

## London Borough of Islington – comments on draft London Plan

Chapter	Draft London Plan Policy	Islington Response
Foreword; Introducing the Plan	N/A	<p>Islington broadly welcome the approach of the draft London Plan, noted in the foreword as a “specific focus on tangible policies and planning issues.” Paragraph 0.0.21 notes the intent that the London Plan does not require repetition at local level. We consider that local translation of policies will remain essential, even where resulting policies are very similar. Without this local translation, there is a significant risk that policy meaning and interpretation will be lost, given that the Mayor cannot possibly comment on every planning application in London. We believe the Mayor’s focus should be on the conformity role rather than the London Plan supplanting Local Plans; this would ensure that the London Plan policies are being addressed in Local Plans and would mean that boroughs would continue to have holistic documents which reflect their specific local circumstances.</p>
Planning London’s Future	Policy GG2 – Making the best use of land	<p>This strategic policy is welcomed and reflects the considered pro-development attitude that Islington have taken over recent years. However, we believe it is wrong to completely rule out development on the Green Belt.</p> <p>We understand and agree with the fundamental principles behind the retention of Green Belt land and we support the principle that development should be, in the first instance, focused on suitable brownfield land. However, there are undoubtedly a significant number of sites within the Green Belt which are brownfield land and could potentially be released for development without affecting the function of the Green Belt. We believe that the Mayor should not force Green Belt boroughs to build on the Green Belt, but he should allow flexibility for such boroughs to do so where justified, and where Green Belt release is necessary to meet housing targets. It is for relevant local authorities to determine whether Green Belt release is appropriate through their Local Plans, and the Mayor should not use his conformity role to prevent such release where justified.</p> <p>We welcome the introduction of the ambitious strategic target of 80% of all trips to be made by foot, cycle or public transport by 2041. We also welcome the recognition of the wider determinants of health that are influenced by spatial planning at the beginning of this important section on communities' health and wellbeing. The reference to healthy life expectancy and the factors set out in the supporting text which all affect quality of life are all relevant. We consider reference to healthy ageing could be added as with an increasing state retirement age, healthy ageing is important for the ability to maintain work and prepare for retirement.</p>

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		<p>Consider that the first sentence which states ‘to create high-density, mixed-use places that makes the best use of land...’ should not refer to high-density as this does not then relate well to the raised profile of design / design led approach and reference to optimum density in Policy D6.</p>
<p>Planning London’s Future</p>	<p>GG3 Creating a Healthy City</p>	<p>We welcome the approach in particular seeking to create a healthy food environment. It is increasingly recognised that an obesogenic environment is an important factor in being overweight and obese. The approach in the London Plan seeks a sensible balance between increasing access to healthy foods and reasonably restricting the availability of unhealthy foods where possible through the planning system. The London Plan approach introduces restrictive criteria regarding hot food takeaways which, in principle, replicates Islington’s approach of restricting such uses near schools.</p> <p>Welcome the use of Health Impact Assessments on assessing the potential impacts on health and wellbeing of communities, but would ask the Mayor to consider requiring prospective assessment at an earlier stage in the development process. To be meaningful any assessment, such as a health impact assessment, has to be considered at an early stage otherwise it is unlikely to result in changes to a proposal. Also unclear why reference to use of Health Impact Assessment is contained in this policy and not elsewhere in the Plan.</p> <p>We are unclear why policy to consider the health and wider environmental impacts of contaminated land has been omitted from the draft new London Plan. A policy exists in the current London Plan and should be carried forward, particularly in light of Policy E7 to intensify and consolidate industrial land.</p>
<p>Planning London’s Future</p>	<p>Policy GG5 – Growing a good economy</p>	<p>Islington’s has a strong and diverse economy. The majority of enterprises; 88%; employ between 0 and 9 employees and further 9% are considered small enterprises, which employ between 10 and 49 employees<sup>1</sup>. The Borough accommodates a number of key growth sectors and economic clusters including Tech City around Old Street, Clerkenwell Design Cluster, Medtech cluster along the Kings Cross / Moorfields Eye Hospital Corridor, and the Vale Royal / Brewery Road industrial cluster. These diverse economic clusters are crucial to the continued success of Islington’s economy and policies which ensure a sufficient supply of employment and industrial space to nurture these clusters, are supported.</p>

