks to take a positive approach to tackling the severe obesity problem in the borough and cultivating a vibrant and healthy urban environment.</p> <p>The PHE report is clear that, even without current evidence that policies have had an effect, there is a strong theoretical argument for restrictions. In addition, the report goes on to note several additional reasons for why fast food outlets may be undesirable from a public health perspective, including increase in litter and traffic congestion. We note that PHE published updated guidance in March 2017 which highlights that planning documents and policies to control the over-concentration and proliferation of hot food takeaways should form part of an overall plan for tackling obesity and should involve a range of different local authority departments and stakeholders. It also specifically encourages local planning authorities to restrict planning permission for takeaways and other food retail outlets in specific areas, such as within walking distance of school. The changes to PPG align with this updated PHE guidance.</p>

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									<p>The full quote from the Oxford University research is as follows: "Overall, this review did not find strong evidence at this time to support policies aimed at regulating food environments around schools. However, given that food retailing is already influenced by a number of other policy drivers (related to economics, antisocial behaviour, litter and pollution, food hygiene, etc.), it is important that broader public health evidence is also considered."</p> <p>The council acknowledge in the draft plan, paragraph 4.104 that the 200m restriction is part of a package of measures, and this is fully consistent with national guidance. The reference to Waltham Forest is an isolated example. The respondent considers that the increase in obesity means it is clear that school restrictions don't work, but this cannot be reasonably concluded from the evidence.</p>
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent cites other boroughs where similar policies have been found unsound	Object	<p>Response does not address modifications.</p> <p>As with various other sections of the response, comments are recycled from earlier comments on the SPD, and hence is covered in the SPD consultation statement (and repeated below). In this case, comments on South Ribble and Brighton are the same as previously submitted.</p> <p>The respondent misquotes from source material. As the full quote shows, the inspector's concern about the evidence base stems from the fact that the policy was introduced at a late stage after examination hearings. The inspector's comment re: difficulty assessing likely impacts related to a lack of mapping to show the geographic crossover of designated centres and the 400m exclusion zones.</p> <p>The inspector also points out an inconsistency with the policy, that the proposed modifications to the policy only target designated Centres within 400m of a school, and a hot food takeaway could be located within 400m of a school outside of those defined areas; it can be inferred from this that a fully restrictive exclusion policy (encompassing all areas within a prescribed exclusion zone) could be suitable. The inspector clearly accepts that such a policy would be suitable in principle, dependent on evidence.</p> <p>The quote from the Brighton research – that newsagents and supermarkets are equally as influential on the unhealthy choices of pupils – is not a conclusion that can be applied uniformly in other areas; it is a summary of key findings in relation to secondary schools in Brighton</p>

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									<p>and Hove. As noted above, the Brighton research paints a picture very specific to Brighton. The methodology used to ascertain the impact of hot food takeaways on secondary schools in the area is limited, and reliant on a single observed visit to each school; the report recognises this, noting that observations are “therefore approximate and may not be typical.”</p> <p>As noted in the SPD consultation statement, there are a number of LPAs (Lewisham, Lambeth, Wandsworth and Hackney, as well as Islington) who have successfully adopted policies restricting HFTs near schools. This is a significant proportion of London boroughs - there may be more boroughs with adopted policies. Importantly, the policies have been upheld on appeal, evidenced by decisions in Islington and Lewisham.</p> <p>The 4% restriction in LSAs is based on considerations of health and wellbeing impacts and the resulting balance of uses that may be harmful, particularly vitality and viability considerations.</p>
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	Respondent suggests amendments to policy approach including removal of 200m approach, removal of condition re healthy catering and clarification that % restriction in LSA should be made on a case by case basis	Object	<p>Response does not address modifications.</p> <p>Refer to responses above. Obesity is a multi-faceted issue and one that can only be tackled through multiple interventions.</p>
N/a	32	N/a	Policy R8: Location and Concentration of Uses		McDonald's Restaurants Ltd	Business	respondents concludes by supporting healthier objectives but does not consider the approach sound way to achieve objectives and is not supported by evidence	Object	<p>Response does not address modifications.</p> <p>Please refer to responses above.</p>
R19.0139	37	N/a	SP2: King's Cross and Pentonville Road		Canal and River Trust	Statutory consultee	The representor wants the policy related to residential moorings changed so that it allows some adverse impact on leisure provision, provided it can be mitigated.	Object	Please see Regulation 19 response on this issue.
R19.0139	37	N/a	Policy S7: Improving Air Quality		Canal and River Trust	Statutory consultee	The representor wants reference to the impact of overshadowing added to policy S7, and that the impact can be mitigated by installation of electric bollards alongside the development. (overshadowing effects efficiency of solar panels on boats).	Object	The Council recognises that overshadowing of the canal space should be considered in development proposals, however the Council consider that overshadowing impacts of development are adequately addressed in policy PLAN1.
R19.0139	37	N/a	Policy T4: Public Realm		Canal and River Trust	Statutory consultee	The representor wants microclimate, sunlight, and heritage value included as considerations in public realm design.	Object	The Council recognise that microclimate, sunlight, and heritage value are considerations in public realm design however this is addressed other policies, particularly PLAN1, DH1, and DH2.

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R19.0139	37	N/a	Policy DH1: Fostering innovation while protecting heritage		Canal and River Trust	Statutory consultee	The representor requests that the canal is included specifically as a heritage asset so it can be protected under DH1	Object	As set out in our regulation 19 response: Part J. of SP2 states: "King's Cross has a distinct character, and the area contains a number of heritage assets, including the Regent's Canal and a number of listed buildings. The area's character will be protected and enhanced, with high quality design encouraged to respect the local context of King's Cross and its surroundings."
R19.0139	37	N/a	Policy ST1: Infrastructure Planning and Smarter City Approach		Canal and River Trust	Statutory consultee	Disappointed to see that suggestions made in relation to canal enhancement opportunities were not included in Policy ST1, would like them included.	Object	The Infrastructure Delivery Plan update is intended to be a living document with regular updates supported by information from infrastructure providers like Canal and River Trust. The Council will consider the canal network improvements in future reviews of the infrastructure plan.
R19.0106	39	SDM-MO7	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site		Home Builders Federation	Business	Respondent suggest that the Council is seeking to nullify the intention of Class E and Class MA permitted development rights in respect to class E light industrial uses and that this might create uncertainty for potential developers.	Object	The recently announced PD rights which will allow change of use from Class E to residential are separate to the approach to class E reflected in the proposed modification, where we are looking to secure specific uses to help meet identified development needs. Securing light industrial uses within class E will not impact on the utilisation of class MA rights. Prior approval is not required for changes within use Class E.
R19.0106	39	SDM-MO31	Policy H1: Thriving Communities		Home Builders Federation	Business	Respondent observes that a housing trajectory is not part of the strategic plan	Object	An up-to-date housing trajectory has been published alongside the submission documents. This has subsequently been updated and published alongside the pre hearing modifications. The Council have not included the trajectory within the Local Plan itself, given that the Local Plan is a 15-year document and the trajectory would quickly become out-of-date upon receipt of new information. However, each new housing trajectory would be relevant to the Local Plan, as noted in paragraph 10.5 of the Strategic and Development Management Policies DPD.
R19.0106	39	SDM-MO36	Policy H7: Meeting the needs of vulnerable older people		Home Builders Federation	business	Further to Regulation 19 response respondent consider policy has not been revised to support the provision of older persons housing using the indicative benchmark in the London Plan of 60 units per annum.	Object	As noted in previous response to regulation 19 consultation response The policy does not preclude specialist older persons housing, it prioritises conventional housing adaptation as the prime method of meeting the need for older peoples accommodation. Policy H7 provides detailed criteria which specialist accommodation will be assessed against. The specialist housing topic paper provides further discussion on this and includes evidence from Islington's Adult Social Services department to support policy approach.

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R19.0106	39	SDM-MO51	Policy B2: New Business Floorspace	new paragraphs	Home Builders Federation	Business	Respondent suggest that the Council is seeking to nullify the intention of Class E and Class MA permitted development rights in respect to class E observing that an article 4 direction is available to the council as a means to disapply permitted development rights. In addition makes point about strategic housing delivery and London more generally not meeting its housing targets. Makes point about importance of small sites to Islington's delivery and suggests Islington has been unable to identify sufficient land to meet 10% NPPF requirement.	Object	The respondent is confusing two recent changes to the planning system, the introduction of Class E and proposed Class MA PDR. The council cannot apply conditions to Permitted Development Rights. The modification is about the impacts of Use Class E which is separate to Class MA permitted development rights. As noted in the Site Allocations DPD paragraph 1.30-1.31, 14% of Islington's housing requirement over the plan period is identified on allocations of one hectare or less; this is consistent with the NPPF.
R19.0106	39	SDM-MO73	Policy R1: Retail, leisure and services, culture and visitor accommodation	4.68 new paragraph	Home Builders Federation	business	Respondent suggest that the Council is seeking to add to prior approval requirements set out in respect to Class MA permitted development rights.	Object	The respondent is confusing two recent changes to the planning system, the introduction of Class E and proposed Class MA PDR. The council cannot apply conditions to national Permitted Development Rights. The modification is about the impacts of Use Class E which is separate to Class MA permitted development rights.
R19.0106	39	SDM-MO76	Policy R2: Primary Shopping Areas		Home Builders Federation	Business	Respondent suggest that the Council is adding 3 additional months to prior approval requirements set out in respect to Class MA permitted development rights.	Object	The respondent is confusing two recent changes to the planning system, the introduction of Class E and proposed Class MA PDR. The modifications have no impact on Class MA permitted development rights.

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R19.0106	39	SDM-MO115	Policy S5: Energy Infrastructure		Home Builders Federation	business	Respondent considers definition of larger minor developments as imprecise and policy requirement for larger minors to have communal heating systems will militate against delivery of smaller sites. Considers policy to be contrary to the London Plan.	Object	<p>The policy requirement for larger minor new-build developments to have a communal heating system where feasible was included in the Regulation 19 submission of the Strategic and Development Management Policies in September 2019. This includes the wording 'where feasible' which means that the feasibility of a communal heating system for such sites will be assessed on a case-by-case basis, taking into consideration factors such as development type and size, as well as the proximity of the development to an existing or committed heat network.</p> <p>This policy seeks to ensure that larger minor developments located very close to an existing or committed heat network can connect to it. In order to connect to a heat network the larger minor will have to install a communal heating system. In addition, communal heating systems with a central heat pump can often offer better control of the system flow temperature compared to an individual heat pump within a dwelling. Heat pumps perform better at lower flow temperatures so being able to control the flow temperature more carefully will result in a more efficient heating system.</p> <p>The modification to add a new Part C to Policy S5 seeks to clarify the policy approach to larger minor new-build developments following amendments to Part D (formally Part C) and also specifies that such developments should select a heat source in accordance with the heating hierarchy in Part A of the policy.</p> <p>'Larger minor' new-build developments are defined clearly in paragraph 6.61 of the supporting text for Policy S5 as 'developments involving five units or more, or 500sqm of floorspace or more.'</p> <p>The role of the local plan is to consider both major and minor developments, while the London Plan generally only considers referable major applications. Paragraph 9.3.3 of the London Plan discusses existing heat networks and the role of combined heat and power (CHP) systems. This paragraph does not refer to communal heating systems. Policy SI 3 of the London Plan supports the use of communal heating systems.</p>

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R19.0106	39	SDM-MO116	Policy S5: Energy Infrastructure		Home Builders Federation	Business	Respondent considers the modification sets out a requirement for air source heat pumps to be fitted in all new homes by 2021 and states that this is unfeasible. Respondent states that this requirement is unnecessary as is dealt with by the Building Regulations and refers to government's proposed changes to the Building Regulations through the Future Homes Standard and the intention that new homes will be future-proofed with low carbon heating and high levels of energy efficiency.	Object	<p>The amendment to Part D (formerly part C) of Policy S5 requires minor new-build developments with an individual heating system to prioritise low carbon heating systems and does not specifically require Air Source Heat Pumps (ASHPs). The use of ASHPs will be considered by the council on a case-by-case basis. New paragraph 6.69 of the supporting text states that ASHPs are the most appropriate low carbon heating system for use in minor new-build developments, but that certain requirements must be met for their use to be acceptable, particularly in relation to fabric energy efficiency. Further details have been set out in the Sustainability Topic Paper.</p> <p>The government has proposed to implement the Future Homes Standard in 2025 and a full technical specification is still being developed. Islington's policies will ensure that minor new-build developments in Islington prioritise low carbon heating systems as soon as possible as part of the aim to achieve net zero carbon emissions from development in the borough by 2050. This will also help to avoid the need for future retrofitting.</p>
R19.0162	40	SDM-MO157	N/a		Theatres Trust	Campaign	Notes that cinemas and theatres are sui generis uses and not Class E	Object	It is accepted that cinemas and theatres are Sui Generis use. Theatres and cinemas have been included within this section as the nature of their use and need for cycle parking is comparable to leisure and sports facilities.
R19.0119	44		N/a		Sport England	Statutory consultee	No comments	N/a	No comment necessary
R19.0135	45		N/a		Groverworld Ltd	Developer	Introduces representations which notes the changes to policy which respond to class E and consider them to be inappropriate. Considers use of conditions will not meet the six tests for using conditions and does not consider that it is 'relevant to planning' or 'reasonable' for the Council to control, by condition, changes of use within Class E, which do not constitute development.	Object	Paragraph 1a confirms that a relevant planning application means an application for planning permission or permission in principle. Paragraph 1A confirms that 'the use of that building or that other land, or if specified, the use of part of that building or the other land ("part use"), for any other purpose of the same class is not to be taken to involve development of the land'. It is noted that the 1987 regulations state '3.—(1) Subject to the provisions of this Order, where a building or other land is used for a purpose of any class specified in the Schedule, the use of that building or that other land for any other purpose of the same class shall not be taken to involve development of the land.' Paragraph 1A does not confirm anything new and conditions have been used to limit use within a use class before the advent of Class E. Further to this the explanatory memorandum sets out that 'A change of use within a single use class is not considered to be development'. There is a difference here to para 1A, with a reference to a single use class. Class E is made up of seven 'classes' of use listed a to g with sub categories within these.

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R19.0135	45		N/a		Groeworld Ltd	Developer	Considers that the proposed approach runs counter to the governments purpose of Class E as set out in the explanatory memorandum to the 2020 regulations and that the Local Plan cannot appropriately protect or control uses described as sub-categories of Class E.	Object	The council recognises the benefits that the flexibility of Class E may bring to some parts of the borough in the short term however considers that the borough wide application of Class E undermines a plan led system and frustrates the ability of a plan to meet development needs and the implementation of other Local Plan policies (e.g. Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2) is dependent.
R19.0135	45	SDM-MO44	Policy SC1: Social and Community Infrastructure	3.155	Groeworld Ltd	Developer	Considers the approach contrary to Class E where development is required to apply a different approach when it comes forward as opposed to sites where changes occur which are not considered development and change within class E with need for planning permission. Considers that this will deter development from coming forward but also considers that this modification will have a limited effect on the councils ability to control uses within class E.	Object	The response is contradictory on the one hand considering the approach would deter development whilst on the other considering the approach will only have limited effect on controlling uses within Class E. Given the potential issues of not considering the impact of potential loss of social infrastructure in Class E on residents and their needs it is the Council's view that this would be counter to a plan led system and would lead to a plan which did not meet development needs in the borough which would not be in line with Governments own policy set out in the NPPF. Class E covers indoor sport and recreation and health.
R19.0135	45	SDM-MO76	Policy R2: Primary Shopping Areas		Groeworld Ltd	Developer	Considers that the proposed approach is at odds with the national approach and governments aims.	Object	The Council has taken a proportionate tiered approach to development proposals involving Class E. The Retail and Leisure Study identify a need for 11,336sqm of additional retail floorspace by 2036 even assuming the high SFT (special forms of trading) scenario which we are seeing due to the pandemic speeding up SFT. The council considers it is appropriate to utilise planning instruments such as conditions in order to ensure future retail need is met in appropriate locations and sustain the retail function of Primary Shopping Areas.
R19.0135	45	SA-MO16	Policy SA1		Groeworld Ltd	Developer	Objects to proposed wording of SA1 and AAP1 for the reasons previously summarised, and considers that a request for specific evidence should be required from the council in relation to each site allocation to justify the need for this approach.	Object	The proposed modification to policy SA1 clarifies the council's approach to determining development proposals for allocations site in light of the changes to the Use Classes Order. Whilst some allocations are worded flexibly others have specific uses such as offices. Securing these uses will be important for boroughs ability to meet evidenced priority development needs. This is necessary to support the implementation of other Local Plan policies (e.g. Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2).
R19.0135	45	SDM-MO78	Policy R3: Islington's Town Centres		Groeworld Ltd	Developer	Respondent considers that all Class E uses are acceptable within town centres and the requirement for an impact assessment would add an unnecessary level of complexity and risk to the planning process.	Object	Policy R3 requires development in excess of 350sqm to provide an impact assessment. This is double the average size of a town centre ground floor unit in Islington. This provides appropriate flexibility. Class E includes such a broad range of uses that could have significant detrimental impacts on town centres vitality, vibrancy and viability especially for shops, leisure and services. It is therefore appropriate to require impact assessments to assess and mitigate potential impacts where appropriate.