<sup>1</sup> UK Business Counts (2017), Nomis / ONS

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		<p>Islington is one of the most densely populated local authority's in the UK. Whilst there a significant number of well-educated, affluent residents, Islington ranks third nationally on income deprivation indicator for children, and fourth for income deprivation affecting older people. This demonstrates that the benefits of Islington's economic success are not being felt by large parts of Islington's community. Policies which seek to share economic success more equitably across London are welcomed.</p> <p>Key to growing a good economy is ensuring there is an adequate supply of employment floorspace to meet projected job growth. Islington's Employment Land Study forecasts substantial growth and demonstrates an ongoing need for a variety of space, including affordable workspace. Policies which support the diversification of London's economy are welcomed.</p>
Spatial Development Patterns	Policy SD1 - Opportunity Areas	<p>Part of Islington falls within the City Fringe / Tech City Opportunity Area and the borough is located in close proximity to the Kings Cross Opportunity Area. The Council is supportive of both Opportunity Areas and has worked with the GLA to produce an agreed OAPF for the City Fringe. Policy SD1(A)(5) aims to maximise delivery of affordable housing in OAs, but there is no mention of maximising employment (particularly office) floorspace. We consider that, given the existence of OAs is predicated on housing <u>and</u> jobs projections, it is important to have something explicit in the policy about maximising high density employment uses such as offices in order to meet jobs projections.</p> <p>The draft London Plan states the City Fringe / Tech City Opportunity Area will accommodate 15,500 new homes and 50,500 additional jobs. Compared to the previous 2016 London Plan, the figure for housing has risen from 8,700, whilst the figure for employment has fallen from 70,000. Additional housing and a reduction in the amount of employment growth in this important office location could potentially have negative impacts on the overall economic function of the area, although we recognise that this is a tri-borough OA so these losses are not necessarily attributed to Islington's section of the OA; we would welcome further discussions on any spatial analysis that has informed these figures, and we note the strong focus on maintaining and enhancing office space in the OAPF, particularly in the core area where the entirety of Islington's part of the OA is located . The London Office Policy Review (2017) forecasts demand for 372,966 sqm net additional office floorspace from 2016 to 2041 for Islington<sup>2</sup>, and much of this growth will be accommodated in the CAZ / Tech City, heightening the importance of maintaining the office function of the area. Whilst we recognise and support creating a mix of land uses, we ask that the potential impact on the existing and future economic function of this area is fully considered.</p>

<sup>2</sup> Figure 9.8, London Office Policy Review, 2017

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		<p>The supporting text of policy SD1 discusses Crossrail 2, which is proposed to have a station at Angel. While we broadly support Crossrail 2, we consider that it's primary aim in Islington is not to unlock development capacity (para 2.1.20), given that development in Islington is already incredibly viable. We have other concerns about MCIL2, which is intended to fund the project. We have detailed these concerns in a separate response to the consultation on the draft charging schedule, but our main concern is that the propose increase in MCIL office rates will render affordable workspace – a key priority for Islington – unviable on most sites in the CAZ.</p>
Spatial Development Patterns	Policy SD4 - The Central Activities Zone (CAZ)	<p>Islington welcomes the increased significance that is placed on the nationally and internationally important office functions of the CAZ. Islington's part of the CAZ is vital to the borough's economy. Seventy percent of the borough's jobs are located here<sup>3</sup>. However, we feel that the draft plan is a missed opportunity to firmly and explicitly prioritise office as the highest priority CAZ strategic function. Reading the draft plan evidence in the round, office can clearly be seen as a higher priority than all other uses in the CAZ area. By recognising this, boroughs will be able to avoid drawn out arguments about the weighting of these functions relative to offices on a case-by-case basis. An alternative would be to provide more clarity in SD4(N) to demonstrate that boroughs could have local prioritisation for offices.</p> <p>For Islington, ensuring an adequate supply of office accommodation in this location is a key priority for the growth of the economy. This is reinforced by our latest Employment Land Study (2016)<sup>4</sup> which forecasts an additional 50,500 jobs in the borough up to 2036. To accommodate this employment growth, there is a need for an additional 400,000 sqm of office floorspace. Current supply does not come close to meeting this demand, and therefore, as part of the local plan review, we will produce policies which will look to prioritise the development of new business floorspace and strongly protect existing floorspace. Ensuring that a range of space is provided is also welcomed as approximately 97% of business in Islington are categorised small and micro in terms of sizes. These businesses greatly contribute to the economy and it is important that employment space meets the needs of these business so that they can remain in the borough and have opportunity to expand where necessary.</p> <p>Part F of the policy sets out that the vitality and viability of the international shopping and leisure destinations should be supported, together with other CAZ retail clusters. We are content with identification of Farringdon and Shoreditch as retail clusters and would expect to provide designate these frontages in the forthcoming Local Plan Review.</p>