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R19.013 5	45	SDM-MO78	Policy R3: Islington's Town Centres		Groeworld Ltd	Developer	Respondent considers all Class E uses to be suitable in town centres and to carry out an impact assessment is unnecessary level of complexity and risk to planning process. Considers that this will deter development. Considers the 350m threshold to be very low and is inconsistent with other assessments eg Transport Assessment and 1,000sqm threshold. In addition consider more detail is needed as it is unclear what an impact assessment would be required to assess, how it should be carried out and how it would be assessed in making a planning decision.	Object	<p>Policy R3 requires development in excess of 350sqm to provide an impact assessment. This is double the average size of a town centre ground floor unit in Islington. This provides appropriate flexibility whilst enhancing the character and protecting the functions. Although not always the case, floorspace size is a good indication as to the person capacity and ability to draw footfall, significant amenity impacts; output of a business's function. Class E includes such a broad range of uses that some could have significant detrimental impacts on town centres vitality, vibrancy and viability especially for shops, leisure and services.</p> <p>350sqm is not insignificant with 200sqm the average size of a small metro supermarket. Islington is characterised by small shop units so increasing the threshold to 1,000sqm would exclude many units and negate the fact Islington's land supply would more likely see smaller units come forward.</p>
R19.013 5	45	N/a	N/A		Groeworld Ltd	Developer	Conclusion: it not been established through evidence that the proposed approach to Class E is justified nor the most appropriate strategy when considered against reasonable alternatives.	Object	The approach set out in the PHM has been considered alongside a reasonable alternative in the examination IIA.
R19.015 8	46		N/A		Better Archway Forum	Campaign	Respondent comments that commercial units should be protected from converting to residential with more stringent requirements in the core of Archway town centre in order to protect the high street. Where conversion does take place clear direction on frontage design is needed which matches the form of surrounding frontages. Comment is also made on promoting short term rent free periods for start-ups in vacant units.	Neither	The proposed Class MA PD right for conversion from Class E to C3 has not come into effect at the time of this consultation. The PD right has its own set of prior approval criteria. Policy R2 seeks a strategic target of 50% retail use in the Archway PSA which is the retail core of the town centre. Where possible, conversion to residential in the PSA will be refused, especially at ground floor. The Local Plan contains Policy R9 'Meanwhile/Temporary Uses' which encourages temporary use of Class E, F.2 or Sui Generis buildings/sites. Any meanwhile/temporary use consistent with criteria in policy R9 will not count as occupancy for the purpose of continuous vacancy (as required by other Local Plan policies), provided that the total cost of renting the unit for temporary occupants is free or at a very low percentage of the prevailing market rate for similar uses in the area; and the units are let, as a priority, to start-ups or small businesses.
R19.015 8	46		Policy H6: Purpose Built Student Housing		Better Archway Forum	Campaign	Respondent comments that student housing only be permitted on condition that clear evidence of demand is provided due to decreases in student numbers from online study, the pandemic and Brexit.	Object	Respondent has not referred to a modification. Policy H15 Part A of the London Plan states that boroughs should seek to ensure strategic and local need for purpose built student accommodation (PBSA) is addressed, dependent on meeting specific criteria. The Councils adopted policy 2011 restricts student development to two specific locations recognising the need to meet other development needs, the historic

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									delivery in the borough and need to create mixed and balanced communities. The draft Local Plan continues a similar restrictive approach to new student development.
R19.015 8	46		Policy DH3: Building Heights		Better Archway Forum	Campaign	Respondent comments that Policy DH1 Tall Buildings should require impact of wind blight, overshadowing and enclosure to be assessed at the earliest stage. Phase 3 of the tall buildings study is claimed to have lacked explanation or consultation on tall building sites in the north of the borough.	Object	The comments do not relate to proposed pre examination modifications. Policy DH3 part F (xi) requires that the development does not harm the microclimate of the area, which includes wind effects. The tall buildings study does not say that tall buildings are only suitable in the south of the borough. The sites identified as potentially suitable for tall buildings are identified in the tall buildings study.
R19.015 8	46		Chapter 6: Sustainable Design		Better Archway Forum	Campaign	<p>Respondent believes local plan does not include policies to utilise waste heat from underground stations for the borough's heat networks and suggests this should be proposed to serve local homes and hospitals.</p> <p>Respondent recommends that new development should include a carbon footprint calculation that addresses: re-use of demolition materials, low-impact/sustainable materials, operation and maintenance. The carbon emissions from these elements of development should be zero.</p>	Both	<p>The comments do not relate directly to the proposed pre examination modifications. The Council is committed to the future transition to the use of cost-effective secondary sources to power heat networks, including low-grade waste heat. Paragraph 6.10 of the supporting text for Policy S1 explains that practical limitations relating to the use of these sources (such as government direction, available technology and funding requirements) mean that the transition to heat networks powered by secondary sources will ultimately be driven by central government and the evolution of carbon reduction targets through updates to the Building Regulations. A Heat Network Strategy reflecting the current position of heat network development in the borough is being developed.</p> <p>Policy S10 requires all developments to adopt a circular economy approach to building design and construction in order to keep products and materials in use for as long as possible and to minimise construction waste. This policy also requires that all development must minimise the environmental impact of materials through the use of sustainably-sourced, low impact and recycled materials, using local supplies where feasible. This includes consideration of the embodied carbon of materials.</p> <p>Policy S4 requires all major development proposals to calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Further guidance on what will be expected as part of a whole-cycle assessment methodology will be provided in a revision of the Environmental Design SPD and/or Net Zero Carbon SPD.</p>

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R19.015 8	46	SDMMO138	Policy DH2: Heritage Assets		Better Archway Forum	Campaign	Respondent requests the sentence in Policy DH3 'Proposals that harm the significance of a conservation area must provide clear and convincing justification for the harm' should be deleted to avoid development in a CA that does not respect or echo the scale, rhythm and materials of the CA.	Object	The representation is not related to one of the proposed modifications. Policy DH2 part B states that development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve and enhance the significance of the area, and must be of a high quality contextual design. The section of the policy related to harm reflects national policy (NPPF paragraph 194). The policy should also be read in conjunction with PLAN1, which has a section on contextual design.
R19.015 8	46	n/a	N/a	n/a	Better Archway Forum	Campaign	Respondent states that the plan should focus on meeting housing need and prioritise larger units and not smaller ones that are becoming surplus to requirement due to population decreases in Islington from the pandemic and Brexit.	N/a	Respondent has not referred to a specific modification. The Islington SHMA provides the evidence base and considers the housing mix needed by households in relation to the identified level of housing need in the borough. This has identified that 2 bedroom units are the highest priority in terms of meeting need both for market and social rented tenures. There is no evidence to suggest that there is a glut of small units in Islington. Longer term effects on population growth will be monitored and whilst the Local Plan is a 15 year plan National policy expects a review of the Plan five years from adoption.
R19.015 8	46	n/a	N/a	n/a	Better Archway Forum	Campaign	Respondent suggests Islington should designate green corridors and a SPD that maps green corridors and associated trees as well as the larger and smaller green spaces that the corridors link up with	Neither	The representation is not related to one of the proposed modifications. The Council recognises the importance of green corridors which is referenced in policy G4 on biodiversity. The Council also has policy G1 on providing green infrastructure, which will help provide more green spaces to link together.
R19.015 8	46	n/a	N/a	n/a	Better Archway Forum	Campaign	Respondent suggests Islington proposals around sustainable transport are minimal compared to Haringey. They recommend Islington states adoption of the Mayor's Health Streets Approach and proposed an hierarchy of road users. The respondent also suggests a walking and cycling action plan to further promote sustainable transport.	Object	Supporting text for T1 refers to the recently adopted Islington Transport Strategy (2020) where the Council's commitment and programme to promote sustainable transport can be seen in more detail. The modifications also refer to the council's People-Friendly Streets programme, Vision Zero and Low Traffic Neighbourhoods which represent the Council's plans to promote sustainable transport, addressing many of the points raised in this representation. The modifications to the supporting text of T2 refer to the Mayor's Transport Strategy and to TfL's Healthy Streets Indicators. Policies T1 Enhancing the Public Realm and Sustainable Transport and T2 Sustainable Transport Choices from the Regulation 19 Plan describe the Council's measures to promote sustainable transport in more detail.
R19.015 8	46	n/a	N/a	n/a	Better Archway Forum	Campaign	Respondent requests that any new advertising is presumed not to acceptable and any loss of advertising should not be replaced to protect resident's mental health and the streetscape.	Not stated	The representation is not related to the proposed modification. Policy for advertisements relates to the impacts of that advertisement with regard to its location and design as opposed to a general presumption against.

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R19.0065	48	n/a	N/a	n/a	Islington Labour Environmental Forum	Campaign	Respondent requests that the Local Plan policies be reconsidered to take account of the Vision 2030 document. The whole Local Plan should be tested for its impact on carbon emissions require, all new development should be net zero in terms of annual emissions and emissions from the development process. It is unclear how the sustainability objectives have been considered in the Site Allocations or B+C AAP. A full carbon accounting process is needed including embedded carbon. Mature trees must be protected. 'Net zero' initiatives must be consistent with securing biodiversity through biodiversity action plan. There should be no net loss of green and open space or permeable land.	Object	<p>The comments do not relate directly to the proposed pre examination modifications. Policy S1 commits the council to ensuring all buildings in Islington will be net zero carbon by 2050, which is consistent with the London Plan. The Council has declared a climate and environment emergency and pledges to work towards making Islington net zero carbon by 2030, ahead of the formal 2050 target. Further details are set out in the Sustainability Topic Paper.</p> <p>Policy S4 requires developments to demonstrate how the on-site net zero carbon target will be met within the framework of the energy hierarchy. All major development proposals are required to calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions.</p> <p>Policy S10 requires all developments to adopt a circular economy approach to building design and construction in order to keep products and materials in use for as long as possible and to minimise construction waste. This policy also requires development to minimise the environmental impact of materials through the use of sustainably-sourced, low impact and recycled materials, using local supplies where feasible. This includes consideration of the embodied carbon of materials.</p> <p>As stated in both the Site Allocations and Bunhill and Clerkenwell Area Action Plan, these documents should be read alongside other policies in the Local Plan. The sustainability policies will apply to any applications that come forward.</p> <p>Policy G4 requires that developments protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area. Parts G and H of Policy G4 set out the council's commitment to protecting existing trees.</p> <p>As set out in Policy G2, development is not permitted on any public open space or significant private open spaces. The Urban Greening Factor (UGF) will help to ensure that new major developments provide for green infrastructure (which will assist in providing for biodiversity and permeable surfaces)</p>

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R19.0176	49	n/a	Policy H1: Thriving Communities		London Metropolitan University	Landowner	<p>Consider that 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.</p> <p>Background information provided - previous response to Regulation 19 consultation.</p>		Respondent has not referred to a specific PHM. The Council has responded to this in section 4 of the Specialist Housing Topic Paper (SD26)
R19.0176	49	n/a	Policy DH3: Building Heights		London Metropolitan University	Landowner	LMU have provided again the representation that they made at Regulation 19, which raises a number of issues and requests changes to Policies H1, H6, SP5, DH3 and site allocations NH13 and NH14. These changes have not been made and the LMU consider that the Local Plan is unsound.	Object	This representation does not related to the proposed modifications. LMU have provided again the representation made at the regulation 19 consultation. The Council has carefully considered the detailed response provided at regulation 19, and have set out responses in the Site Allocation Topic Paper (SD23), the Tall Buildings Topic Paper (SD28) and the consultation report "Summary of representations received during Regulation 19 consultation and Council response (organised in order of respondent reference number)" (PD9a). The Council considers that these responses remain valid.
N/a	50	SDM-MO143	Policy DH3: Building heights		Bidwells	Developer	Bidwells support the modifications related to DH3 Part F.	Support	Support is noted.
N/a	51	SDM-MO111	N/a	Figure 5.2: Sites of Importance to Nature Conservation (SINC) designation	Network Rail	Statutory consultee	<p>Network Rail does not object to the proposal for the SINC at 351 Caledonian Road.</p> <p>Considerations were/are crucial railway access points to the North West and North East of the development land East of 351 Caledonian Road and North of Gifford Street. Therefore, Network Rail will on occasions be required to move railway and engineering equipment in proximity to and across the SINC when appropriate.</p> <p>Encroachment on the boundary fence, interference with sensitive equipment, space for inspection and maintenance of the railway infrastructure.</p> <p>Stability of railway infrastructure and potential impact on the services.</p> <p>Potential buried services crossing under the railway tracks. Some of the services may be owned by Network Rail or Statutory Utilities that may have entered into a contract with Network Rail.</p> <p>Proximity of the development to the Network Rail infrastructure and boundary fence and adequate space for future maintenance of the development.</p>	Both	With regard to the amended boundary for 351 Caledonian Road, the Council welcomes Network Rail's comment that they appreciate the value of an SINC and that where use is required, and that mitigations will be considered. With regard to the comments on asset protection Network Rail has not identified any problems or potential changes with the proposed modifications.

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							<p>Collapse of lifting equipment adjacent to the boundary fence/line.</p> <p>Collapse of temporary structure near the railway boundary and infrastructure.</p> <p>Piling adjacent to the railway infrastructure if any. Concerns with ground movement affecting the track geometry and surrounding ground and structure stability.</p> <p>Trespasses and unauthorised access through an insecure or damaged boundary fence.</p> <p>Interference with the Train Drivers' vision from artificial lighting and human factor effects from glare.</p> <p>Errant vehicle onto the railway land.</p> <p>Potential impact on the adjacent railway infrastructure from the construction activities.</p> <p>Structural stability and movement of Network Rail Assets.</p> <p>Invasive or crawling plants near the railway.</p> <p>Interference with the Train Drivers' vision from sunlight and human factor effects from glare.</p> <p>Effects due to electromagnetic compatibility on the users and the development located within proximity of a high voltage overhead electrification lines if there is a imported risk from the development.</p>		
R19.0026	52	SDM-MO58	Policy B4: Affordable Workspace		Flowervale UK Limited	Landowner	Respondent claims the requirement for 10% affordable workspace floorspace does not appreciate the nuances of viability and should be considered on a case by case basis. It is also claimed Policy B4 is not appropriately evidenced.	Object	The results of the Council's viability evidence supports the policy. This is set out in the Viability Topic Paper and Viability Topic Paper Update. Further background on affordable workspace policy is set out in the Employment Topic Paper.

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R19.0026	52	SDM-MO43	Policy SC1: Social and community infrastructure		Flowervale UK Limited	Landowner	Respondent finds there is insufficient evidence to designate Archway as a Cultural Quarter and that there is no evidence of need for site ARCH3 use as a cultural hub and there is very significant doubt that such use would be deliverable.	Object	London Plan policy HC5 states Development Plans should- identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal. The Cultural Quarter at Archway Town Centre will assist in developing the cultural role of this area and complement ongoing regeneration. Archway is home to a variety of artistic and cultural organisations, which would benefit from the heightened importance of culture that is afforded by the Cultural Quarter designation, for example through agglomeration benefits gleaned from new cultural uses locating in the area. Enhancing Archway as an exciting cultural destination building on the existing yet often hidden cultural and artistic organisations will help enhance the town centre in the future. Further detail is set out in in the Retail, Leisure and Services, Culture and Visitor Accommodation Topic Paper (document reference SD22), section 10.
R19.0149	53	SDM-MO65	Policy H3: Genuinely affordable housing		Transport for London Commercial Development	Landowner	TfL CD support modification SDM-MO65. However, Islington are not promoting a 'portfolio approach' to affordable housing delivery. TfL CD follow a portfolio approach in line with London Plan policy H4 which provides the flexibility for more complex sites to come forward with a lower affordable housing provision where that site would be unviable if it had to provide the full 50% affordable housing requirement	Object	Comments on affordable housing do not respond to a modification. As stated in the Councils response to comments made at Regulation 19 it is vital that each and every site capable of delivering affordable housing (AH) delivers the maximum amount in line with the Local Plan. The portfolio approach undermines the Council's approach to AH. The Mayor has not raised any concern with Islington's approach to the portfolio approach in any previous conformity responses. Our AH policy will mean schemes providing less than 50% (where a site is in public ownership) will be refused permission; the portfolio approach cannot co-exist with this policy. We note that the policy does not preclude the Mayor 'calling in' certain schemes which are considered strategically important, if he considered that instituting the portfolio approach had wider London benefits.

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R19.0143	54	N/a	Policy B1: Delivering business floorspace		Lion Portfolio Ltd	Landowner/developer	<p>Respondent supports the strategic aim of an uplift of 400,000 sqm of office floorspace in the borough over the plan period. However, need may now be in excess of 400,000sqm. Suggest that the figure of 400,000sqm be incorporated in to draft Policy B1 to enshrine the commitment. At part C of draft Policy B1 the following wording is suggested:</p> <p>“The Council is committed to ensuring there is an adequate supply of business space in line with job growth projections equating to 400,000sqm of Office floorspace over the plan period. The Council and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, at least, no net loss of business floorspace, and through the making of Article 4 Directions, where appropriate.”</p> <p>Policies that could restrict this growth include tall buildings, and affordable workspace policies.</p> <p>Concerned that land supply for offices is not site specific enough to meet need. There is a shortfall of 62,500sqm to meet the 400,000sqm office capacity after Spatial Strategy Areas and B+CAAP capacity has been accounted for.</p> <p>New site allocations are focused on resi led rather than office.</p>	Both	<p>This representation does not respond to the proposed modifications.</p> <p>Support noted for overall approach to business floorspace.</p> <p>The Local Plan puts a strong focus on identifying as many opportunities as possible for the provision of additional office floorspace, whilst ensuring that other priorities, such as housing in particular but also the need for industrial floorspace, are appropriately addressed.</p> <p>The Council's intention to protect business floorspace through the implementation of A4Ds is mentioned in policy B1, part C.</p> <p>In relation to the office floorspace demand, the 400,000sqm was a target set in the ELS (2016). This target has been updated in the Employment Topic Paper (document reference: SD16 in the Local Plan Examination Library) to account for further loses of office floorspace between 2015/16 and 2018/19. The updated office floorspace demand is of 443,000sqm.</p> <p>The Council considers that the Tall Buildings Study is a robust evidence base for identifying sites that are potentially suitable for tall buildings. Further detail is available in the Tall Buildings Topic Paper and the regulation 19 responses on this matter.</p> <p>The Council's affordable workspace initiative is an important tool to nurture the borough's SME economy, but also to address the economic challenges of social inequality and disadvantage of residents, as well as the negative impacts of rising costs and displacement of small and micro businesses in the borough due to lack of space. This is also a key objective of the Mayor of London who set out his commitment to ensuring a range of different types of workspace, to accommodate the growth in London's businesses, in his Economic Development Strategy.</p>
R19.0143	54	N/a	Policy SP1: Bunhill and Clerkenwell		Lion Portfolio Ltd	Landowner/developer	The representation is supportive of SP1 generally.	Support	Support is welcomed.

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R19.0143	54	N/a	Policy DH1: Fostering innovation and conserving and enhancing the historic environment		Lion Portfolio Ltd	Landowner/developer	Suggested change to Part F Policy DH1: 'Tall building locations must be carefully managed and restricted to identified locations/areas of search where their impacts can be managed through appropriate design and site specific considerations can be taken into account.'	Object	This representation does not respond to the proposed modifications. The representation repeats criticism made of the approach to tall buildings. The policy has not changed and the regulation 19 response remains valid in this instance. Please refer to the Tall Buildings Topic Paper (document reference SD28) for further detail.
R19.0143	54	SDM-MO138	Policy DH2: Heritage assets		Lion Portfolio Ltd	Landowner/developer	Development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve [SUGGESED DELETION' and'] [SUGGESTED ADDITION 'or'] enhance the significance of the area, and should be of a high quality. Proposals that harm the significance of a conservation area must provide a clear and convincing justification for the harm, commensurate to the level of harm proposed. Substantial harm to the significance of a conservation area will be strongly resisted.	Object	Lion Portfolio ask that the policy wording of DH2 is changed from "conserve and enhance" to "conserve or enhance". This is already a modification reference SDM-MO138.
R19.0143	54	N/a	Policy DH3: Building heights		Lion Portfolio Ltd	Landowner/developer	Respondent finds the tall buildings policy DH3 is too restrictive in nature when using a site based approach to defining the location of tall buildings. This approach, combined with the highly-limited land supply available in the borough (as demonstrated in the evidence base for the new Local Plan), will mean that the full potential of development sites cannot be unlocked, and in instances where proposals accord with all other development plan policies, they may be refused simply because they are over 30 metres. Clearly, this is a highly restrictive approach which will depress the provision of floorspace, and will mean targeted quantum's of floorspace are simply unattainable. This will have significantly negative impacts on the economic well-being of the borough. In addition, the Tall Building Study did not assess the combined building and therefore cannot be relied upon as an accurate evidence base.	Object	This representation does not respond to the proposed modifications. The representation repeats criticism made of the approach to tall buildings. The policy has not changed and the regulation 19 response remains valid in this instance. Please refer to the Tall Buildings Topic Paper (document reference SD28) for further detail.

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R19.0143	54	N/a	Policy B4: Affordable workspace		Lion Portfolio Ltd	Landowner/developer	Respondent finds the affordable workspace policy B4 may also restrict development within the borough, due to its current wording. At present, the policy represents the most onerously worded policy in relation to affordable workspace in any London borough by some considerable margin. The requirement for 10% of the overall amount of floorspace to be made available at a peppercorn rate for 20 years is very likely to render some developments unviable. Indeed, the Council's own evidence base suggests office intensification within areas of the CAZ and the Opportunity Area would not be viable with this policy in place. Given these areas are intended to receive the most substantial intensification in the Borough, it would suggest the policy is not sound as it would greatly reduce the delivery of floorspace required over the plan period and / or increase rents. Furthermore, new affordable space may indirectly drive up vacancies elsewhere to due an oversupply of low cost space and a significant lack of demand as has been seen in Castle and Fitzroy House where new tenants for low cost second-hand space are not easily found.	Both	This response is not related to a specific modification. The results of the Council's viability evidence supports the policy. This is set out in the Viability Topic Paper and Viability Topic Paper Update. Further background on affordable workspace policy is set out in the Employment Topic Paper.