<sup>3</sup> Paragraph 8.1.4, Islington Employment Land Study, 2016

<sup>4</sup> Figure 7.8, Islington Employment Land Study, 2016

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		<p>Islington is home to a number of world class and locally-significant cultural and arts institutions. Part E of the policy sets out that the CAZs unique concentration and diversity of cultural, arts, entertainment, and night time economy and tourism functions should be promoted and enhanced. This is generally supported, however, regard should be had to ensure that the CAZ's office function is not undermined as a result. The policy on visitor infrastructure focuses development on town centres and City Fringe / Tech City part of CAZ, provided there is no impact on strategic office accommodation. Further comments on this are made under response to policy E10: Visitor Infrastructure.</p> <p>It is important that the CAZ is a place where businesses, residents and visitors want to spend time. Policies for improving air quality and making public realm improvements, including reducing traffic dominance, are supported. The CAZs continued success is also reliant on a good public transport system and digital connectivity, Part I of the policy seeks to ensure adequate infrastructure provision, and this is welcomed by the Council.</p> <p>Paragraph 2.4.5 states that new residential development should be complementary and not compromise the strategic functions of the CAZ. Land within the CAZ is under great pressure to be developed for residential use increasing competition between residential and commercial property markets which leads to rising land values. This reinforces the need for policies which to seek to promote and enhance CAZ strategic functions, particularly the agglomerations of nationally and internationally significant offices and company headquarters.</p> <p>We support Part M of the policy but consider that the Mayor should consider some stronger spatial protections for industry and logistics close to the CAZ. This could be more explicit protection for such uses within a defined buffer zone, similar to the CAZ transition zone proposed in the Small Offices and Mixed Use in CAZ study (Ramidus, 2015) which forms part of the plan evidence base.</p>
Spatial Development Patterns	Policy SD5 - Offices, other strategic functions and residential development in the CAZ	As noted above, we believe office use should explicitly be prioritised as the highest priority CAZ strategic function. The Council notes that this policy builds upon Table 1.1 of the CAZ SPG. The wording of the policy is essentially lifted from the SPG however there is a potentially significant departure from the SPG in Part C of Policy SD5, which states where office is given greater weight over residential use. The policy does not state that 'all other parts of the CAZ' should be given greater weight than residential use, meaning that in Islington, the draft plan gives only offices in the City Fringe/Tech City OA greater weight than residential use. We note that this area is also one of the specific areas where the draft plan promotes hotel development, which opens up significant potential for conflict between strategic functions here (see response to policy E10 for further

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		<p>comment). There are numerous clusters of office uses in the Islington CAZ, including a significant cluster in Clerkenwell, which would therefore be unprotected.</p> <p>Further clarification on whether this is the intention of the policy is needed, as if this is the case, it is potentially contradictory to the intent of Part H of the policy, which states that residential development should not lead to a net loss of office floorspace anywhere in the CAZ. We can envisage such conflict within the policy being used against us in planning applications. Fundamentally, it creates a potential policy weakness which could be exploited and could make it difficult for the Council sustain the primary economic function of the majority of Islington’s CAZ. Islington’s Employment Land Study (2016) clearly sets out the need for a significant amount of additional office floorspace over the plan period (circa 400,000 sqm) and this policy could potentially undermine the Council’s ability to meet this demand and therefore secure economic growth. The council consider that there are two straightforward solutions to this issue; either reinstate the wording as per table 1.1 of the CAZ SPG; or (Islington’s preferred wording) replace all of Part C sub criteria 1-5 as follows:</p> <p>C. Offices and other CAZ strategic functions are to be given greater weight relative to new residential development all parts of CAZ except those stated in D below.</p> <p>The City Fringe OAPF establishes a boundary for the City Fringe and identifies parts of Islington, Hackney and Tower Hamlets as ‘core growth areas’. These core growth areas are locations where there will need to be a continued supply of employment space. The OAPF further identifies inner core areas, outer core areas and hinterland areas. The inner core areas are where there is likely to be most demand for employment space and where development proposals should provide the maximum amount employment floorspace feasible, and there should be no net loss. The GLA is asked to consider identifying the inner core areas of the City Fringe in Part B of policy, which states that residential development is not appropriate in the City of London and the Northern Isle of Dogs.</p> <p>Policy 4.3Bc of the 2016 London Plan seeks to protect small scale offices of under 500 sqm, where justified by local and strategic office demand. We note that this has been removed from the Draft London Plan. In Islington, there is strong demand within the CAZ (and elsewhere) for office floorspace which caters specifically for small occupiers. The Council welcomes clarification on why this has been removed and would support its reinstatement in the draft London Plan. We note that policy E2 does have some focus on protecting small offices but it does not equate to the protections in the current London Plan policy.</p>

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	Policy SD6 Town Centres	<p>The Council is supportive of higher density mixed-use development in Town Centres (and in edge of centre locations where sequentially justified) provided it supports the continued function and contributes positively to the vitality and viability of such centres, particularly designated frontages and/or primary shopping areas. SD6 should be reworded to prioritise Town Centre sites for mixed-use development first, then edge-of-centre where sequentially justified. Islington consider that any residential element of mixed-use town centre development should only be permitted on upper floors. We do not agree with SD6(C) which suggests that residential only schemes may be appropriate in Town Centres outside existing frontages. We consider that residential only schemes would be a wasted opportunity to provide commercial space in inherently commercial areas, and believe that they should only be considered outside retail designations, both Town Centres and local designations.</p> <p>Para 2.6.2 correctly recognises the need for town centres to evolve in the face of changing circumstances but this does not necessarily mean that residential should be prioritised in place of commercial. The need for diversification of town centres relates more to promoting a wider mix of commercial uses, particularly leisure. Islington’s own evidence supports such commercial diversification.</p> <p>SD6(D) can be read as prioritising certain specialist housing types over conventional residential. There is no reason why these typologies are any more suitable in town centre locations, and Part D may have the effect of incentivising these typologies which have their own inherent issues, particularly regarding appropriate affordable housing tenures. We have provided comments on these typologies in the housing section below.</p> <p>SD6(E) supports the loss of surplus office space in Town Centres, however surplus is not defined. A definition which places a strong emphasis on robust information is necessary in order to avoid spaces being lost unnecessarily. The London Plan should defer to any borough thresholds, particularly related to marketing and vacancy requirements.</p> <p>SD6(G) should have a more explicit ‘dispersal’ approach which looks to locate new visitor accommodation in well-connected outer London locations instead of inner London locations which have historically delivered the vast majority of such floorspace.</p> <p>Policy SD6 should reflect the terminology of the NPPF and refer to Primary Shopping Areas, rather than (or in addition to) Primary and Secondary Frontages.</p> <p>The draft London Plan does not define edge of centre. We suggest adopting the definition in the NPPF and that this should be repeated in the glossary of the London Plan.</p>