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R.19.0074	55	N/a	Policy H6: Purpose-built Student Accommodation, Part A		Unite Group PLC	Landowner	<p>Respondent recommends that Part A of the draft policy is amended in light of it being contrary to London Plan Policy H15, part B, which states that Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.</p> <p>The policy should be amended as follows: "Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will only be permitted on: (i) sites which are well-connected to local services by walking, cycling and public transport; or (ii) sites with existing purpose-built existing student accommodation or allocated sites for conventional residential, subject to consistency with other Local Plan policies and additional impacts of development being acceptable."</p>		Respondent has not referred to a modification. Policy H15 Part A of the London Plan states that boroughs should seek to ensure strategic and local need for purpose built student accommodation (PBSA) is addressed, dependent on meeting specific criteria. Historically the Councils adopted policy 2011 restricts student development to two specific locations recognising the need to meet other development needs, the historic delivery in the borough and need to create mixed and balanced communities. The draft Local Plan continues a similar approach. The rationale for draft Policy H6 is based on historic delivery of PBSA, the unsustainable built form, and the significant need to deliver higher priority land uses in the borough; namely conventional housing and employment use. Further explanation on these issues is set out in the Specialist Housing topic paper.
R.19.0074	55	N/a	Policy H6: Purpose-built Student Accommodation, part B		Unite Group PLC	Landowner	Respondent suggests there is no evidence that 10% of bedspaces and associated bathrooms in PBSA should be wheelchair accessible and thus this policy is unsound. The requirements for conventional residential accommodation should not be applied to student housing as in reality, the typical demand from students per annum falls significantly below the 10% mark. This is evidenced by Unite's experience in London which highlights that less than 0.5% of their London portfolio is occupied by wheelchair users.	Object	Respondent has not referred to a modification. The council considers demand for accessible student housing to be one of unmet need and unfulfilled potential. It is a fact that: <ul style="list-style-type: none"> • disabled people are around twice as likely not to hold any qualifications compared to non-disabled people, and around half as likely to hold a degree-level qualification; • 20% of working age disabled people do not hold any formal qualification, compared to seven per cent of working age non-disabled people; and • 14.5% of working age disabled people hold degree-level qualifications compared to 26.8 per cent of working age non-disabled people. It is a fact that low numbers of disabled students currently occupy existing accommodation. However, this should not be accepted as evidence of low demand, given the difficulties many disabled students and would-be student face accessing the system or that may cause them to drop out of university. Further detail on this issue is set out in the Specialist Housing topic paper paragraph 4.50 to 4.60.

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R.19.0074	55	N/a	Policy H6: Purpose-built Student Accommodation, part B		Unite Group PLC	Landowner	Respondent considers this part of the policy should be deleted on the basis that of PBSA developments, 35% of the accommodation will be delivered as affordable, therefore this creates double counting. Should this criterion be retained, recommend that in the interest of transparency, there should be a requirement for the Council to produce an annual report, setting out how the financial contributions have been used. If the contributions have not been put towards the provision of student bursaries, there should be a clawback provision, allowing the funds to be reclaimed if not spent within 5 years.	Object	Respondent has not referred to a modification. The student bursaries contribution is aimed at enabling disadvantaged Islington residents continue their education. This helps some local young people take a step towards improving their employment potential, tackling poverty and worklessness in the long term, including inter-generational worklessness. As set out in the background section the Indices of Multiple Deprivation identify the borough as one of the top 30 most deprived boroughs nationwide with nearly 50% of children affected by income deprivation. In addition, Islington has one of the highest rates of looked after children for a London borough. The 35% affordable housing contribution is set by the London Plan 2021 and aims to ensure students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs can afford to stay in PBSA. The evidence set out in the Local Plan viability study makes clear that a PBSA scheme would be viable in Islington with all the policy commitments the Council requires. The viability testing found that both of the policy requirements for affordable accommodation and bursaries could be viably provided.
R.19.0074	55	N/a	Policy H6: Purpose-built Student Accommodation, part B		Unite Group PLC	Landowner	Respondent considers that criterion vi is directly contrary to the adopted London Plan. The London Plan supports the use of PBSA as general visitor accommodation outside of term time recognising many of the benefits this brings to the local community and wider London economy.	Object	Respondent has not referred to a modification. The issue of temporary uses relates primarily to an issue of housing supply which relates to the principle that student accommodation makes a contribution, albeit less effective than conventional housing. The Mayor already considers student accommodation meets less housing need with net non-self-contained accommodation for students counting towards housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Use as visitor accommodation, albeit temporary, further dilutes this less efficient use of land so affects supply of housing further. There is also a risk that demand from students to remain in their accommodation will not be satisfied and they will be displaced into private rented accommodation. This of course has a direct impact on housing supply and is the key reason why this aspect of the policy resists such changes of use. Further detail on this issue is set out in the Specialist Housing topic paper paragraph 4.42 to 4.49.
R.19.0074	55	N/a	Policy H6: Purpose-built Student Accommodation, part B		Unite Group PLC N/a	Landowner	Respondent supports the inclusion of affordable accommodation within development, in line with the adopted London Plan policy, however, object to the level of prescription in the policy and the offset with the student bursary requirement. This policy should therefore be wholly reflective of the London Plan policy	Both	Respondent has not referred to a modification. No modifications have been made to Policy H6. The policy requirement for bursaries is a local requirement and should take precedence. The evidence set out in the Local Plan viability study makes clear that a PBSA scheme would be viable in Islington with all the policy commitments the Council requires. The viability testing

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							(H15 part 4) and not include the reference and requirement to student bursaries.		found that both of the policy requirements for affordable accommodation and bursaries could be viably provided. Please also see response above and further detail on why bursaries are a locally important issue set out in the background section (paragraphs 3.19 to 3.31) of the Specialist Housing Topic Paper
R.19.0074	55	N/a	Policy H1: Thriving communities, part Q	Policy H1: Thriving communities, part Q	Unite Group PLC	Landowner	Respondent requests Part Q of H1 to be replaced by a policy which allows the delivery of co-living developments on suitably located sites including allocated housing sites considering that it would diversify the boroughs housing offer and provide a greater choice of homes. Thus, reflective of London Plan Policy H16 'Large-scale purpose-built shared living'.	Object	Respondent has not referred to a specific modification. Policy H10 states that applications for large-scale HMOs will generally be refused as they limit capacity to deliver conventional (self-contained housing); limit the ability to secure genuinely affordable housing; and are not a sustainable model of residential development. Further explanation of these three reasons is set out in paragraph 4.207 in the Housing Topic Paper.
R.19.0074	55	N/a	Policy H10: Houses in Multiple Occupation (HMOs) Part C(iii)		Unite Group PLC	Landowner	Respondent states 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	Respondent has not referred to a specific modification. The response is made on the basis that there will be no need for such bed spaces due to the generally younger demographic who occupy large-scale HMOs and the differentiation from conventional housing, as sui generis rather than C3 use class. This argument assumes that there will not be younger disabled people, which would not be the case. Such an approach would only serve to entrench a limited choice for mobility impaired people who may already have a limited choice of accommodation. It would raise significant issues related to equalities.
R.19.0074	55	N/a	Policy H10: Houses in Multiple Occupation (HMOs), Part C(iv)		Unite Group PLC	Landowner	Respondent considered the policy should be revised to be in accordance with the adopted London Plan policy and replace part iv to include "deliver a cash in lieu contribution towards conventional C3 affordable housing, which is equivalent to 35% of the units or 50% where the development is on public sector land or industrial land appropriate for residential uses".	Object	Respondent has not referred to a specific modification. The response is indicative of the concerns the council has about large-scale HMO and it is considered to undermine efforts to maximise affordable housing thereby effectively wasting the scarce supply of land which could be used for more priority needs. The Council considers that it is essential for any large-scale HMOs that are developed to provide on-site affordable housing.
R19.0117	58	N/a	Policy SP5: Nag's Head and Holloway		John Lewis Partnership	Landowner	The respondent makes reference to a specific site: Waitrose store located at 366 Holloway Road, N7 6PA, and requests that the Local Plan recognises this location for a potential mixed-use scheme. The response makes reference to additional sites allocations which have been identified for mixed-use schemes and tall building locations in the surrounding area. The respondent suggests that Draft Policy SP5 should recognise further sites for tall buildings to allow potential future investment in housing, subject to impact assessment.	Not stated	The site has not been put forward for allocation during previous rounds of consultation. The representation asks that the policy recognise that further sites may be identified as suitable for development of tall buildings over the lifetime of the Local Plan. The Council has identified sites potentially suitable for tall buildings based on the Islington Tall Building Study. The Further information is set out in the Tall Buildings Topic Paper (SD28).

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R19.0183	61	SDM-M016	N/a	2.52	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0132	Policy T2: Enhancing the public realm and sustainable transport		Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-MO133	N/a	7.17	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0134	Policy T5: Delivery, servicing and construction, Part A		Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0135	Policy T5: Delivery, servicing and construction, Part C		Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0136	Policy T5: Delivery, servicing and construction		Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0137	N/a	New para	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0147	ST3: Telecommunications, communications and utilities equipment, Part C		Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0152	N/a	Appendix 3 Table A3.1	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0153	N/a	Appendix 3	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0154	N/a	Appendix 3	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0155	N/a	Appendix 3	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0156	N/a	Appendix 4	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification

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R19.0183	61	SDM-M0157	N/a	Appendix 4 Table A4.1	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0158	N/a	Appendix 4 Table A4.1	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0183	61	SDM-M0159	N/a	Appendix 4 Table A4.1	Transport for London (TfL)	Statutory consultee	The respondent supports the proposed modifications	Support	Support noted for the modification
R19.0177	63	N/a	N/a		GLA	Statutory consultee	The Mayor welcomes the identification of additional housing capacity as well as the detailed amendments to address the changes to the Use Class Order that are set out in the proposed Modifications. The response also confirms that comments provided in the representations through Regs 18 and 19 remain valid.	Support	Support noted
R19.0177	63	SDM-MO39	Policy H12, Gypsy and Traveller Accommodation, Part A	3.18	GLA	Statutory consultee	London Plan Policy H14(A) requires boroughs to include 10 year pitch targets in Development Plans and this figure should not be deleted from the policy. The respondent requests that the definition included in paragraph 3.148 includes the need figure of 6 pitches which would follow Government's Planning Policy for Traveller Sites, and that Council proactively explores the opportunity to deliver the required pitches.	Object	The Council notes that this response has provided some clarification on this issue and will consider a modification as part of a Statement of Common Ground with the GLA.
R19.0177	63	N/a	Policy DH3: Building heights, Part A		GLA	Statutory consultee	The part of the definition in policy DH3 part A which considers tall buildings those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) could result in locations with lower figures than the threshold of 6 storeys or 18 metres prescribed in London Plan policy D9(A). The respondent recommends that this part of the definition and references in the supporting text are deleted.	Object	The Council acknowledges that the definition for tall buildings set out in Policy DH3 part A is not in accordance with the final publication version of London Plan policy D9(A) which was changed in response to a Secretary of State Direction. The Council will undertake further discussion with this matter as part of a Statement of Common Ground with the GLA.
R19.0177	63	N/a	Policy G5: Green roofs and vertical greening, Part B	8.5.5	GLA	Statutory consultee	The respondent recommends that a reflection of why B2 and B8 uses are not included in the Urban Greening Factor of policy G5(B) is included in policy G1(E), and refers to the GLA's draft planning guidance to support the implementation of the UGF.	Neither	The Council will consider how the UGF score applies to B2 and B8 uses following changes to the London Plan on this issue as part of a Statement of Common Ground with the GLA.

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N/a	67	SDM-MO10	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site	Paragraph 2.31	Access Self-Storage	Landowner	The text of SP3 should include reference to research and development space as well as offices, to be flexible and positively prepared.	Object	Research and development can play a similar complimentary role as offices as part of hybrid space. An amendment will be considered that reflects research and development space as well as offices where industrial space is the predominant function. Offices and research and development uses can be accommodated elsewhere in the borough.
N/a	67	SDM-MO10	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site	Paragraph 2.31	Access Self-Storage	Landowner	The text referring to a 'small proportion of the development' is unclear and questions why this approach is needed provided redevelopment increases primary LSIS uses. This additional text is not in line with the NPPF and should be deleted.	Object	The Council's view is that, given the development pressures facing Islington, and in particular the pressures on the limited amount of industrial land. The policy is clear that the proportion of office space should only be a small part of the development, in line with the definition of 'hybrid space' in LSISs. We don't consider that this modification removes flexibility as it allows assessment on a case by case basis.
N/a	67	SDM-MO13	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site	Paragraph 2.38	Access Self-Storage	Landowner	The policy should not state that development must be subordinate in height to the Maiden Lane tower (assessment must be carried out against DH3 to determine). The phrase 'clearly subordinate' is unclear. Conflicts with the NPPF.	Object	This modification provides clarification to the supporting text consistent with part G of policy SP3. The phrase 'clearly subordinate' indicates an urban design objective, and expects that it will be understood to mean a building that is significantly lower in height than the Maiden Lane tower, to the extent which when observed from the street level it would be considered clearly subordinate in scale to the Maiden Lane tower. The Council considers that this directs the developer and architect to an appropriate built scale while not stipulating a height expressed in metres.
N/a	67	SDM-MO50	Policy B2: New Business Floorspace, Parts A, C and E.		Access Self-Storage	Landowner	Policy B2 part C should include reference to research and development space. The requirement that it should only be a small proportion of development should be deleted.	Object	Please see above response in relation to SP3 on this issue.

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N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	The documents are lengthy and cumbersome and changes are expressed in general terms. There is no clear summary of the relationship between proposed modifications and Vision 2030, Biodiversity Action Plan, case for revision of Council's strategy for training and employment to achieve net zero, or the zero carbon SPD which needs to be published with urgency. There is no overview of the impact of the modifications on embedded carbon, impact on targets in Vision 2030 and the Biodiversity Action Plan, loss/replacement of mature trees, or loss/replacement of existing green space/permeable land. Respondent urges Council to make explicit proposals for key changes and the direction of travel in the future.	Neither	<p>The council submitted the new Islington Local Plan to the Planning Inspectorate for Examination in February 2020 and this included all proposed planning policies and objectives for Islington. The respondent requests a summary of the relationships between, or impacts of, the proposed modifications and specific topics and documents, including Vision 2030: Creating a Net Zero Carbon Islington by 2030 and Islington's Biodiversity Action Plan. The proposed pre examination modifications relate to specific amendments to the Local Plan Policies documents proposed since the document was submitted in February 2020. As a result the Modifications for Consultation document does not discuss all of the policies included in the new Local Plan.</p> <p>a. The Council has declared a climate and environment emergency and pledges to work towards making Islington net zero carbon by 2030, ahead of the formal 2050 target. Achieving net zero carbon from all buildings in Islington will include activities across council departments, which will be set out in the council's plans and strategies to achieve net zero carbon by 2030. This will include requiring significant retrofitting of the existing building stock. Mandating such retrofitting is outside the current scope of the planning system and would require significant changes to national policy and legislation. The council's planning policies can only reduce carbon emissions through the design and construction of new and refurbished buildings that require planning permission, for example by requiring developments to meet on-site carbon reduction targets. Further details are set out in the Sustainability Topic Paper.</p> <p>b. The council's policies relating to green infrastructure and biodiversity are set out in Policies G1 to G5.</p> <p>c. Any changes relating to the council's strategy for training and employment with respect to achieving a net zero borough will be included in the council's Zero Carbon SPD and other related documents.</p> <p>d. The development of a Zero Carbon SPD will supplement the policies in the Local Plan and it will be prepared once the Local Plan is in place. Resources have already been allocated for an officer to lead on the preparation of an SPD. This will be a collaborative piece of work with other stakeholders and will include research on exemplars on retrofitting and refurbishing existing buildings as well as new build.</p>

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	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Respondent welcomes the Council's commitment to tackling the housing crisis.	Neither	Support noted.
N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Construction has impact on carbon emissions and natural space. Alternative construction methods should be adopted and homes built on brownfield sites.	Neither	<p>The comments do not relate directly to the proposed pre examination modifications. Policy S10 requires that all developments adopt a circular economy approach to building design and construction, including ensuring buildings are designed to be adaptable and are made from components and materials that can be re-used or recycled.</p> <p>Development is not permitted on any public open space and significant private open spaces in accordance with Policy G2.</p>
N/a	68	SDM-MO116 and SDM-MO119 General comment / all policies	Policy S5: Energy Infrastructure		Islington Environmental Emergency	Campaign	The use of energy in homes must be tackled to achieve net zero target. Respondent welcomes modification to Policy S5 regarding the use of Air Source Heat Pumps. The council needs to demonstrate that operational emissions from homes will be net zero and as near to actual zero as possible. Council is taking into account only 'operational emissions' from existing and new dwellings.	Support/ Neither	<p>Support is noted for modification to Policy S5 regarding the council's support for the use of air source heat pumps in minor new-build developments with individual heating systems.</p> <p>The other comments do not relate directly to the proposed pre examination modifications. Policy S4 requires all major developments and minor new-build residential developments of one unit or more to demonstrate how they will be net zero carbon within the framework of the energy hierarchy. All developments are required to reduce on-site operational emissions as far as possible by reducing energy demand through energy efficiency measures in the first instance. Major residential developments and minor new-build residential developments of one unit or more will be required to comply with the Fabric Energy Efficiency Standard (FEES), as defined by the Zero Carbon Hub. Major developments are required to submit a Green Performance Plan detailing the actual measurable outputs for the occupied building in relation to energy consumption and carbon emissions.</p> <p>The Local Plan policies take both operational and embodied emissions from development into account. Policy S4 requires all major development proposals to calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Further guidance on what will be expected as part of a whole-cycle assessment methodology will be provided in a revision of the Environmental Design SPD and/or Net Zero Carbon SPD.</p>

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N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Concern over loss of green space, including that on housing estates and the impacts that has on net zero carbon, biodiversity, and local food growing.	Neither	This representation does not respond to the proposed modifications. The approach to operational emissions is addressed above. Protection of trees and open space while delivering much needed housing and affordable housing are objectives of the Local Plan, and a number of policies relate to this including policies G1, G2, and G4 for trees and open space, and Policies H1, H2, and H3 for housing. New housing, including on the Council's estates must be developed in accordance with Local Plan policies.
N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Concern over loss of open space and trees and emissions from construction and new homes.	Neither	This representation does not respond to the proposed modifications. The approach to carbon emissions is addressed above. Protection of trees and open space while delivering much needed housing and affordable housing are objectives of the Local Plan, and a number of policies relate to this including policies G1, G2, and G4 for trees and open space, and Policies H1, H2, and H3 in for housing. New housing, including on the Council's estates must be developed in accordance with Local Plan policies including those in relation to open space and trees.
N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Alternatives to carbon intensive building materials should be used where possible. Improvements can be achieved through material selection, design and specification of lower-carbon suppliers. Respondent is concerned that embedded emissions have not been taken into consideration when calculating the amount of total GHGs emitted yearly in Islington.	Neither	The comments do not relate directly to modifications. Policy S10 requires that all developments adopt a circular economy approach to building design and construction. Part of F of Policy S10 requires that development must minimise the environmental impact of materials through the use of sustainably-sourced, low impact and recycled materials, using local supplies where feasible. Part E of Policy S4 requires all major development proposals to calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	There is no carbon sequestration calculation undertaken by the Council. It is unclear how the objectives of the BAP and need for new homes will be balanced. The impact of loss of trees and opens space on health and wellbeing have not been addressed.	Neither	This representation does not respond to the proposed modifications. The Local Plan has policies to protect open space and trees, biodiversity and SINC's, to provide new open space on major developments, and for new development to provide green infrastructure including green roofs and walls, including meeting an Urban Greening Factor. The supporting text to policy G4 recognises the carbon sequestration benefits of trees. With regard to carbon offsetting Policy S4 sets out that schemes which fail to meet the zero carbon target on-site must provide a cash in lieu contribution to Islington's carbon offset fund.