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Spatial Development Patterns	Policy SD7 - Town Centre Network	<p>The Council supports the defined roles of each category of centre, and agrees that district centres should consolidate a viable range of functions, particularly retailing, leisure, local employment and workspace. Supporting the dynamism of these centres will help contribute to their continued vitality and support long term viability of centres in particular centres such as Finsbury Park and Archway. In terms of supporting higher density mixed use residential development in district town centres, the Council's policy approach is clear and seeks to resist residential development in ground floor units. This is discussed in response to SD6 above.</p>
	SD8 Town Centres: Development Principles and Development Plan Documents	<p>We welcome guidance on identifying, considering and managing change in town centres.</p> <p>SD8(A)(1) notes the sequential approach but includes hotels. While this is consistent with the NPPF, it conflicts with policy E10 of the draft London Plan which identifies very specific locations for new hotels, including Town Centres. The London Plan should explicitly exclude hotels from the sequential approach.</p> <p>SD8(B)(5)(b) refers to surplus frontages but does not define what is meant by surplus. As noted above in relation to SD6, a definition of surplus which places a strong emphasis on robust information is necessary in order to avoid space being lost unnecessarily. The London Plan should defer to any borough thresholds, particularly related to marketing and vacancy requirements.</p>
Spatial Development Patterns	Policy SD10 Strategic and local regeneration	<p>Islington has significant areas of deprivation. The council support initiatives to reduce deprivation and inequality but we consider that identifying Strategic Areas for Regeneration is the incorrect approach. These are based on IMD data rather than any contextual consideration; hence they can be skewed by single issues. IMD data updates approximately every three years, so basing a plan designation directly from this means it will quickly become out of date. Most importantly, this approach repeats the areas for regeneration approach from the current London Plan, which has shown no causal evidence of success.</p> <p>A better approach would be to have a qualitative approach which focuses initiatives in areas which would benefit most, taking on board local evidence and IMD information (alongside any other relevant considerations). Islington have various projects and initiatives designed to address the causes of deprivation. This includes the emerging affordable workspace strategy which uses planning policy to deliver a variety of affordable workspaces across the borough and achieve social value outcomes.</p>



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Design	D1 – London’s form and characteristics and Chapter in general	<p>We welcome the recognition of the intrinsic link between good design and good planning emphasised in the draft London Plan. The focus on the design process is fundamental to the quality of what is achievable. However, we would like to see a greater distinction between high level principles (nominally inclusive design, sustainability, connectivity and suitability to context), the objectives to be met, and the detailed design guidance associated with particular development types (e.g. housing, tall building, etc). Providing this clear hierarchy of policy advice would be more useable and effective for end users.</p> <p>At present all policies hold the same status and follow no clear order, so for example ‘Delivering good design’ enjoys the same prominence as ‘Basement development’. It is unclear that policies such as those on Housing Density or Noise are subservient to those of ‘Delivering good design’ or ‘Inclusive design’.</p> <p>‘Delivering good design’ (the design process) seems, evidently, to be the key overarching direction you intend to provide; everything else falls within its scope, including ‘London’s form and characteristics’, the analysis of which would seem to form an elementary part of the design process, but which currently enjoys the premier listing in the Chapter.</p> <p>We have further detailed comments on the policy as follows:</p> <ul style="list-style-type: none"> <li>• D1 (A) - Sustainability (particularly fabric energy efficiency) should be mentioned in relation to the form and layout of a place because the orientation of the development is critical in terms of its thermal performance, ventilation, air quality and the viability of landscaped/growing areas.</li> <li>• D1 (A)7- The biodiversity value of green and open space should be mentioned</li> <li>• D1 (B)1 – The site analysis to which the development design responds should take into account conditions beyond the site’s red line boundary. Too often proposals are considered and proposed in isolation.</li> <li>• D1 (B) 6 – We suggest a slight amendment to “achieve inclusive, comfortable and inviting environments...”</li> <li>• Para 3.1.2 – We suggest some additional wording to require integration of all design objectives and considerations, which is essential to an effective, coherent design.</li> <li>• Para 3.1.4 – Add reference to protecting and enhancing existing green infrastructure through design.</li> <li>• Para 3.11.2 – we support embedding Circular Economy principles throughout the plan, but the caveat about best use of land dictating whether to retain existing buildings is a significant caveat which does undermine the principles somewhat.</li> </ul>

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Design	D2 – Delivering good design	<p>We have the following detailed comments on policy D2:</p> <ul style="list-style-type: none"> <li>• D2 (A&amp;B) – Given that A &amp; B consider the suitability of development, they should come before policy D1. If no capacity for growth is identified, then no further examination is necessary</li> <li>• D2 (A4) – Suggest rewording to ‘accessibility of’ transport networks</li> <li>• D2 (A6) – Suggest adding ‘play space and trees’</li> <li>• D2 (A8) – Suggest adding ‘subterranean utilities’</li> <li>• D2 (G1) – we support the explicit link between design review and the local policy context; panels can often ignore policy context completely which means that the design opinion is of little use in terms of progressing an acceptable scheme, i.e. the design would not be policy compliant In order to safeguard broad aspects of design quality (social and economic as well as physical) it is our view that Design Review Panels should not be ‘architect-heavy’ and that LPAs should be encouraged to expand or supplement those panels with representatives from other internal or external stakeholders including ‘Children and Families’, ‘Highways’, ‘Ecology and bio-diversity’, the ‘Public Realm’, ‘Adult Social Services’, ‘Energy Teams’ and the voluntary/community groups representing those with protected characteristics.</li> <li>• D2 (H4) - We do not think ‘architect retention clauses in legal agreements’ will be necessary in most cases. If clear objectives are set for each stage of the design process, it is the designers’ responsibility to meet those objectives and to be judged accordingly. Any suggestion of approved lists and/or retention based on reputation is fundamentally unfair and anti-competitive. It could also have an impact on development finances and potentially squeeze other benefits of a scheme; it is not unreasonable to think that the cost of maintaining an architect until development is complete could total into the hundreds of thousands, which could equate to an affordable housing unit.</li> </ul>
Design	D3 – Inclusive Design	<p>We have the following detailed comments on policy D3:</p> <ul style="list-style-type: none"> <li>• D3 (A) – Reference to ‘versatility to respond to changing needs over time’ and ‘ensuring that layouts are legible and logical’ should be added.</li> <li>• D3 (A)3 - This is welcomed. It should be made clear that an evacuation lift is in addition to any proposed firefighting lift.</li> <li>• D3 (B) - An inclusive design statement should bring together the design and management of the proposed development.</li> </ul>

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Design	D4 – Housing Quality and Standards	<p>We have the following detailed comments on policy D4:</p> <ul style="list-style-type: none"> <li>• Policy D4(A) – we are concerned about the broad reference to broad typologies and the potential for innovative housing designs to override important design considerations. The policy should be clear that addressing housing supply does not lead to a race to the bottom in terms of residential standards, and do not compromise the ability to deliver homes that are flexible and can respond to changing circumstances over their lifetime. We have particular concern about certain typologies, which we detail in our response to the housing policies.</li> <li>• 3.4.6 – Private open space is under pressure and yet is so vital to the health and wellbeing of our communities. We very much welcome the requirement that ‘All dwellings should have level access to one or more of the following forms of private outside spaces’; this is a useful addendum to M4(2) which requires level thresholds but overlooks the associated access to private amenity space.</li> <li>• 3.4.7 - The provision of play space should specifically mention facilities suitable for all age groups; at present there is a widespread assumption that children over 11 can travel significant distances to play/socialise. However, many cannot, due to issues of personal safety.</li> <li>• 3.4.8 - We support the commitment to maximise tenure integration, which should be interpreted as more than a lack of visual distinction and require equivalent quality. This creates a strong presumption against so-called ‘poor doors’.</li> <li>• 3.4.9 - We support the clear objection to gated communities and promotion of permeability.</li> <li>• 3.4.11 – It would be helpful to say more about legible, logical layouts and clear sightlines as fundamental to intuitive (non-text based) wayfinding; and the avoidance of excessive signage.</li> <li>• 3.4.11 - It would also be useful to define ‘private’ in relation to ‘private amenity’; it does not mean hidden from view but simply for exclusive use.</li> </ul>