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	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	The council should reconsider retail policies to protect retail frontages to reduce car use and ensure local shopping choices are available.	Neither	The draft plan does not include primary and secondary frontages and now seeks a primary shopping area instead in line with para 85b of the NPPF. Islington has four town centres that enjoy high PTAL ratings and increased accessibility from enhanced cycle infrastructure made more accessible from surrounding areas through the implementation of LTN's. Islington also has 40 LSAs that serve local need. The draft policies seek to protect retail and leisure designations to support Islington's town centres and LSAs to meet the day to day needs of residents and businesses.
N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Council must have a disciplined approach to off-setting and not rely on the 'net' aspect of the net zero target. Respondent refers to carbon sequestration and states that the timescales should be short. Respondent suggests all emissions from housing developments up to 2022 must be offset by 2025. Offsetting must not have negative impact on biodiversity or deprived communities, and must be approved by independent experts.	Neither	<p>The comments do not relate to the proposed pre examination modifications.</p> <p>Islington's dense urban nature and limited amount of green space mean that there is limited space to plant the volume of trees to significantly capture carbon emissions within the borough through carbon sequestration. In order to ensure carbon emissions from development are offset, Policy S4 requires developments to pay the full cost of offsetting the remaining regulated emissions through a legal agreement. Major developments and minor new-build residential developments of one unit or more are expected to achieve net zero carbon targets on-site in accordance with the energy hierarchy, rather than relying on offset fund payments to make up any shortfall in emissions. Where it is clearly demonstrated that the net zero carbon target cannot be fully achieved on-site, all projected residual carbon emissions will be offset through a financial contribution to Islington's carbon offset fund. Offset fund payments will be ring-fenced to implement measures and projects that reduce carbon emission from the existing building stock in the borough, such as energy efficiency improvements to social and private housing.</p> <p>All developments are required to protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area, in accordance with Islington's Biodiversity Action Plan.</p>
N/a	68	General comment / all policies	N/a		Islington Environmental Emergency	Campaign	Call for honest assessments about carbon impacts, and the ability to meet social and housing goals.	Neither	This representation does not respond to the proposed modifications. The Council considers that it acts honestly and transparently with respect to the challenge of the climate change emergency and the great need for housing and affordable housing.

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R19.013 2	72	N/a	SP3, B1 and B2 and Site Allocations VR1-VR10 VR10		Tileyard London Ltd	Landowner	<p>Tileyard London are a major stakeholder in the Vale Royal LSIS, owning and operating a cluster of creative workspaces and support facilities. Tileyard have provided detailed representations objecting to the Local Plan approach for the LSIS at all stages of consultation. Tileyard object to the requirements of the Local Plan with respect to the Vale Royal LSIS, which they believe will lead to the inefficient and unsustainable use of land and lead to 'suppression' of the LSIS. Tileyard consider that the policy approach is not supported by evidence, is inconsistent with national and regional policy, fails to take into account representations, and they have raised concerns with the sustainability appraisal. They do not consider that the proposed modifications, or further information submitted to the examination, adequately addresses their previous concerns or those raised by the inspectors.</p> <p>Tileyard consider that the proposed modifications are unsound in context of the NPPF, fails to comply with the Planning and Compulsory Purchase Act with regard to consultation, and is in breach of the EU directive of SEA.</p> <p>Evidence base The first main area of criticism is with the evidence base, and Tileyard consider the evidence base to be out of date, and set out a number of reasons for this. Tileyard consider that the Employment Land Study is out of date as it is more than 5 years old. In addition they state that the Employment Land Study does not support draft LSIS policies, as while the study recommends no loss of industrial floorspace within the LSIS and acknowledges the importance of the economic cluster that has emerged around Tileyard Studios, and also that it recommends that opportunities should be sought for intensification of businesses uses in the LSIS particularly through the provision of hybrid space.</p> <p>The representation argues that since the policies were originally drafted circumstances have materially changed, with Tileyard doubling in size since 2015, which has changed the function and character of the area. Tileyard point to significant support from businesses and landowners, and reference developments in the area detailing three schemes in recent years in the area which provided B use class floorspace.</p> <p>Tileyard reiterate concerns over the approach to heights and the LSIS height study stating that previously stated concerns still stand.</p> <p>With regard to the general townscape character</p>	Object	<p>This representation does not respond to the proposed modifications.</p> <p>The Employment Land Study, provides detailed evidence to inform the making of industrial policies, and analysed in detail the historic legacy, business composition of the Vale Royal and Brewery Road LSIS. The Council has demonstrated that the approach of the proposed industrial policies is consistent with the new London Plan. The soundness of these policies was confirmed by the GLA during the Regulation 19 consultation.</p> <p>On January 2021, the Council responded to the inspectors' letter INS08, in which the inspectors asked if the recent updates to the London Plan had any bearing on the soundness of the Draft Islington Local Plan. On this letter the Council addressed the proposed modifications to industrial land policies E4 and E7 and any potential implications for the Draft Local Plan Policies. The letter can be found in the Examination Library (reference LBI 05). In addition, the GLA did not make any further comments about industrial policies in their response to the pre-hearing modifications.</p> <p>Consultation responses have been carefully considered at each stage as set out in the consultation statement, the response to regulation 19 comments and with further detail provided in topic papers where appropriate.</p> <p>Specific comments on the IIA are addressed separately.</p>

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							<p>Tileyard refer to an appeal decision where an inspector stated that the Council overstated the level of homogeneity to the building in the immediate area, and where the inspector found a view to the Market Clock Tower not to be important.</p> <p>Other planning changes and reforms are also cited which Tileyard claim change the context. These changes are amendments to the use classes order (class E), publication of the London Plan 2021 (including Policies E4, E7 and deletion of the no net loss requirement on existing industrial sites), and revoking of the Mayor's Land for Industry and Transport SPG (2012).</p> <p>They are also critical that the Council has not referenced the GLA practice note Industrial Intensification (2018), or undertaken an Industrial Land Audit.</p> <p>Consultation The second area of criticism is consultation and Tileyard state that the Council has disregarded the objections to the proposed LSIS policies from businesses, landowners, and workers. Tileyard consider that large number of representations have been disregarded as 'set responses'.</p> <p>IIA The third area of criticism is the IIA, which Tileyard state to be not legally compliant or fit for purpose. Tileyard provided a review of the IIA undertaken on their behalf by a consultant and refer to the views and conclusions of this review. Tileyard believe that the results indicate post rationalisation for pre-determined decisions. Particular criticism has been directed at the reasonable alternatives.</p>		
R19.0174	83	SDM-MO25	Policy SP6: Finsbury Park, part D	2.7	London Centric	Landowner	Object to the development of Finsbury Park as an affordable office location. Believe Finsbury Park has little existing industrial and SME space, which therefore should not be retained or protected by policy. Claim that Islington has seen an increase in office space rather than a loss	Object	The delivery of affordable workspace is a key priority of the local plan, and Finsbury Park was identified as a key alternative office location to the CAZ. There is a misunderstanding of results from the annual monitoring reports, since the reporting year 2015/2016, there have been significant loss of office floorspace in Town Centres, including Finsbury Park and these losses have significantly outweighed office gains over the years. Secondary and satellite employment locations outside the CAZ have been the ones most impacted by the PD right introduced in May 2013 for to allow the conversion of offices to residential.

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R19.0174	83	N/a	Policy H1: Thriving Communities		London Centric	Landowner	Respondent is disappointed there are no modifications and considers that Islington is not supporting diverse housing choices, including non-self-contained housing, build to rent or specialist housing.	Object	This is not a response to a modification. Islington has demonstrated the need for adaptable and accessible housing. Further information on this is included in the Topic Paper for Housing. The London Plan 2021 is also supportive of the approach that housing should be designed to adapt to changing needs rather than to cater for different segments of the population who should use X or Y housing product. The Local Plan is not supportive of non-self-contained housing as these forms of development limit capacity to deliver conventional (self-contained housing); limit the ability to secure genuinely affordable housing; and are not a sustainable model of residential development. Again, further explanation is provided in the Housing Topic Paper (SD19).
R19.0174	83	unclear - that seems to be more relating to Reg 19	Policy H2: New and existing conventional housing, part G		London Centric	Landowner	Believe the market should be allowed to produce 'unconventional' housing for the private rental sector. Claims that the demand for such 'unconventional accommodation' for people such as new comers to London is real and unmet.	Object	Islington's identified need is more conventional housing, which stems from the need to use land efficiently as well as evidenced need. High quality HMOs are supported.
R19.0174	83	n/a	Policy H3: Genuinely affordable housing		London Centric	Landowner	Disappointed with no modifications - and consider the blanket policy unreasonable - want viability testing / negotiation	Object	Respondent has not referred to a specific modification. The position suggested by the respondent does not reflect paragraph 34 of the NPPF (2019) and the requirements of NPPG (2019) in respect to viability which require Development Plan policies to clearly stipulate affordable housing policy requirements in the form of a site-specific target to enable certainty for developers, landowners and the community; nor does it account of the new London Plan which under Policy H5 requires a site-specific affordable housing targets to be achieved under the threshold approach. Further justification for the Councils approach is set out in the draft Viability Topic Paper.
R19.0174	83	SDM-MO36	Policy H7: Meeting the needs of vulnerable older people	Parts F and Para.3.111	London Centric	Landowner	Claim that the needs of vulnerable and older persons can be met through non self contained high quality housing	Object	Respondent has not referred to a specific PHM. As noted in previous response to regulation 19 consultation response The policy does not preclude specialist older persons housing, it prioritises conventional housing adaptation as the prime method of meeting the need for older people's accommodation. Policy H7 provides detailed criteria which specialist accommodation will be assessed against. The specialist housing topic paper provides further discussion on this and includes evidence from Islington's Adult Social Services department to support policy approach.
R19.0174	83	n/a	Policy H10: Houses in Multiple Occupation (HMOs)	Part A and C	London Centric	Landowner	Disappointed of no change for Part C - and support no change for Part A	Both	Respondent has not referred to a specific PHM. Policy H10 states that applications for large-scale HMOs will generally be refused as they limit capacity to deliver conventional (self-contained housing); limit the ability to secure genuinely affordable housing; and are not a sustainable model of residential development. Further

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									explanation of these three reasons is set out in paragraph 4.207 in the Housing Topic Paper. The market cannot dictate the type of housing (or indeed any development) that comes forward in isolation from the planning system.
R19.0174	83	n/a	Policy H11: Purpose Built Private Rented Sector development		London Centric	Landowner	Object to lack of modifications. PRS has a role in meeting housing needs. Market forces should dictate what type of housing is delivered.	Object	Respondent has not referred to a specific PHM. The Council is not opposed to private rented accommodation. The market housing element of any proposal has flexibility to be let on whatever terms the owner desires. The policy is concerned with overarching 'Build to Rent' proposals, which could be used as a mechanism to undermine key policy requirements. The market cannot dictate the type of housing (or indeed any development) that comes forward in isolation from the planning system.
R19.0174	83	SDM-MO43 and SDM-MO44	Policy SC1: Social and Community Infrastructure	Part C and para 155-156	London Centric	Landowner	Social and community infrastructure not falling within F1, F2 and Class E will now be Sui Generis. Planning precedent and evidence should be used to determine if a community asset is present.	Object	Islington's approach is to reflect the changes to the Uses Classes Order, translating former D1 and D2 uses into new uses.
R19.0174	83	SDM-MO43 and SDM-MO44	Policy B1: Delivering business floorspace		London Centric	Landowner	Agree with priority locations for new business floorspace, but argue that SME and affordable workspace must be delivered as part of mixed use schemes	Both	<p>Support noted on Priority Employment Locations for new business floorspace.</p> <p>Small and micro businesses rely on the flexibility of smaller spaces and benefit from clustering with similar type of businesses, and from creating synergies with larger businesses. New business floorspace policies seek to deliver high quality business space that caters for a diverse range of future occupiers, allowing the provision of a range of units in terms of type and size, and provision of affordable workspace.</p> <p>Ensuring that Islington is a place where SMEs can do business is key priority for the Council. Protecting premises for occupation by SMEs, and promoting the delivery of a range of spaces, are key principles embedded in the current Local Plan. This is also a key objective of the Mayor of London who set out his commitment to ensuring a range of different types of workspace, to accommodate the growth in London's businesses. The new London Plan identifies that office market is going through a period of restructuring with increasing numbers of SMEs, changing work styles supported by advances in technology, and new forms of accommodation such as flexible and co-working space.</p>

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R19.0174	83	SDM-MO50 and SDM-MO55	Policy B2: New business floorspace	Part A, B, C and E and para 4.24	London Centric	Landowner	Affordable workspace / SMEs should only be delivered as part of mixed use schemes. Disagree with text under paragraph 4.24 about conditions attached to new business floorspace under S.20 of the Town and Country Planning Act, consider this is an infringement on national policy rights and should be removed from the text.	Object	<p>Small and micro businesses rely on the flexibility of smaller spaces and benefit from clustering with similar type of businesses, and from creating synergies with larger businesses. New business floorspace policies seek to deliver high quality business space that caters for a diverse range of future occupiers, allowing the provision of a range of units in terms of type and size, and provision of affordable workspace.</p> <p>The long-term outlook remains positive for the prime London office market, due to the shortage of new build grade A office space. Recent GLA research outlines the importance of maintaining sufficient stock within and near the CAZ to support tech and science-based sectors. These sectors have grown stronger during the pandemic and will play a key role in the economic recovery of London. Securing new business floorspace will be important in helping to meet identified needs.</p>
R19.0174	83	SDM-MO56	Policy B3: Existing business floorspace	Part B and C	London Centric	Landowner	24 months marketing period should only for be office use	Object	<p>Since the UCO changes, now most existing premises have the option of a range of class E rights, therefore, it is important to assess if there will be demand for class E more generally in the future, in addition to the specific use. The government introduced Class E to help commercial premises adapt to changing marketing conditions. The modification proposed in Appendix 1 provides flexibility if some class E uses aren't considered appropriate where this is justified.</p>
R19.0174	83	SDM-MO58 and SDM-MO60	Policy B4: Affordable workspace	Part A, B C and D	London Centric	Landowner	The respondent agrees with the Council's aspiration to secure affordable workspace but disagrees with the Council's strategy for managing affordable workspace. The respondent thinks that affordable workspace should be secured and managed by landowners/developers to reflect the needs of the market and finds the 20 years at peppercorn rent excessive.	Object	<p>The representation is not related to one of the proposed modifications.</p> <p>The Council considers that co-working space below market rent is still not affordable in Islington's key business locations. The rationale and justification for securing affordable workspace is explained in paragraphs 8.10-8.17 of the Employment Topic Paper (ref.SD16 in the Local Plan Examination Library).</p> <p>The affordable workspace policy approach is supported by viability evidence as set out in the Viability Topic Paper and Viability Topic Paper Update.</p>

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R19.0174	83	SDM-MO78 and SDM-MO79	Policy R3: Islington's Town Centres		London Centric	Landowner	Respondent considers that town centre sites should be allowed flexibility to be developed as residential at ground floor and residential should not be restricted to upper floors. Also that sui generis town centre uses is not a town centre use. Consider that not all town centre sites are located in traditional town centre environments - some are residential in character.	Object	The Retail Leisure Service and Cultural Uses Topic Paper sets out further detail on the issue of ground floor residential and residential use in town centres from paragraph 5.19 to paragraph 5.23. The introduction of incompatible uses in close proximity to functioning commercial uses and the lost opportunity for additional commercial floorspace is an issue which needs to be carefully managed, with clear reference to the overarching commercial function of such areas. The Local Plan is considered to take a balanced approach to residential use in town centres with a number of site allocations which promote residential uses at upper floors and which is consistent with the NPPF. The council considered alternatives including a more relaxed general approach to residential development in primary shopping areas as part of the examination IIA addendum and concluded a restrictive approach will have the most positive outcome. SG uses can contain many town centre uses e.g. launderettes, nail bars, private clubs, nightclubs.

Summary of responses to Site Allocations modifications

Reg 19 ID if applicable	Pre hearing modification response ID	Modification reference	Site reference	Organisation name (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
	PHM0002	SA-MO6	OIS31: Hillside Estate		Resident	<p>The respondents objections to the plan are:</p> <ol style="list-style-type: none"> 1. It is unclear what your policy towards the park on Hillside estate is. It is difficult to object to a proposed policy when that policy is at best ambiguous. 2. Islington has the lowest ratio of open space to built-up areas of any London borough. The park attached to Hillside estate is our local 'lung'. There is moreover no other nearby significant open green space. 3. I want to argue strongly how important this open space is. This small area has a high population density, many people living in what is or was council accommodation with a limited access to gardens etc. 4. The park is heavily used, there will be many people using it for different purposes: playing with their children, sitting for a chat on benches, walking their dogs, catching the sun etc. 5. The lowest part of the park which is a sort of football pitch which runs alongside St Johns Way is used by (mainly) boys to play but also by women who use the benches to sit and chat, often, I notice, with prams and pushchairs. Mothers have somewhere nearby they can take their children. This helps preserve their and their children's sense of wellbeing and they will be especially badly affected if this space is built on. 6. 47% of children in Islington live in poverty (or thereabouts), higher than the London average of 38%. Free local green spaces therefore become even more essential. 7. Increasing the density of housing in an area which is already heavily built on could suggest a lack of concern for the local inhabitants. 8. Although one hopes there will not be a repeat of the isolation demanded over the last year, nevertheless the pandemic has revealed how essential this open space is to allow local people a 'breathing space'. <p>This is not the time to be planning on building on this essential open space.</p>	Object	Objection to allocation noted. The site allocation recognises Hillside Park as a constraint and that any impacts on this should be carefully considered and mitigated. In addition, as a designated open space and so relevant policies to protect and enhance this apply. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary.
	PHM0004	SA-MO113	OIS24: Pentonville Prison		Resident	It could become a space for art, exhibitions, culture, or local shops and cafe. It would add to the community to have something cultural in the area	Neither	The modification to the site is in relation to the site boundary. The site allocation specifies some community use as part of a

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						or alternatively new residential area but with something for the full community. Question about removed trees next to residential block and if a garden will be put their instead		residential scheme which could have the potential to support culture and arts initiatives.
	PHM0005	SA-MO5	OIS30: Cluse Court		Resident	The respondent would like to see their block demolished and redeveloped due to multiple issues including damp, odour, cracked walls and window ceiling coming away, lack of space for a sink in the toilet, and no bike storage.	Neither	The detailed feedback on issues is welcomed, part of the purpose of the early engagement carried out by the new build team is to understand more about what improvements can be made. A site allocation sets out key principles for a site that will need to be considered as part of a future planning application. Before a planning application is submitted the council will run a full consultation with local residents.
	PHM0006		OIS5: Bush Industrial Estate, Station Road		Resident (assumed)	Resident objects to provision of the Bush Industrial Estate, specifically its proximity to residential areas. Resident objects to the omission of the following roads: Wedmore Gardens, Pemberton Gardens, Goddard Place, Foxham Road, Student accommodation on Station Road and stated the proximity to residential should be listed among constraints. The no "warehousing" 1984 planning ruling for the site is cited.	Object	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the north eastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0007	SA-MO41	VR6: The Fitzpatrick Building, 188 York Way		Landowner	The respondent considers the modification is unreasonable. The building is now a Class E building. It should be referenced as such and should remain as such. Suggested amendment proposed.	Object	The modification removes references to old use classes as a result of changes to the Use Classes Order, with cross references to relevant policies added. The wider objection to the policy was responded to at Regulation 19.
	PHM0008	SA-MO3	OIS28: Barnsbury Estate		Resident	The respondent is supportive of the allocation OIS28 Barnsbury Estate. In particular the two new parks and additional seating areas. However, the completion of the park should be early in the development process to allow existing residents to take advantage of this space. A rough timeline of the phasing of development in relation to construction impacts should be made available to residents. The provision of dog mess bags and bins would help with the significant increase in dog ownership. Development should seek to improve the safety along the canal, especially for women.	Support	Support noted. The development considerations section highlights the improved connections along the canal to also deliver a safer environment for Pedestrians and Cyclists. A detailed phasing plan will be developed as part of the planning application process.
	PHM0009	SA-MO101	OIS5: Bush Industrial Estate, Station Road		Resident	Resident strongly objects to site designation and constraints stating they will not adequately protect school children and residents from negative impacts of air, light and noise pollution through constant operation.	Object	The Council has proposed a modification to include reference to the adjacent Yerbury Primary School and proximity to Whittington Park and the school. The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the north eastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic