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Design	D5 – Accessible Housing	<p>We have the following detailed comments on policy D5:</p> <ul style="list-style-type: none"> <li>• It is unclear why the policy distinguishes between ‘housing quality and standards’ and ‘Accessible Housing’. The GLA made a powerful case with the MALP, demonstrating the universal nature of visitability and adaptability. Logically these qualities should be integral to the ‘good design/planning’ of new homes and part of one policy.</li> <li>• 3.5.6 - Lift provision (and therefore M4(2) compliance) should be a general policy requirement with deviation where the case-specific circumstances are clearly demonstrated by an applicant, with reference to the particulars of a specific site. It is not helpful to specifically identify circumstances in policy.</li> </ul>
Design	D6 - Optimising Density	<p>The density matrix, which gave ranges of suitable levels of housing density in certain areas, has been removed from policy, and replaced with a criteria-based policy which takes into account a number of considerations. This approach is supported as it enables robust consideration of high density development but does not automatically preclude development in the way that a rigid density matrix does.</p>
Design	D7 Public Realm	<p>We have the following detailed comments on policy D7:</p> <ul style="list-style-type: none"> <li>• D7 (A) – Add sustainable (providing value for money without negatively impacting the environment, over time) and robust.</li> <li>• D7 (D) – Add ‘avoid ambiguity; be clear about routes and places and guarantee safety for vulnerable road users. The approach to the application of shared/single surfaces should be cautious and context specific’.</li> <li>• D7 (I) – Street furniture should, wherever possible be multifunctional and bollards avoided other than as a last resort.</li> <li>• D7(K) – to help support the Healthy Streets approach the policy could also state that public realm supports social interaction which may be different to social activities</li> <li>• D7(M) and 3.7.11 – Add the provision of WCs as a fundamental to many people’s ability to dwell – whether they be strictly public or district/community schemes. We support the provision of free drinking water.</li> <li>• 3.7.4 - We refer you to the Islington Streetbook SPD - <a href="http://www.islington.gov.uk/streetbook">www.islington.gov.uk/streetbook</a> - wherein we describe route: place spectrum (between trunk road and public square) that will enhance the application of Healthy Streets measures.</li> <li>• 3.7.7 - The needs and abilities of sensory and cognitively impaired pedestrians should be mentioned here</li> <li>• 3.7.9 – In developing a Public London Charter the Mayor should take into account different groups which may have different, and sometimes conflicting, uses of public space for example, commercial areas are generally seen as solely places for retail/commerce, but for young people who have little money, they are seen as places to simply "hang out", and activity often perceived as anti-social behaviour.</li> </ul>

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Design	D8 – Tall Buildings	<p>Policy for tall buildings has been revised, which we consider a helpful start in developing a consistent approach to tall buildings across London. We support the clear requirement that boroughs should identify in their Development Plan the locations which are suitable for tall buildings.</p> <p>Whilst it is accepted that it is appropriate for individual boroughs to consider suitable locations for Tall Buildings, some direction on the contextual appraisal of sites bordering other boroughs would be helpful; perhaps a specific reference to the boroughs’ duty to cooperate.</p> <p>The reference in D8©(1)(b) that tall buildings should reinforce the spatial hierarchy of the local and wider context may be used to justify tall buildings in many locations which are not suitable for tall buildings. We suggest that the policy specifies a relationship with other factors such as land use and transport accessibility. In addition, we would expect further detail on the visual cumulative impact of tall buildings in this visual section of the policy, reference to the cohesion of a group of buildings for example. An expanded approach to visual cumulative impact would be in addition to the reference in section D8(C)(4)(a).</p>
Design	D9 – Basements	<p>Policy D9 of the draft London Plan suggests that boroughs should establish policies to address the negative impacts (particularly cumulative impacts) of basement development. The draft policy offers little detail on implementation. The policy should be expanded to require applicants to provide detailed investigation of impacts, including cumulative impacts. The Mayor should consider policies to ensure that the risk to life and livelihood from flooding is subject to a full and robust risk assessment prior to approval of any planning application involving basement development. This issue was a recommendation of the Islington Policy and Performance Scrutiny Review Committee’s report on Thames Water’s response to Burst Water Mains.</p>
Design	D10 – Safety, Security and resilience to emergency	<p>Our concern here is that, taken in isolation, secure by design measures can compromise the accessibility and sustainability of a proposal; all these design principles should be integrated.</p>
Design	D12 – Agent of Change	<p>We support the introduction of the Agent of Change principle, which places the responsibility for mitigating the impact of noise firmly on the new development. We would support additional reference to delivery and servicing in Part D, as this can often be a contentious issue.</p>