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								impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
R19.0150	PHM0010	SA-MO46	VR10: 34 Brandon Road		Resident	The respondent finds that intensification of industrial uses at site VR10 is not appropriate due to constraints around deliveries from parking restrictions and a road that is too narrow for two way traffic. The allocation would be more appropriate for office/studio uses on the lower floors. The development considerations state servicing should be on site but the respondent finds any new access for servicing would impact on the quantum of useable floorspace.	Object	The Council's response to previous representations is set out in the consultation statement. Maintaining industrial uses within the Borough is a key priority, such uses play an important role in supporting both the local and London-wide economies. Residential and office development could seriously harm the area's primary economic function and lead to the deterioration and gradual loss of industrial use in this area. The introduction of office space may be permitted, when provided as part of a hybrid workspace scheme.
	PHM0010		KC4: Former York Road Station		Resident	Response states building should be used for cultural/entertainment venue, not residential, if not used as an underground station.	Object	The priority for the site allocation is business use. The site is in a CAZ-fringe location where proposals for new business floorspace are required to maximise the provision of business floorspace. The allocation includes an element of residential use.
	PHM0011	SA-MO3	OIS28: Barnsbury Estate		Resident	Resident strongly opposes the redevelopment plans	object	Objection to plans for the estate noted. Newlon will work with residents on detailed designs as part of the preparation of a planning application. There will also be further detail and opportunity to comment as part of the planning application process.
	PHM0012		OIS28: Barnsbury Estate		Resident	Respondent questions level of consultation and if comments are expected to be general in relation to what the estate might be like or if comments are expected on the site, its urban location in an internationally relevant post covid situation, the actual probabilities of what can be provided by a quasi risk averse landlord. Respondent also questions issues about the movement of existing residents into new flats and what arrangements with officers will be put in place or if such matters are beyond the remit of planning.	Neither	General or specific comments can be provided. The site allocation sets out key principles for the site, which will form part of the planning policy framework that a future planning application will be assessed against. Newlon will be developing detailed plans for the site with residents as part of preparing a planning application.
	PHM0012	SA-MO3	OIS28: Barnsbury Estate		Resident	Resident proposes that there is opportunity to explore a design which adds a basin to the canal frontage to encourage people to use the canal more.	Neither	The southern part of the site is adjacent to the Regent's Canal (West) Site of Importance for Nature Conservation (Metropolitan grade). The development of a new basin along the canal would be outside of the site boundary.
	PHM0013	SA-MO7118	OIS32: New Orleans Estate		Resident	The respondent supports the development of affordable housing on site OIS32 especially if this helps improve the permeability of the site. Any redevelopment should remove the perimeter fence which creates a sense of enclosure and invites anti-social behaviour. The well-used multi use games unit and community centre should be re-provided and improved in consultation with Sport England. The current location of the sports pitch is suitable	Support	Support for affordable housing and connection with Hornsey Rise noted. The re-provision of the multi-use games area is stated in the allocation together with improvements to the play space and increased permeability. Further details about proposals will be consulted on by the Council's New Build team.

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						whereas if it was to move to the centre this would cause noise nuisance for surrounding residents. The play space in the centre should be retained for use by residents especially those without a balcony. The respondent finds the site likely too constrained to carry out the allocation, although improved connection with Hornsey Rise would be positive		
R19.0032	PHM0014		HC3: Highbury and Islington Station		Resident	The respondent made comment on the Regulation 19 version of the plan which they still stand by. Development to extend the Overground line at Highbury and Islington station and the redevelopment of Highbury Corner have caused significant disruption to residents from works taking place through the night. Further development at site HC3 would cause more disruption for residents and overshadow homes and gardens and allow overlooking into surrounding properties. The respondent agrees with the consideration to improving biodiversity and green infrastructure albeit not at site HC3. Reference is made to the IIA.	Object	As part of a future planning application for the site developers will be required to set out how they will manage and limit construction impacts, this includes addressing policies which require best practice construction techniques to limit impacts on air quality and reduce noise and vibrations. As part of any planning permission there will also be a legal agreement that to manage the construction impacts of new development. The IIA identified potential impacts on biodiversity due to the proximity of the SINCs, however in line with Local Plan policies a scheme would have to protect this biodiversity.
	PHM0015		OIS24: Pentonville Prison		Resident	The respondent asks for assurances about noise levels create from development on the site, and wider impacts of building work in the local area given other developments that have been built recently.	Neither	As part of a future planning application for the site developers will be required to set out how they will manage and limit construction impacts, this includes addressing policies which require best practice construction techniques to limit impacts on air quality and reduce noise and vibrations. As part of any planning permission there will also be a legal agreement that to manage the construction impacts of new development.
	PHM0016	SA-MO5	OIS30: Cluse Court		Resident	Respondent objects on the basis of not enough information being provided about what is planned, if the plan is to knock down existing housing or build in between it, likely heights, where the entrance will be.	Object	The allocation sets out key principles for a site that will need to be considered as part of a future planning application. Further detail about the proposals will be set out and consulted on by the Council's New Build Team, there would also be further consultation as part of a future planning application. This will include further detail about building heights, design and entrances.
	PHM0017	SA-MO5	OIS30: Cluse Court		Resident	Generally supportive of the proposed site allocation, subject to strengthening of development considerations around existing trees and green infrastructure. In particular considers text could be strengthened with regard to the retention of mature trees	Support	Site allocations will be read alongside alongside other policies in the Local Plan which provide further detail, including draft Local Plan policy G4 which provides sets out a robust basis for considering trees on sites. The allocation in highlighting the importance of considering green infrastructure, including trees, comprehensively is consistent with draft policy G4 which requires a holistic approach to landscape design so that this is considered from the start of the design process. The support text to policy G4 highlights that Development proposals which are likely to affect trees within the application site or on land adjacent to the site (including street trees) are

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								required to follow the process outlined in BS5837:2012 and include an up-to-date Arboricultural Impact Assessment, which must include a Tree Constraints Plan and Tree Survey.
	PHM0019	SA-MO6	OIS31: Hillside Estate		Resident	The respondent says the estate is too congested with many homes overcrowded, too much land for parking space, and too many cars. They state that traffic, noise pollution and infrastructure are at breaking point because of overcrowding. Drug dealing has been a problem. Better lighting is needed. Not enough land for residents without a garden, football area is not used enough and should be redesigned so more residents can use it.	Object	Concerns about overcrowded homes noted. The provision of local, genuinely affordable housing will help to address overcrowding. The detailed feedback on other issues is welcomed, part of the purpose of the early engagement carried out by the New Build team is to understand more about from resident is what improvements can be made.
	PHM0020	SA-MO1	KC8: Bemerton Estate South		Resident	Respondent suggests that infill/additional residential development is likely to be extremely damaging to the residential development already there, for example the greenspace and the housing round it on the estate is the most attractive feature and infill development/intensification will destroy its charm.	Object	The designs for this site that have been consulted on show infill residential development around the main green space, with the new homes being provided on rooftops and extensions to existing block. A number of green infrastructure and open space improvements are proposed. The site allocation is clear that proposals should maximise opportunities to improve urban greening and enhance green infrastructure.
	PHM0020	SA-M03	OIS28: Barnsbury Estate		Resident	The publicised Newlon proposal will lead to the loss of about 2 acres of open space (of all kinds) and a great many trees.	Object	The site allocation is clear that there should be improvements to existing estate open spaces including the creation of a park on Pultney Street, and the provision of a new park on Carnegie Street. It also highlights that opportunities to improve urban greening and enhance green infrastructure should be maximised. The scheme design has not been finalised. Newlon will work with residents on detailed proposals as part of the preparation of a planning application. A future planning application will need to take into account with relevant policies including those in relation to trees, green infrastructure, open space as well as the site allocation.
	PHM0020	SA-MO2	OIS27: York Way Estate		Resident	Respondent states that the estate has good green space that needs more imaginative landscaping – not building on. The amenity space is not underused. Underused parking needs to be mainly landscaped although a small amount of additional housing could be accommodated.	Object	There is an identified need for more housing, including genuinely affordable and the site has been identified as having the potential to accommodate additional housing to help meet this need alongside other improvements to the estate. The estates owners (City of London) have carried out consultation with residents including in relation to the location of new buildings as part of the development of proposals. The site allocation requires improved/enhanced landscaping. Proposals will need to take account of relevant Local Plan policies including those in relation to green infrastructure.
	PHM0020	SA-MO5	OIS30: Cluse Court		Resident	Respondent not sure where additional housing on Cluse Court could be provided without seriously damaging the setting of existing housing.	Object	Site Allocations identify potential sites for development and assign appropriate uses for that site based on need and evidence. There is an identified need for more local, genuinely affordable housing and the site has been identified as having the potential to accommodate additional housing to help meet this need. Residents and stakeholders will have the opportunity to comment on proposals in more detail as they are developed.

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								Proposals will need to be of a high quality design that responds to and enhances the context of the site in line with relevant Local Plan policies.
	PHM0020	SA-MO1, SA-MO2, SA-MO3, SA-MO5	KC8 Bemerton Estate South, OIS27 York Way Estate, OIS28 Barnsbury Estate, OIS30 Cluse Court		Resident	Intensification policy is misguided and damaging and contrary to the spirit of London as a National Park City, which means the maintenance and extension of green surfaces. Unbuilt-on ground surface needs to be protected - and planted. These Site Allocations should be withdrawn.	Object	There is an identified need for more housing, including genuinely affordable housing. These site allocations identify the potential for additional housing to help meet identified needs alongside other improvements for example, improvements to permeability, landscaping and social infrastructure. The site allocations identify site specific requirements for green infrastructure. Proposals on all the sites will also need to take account of other relevant local plan policies, including those in relation to Urban Greening Factor and open space.
	PHM0021	SA-MO8	OIS33: Drakeley Court and Aubert Court		Resident	Respondent questions if there are there any further details of the proposals. Interested in the height of any new buildings proposed and the siting of green areas/tree preservation. Considers that although the current buildings are badly in need of renovation, the site has a lovely outside space which it would be a shame to lose.	Neither	The site allocations sets out key principles for the future development of the site to be taken into account as part of a future planning application. Detailed proposals for the site are being developed by the Council's New Build in consultation with local residents, further detail about the proposed development will be provided as part of this process. The site allocations is clear that improved landscaping, including the creation of a new green square should be provided as part of future proposals.
R19.0033	PHM0022	N/A	HC3: Highbury and Islington Station		Resident	The respondent strongly objects to site allocation HC3, although appreciates the need to develop the station into a more substantial building and the surrounding public space. However, building over the railway tracks west of the station should not be permitted as there is no public benefit and would damage the character of the area. The objection relates to: <ul style="list-style-type: none"> - an increase in overlooking of nearby properties - views to Union Chapel would be lost - demolition of social housing on Court Gardens - the site would be a building site for decades - impact on bat boxes and natural habitat for birds and foxes -Railway area between Court Gardens, Highbury Station Road and Liverpool Road is not in a deep cutting so any decking over the railway would create a high wall at ground level. - The consultation states 'any development would have to be accompanied by significant amounts of open space' which is not possible here. Decking over the railway and building above would be destructive to the neighbourhood	Object	No modifications were proposed to this site allocation. Please see regulation 19 responses and the Site Allocations Topic Paper.
	PHM0023	SA-MO3	OIS28: Barnsbury Estate		Resident	The respondent strongly objects to the site allocation OIS28 on the new Barnsbury Estate. The respondent appreciates the need for housing	Object	The site allocations sets out the key principles for a site that will need to be considered as part of a future planning application, this includes the need for high quality design. The site allocation

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						and agrees with the development plans but finds having high rise flats along Copenhagen Street to severely affect surrounding blocks and residents on Copenhagen Street. The Barnsbury Conservation Area borders the site and development of 7-8 storey flats would detrimentally impact on the character of the conservation area and access to light in already darkened properties. A maximum four storey residential development would be more appropriate.		also highlights the Barnsbury Conservation and listed buildings in proximity to the site which will need to be conserved or enhanced consistent with other policies in the plan. Newlon will work with residents on detailed design proposals. There will then also be an opportunity to comment on building heights as part of the planning application process.
	PHM0024	SA-MO6	OIS31: Hillside Estate		Resident	Respondent objects to inclusion of Hillside estate and considers Hillside Park has biodiversity value and is well used	Object	Objection to allocation noted. The site allocation recognises Hillside Park as a constraint and that any impacts on this should be carefully considered and mitigated. In addition, as a designated open space and so relevant policies to protect and enhance this apply. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary.
	PHM0028		General		Resident	Resident is concerned that the impact of infill development on the 8 allocated council estates and the green space which is important for people who live in flats. Suggests an independent assessor and a process for considering this at planning application stage, particularly relevant given these are council sites and represent a conflict of interest. Would like the council to commit to no net loss of green space and increase it where possible through using roof space for example.	Object	Policy G2 part C states that the Council will protect open space on housing estates, and where development is proposed on housing estates on site re-provision of the same quantum of an improved quality is encouraged. The policy also sets out circumstances where some loss of overall area may be acceptable, which includes if the re-provided space is an improved quality, the space serves multiple functions. Local Plan policies also require incorporating green infrastructure into new development and meeting an urban greening factor target.
R19.0142	PHM0030	SA-MO101	OIS5: Bush Industrial Estate, Station Road	LaSalle Investment Management	Landowner	Opposition to including the Upper Holloway Railway Cutting SINC as a constraint for site OIS5.	Object	The council proposes to modify the proposed modification to remove reference to the Upper Holloway Railway Cutting SINC and include the Whittington Park SINC which is adjoining the site.
R19.0142	PHM0030	SA-MO102	OIS5: Bush Industrial Estate, Station Road	LaSalle Investment Management	Landowner	Objects to drafting of the modification and suggest revision to make clear it should only be applied where relevant.	Object	The Council recognises the sensitivities of development in this location. Local Plan policies will help to protect against the impacts of air pollution, noise, servicing and traffic impacts and will implement these policies with respect to any development on this site allocation.
	PHM0031	SA-MO6	OIS31: Hillside Estate		Resident	Resident considers that the combination of population decline caused by Brexit/pandemic and economic impact of pandemic will result in unused office and shop space which can take advantage of Government introduction of class E to residential rights which would be preferable to building housing on Hillside Park.	Object	The site allocation recognises Hillside Park as a constraint and that any impacts on this should be carefully considered and mitigated. In addition, as a designated open space and so relevant policies to protect and enhance this apply. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary.
	PHM0033	SA-MO7	OIS32: New Orleans		Resident	Resident questions if there would be increased traffic on Hornsey Rise (short term for works traffic, long term for increased residential	Object	Regarding a short term increase of works traffic, Islington's emerging Policy S10, part G requires all developments to take all possible measures to minimise the impact of construction on the

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						traffic) and affect on existing residential parking on Hornsey Rise		environment and comply with Islington's Code of Practice for Construction Sites. Regarding a possible increase in residential traffic, Islington's emerging Policy T3 requires that new residential developments are car-free will not be permitted vehicle parking or development for new homes, except for essential drop-off and accessible parking.
	PHM0033	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact of redevelopment and privacy from proposed active frontage for houses on Hornsey Rise	Object	An 'active frontage' in this residential location should mean providing a ground floor with windows and entrances to Hornsey Rise which provide overlooking and helps create a sense of security. As part of the development of the detailed design of proposals issues such as privacy will be looked at. This will also be assessed as part of the planning application process in line with relevant planning policies.
	PHM0033	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact of redevelopment on light for the buildings on Hornsey Rise	Object	The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing levels of daylight and sunlight would be considered. Proposals will need to be of a high quality in line with specific design criteria and standards.
	PHM0033	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact of redevelopment on children using the playground/basketball courts and their continued access to suitable outdoor play facilities	Object	The site allocation requires that the multi-use games area must be reprovided as well as improvements to the play space. The phasing of development will consider how access will be provided when detailed proposals are put together following further consultation with residents.
	PHM0033	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact of redevelopment on the current flats on the New Orleans estate	Object	The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing levels of daylight and sunlight would be considered. Proposals will need to be of a high quality in line with specific design criteria and standards.
	PHM0033	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact of redevelopment have on the green spaces of the estate / existing mature trees	Object	The site allocation highlights any development should maximise opportunities to improve urban greening and enhance green infrastructure as well as the need for trees to be carefully considered as part of a comprehensive landscaping plan. Other Local Plan policies provide further detail including draft Local Plan policy G4. G4 which requires a holistic approach to landscape design so that this is considered from the start of the design process. The support text to policy G4 highlights that Development proposals which are likely to affect trees within the application site or on land adjacent to the site (including street trees) are required to follow the process outlined in BS5837:2012 and include an up-to-date Arboricultural Impact Assessment, which must include a Tree Constraints Plan and Tree Survey.
	PHM0034	SA-MO7	OIS32: New Orleans		Resident	Resident objects to any proposed development of New Orleans estate stating the existing high	Object	Site Allocations identify potential sites for development and assign appropriate uses for that site based on need and

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						housing density in the area and reference to insufficient space or amenity to expand further.		evidence. There is an identified need for more local, genuinely affordable housing and the site has been identified as having the potential to accommodate additional housing to help meet this need. Residents and stakeholders will have the opportunity to comment on proposals in more detail as they are developed. Proposals will need to be of a high quality and provide a good level of amenity in line with specific design criteria and standards.
	PHM0035	SA-MO85	ARCH5: Archway Campus	Peabody	Landowner	Peabody welcome the modifications to the allocation that states that the site is vacant and is allocated for residential-led development, with some commercial, community and social infrastructure uses on the ground floor, as well as student housing. They would like a change to the allocation to remove the stipulation that commercial and social infrastructure is located on the ground floor. Alternative suggested wording is provided. The also considered such uses should not be a requirement for any future application, while the potential for such uses is supported.	Both	Support noted. The Council considers that it may be appropriate to allow commercial, community, and social infrastructure uses on more than the ground floor and will consider a relevant modification in relation to active frontages. This will be explored with a Statement of Common Ground.
	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident has amenity concerns regarding potential for development to impact on privacy and light of existing residents on Hornsey Rise	Object	The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing levels of daylight and sunlight would be considered. Proposals will need to be of a high quality in line with specific design criteria and standards and ensure a good level of amenity.
	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident has concerns regarding potential for development to impact on existing character of the area	Object	The site allocation requires high quality design to be provided. Design will also need to take into account other Local Plan policies such as the need to respond to and enhance the site's context. Further detailed design proposals will be consulted on by the Council's New Build team prior to a planning application being submitted.
	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident has concerns regarding new residents exposure to noise and air pollution from road traffic	Object	Any development along Hornsey Rise would need to be designed in a way that mitigates or prevents adverse impacts on air quality this includes not creating any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality consistent with policy S7. In addition, development that has the potential to cause or exacerbate unacceptable noise and vibration impacts will be required to prevent or mitigate these impact consistent with policy DH5.
	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident would support development which retains existing built footprints and maintains spaces between and layouts and protects trees	Object	The site allocation highlights any development should maximise opportunities to improve urban greening and enhance green infrastructure as well as the need for trees to be carefully considered as part of a comprehensive landscaping plan. Other Local Plan policies provide further detail about the approach to trees including draft Local Plan policy G4. Further details about proposals will be consulted on by the Council's New Build team.

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	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about construction impacts	Object	As part of a future planning application for the site it will be necessary to set out how construction impacts will be managed and limited, this includes addressing policies which require best practice construction techniques to limit impacts on air quality and reduce noise and vibrations. As part of any planning permission there will also be a legal agreement to manage the construction impacts of new development.
	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact on social infrastructure	Object	The Site Allocations highlights amenities and social infrastructure that will be required for future proposals (e.g. multi-use games area, community buildings and improved play space).
	PHM0038	SA-MO7	OIS32: New Orleans		Resident	Resident has made some observations on how the consultation process could be improved in future.	Object	The site allocation sets out key principles for the site to be considered as part of a future planning application. The Council's New Build team will consult on more detailed proposals following initial feedback. This will then help to inform a future planning application on which there would be another chance to comment. Further explanation of proposals will be provided as part of this process.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident notes that they did not receive direct consultation from planning department	Object	Letters were sent to properties adjacent to the site. The site allocation sets out key principles for the site to be considered as part of a future planning application. The Council's New Build team will consult on more detailed proposals following initial feedback. This will then help to inform a future planning application on which there would be consultation. Further explanation of proposals will be provided as part of this process.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident notes that there is no detail on size, height or footprint of the new buildings would take.	Object	Please see response above.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident notes that community hall and playing pitches are well used and demolition and re-build is less sustainable.	Object	The site allocation is clear that community hall and multi-use game area are to be re-provided in recognition of their importance to the local community. The details of the proposals will be developed and consulted on by the Council's New Build team. As part of the development of proposals and the submission of a planning application the proposals will be required to comply with planning policies which requires high environment standards to achieve net zero carbon and the use of sustainable/recycled materials.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident has concerns regarding new residents exposure to noise and air pollution from road traffic	Object	Any development along Hornsey Rise would need to be designed in a way that mitigates or prevents adverse impacts on air quality this includes not creating any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality consistent with policy S7. In addition, development that has the potential to cause or exacerbate unacceptable noise and vibration impacts will be required to prevent or mitigate these impacts consistent with policy DH5.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about the existing density	Object	The development of detailed proposals will be consulted on by the Council's New Build team. In line with planning policies a future planning application will consider the appropriateness of design and how this responds to the site's context.

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	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about impact on social infrastructure and additional demand for parking	Object	The Local Plan is clear that development should be car free and this is supported by the London Plan. This will help to limit additional demand for parking. The Site Allocations highlights amenities and social infrastructure that will be required for future proposals (e.g. multi-use games area, community buildings and improved play space).
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about construction impacts	Object	As part of a future planning application for the site it will be necessary to set out how construction impacts will be managed and limited, this includes addressing policies which require best practice construction techniques to limit impacts on air quality and reduce noise and vibrations. As part of any planning permission there will also be a legal agreement to manage the construction impacts of new development.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about loss of greenery and trees	Object	The site allocation highlights any development should maximise opportunities to improve urban greening and enhance green infrastructure as well as the need for trees to be carefully considered as part of a comprehensive landscaping plan. Other Local Plan policies provide further detail about the approach to trees including draft Local Plan policy G4. There is a need to do further detailed design work for the site which would include careful assessment of existing trees that will be undertaken as part of the development of proposals.
	PHM0041	SA-MO7	OIS32: New Orleans		Resident	Resident is concerned about loss of amenity and pleasant outlook from flat on greenery and trees, and also notes benefit to residents of the estate.	Object	The site allocation highlights any development should maximise opportunities to improve urban greening and enhance green infrastructure as well as the need for trees to be carefully considered as part of a comprehensive landscaping plan.
R19.0152	PHM0042	N/A	OIS21: Former railway sidings adjacent to and potentially including Caledonian Road Station	Historic England	Statutory consultee	Respondent identifies previous concern raised at Regulation 19 stage and the expectation that further assessment will be produced which considers the significance.	Object	The Council will be preparing an additional heritage assessment of OIS21 which we will share with Historic England with a view to meeting their concerns and agreeing a statement of common ground.
R19.0152	PHM0042	SA-MO3 SA-MO5 SA-MO9	OIS28: Barnsbury Estate OIS30: Cluse Court OIS34: Kerridge Court	Historic England	Statutory consultee	Respondent notes the new site allocations and suggests words to add to development considerations to consider local character and conserve significance of any heritage assets likely to be affected.	Object	We agree that development will need to be sympathetic to the existing Local Character, and conserve the significance of any affected heritage assets, however this is addressed by the Local Plan policies related to design and heritage. The development considerations in each site allocation do not seek to repeat policy which applies to all development in the borough, but to identify site specific development considerations.
R19.0118	PHM0043	SA-MO3	OIS28: Barnsbury Estate	Thames Water	Statutory consultee	The respondent notes that the scale of development is likely to require upgrades to water infrastructure but not waste water. Also notes that		Potential upgrade to water supply network infrastructure and location within Source Protection Zone noted.

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						the site is located in a Source Protection Zone in respect of ground water.		
R19.0118	PHM0043	SA-MO4	OIS29: Highbury Quadrant Congregational Church	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site.	n/a	Noted
R19.0118	PHM0043	SA-M01	KC8, Bemerton Estate South	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site. Also notes that the site is located in a Source Protection Zone in respect of ground water.	Object	Noted. Location within SPZ also noted.
R19.0118	PHM0043	SA-MO2	OIS27: York Way Estate,	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site.	n/a	Noted
R19.0118	PHM0043	SA-MO5	OIS30: Cluse Court	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site. Also notes that the site is located in a Source Protection Zone in respect of ground water.	Object	Noted. Location within SPZ also noted.
R19.0118	PHM0043	SA-MO6	OIS31: Hillside Estate	Thames Water	Statutory consultee	The respondent notes that the scale of development is likely to require upgrades to water infrastructure but not waste water.	Object	Potential upgrade to water infrastructure noted.
R19.0118	PHM0043	SA-MO7	OIS32: New Orleans Estate	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site.	n/a	Noted
R19.0118	PHM0043	SA-MO8	OIS33: Drakeley Court and Aubert Court	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site.	n/a	Noted
R19.0118	PHM0043	SA-MO9	OIS34: Kerridge Court	Thames Water	Statutory consultee	Respondent does not envisage either water or waste infrastructure concerns regarding this site.	n/a	Noted
R19.0119	PHM0044	N/A		Sport England	Statutory consultee	No comments	n/a	Noted
R19.0135	PHM0045	SA-MO16	Policy SA1	Groveworld Ltd	Developer	Objects to the proposed wording of SA1 and AAP1 for the reasons previously summarised, and considers that a request for specific evidence should be required from the council in relation to each site allocation to justify the need for this approach.	Object	The proposed modification to policy SA1 clarifies the council's approach to determining development proposals for allocations site in light of the changes to the Use Classes Order. Whilst some allocations are worded flexibly others have specific uses such as offices. Securing these uses will be important for boroughs ability to meet evidenced priority development needs. This is necessary to support the implementation of other Local Plan policies (e.g. Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2).
R19.0158	PHM0046	SAMO102	OIS5 Bush Industrial Estate	Better Archway Forum	Campaign	Development considerations for site OIS5 Bush Industrial Estate should include 'This includes a requirement that any proposals will not result in any increase in air, light or noise pollution,	Both	The Council has proposed a modification to include reference to the adjacent Yerbury Primary School and proximity to Whittington Park and the school. The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the

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						particular insofar as they may affect residents and Yerbury School and Nursery. Comment is also made about reducing permeability on the Girdlestone Estate, however this is not a site allocation.		northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
R19.0158	PHM0046	SA-M0101	OIS5: Bush Industrial Estate, Station Road, Site designations and constraints	Better Archway Forum	Campaign	Do not consider the proposed wording strong enough protection and suggest some wording.	Object	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
R19.0158	PHM0046	SA-M0101	OIS5: Bush Industrial Estate, Station Road, Site designations and constraints	Better Archway Forum	Campaign	Do not consider the proposed wording strong enough protection and suggest some additional development consideration	Object	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0047	SA-MO3	OIS28 Barnsbury Estate		Business	Respondent is supportive of the overall allocation however it is unclear there has been any provision for relocating of the dental practice as to a precise location, cost of moving, estimate rental charges, lead time from notice to quit to operating in the new site. The respondent is keen to know if there is to be compensation to cover the cost of relocation as this is to be handled by specialist contractor. There are significant lead in times with moving the dental practice that need to be considered.	Both	This sets out key principles for a site that will need to be considered as part of a future planning application. The development considerations set out in the Site Allocation modification for the Barnsbury estate requires replacement commercial uses to maintain and enhance the retail and service function of the Caledonian Road Local Shopping Area. Dental surgeries form part of the new class E ((Commercial, business and service) use class. Newlon will work on detailed proposals as part of the preparation of a planning application, there will then also be further consultation as part of the planning application process.
	PHM0050	SA-MO84; SA-MO85	ARCH5: Archway Campus, Highgate Hill	Bidwells	Developer	Respondent welcomes the proposed changes to the allocation and believe that they will allow for the flexibility required to ensure that this site can be delivered. The provision of a quantum of student accommodation on site will facilitate the early delivery of much needed private and affordable housing within the Borough.	Support	Support for allocation and flexibility to ensure delivery noted.
	PHM0052	N/A	ARCH3: Archway	Flowervale UK Limited	Landowner	Respondent is the owner of site ARCH3, looking to redevelop the site for high quality replacement	Object	The Council considers that it is important to limit uses within the use class E in some circumstances where necessary to meet

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			Central Methodist Hall,			community/cultural accommodation and employment generating workspace. The respondent argues the Council should ensure that exercising control of uses through conditioning should ensure this does not inhibit the development of sites or hinder their commercial positions in the context of flexibility within the revised Use Class Order.		Local Plan objectives. Development viability has been considered in the Local Plan and the plan was viability tested.
	PHM0056	SA-MO3	OIS28 Barnsbury Estate		Resident	Resident queries what indicators/evidence is used for the provision of genuinely affordable housing; and why the Old and New Barnsbury is being considered together when one is a refurbishment and the other redevelopment. The respondent expects to see: specific reference to housing improvements for tenants; the expected lifespan of the estate; how quality materials will be ensured; commitment to blind tenure; no impact of tall buildings on light of existing flats; a clear transport strategy to ensure no rat running and guaranteed cycle infrastructure and traffic calming; and consideration of plumbing including soil pipe infrastructure that will not impact exteriors and access to light.	Object	The need for genuinely affordable housing and how this is defined is set out in the Local Plan (policy H3). The site allocation sets out key principles for the whole site as the whole site will come forward for a planning application and there are links between the old and new Barnsbury. Those homes that are subject to planning permission will be required to meet housing quality standards. Consistent with circular economy principles (and policy S10) major development will need to demonstrate how they will be designed for longevity. Local Plan policy H4 sets out how development must be designed to ensure shared access for market and affordable units. Proposals will be expected to provide a good level of amenity including consideration of daylight/sunlight. A future planning application will be required to provide cycle parking.
	PHM0057	SA-MO8	OIS33: Drakeley Court and Aubert Court		Resident	Proposed amendments to the Site Allocation description in relation to protecting the amenity of residents: "Any development should ensure high quality design, meet identified local housing needs and respect the integrity of the existing estates where appropriate, by protecting the amenity of existing residents – preventing unacceptable impacts on daylight and sunlight, sense of enclosure, overshadowing, privacy and overlooking."	Not stated	The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing levels of daylight and sunlight would be considered. Proposals will need to be of a high quality in line with specific design criteria and standards and ensure a good level of amenity.
	PHM0059	N/A	OIS5: Bush Industrial Estate, Station Road		Resident	The respondent states that intensification of industrial uses along Station Road and on this site will cause additional negative noise and air quality impacts on nearby school and residents in the surrounding area.	Object	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0060	SA-MO7	OIS32: New Orleans Estate		Resident	The respondent asks for questions related to the potential redevelopment plans for the estate. Requests further details of the plans for multi-use game areas, landscaping, parking; and details on potential impact on residents. Asks for clarification	Neither	The site allocation sets out key principles for the site to be considered as part of a future planning application. The Council's New Build team will consult on more detailed proposals following initial feedback. This will then help to inform a future planning application on which there would be another chance to comment.

Reg 19 ID if applicable	Pre hearing modification on response ID	Modification on reference	Site reference	Organisation name (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
						of concepts in the SA description such as 'build edge' and 'active frontage'.		Further explanation of proposals will be provided as part of this process.
	PHM0062	SA-MO6	OIS31: Hillside Estate		Resident	The respondent objects to the inclusion of Hillside Park in the site allocation because of the potential loss of biodiversity and its negative effects on the Council's own Biodiversity Action Plan.	Object	Objection to allocation noted. The site allocation recognises Hillside Park as a constraint and that any impacts on this should be carefully considered and mitigated. In addition, as a designated open space and so relevant policies to protect and enhance this apply. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary.
	PHM0064	SA-M07	OIS32: New Orleans Estate, section 9		Resident	<p>The respondent reflects comments and observations based on public and stakeholder engagement work undertaken in Crouch Hill and Hornsey Rise Neighbourhood Area in 2014 and the Draft Neighbourhood Plan Policies (2015). The site allocation is located within this area. The findings are outlined as follows:</p> <ul style="list-style-type: none"> - Concerns about scale and height of development and lack of supporting community infrastructure. - Overcrowded state of New Orleans Estate and residents wanting new homes. - Consideration of opportunities for community developer (Housing Cooperative/Land Trust). - Feasibility for improvement and refurbishment. - Open spaces in the estate perceived as community assets. - Cromatie Road and Hornsey Rise buildings considered locally distinctive historic buildings. - Preference that the council holds discussions with the public and stakeholders on the issue of identifying housing needs in the area. - Infrastructure for residents over 70 years old was raised as an issue. - There was consensus for a preferred maximum building height of 8 storeys. - Potentials for community energy and micro-generation. - Concerns for community safety. - Loss of community facilities. - Desire for support on cultural activities for youth and adults. - Development was perceived to create a loss of employment in the area, where for example light industrial uses were shifting to service economy and retail. - Need for provision of low cost leases on flexible terms for businesses. 	Object	The site's location within the Crouch Hill and Hornsey Rise Neighbourhood Area and background material is noted. The proposals for the site seek to respond to issues such as overcrowding/residents wanting new homes as well as the importance of community/social infrastructure and green infrastructure on the estate. Following initial consultation the Council's New Build team will take into account feedback received in developing more detailed proposals for the site.

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	PHM0066	N/A	OIS5: Bush Industrial Estate		Resident	<p>The respondent states that the wording of the site allocation only reflects limited control regarding potential planning applications and proposes the following sentence to be added:</p> <p>"This includes a requirement that any proposals will not result in any increase in air, light or noise pollution, particularly insofar as they may affect residents and Yerbury School and Nursery."</p> <p>The respondent also proposes a new development consideration to be added which includes a requirement for proposals not to result in increase an increase on air, light and noise pollution which may affect residents and the school and nursery:</p> <p>"The northeastern section of the site is located in close proximity to Yerbury Primary School, Whittington Park (a designated SINC), and existing residential uses. Development proposals for this section of the site will be required to carefully consider and mitigate potential negative impacts."</p>	Neither	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0069	SA-M0101 and SM-M0102	OIS5: Bush Industrial Estate		Resident	<p>Strong opposition to the proposed Ocado development. The wording should be expanded with regard to impacts on the Yerbury Primary School and the Whittington Park, including with regard to air quality, traffic, noise, light, safety, and amenity.</p> <p>The condition attached to units A-D precluding warehousing should remain.</p>	Object	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0070	SA-M08	OIS33 Drakeley Court Estate and Aubert Court Estate		Resident	<p>Objection to the increasing permeability of the estate and concerns about safety and security, concern about mopeds cutting through the estate, loss of privacy. Also concerns about light pollution, noise pollution, and the need to retain trees and nature.</p>	Object	<p>The site allocation highlights the need to create safe routes through the estate. Issues raised by residents through consultation by the New Build team will help to inform the final detailed design.</p> <p>The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Proposals will need to be of a high quality in line with specific design criteria and standards and ensure a good level of amenity.</p> <p>Site allocations will be read alongside alongside other policies in the Local Plan which provide further detail on the approach to trees, including draft Local Plan policy G4 which provides sets out a robust basis for considering trees on sites. As part of the development of proposals further detailed design work for the site will include the assessment of existing trees which it is not possible to do for each site allocation but that will be undertaken part of the development of proposals.</p>

Reg 19 ID if applicable	Pre hearing modification on response ID	Modification on reference	Site reference	Organisation name (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
								The allocation highlights the importance of considering green infrastructure, including trees, comprehensively as part of proposals is consistent with draft policy G4 which requires a holistic approach to landscape design so that this is considered from the start of the design process.
	PHM0071	SA-M0101	OIS5: Bush Industrial Estate, Station Road, Site designations and constraints		Resident	Opposes to a food depot in the area as it is a residential area and there is adequate provision of food in the area. Concern about pollution and impacts on children at the adjacent primary school.	Object	The site is allocated for industrial uses but not for a food depot specifically. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0073	SA-M0101	OIS5: Bush Industrial Estate, Station Road, Site designations and constraints		Resident	Opposes designation of OIS5 due to the impacts on air, noise, and light pollution on Yerbury Primary School, local residents, and users of Whittington Park.	Object	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0074	SA-MO7	OIS32: New Orleans Estate, Section 9		Resident	Believes there is insufficient detail of the proposed development, and no plan or layout of the proposed development. The site is already too crowded, concerns about loss of light and privacy to neighbouring residents, concern about disruption caused by construction including on traffic. More detail and visual material is needed.	Object	The allocation sets out key principles for a site that will need to be considered as part of a future planning application. Further detail about the proposals will be set out and consulted on by the Council's New Build Team, there would also be further consultation as part of a future planning application. This will include further detail about building heights, design and entrances. The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Proposals will need to be of a high quality in line with specific design criteria and standards and ensure a good level of amenity. Regarding impacts from construction Islington's emerging Policy S10, part G All developments are required to take all possible measures to minimise the impact of construction on the environment and comply with Islington's Code of Practice for Construction Sites.
	PHM0075	SA-M08	OIS33 Drakeley Court Estate and Aubert Court Estate		Resident	Objects to removing the boundary between Aubert Court and Drakeley Court Estate which is currently a gated entrance. Objects to new access provided at the back of the South Stand at Highbury Station Square. Concerns about privacy, security, light and noise pollution, and traffic cutting through.	Object	The site allocation highlights the need to create safe routes through the estate. Issues raised by residents through consultation by the New Build team, including issues around safety, will help to inform the final detailed design. With regard to joining the estates that New Build team have identified that access to Aubert Court gardens will be limited to Drakeley Court residents only.

Reg 19 ID if applicable	Pre hearing modification on response ID	Modification on reference	Site reference	Organisation name (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
								The Local Plan contains policies to protect residential amenity. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Proposals will need to be of a high quality in line with specific design criteria and standards and ensure a good level of amenity.
	PHM0076	SA-M06	OIS31 Hillside Estate		Resident	Opposes inclusion of Hillside Park with the Hillside Estate site allocation. Allocating the park for development at odds with designation as open space and not in line with Strategic and Development Management Policies, London Plan, and unsound with regard to the NPPF. The park should be excluded from the red line boundary.	Object	Hillside Park falls within the Estate boundary and within the allocation boundary, but it is also a designated open space which is protected by Local Plan policy G2. Hillside Park is recognised in the site allocation as a constraint and that any impacts on this should be carefully considered and mitigated. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary.
	PHM0078	SA-MO105 and SA-MO106	OIS10 - 500-502 Hornsey Road and Grenville Works, 2A Grenville Road	Grenville Northside	Landowner	The site allocation Appendix 1 table refers to 14 residential units for this site, but the planning application is for 16 units, this should be reflected accordingly.	Neither	Please note that the modifications do not include a reference to the number of units on site.
	PHM0079	SA-MO102	OIS5 - Bush Industrial Estate		Residents	Supportive of the reference to the primary school and the SINC, but believes the policy does not go far enough to prevent negative impacts of development in terms of air pollution, especially in relation to the Ocado hub]	Both	The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0080	SA-NO6	OIS31: Hillside Estate		Resident	Concerns about development on green open spaces, and new buildings obstructing sightlines, leading to dead ends and making the estate feel unsafe	Neither	Hillside Park falls within the Estate boundary and that is why it is included in the allocation. The site allocation recognises Hillside Park as a constraint and that any impacts on this should be carefully considered and mitigated. In addition, as a designated open space and so relevant policies to protect and enhance this apply. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary. The site allocation highlights the need for development to increase permeability to create safe, direct, active and overlooked routes through the estate, this will be important when considering any opportunities for active frontages.
	PHM0081	SA-MO102	OIS5 - Bush Industrial Estate		Resident	Suggest modifications to the Reg19 OIS5 table. Would like to see all neighbours notified on planning activities, beyond legal obligations. Robert Blair Primary is within the industrial estate and should be mentioned. Supportive of the 200m food takeaway restriction policy,	Neither	The Council has proposed a modification to include reference to the adjacent Yerbury Primary School and proximity to Whittington Park and the school. The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential

Reg 19 ID if applicable	Pre hearing modification on response ID	Modification on reference	Site reference	Organisation name (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
								negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0082	SA-NO6	OIS31 - Hillside Estate		Resident	Concerned about opportunities on St John's way reducing physical and visual access into existing open spaces on the estate and impacts on safety. Green spaces are critical for well-being. Hillside Park and the football pitch beside Caxton House need to be protected. Redevelopment should be by an architect chosen by the residents	Neither	The site allocation highlights the need for development to increase permeability to create safe, direct, active and overlooked routes through the estate, this will be important when considering any opportunities for active frontages. The site allocation recognises Hillside Park as a constraint and that any impacts on this should be carefully considered and mitigated. In addition, as a designated open space relevant policies to protect and enhance this apply. There are no intentions to develop on Hillside Park, it is therefore proposed to remove it from the site boundary.
R19.0174	PHM0083	SA-MO74	FP5 1 Prah Road	London Centric Ltd	Landowner	Strongly support the residential allocation - but question Islington's definition of affordability, want a conversation about other 'affordable products' such as build to rent and London living rent. In their view public realm improvements should be modest in scale given the size of the site.	Both	Support for residential use allocation noted. The emerging local plan is clear on what Islington considers affordable housing - please refer to the Housing topic paper. Public realm improvements do not need to be substantial in scale to be of high quality. Policy T4 must be met.
	PHM0084	SAMO102 - SA-MO100	OIS5: Bush Industrial Estate, Station Road		Resident	Resident supports inclusion of constraints of Bush Industrial Estate allocation. Thinks wording to fully protect these areas is not strong enough. Recommends "potential negative impacts should be avoided." Objects to the word "intensification" which presumes ever more intensive activities, posing a risk to residential areas. Suggests use of "suitable" or "appropriate." Requested council notify residents of changes of use or conditions outside planning process	Both	Islington notes the support for the inclusion of the Yerbury Primary School, Whittington Park SINC and residential to the Bush Industrial Estate site constraints. The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.
	PHM0085	N/A	OIS5: Bush Industrial Estate, Station Road		Resident	Resident strongly objects to the intensification of industrial use at Bush Industrial Estate, especially given Ocado controversy. Their view is that the wording to protect the community surrounding the site from negative is inadequate and should be stronger. The no "warehousing" 1984 planning ruling for the site is cited. The resident particularly highlights that proximity of residential development Wedmore Court close to the site should be added as a constraint.	Object	Note the concern for protecting amenity for neighbours of the Bush Industrial Estate. The Council recognises the sensitivities of development in this location and the modification reflects that by requiring development proposals in the northeastern section to carefully consider and mitigate potential negative impacts. Local Plan policies seek to prevent or mitigate against the impacts of air pollution, noise, servicing and traffic impacts which would also apply to a future planning application on this site. Further changes have also been proposed to the draft Local Plan to follow commitments set out in the Islington Transport Strategy which aim to reduce the impact of deliveries.

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	PHM0086	N/A	NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road	Islington Holdings	Landowner	Respondent welcomes the allocation but would like to see the allocation revised to prioritise mixed use redevelopment and considers it can accommodate a 20 storey tower and a minimum 500 new homes. Considers this is necessary to incentivise the landowner. Notes the substantial contribution this site could make the boroughs housing supply.	Both	Response was received after the consultation closed. Did not respond to regulation 19 consultation. Support for the inclusion of the allocation and modifications noted. The site allocation identifies the potential for a tall building (of up to 15 storeys) on this site based on evidence. The allocation is considered to provide clarity in relation to housing and the mix of uses as well as tall buildings for a future planning application for the site.
	PHM0088	SA-M06	OIS31: Hillside Estate		Resident	Resident is concerned about inappropriate development in particular building height and notes effect on Whitehall Park conservation area and views. Also notes construction impact on residents and related noise.	Object	The objection to the allocation of the Hillside estate is noted. The site allocation recognises the Whitehall Park Conservation Area as a constraint. Any development on the site would have to be designed in accordance with Local Plan policies on design and conservation including with regard to height, bulk, scale, and preservation of local character and context. Any development would have to minimise the impacts of construction on the local area and residents and adhere to the Islington Code of Practice for construction sites.
R19.0114	PHM0077	N/A	N/A	Sunnyside Road Land Limited	Developer	Representations were submitted at regulation 19 asking that 87 Sunnyside Road was made a site allocation. This was not accepted by the Council. The respondent believes this to be unsound as London Plan policy direction has changed since regulation 19, that the Council stated that clearance of the existing buildings with the exception of the coach house could improve character and appearance, and the PTAL rating is too low to justify employment use. They also consider that not allocating the site is not consistent with national policy. In addition they consider that at least the coach housing building is suitable for residential development, and that the site has a residential context which makes it appropriate. They consider not allocating the site is not in line with the government agenda to increase housing delivery, and raise concerns with housing delivery in recent years, and that consideration should be had to the Government Standard Method which would mean much more housing should be developed. The respondents consider the Local Plan to be unsound for these reasons.	Object	This response is not in relation to a specific modification. Earlier representations in relation to this site were considered as set out in the Site Allocations topic paper.

Summary of responses to modifications on Bunhill and Clerkenwell Area Action Plan

Reg 19 ID (if applicable)	Pre hearing modification response ID	Modification reference	Policy reference and name	Paragraph reference	Organisation (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
n/a	PHM0036	n/a	BC38: Moorfields Eye Hospital	n/a	Moorfields Eye hospital	Landowner	Moorfields Eye Hospital NHS Foundation Trust are concerned that the site allocation has not been changed since Regulation 19 stage and contains wording which they believe is too prescriptive in relation to the location of the public realm and the location of tall buildings. They believe that the prescriptive nature of the allocation will limit a future developer's ability to creatively deliver the site. Suggested alternative wording for the allocation is provided. They also question the need for affordable workspace, and state that the overriding need in this instance is the provision of the eye hospital and research facility at King's Cross. They believe that the Moorfields site should be a facilitating site for the King's Cross site, and refer to the case of the Central Foundation School.	Object	<p>With regard to the location of tall buildings, the Moorfields Eye Hospital NHS Foundation Trust have asked that the location for tall building site G4 be changed from being located north of the junction of Baldwin Street and Peerless Street (approximately mid way along Peerless Street) to on the western part of Peerless Street. Islington's Tall Buildings Study states that a tall building in this location should be situated about half way on Peerless Street, sufficiently away from the City Road frontage to avoid an imposing visual impact on City Road. The Tall building Study also states that the taller element of this building should rise from within the street block with its mass clearly set back behind adjoining respective street frontages to avoid a sheer wall of height rising up and overbearing the public realm, and to retain a human scale and sense of proportion in the street space. The wording suggested by the representation does not preclude a tall building from being built close to City Road or other street frontages, and would therefore not align with the Council's evidence, and is not supported.</p> <p>With regard to site G5 the Moorfields Eye Hospital NHS Foundation Trust have asked that the location be changed from the northwest corner of the site to the northwest quadrant of the site. The Tall Buildings Study states that the building is to be situated at the corner of Bath Street with Cayton Street, announcing the new commercial place in views down Bath Street from City Road. In addition, the Tall Building Study states that a tall building in this location should principally rise out of the street block, with its taller element being set back clearly behind adjoining respective street frontages to avoid a sheer wall of height rising up and overbearing the public realm. The Council considers that development description for the tall building at location G5 is appropriately worded and reflects the evidence of the Tall Buildings Study, and we do not consider that an amendment is required, especially considering the additional information set out in the Tall Buildings Study for this location.</p> <p>The Moorfields NHS Foundation Trust have requested that the development considerations for the location a new open space on the site be changed to remove the requirement to locate the new open space on Cayton Street, suggesting revised wording that states "A new public open space must be provided, as the focus of the</p>

Reg 19 ID (if applicable)	Pre hearing modification response ID	Modification reference	Policy reference and name	Paragraph reference	Organisation (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
									development." The Council will discuss this matter with the Moorfields NHS Foundation Trust as part of a Statement of Common Ground.
n/a	PMH0037	BC-M09	BC4 City Road	n/a	Canal and River Trust	Statutory consultee	The Canal and River Trust want the policy related to residential moorings changed so that it allows some adverse impact on leisure provision, provided it can be mitigated. Suggested alternative wording is provided.	Object	The Council gives priority to the leisure function of the waterspace in this location to protect the function of the waterspace in this location, which provides valuable sporting and outdoor activities for a range of people.
n/a	PMH0037	BC-M09	BC4 City Road	n/a	Canal and River Trust	Statutory consultee	Respondent suggested removing the reference to limiting moorings to the south side of the canal as it is not appropriate in the City Road Basin policy area.	Object	The Council agrees that the policy related to the location of residential moorings on the south side of the Canal in the City Road Basin is not appropriate, and it has been included in BC4 in error and should be corrected. The Council will discuss this matter with the Canal and River Trust as part of negotiating a Statement of Common Ground.
R19.0119	PHM0044	n/a	n/a	n/a	Sport England	Statutory consultee	No comments	n/a	No response required.
n/a	PHM0048	BC-MO3	BC1 Prioritising Office Use	2.8	Islington Labour Environmental Forum	Campaign	Concern that the plan does not take into consideration the effects of the global pandemic, including the move to home working. The representation believes that the need for additional office floorspace needs to be reconsidered.	Object	This response does not relate to a proposed modification. The Council has been considering the effects of the Coronavirus pandemic throughout 2020 and 2021. This is reflected in updated evidence in the Viability Topic Paper updated, as well as an updated IIA. Up to date evidence, including from GLA Economics, predicts that economic growth and a demand for high quality office space with larger meeting and collaboration spaces from businesses will drive demand for office floorspace and outstrip any lowering in floorspace requirements from the move to more flexible working patterns post the Covid19 pandemic. This additional floorspace will remain critical for economic and employment growth.
n/a	PHM0048	BC-MO5, BC-MO6, BC-MO41, BC-MO52, BC-MO55, BC-MO60	BC2 Culture, retail and leisure; Policy AAP1; Site Allocation Monitoring; Glossary uses	n/a	Islington Labour Environmental Forum	Campaign	Concern that the plan does not take into consideration the effects of the global pandemic, including increasing online retailing.	Object	This response does not relate to a proposed modification. The Council has been considering the effects of the Coronavirus pandemic throughout 2020 and 2021 and what implications it has for the Local Plan. Any impacts of the pandemic are considered to be short term. The Local Plan covers the period up until 2036.
n/a	PHM0048	n/a	n/a	n/a	Islington Labour Environmental Forum	Campaign	The representation expresses concern over building on open space in council estates, especially in light of the pandemic and the need for open space and social distancing. There is also concern about release of office and retail space. Compulsory acquisition of empty buildings is suggested.	Object	This representation does not relate to the proposed modifications. Contrary to releasing office and retail space, these uses are generally protected by Local Plan policies. Policy G2 part C states that Council will protect open space on housing estates. Where development is proposed and on site re-provision of the same quantum and improved quality is encouraged. In some circumstances where re-provision of open space leads to a net loss, a number of criteria are set out,

Reg 19 ID (if applicable)	Pre hearing modification response ID	Modification reference	Policy reference and name	Paragraph reference	Organisation (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
									including that the replacement space is of a higher quality.
R19.0143	PHM0054	n/a	BC3 City Fringe Opportunity Area	n/a	Lion Portfolio Ltd	Landowner	General support for policy. Respondent's suggested change: delete Part L and instate 'The City Fringe Opportunity Area is identified as an area potentially suitable for tall buildings. Any proposal for tall buildings within the area will be considered on a site by site basis and must be fully consistent with Policy DH3 and all other relevant policies.'	Both	This representation does not relate to the proposed modifications. The general support for Policy BC3 is welcomed. The Council does not support the suggested change to the approach to tall buildings as it is not in line with the Council's proactive and evidence based approach informed by the Islington Tall Buildings Study. Please refer to the Tall Buildings Topic paper and regulation 19 responses for further details.
R19.0143	PHM0054	n/a	BC48 Castle House, 37-45 Paul Street, EC2A 4JU; and Fitzroy House, 13-17 Epworth Street, EC2A 4DL and 1-15 Clere street, EC2A 4U	n/a	Lion Portfolio Ltd	Landowner	The representation repeats points made in the regulation 19 consultation with regard to tall buildings on this site allocation. It states that the Tall Buildings Study did not take into consideration the new consolidated site allocation at Castle House and Fitzroy House, and is therefore flawed and this site should be reconsidered.	Object	<p>This representation does not relate to the proposed modifications. The representation repeats points made during the regulation 19 consultation.</p> <p>Regulation 19 response: The Council considers that the merged allocation will have no bearing on the TBS assessment. It is noted that the original assessment which informed the TBS took place before any allocations were identified even in draft form; allocations therefore are irrelevant.</p> <p>Additional information: The site was considered in the Islington Tall Buildings Study, and proceeded to be assessed in the sieve analysis under site CF-23 37-45 Paul Street and adjacent sites. The Tall buildings Study states that the site was inappropriate for development of a tall building and that a tall building would have a detrimental impact on the view to Grade I listed Wesley's Chapel from City Road and undermine its setting, further it impacts on the adjacent conservation area (LB Hackney).</p>
n/a	PHM0054	n/a	BC48 Castle House, 37-45 Paul Street, EC2A 4JU; and Fitzroy House, 13-17 Epworth Street, EC2A 4DL and 1-15 Clere street, EC2A 4U	n/a	Lion Portfolio Ltd	Landowner	The Tall Buildings Study and the associated review of sites did not take account of the Regulation 19, consolidated site allocation of Castle House and Fitzroy House. Rather it looked at each allocation individually. As such, the assessment of this new site allocation is flawed and should be reconsidered more fully.	Both	This representation does not relate to the proposed modifications. The Council considers that the Tall Buildings Study is a robust evidence base for identifying sites that are potentially suitable for tall buildings. Further detail is available in the Tall Buildings Topic Paper and the regulation 19 responses on this matter.
n/a	PHM0061	n/a	Whole document	n/a	TfL	Statutory consultee	No further comments. Issues have been addressed in the proposed modifications	Support	No response required.
n/a	PHM0065	n/a	BC4 Finsbury	n/a	n/a	Resident	The respondent states that the site allocation and AAP Policy BC7 F are not consistent with NPPF Policies 96 and 97 because they	Object	This representation does not relate to the proposed modifications. The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure

Reg 19 ID (if applicable)	Pre hearing modification response ID	Modification reference	Policy reference and name	Paragraph reference	Organisation (if applicable)	Respondent group	Summary of comments	Support/object?	LBI response
			Leisure Centre				<p>allocate housing on the Finsbury Leisure Centre site, which would significantly reduce the existing open space, space for sports and recreational facilities and green space, also considering the importance of these type of spaces after the pandemic.</p> <p>The respondent states that the policies are not based on robust up-to-date assessments as required by the NPPF because based on representations from Sports England and the Environment Agency and evidence in the Bunhill and Clerkenwell Urban Design Study (2010) there is an undersupply of open space, green space, sports and recreational facilities in the Bunhill area.</p>		centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.
n/a	PHM0087	n/a	n/a	n/a	n/a	Resident	Concerned about the loss of cafes and restaurants to retail units in the Clerkenwell area and considers it to be having a deleterious effect on the neighbourhood.	Object	Showrooms generally fall under use class E which includes a broad range of business, commercial and service uses including shops and offices. Showrooms were formerly generally use class A1 which comprises retail uses. Planning permission is not required for change of businesses within a use class so most conversions from shops to showrooms is outside the control of the Council through planning. Since Class E has been introduced this range of uses not requiring permission has broadened significantly and now include cafes and restaurants.

Summary of responses of Tileyard London Ltd to pre-hearing modifications consultation on IIA

Pre heading modification response ID: PHM0072.

Comment para ref	Summary of comments	LBI response
2.1	Explains the policy areas of concern.	n/a
2.2	Considers that assessment still fails to assess the full significance criteria including the duration and permanence of effects.	<p>These are referenced where relevant in the assessment. As explained in the submission IIA in paragraph 2.21:</p> <p>'The Framework includes consideration of short/medium/long term effects, cumulative effects, synergistic effects, secondary effects and permanent / temporary effects. The approach taken in presenting the cumulative and synergistic effects in the IIA is pragmatic and reflects an implicit consideration in the individual policy and site assessments that most policies will have a variety of potential effects; therefore, while these may not all be explicitly noted in individual assessments, there has been detailed consideration of the effects.'</p> <p>Further to this the expanded consideration of cumulative effects and mitigation in the examination IIA has helped draw out the consideration of effects further.</p>
2.3	Response notes the various documents which have been updated since publication of the Scoping Report in 2017 and would have been useful to reference.	The evidence base has been considered and is referred to where appropriate in the IIA. The wider context is also referred to in part 2. The topic papers are also referred to which provide further context. It is not clear what the 'variety of new evidence' post regulation 19 that is being referred to.
2.4 – 2.11	<p>Response notes the plans, policies and programmes set out at the Scoping Stage previously identified as being very out of date and considers that it is not clear how the objectives of other plans and programmes have been considered.</p> <p>Also notes the additional documents [topic papers] published as evidence in the examination library that were published in February 2020 as part of submission. Identifies various documents which have particular relevance to the IIA. Response goes onto note that various of the topic papers are out of date, giving various reasons.</p> <p>The GLA have produced a Practice Note on Industrial Intensification (2018). The response considers there is a need to prepare an industrial land audit to support the Local Plan.</p>	<p>The response to the submission IIA from Tileyard London Ltd (R19.0132) sought to identify that the evidence base was out of date, whereas this response to the examination IIA considers that the objectives are out of date. For Councils response to this aspect of R19.0132 is set out in Legal Compliance statement table on page 53 paragraph reference 2.3.14 to 2.3.15.</p> <p>The additional documents were published as supporting documents and are 'topic papers' which provide further justification for the soundness of various policies set out in the draft Local Plan. Topic papers are referenced in the IIA updated where these are relevant (e.g. Topic Paper SD20 on page 42, SD22 on page 46, SD25, page 98, SD16 on page 113).</p> <p>The response considers there is a need to prepare an industrial land audit to support the Local Plan. Whilst this references the existing Employment Land Review evidence but ignores the Vale Royal /Brewery Road Locally Significant Industrial Site height study which provides aspects of this data recommended in the GLA practice note. Whilst it is recognised that this evidence dates from 2016 it is not explained what aspects are considered out of date. The GLA practice note on industrial intensification is not new and doesn't have weight, it's not clear what relevance it has.</p> <p>In respect to the changes made to the new London Plan in relation to industrial land Policies E4 and E7 these are addressed in Part 2 of the examination IIA as are the Class E changes to the Use Classes Order.</p> <p>The role of a sustainability appraisal</p> <p><i>"is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."</i></p> <p>PPG6 provides guidance on what baseline information is:</p> <p><i>'The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan.'</i></p>

Comment para ref	Summary of comments	LBI response
		The purpose of the evidence base, in the context of IIA, is to provide a baseline against which the sustainability effects of the proposed policies can be judged. It is not the purpose of the IIA to test the evidence base or provide a definitive list of all evidence base documents.
2.12	Notes the introduction of the assessment of additional alternatives and presents these in a summary table. Compares with the previous assessment.	Whilst it is useful to demonstrate the change in effects between submission and pre hearings it's also necessary to review the commentary which provides the reasoning, so neutral results can be the result of a balance of positive and negative effects cancelling each other out for example the assessment of alternatives 2 and 3 against objective 8 and employment growth.
2.13	Provides a summary table of the PHM assessment	The risk of creating a summary table is also evident. There is a mistake in the respondents table below for objective 9, the need to travel is considered negative by the examination IIA and not neutral as shown in the respondents summary table.

Comment para ref	Summary of comments	LBI response
2.15	Considers the commentary weak and not linked to the appropriate evidence to support the decisions made. Also considers that other policies are used in support of the assessment rather than set out separately as mitigation.	<p>No examples are given to support this assertion and the commentary is considered thorough and sufficiently detailed. The commentary is directly informed by the prompt questions under each objective and the response questions were not mentioned to avoid repetition.</p> <p>The reference to other policies does occur, although not considered as mitigation, e.g. there is reference to car free policy for housing development. The assessment of site allocation policies also refer to the benefits or support from other policies in the Local Plan, for example the provision of affordable housing is considered positive for housing led sites and is something that policy could reasonably be expected to achieve and is not considered as mitigation.</p> <p>Policy S7 is referenced to: 'provide strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral' for a number of site allocations in Vale Royal. It is considered reasonable to reference this policy given its relevance to air quality.</p>
2.16	Considers that results do consider duration or permanence of the effects as required by the Regulations.	As set out above, the permanence of effects are set out under assessments where these are relevant/appropriate.
1 Built Environment	Respondent considers that the commentary on built environment does not reflect all of the prompt questions.	<p>The assessment responds to the policy in relation to the objective and the relevant prompt questions. Not all the prompt questions are relevant for every policy. The aspect of SP3 which concerns the quality of the built environment and can be addressed by the prompt questions is building height.</p> <p>It's noted that Policy T5 is referenced under objective 14 not objective 1. It is also referenced alongside other policies SP3, S7, T2 and T3 to reflect the cumulative mitigating effect of policies.</p>
2 Use of Land	Respondent considers that evidence of industrial use of land in this area is not provided or reason as to why it should be protected is not provided.	The assessment should be read as a whole. Significant commentary is provided against objective 1 – it is not considered necessary to repeat this. .
6 Social Inclusion	Notes the change in scoring to a significant positive from neutral with no reference to evidence and suggests that it's unlikely.	The submission IIA was judged neutral on the basis that the policy was the spatial expression of other policies in the plan. This was reviewed and considered unlikely, so to help clarity the commentary has referenced the other policies which help support the achievement of SP3 as part of consideration of cumulative effects. More importantly new effects were identified including the protection of the jobs in the industrial sectors which helps to provide opportunities for those people who have low skills or no qualifications levels – one of the sustainability issues identified in the Scoping Report.
7 Health & Wellbeing	The response considers that there is no evidence provided to support the claim that the policy will have a positive effect on air quality when considered against the baseline position.	<p>The IIA addendum is based on appropriate and proportionate evidence. It is noted that the Aecom Review note (SD63) on page 29 identified the following regarding the presentation of evidence:</p> <p>'whilst the submission SA Report presented a detailed review of evidence and discussion of implications for the SA scope, the IIA Examination Addendum presents a much more succinct review of key issues and objectives. This is considered to be proportionate and appropriate, recognising the extent of appraisal narrative, as part of which there is extensive discussion of the SA scope and evidence'..</p>
9 Need to Travel	The response considers that there is no evidence provided to support the claim that the policy will have a positive effect on air quality when considered against the baseline position.	The IIA addendum is based on appropriate and proportionate evidence.
12 Climate Change	The response considers that there is no evidence provided to support the claim that the policy will have a positive effect on air quality when considered against the baseline	The examination conclusions highlight the fundamental tension between development and climate change stating:

Comment para ref	Summary of comments	LBI response
	position. In addition the response consider that the impact of the policy on greenhouse gas emissions is not considered.	<p>“There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs.”</p> <p>And goes on to consider the sustainable design and public realm and transport policies which go some way to addressing the tension and mitigate the effect.</p>
14 Natural Resources	The response considers that there is no evidence provided to support the claim that the policy will have a positive effect on air quality when considered against the baseline position.	The IIA addendum is based on appropriate and proportionate evidence.
2.18	Explanation of which objectives receive negative effects	n/a
2.19	The respondent considers that there is muddle between the assessment of alternatives and 2 and 3 are combined. Also that positive effects are not considered.	<p>The assessment has combined results for alternatives 2 and 3 together. This is not considered to affect the results of the assessment. A minor amendment to clarify this can be made for the final IIA.</p> <p>The assessment identifies positive effects in respect to the alternatives and potential improvements to connectivity which have a positive effect responding to the prompt question ‘Make the built environment safer and more inclusive?’ But based on a judgment the assessment considers that this positive effect does not outweigh the impact on industrial character.</p>
2.20	The response considers that there is no evidence provided to support the claim that office uses have no more of a negative effect on climate change emissions than industrial uses.	Further cross referencing to the supporting documents in particular the Sustainability topic paper can be added which provides some information on this issue. See paragraphs 3.86 to 3.139. The topic paper notes that there is no evidence to suggest that industrial uses have any more significant impact on air quality compared to office uses, or vice versa.
2.21	Notes same as for climate change	See previous response
2.22	Notes that the commentary for the preferred approach is not identified for the alternatives policies.	With respect to the alternatives and the positive locational effects of policies B1 and B2 are relevant to mention and not considered mitigation as they focus business development to the most accessible locations in the borough. This can be applied against the alternatives, given that more accessible office locations are available elsewhere in the borough relative to the LSIS.
2.23	The results are not considered to be based on evidence and provide overly optimistic assumptions for preferred policies and pessimistic assumptions for the alternatives.	<p>The AECOM review note (SD63) provides an independent review of the assessment and concludes the following:</p> <p>“Policy B1 (Delivering business floorspace) – this is a centrally important set of RAs, within the context of the Local Plan IIA process as a whole. The alternatives relate to a key, contentious and potentially marginal element of the Local Plan spatial strategy, namely the policy position on non-industrial uses at Vale Royal LSIS. A detailed appraisal explores the pros and cons of the RAs; however, on balance, the appraisal lends quite clear support for the submission policy, which resists non-industrial uses. The appraisal is meaningful and helpful, and will no doubt serve to inform representations as part of the forthcoming consultation”</p>
2.24	Response considers that there is no discussion of the shortfall in office provision.	<p>Meeting a considered ‘shortfall’ in office space is considered elsewhere in the IIA (the sustainability issues in the examination IIA identifies projected growth in para 2.15 and the Scoping Report 2017 provides detail on floorspace para 5.184 to 5.188). References to the Employment Land Study are also made throughout the document and that document makes clear the position in respect to floorspace need, pipeline supply and shortfall. This further detail on floorspace has not been reproduced in the IIA but has formed the wider consideration of policy for this area.</p> <p>The IIA identifies the issue of land supply in the background section. The</p>
2.25	Respondent notes that there is no discussion of the recent planning decision for 22-23 Tileyard Road for mixed use development where appeal Inspector concluded the benefit of the scheme from a land use point of view.	It is not clear what relevance this appeal scheme has for the IIA and the council maintains the proposal is contrary to policy.
2.25	Notes that other alternatives were not considered including co-location of broader selection of business uses or a sub-area of the LSIS.	It is not clear what a broader range of business uses could be if it wasn’t considered an office or industrial use.

Comment para ref	Summary of comments	LBI response
		<p>A justification of the boundary is included in Councils response to Inspectors letter (LBI03 page 5). A sub-area would exacerbate the loss of industrial floorspace and lead to speculative applications outside it.</p> <p>The AECOM Review notes (SD63) identifies that :</p> <p><i>'There is no reasonable expectation on LPAs to systematically list out and screen each and every policy issue in turn, in order to reach a conclusion on those which do and do not warrant work to formally establish RAs for appraisal and consultation. Rather, there is an expectation that LPAs will take a proportionate approach, applying professional judgement to foresee instances where at least one alternative policy approach can be defined and meaningfully appraised, such that the appraisal serves to identify differential significant effects. In this light, the work undertaken by LB Islington, to the identification of policy RAs, is considered to be highly systematic, and robust.'</i></p>
2.26	States what alternatives have been assessed for site allocation VR3.	n/a
2.27	Explains how the examination IIA has approached site assessments and provides a summary table of the assessment.	n/a
2.28	Considers the assessment has not considered impacts against criteria including duration and permanence.	<p>Paragraph 2.21 in the submission IIA outlines how short/medium/long term effects, cumulative effects, synergistic effects, secondary effects and permanent / temporary effects have been assessed and presented as part of the IIA. Such effects have been set out where appropriate in the IIA addendum. The permanence of and duration of effects is identified where relevant. Ultimately, there is no requirement to provide full detailed narrative for assessment of every policy against every objective. Regulation 12 of the 2004 Regulations requires the responsible authority to identify, describe and evaluate the likely significant effects on the environment of implementing the plan. The PPG¹ is also explicit in this regard:</p> <p><i>"The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan."</i></p>
2.29	The response notes a difference in assessment between that for policy SP3 and site allocation VR3.	Noted
2.30	The response notes the reference to the mitigation applied by policy S7.	The commentary notes the mitigation against potential negative air quality impacts of policy S7. The commentary also refers to enabling shorter journeys and supply chains if industrial users can stay in the borough.
2.31	The response considers there is a contradictory approach to assessment with different conclusions made for the same objectives.	The difference in assessment results stem from the different scale of policy which is being dealt with. Policy SP3 includes elements to the policy which have positive effects through seeking to improve walkability and connections but because of the smaller scale of VR3 the site allocation cannot be considered to have the same effect. The wider effect on the industrial function and potential impact of the displacement of that function elsewhere is still recognised.

¹ Paragraph 009, <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Comment para ref	Summary of comments	LBI response
2.32	The response considers that there is no evidence provided to support the claim that the policy will have a positive effect on air quality when considered against the baseline position.	Further cross referencing to the supporting documents in particular the Sustainability topic paper can be added which provides some information on this issue. See paragraphs 3.86 to 3.139. The topic paper notes that there is no evidence to suggest that industrial uses have any more significant impact on air quality compared to office uses, or vice versa.
2.33	Considers that a neutral effect does reflect the uncertainty noted in the commentary.	The uncertain effect is noted in the assessment commentary but the effect is identified as neutral as it is recognised that at a site specific level the design quality of the building would determine whether it is positive or negative.
2.34	The respondent notes that there is no information on the current land use and refers to the advice given in the ELS.	<p>The site allocation provides detail on the current/previous use stating 'studio, writing rooms and offices serving the music industry...'</p> <p>In response to the Inspectors the consideration of alternatives has been presented in the examination IIA. The Employment topic paper note the varied make-up of uses and demand for uses within the LSIS in paragraph 8.34. The topic paper sets out the risks from office intensification in paragraph 8.40.</p>
2.35	Consider that the failings in the policy assessments means that the cumulative effects cannot be considered accurate or appropriate. Highlights impacts from climate change.	<p>As noted above the assessment is considered appropriate and proportionate. The examination conclusions highlight the fundamental tension between development and climate change stating:</p> <p>"There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs."</p> <p>And goes on to consider the sustainable design policies which go some way to addressing the tension and mitigate the effect.</p> <p>The AECOM note (SD63) identifies that the IIA Examination Addendum not only reaches clear and robust conclusions on the positive effects of the submission plan, proposed modifications and the submission plan as modified, but also helpfully highlights key tensions with sustainability objectives.</p>
2.36	Identifies the neutral effect for the objectives for natural resources and air quality.	<p>The examination conclusions pulls together the part 1 and part 2 assessments and notes the positive effect of the changes to policy T5 in respect of transport emissions and mitigating the impacts of delivery use. The IIA assessment notes this change has been in part response to the Transport Strategy. That cumulative effects have been considered and identified. The AECOM review notes (SD63) identify:</p> <p>'The appraisal conclusions are succinctly presented, evidenced and clearly tailored to reflect officers' understanding of key local issues and opportunities. There is also a helpful focus on larger-than-local issues and impacts, in-line with the spirit of cumulative effects assessment.'</p>
2.38	Consider that the response has failed to address certain impacts listing examples.	The Scoping Report sets out a comprehensive review of the baseline which covers social, economic and environmental issues. For completeness the main sustainability issues are also included in the IIA addendum. HS2 does not affect Islington. The uncertainty caused by Brexit and the pandemic are addressed in the employment topic paper and also referenced in the IIA.
2.39	Considers that the cumulative effects of the site allocations offers a simplistic assessment of the effects and are not in a table format.	<p>The IIA Addendum explains why this approach was taken. Scores were not presented in a single cumulative effect summary table for each objective because this would not provide a meaningful representation of the sites and their effects. Rather, an overview is provided against relevant objectives.</p> <p>The AECOM review notes (SD63) states the following about the approach to cumulative effects assessment :</p>

		'The brief commentaries set out above serve to evidence a conclusion that the IIA Examination Addendum not only reaches clear and robust conclusions on the positive effects of the submission plan, proposed modifications and the submission plan as modified, but also helpfully highlights key tensions with sustainability objectives.'
2.40	States that it is unclear how the Transport Strategy, Air Quality Strategy and Zero Carbon Strategy have informed the assessment.	References are made to the Zero Carbon Strategy, Air Quality Strategy and Transport Strategy in the cumulative impacts section under synergistic effects. References are also made elsewhere in the examination IIA.
3.1	Explains what part 2 covers	n/a
3.2	Explains what part 2 covers	n/a
3.3	Identifies that the issues raised at regulation 19 are not provided.	A summary of the issues that were identified were set out in the regulation 19 consultation statement.
3.4	Explains where the modification policy changes are about.	n/a
3.5	States that the changes in relation to E4 and E7 are not referenced.	The changes made (SDM-MO57) in relation to E4 are referenced in table 2.4 in Part 2 of the examination IIA.
3.5	Explains the changes made to London Plan policy E4 and E7 are not referenced.	n/a
3.6	Explains what the changes in relation to Class E and the LSIS	n/a
3.7	Provides a summary table of the PHM assessment	n/a

Comment para ref	Summary of comments	LBI response
3.8	Explains what the assessment methodology	n/a
Built Environment	Suggests that there is no evidence that new Class E uses will attract large volumes of visitors. Also that industrial uses should also be limited by narrow streets.	The conclusions make clear the uncertainty of the effect of class E although it would seem reasonable to assume that a class E use such as a supermarket would generate greater volumes of footfall than an existing light industrial space. In respect to the impact of the new policy and existing industrial uses and the narrow streets There is evidence set out in the Vale Royal/Brewery Road LSIS Height Study (EB15) section 1.6.4 that provides detail on the average street width in the LSIS and the issues this causes for vehicles and pedestrians.
Use of Land	Suggest that evidence has in relation to office and light industrial floorspace has not been made available.	The reference to the estimate of floorspace is the first time this has been published and is made available as part of the examination IIA.
Economic Growth	Suggests that the assessment is contrary to London Plan policy and the recent appeal decision.	See responses above. It is not clear what relevance this appeal scheme has for this aspect of the IIA and the council clearly considers the proposal is contrary to policy. The Councils response to the Inspector (LBI05) sets out the Councils view on the amendments to the London Plan. This identifies that whilst the SoS direction removes the approach to no net loss of floorspace capacity across London at a strategic level, this is different to a local approach which aims to protect industrial capacity based on evidence.
Need to Travel	The response considers that there is no evidence provided to support the claim that there will be a minor to significant negative effect on need to travel and air quality when considered against the baseline position. Considers the recent approved appeals provide evidence that they are car free and improve servicing and loading arrangements.	The Sustainability topic paper provides some information on this issue. See paragraphs 3.86 to 3.139.
3.9	Considers that no mitigation measures are identified for the negative impacts on air quality and quotes the modification SDM – MO53.	The examination conclusions pulls together the part 1 and part 2 assessments and notes the positive effect of the changes to policy T5 in respect of transport emissions and mitigating the impacts of delivery use. The IIA assessment notes this change has been in part response to the Transport Strategy. In addition the Sustainability topic paper provides some information on this issue. Broadly see paragraphs 3.86 to 3.139 and more specifically in paragraph 3.110 it is recognised 'that the LSIS largely accommodates 'clean' activities that provide for the expanding Central London business market. Based on the Council's knowledge and understanding of the

		area, and the ELS assessment of the LSIS, it is evident that heavy/polluting industries have no significant presence (if any) in the area.'
3.10	The proposed modification implies that there are negative impacts which have not been suitably identified or evaluated by evidence.	See response above to 3.9
4.1	Introduces section on mitigation	n/a
4.2	Respondent considers that mitigation should have been considered for the alternatives and not just the preferred approach.	Reference to other policies is made where relevant in the assessment and whilst some policies do provide mitigation and this is noted they are not intended as the primary mitigation for negative effects and the mitigation they provide is not considered to change the outcome of the assessment. This is considered a proportionate approach to assessment.
4.3	Consider the results of the assessment for SP3 and VR3 are not robust.	See response above
4.4	Consider the application of mitigation is not clear with reference made in assessments and not in the mitigation section.	The IIA notes where relevant policies which help contribute positive effects where relevant. The IIA also refers to the wider policy context for example with Policy B1 and B2 which notes the positive locational effects that are relevant to the effect against the need to travel objective so are not considered mitigation. Also see response above.
4.5	Considers that there is missing detail on mitigation in relation to site allocations in relation following statement: 'Development on site allocations will be subject to other plan policies which will help to assess and mitigate potential impacts, for example on Green Infrastructure and heritage policies.'	What is meant is that where a site allocation includes reference to an adjacent heritage asset in the development considerations for example it is expected that the heritage policy DH2 would be used to help determine the application.
4.6	Has identified that various gaps in the indicators.	The suggestions will be considered and indicators updated as part of the monitoring framework.
4.7	Considers a review of monitoring framework is necessary.	This will be undertaken.
5.1	Explains the responses and cross references`	n/a
5.2	Respondent quotes the regulations in relation to consultation	The tables 2.2 to 2.15 provided in part 2 of the examination IIA provide a description of the changes made in the modifications and where they are responding to regulation 19 consultation responses this is referenced.
5.3	Respondent considers that the IIA has failed to respond to consultation responses.	The council has provided a response to every issue raised by respondents which is set out in the documents submitted to the Inspectors (PD9a). A more detailed response was provided to the comments on the submission IIA and provided in the legal compliance statement (SD30 appendix 1). The Council has considered all responses on the Regulation 18 and 19 draft plans before proceeding with subsequent stages of plan preparation (PD7). The examination IIA has identified further alternatives which help respond to consultation responses in particular those around options for policy SP3.
5.4	Notes guidance produced by the RTPPI which considers that there is a strong case for the SA report to be published alongside the Reg 18 draft Local Plan.	The published note is guidance published by a professional body the RTPPI and not recognised Government guidance. As noted in the previous response (SD30 table A1.1 para 2.2.2) the Council have met the requirements of the regulations.
5.5	Consider the IIA has not demonstrated how consultation response have been taken into account in the assessment	The Council has considered all responses on the Regulation 18 and 19 draft plans before proceeding with subsequent stages of plan preparation (PD7). Responses have been provided and published at the next stage in the process (PD9a).