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Design	D12 – Noise	<p>The reason for removal of the reference to “the impact of aviation noise on noise sensitive development” is unclear. Any policy on noise should address all sources and we would support reinstating the previous London Plan reference.</p>
	Policy H1 – Increasing Housing Supply	<p>Islington strongly support the approach taken in the London Plan to identify London-wide strategic need for the single housing market, and the aim to meet this as far as possible through disaggregated borough housing targets. The process for arriving at these borough targets has been fully inclusive with all boroughs having significant opportunity to assess potential housing sites to inform the targets, through the SHLAA process.</p> <p>Islington’s circumstances, principally the lack of suitable land for development, means that our target has reduced significantly, but this should not overshadow our significant over-delivery on London Plan targets over the past decade. The target of 775 units per annum is considered achievable, although in itself will be challenging.</p> <p>The refocusing of housing delivery toward outer London is a sensible approach which factors in the greater potential for these boroughs to bring forward sites for development, due to greater land availability. We recognise that these proposals may be contentious for the boroughs involved, but it is the only logical and evidenced approach that can address the acute housing supply issues in London as a whole. Islington would be prepared to support the Mayor on these issues during the examination process, and at the hearing itself where necessary.</p> <p>Paragraph 4.1.8 notes the issue about using windfall assumptions in housing trajectories, which detail the five year supply of housing and can be integral to planning determinations involving housing. We support the ability for boroughs to use windfall assumptions based on table 4.2, but we note that this does potentially conflict with Government guidance on use of windfall allowance. The Mayor may need to provide further guidance to assist boroughs justifying this approach.</p>
	Policy H2 - Small sites	<p>Islington, in principle, supports the Mayor’s approach to delivery of increased housing on small sites. Over the last 10-15 years, Islington has delivered a large amount of housing on small sites. The new London Plan gives very strong direction to boroughs, particularly Outer London boroughs, to deliver a step-change in their approach toward small sites housing development. Effectively, the Mayor is requiring other boroughs to adopt a mind-set that Islington and other Inner London boroughs have taken for many years.</p> <p>We do have some detailed comments on the policy however:</p>

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		<ul style="list-style-type: none"> <li>• H2(A)(1) should be clarified to read “significantly increase the contribution of small sites to meeting borough housing targets set out in table 4.1, which will go toward meeting London’s housing needs”.</li> <li>• The reference to self-build and custom housebuilding in H2(A)(4) is curious, as it is unlikely to be a large component of delivery and such developments are less likely to optimise use of suitable sites. This criterion should be removed.</li> <li>• H2(B)(1) – we support the sentiments behind this part of the policy, but consider that more careful wording is required. The current wording relegates character to a minor consideration. We also consider that the wording in the supporting text, para 4.2.7, should be brought into the policy. We consider the following wording is more appropriate and provides balance between evolving and protecting character:   <p>“optimisation of housing delivery may necessitate changes and evolution to the character of an area, but this should be done constructively with full objective consideration of the existing character (taking particular account of conservation areas) having equal weight in any determination. In the first instance, development proposals should aim to incorporate development within the existing character.”</p> </li> <li>• The wording of H2(D) suggests that the presumption would apply even if boroughs meet the overall housing target in table 4.1. It should be made explicit that it is the overall target that boroughs need to meet; the figures in table 4.2 are a benchmark; and the presumption doesn’t apply where boroughs can demonstrate that they meet the overall target.</li> <li>• H2(E) - the wording in this part of the policy suggests that where borough’s do not have a design code, the presumption (essentially attributing heightened weight) would apply unless very specific harm is demonstrated. The policy does not specify lack of affordable housing, space standards or other important policies, hence there is a real risk that the presumption could lead to approval of sub-standard development.</li> <li>• H2(F)(2) – we note that the draft plan has policies on optimising sites, but by setting the presumption cut off at a specific number of units (25), there is a risk that will incentivise developments of 23 or 24 units coming forward in order to utilise the presumption, but which could otherwise provide more units. Combined with the concern about how the presumption interacts with affordable housing noted above, this would be concerning. Additional wording to clarify optimisation requirement would be supported.</li> <li>• H2(H) – we note the support for seeking small sites affordable housing contributions for sites of ten or fewer units. Islington have operated such system since 2012 and have received millions of pounds which has been used to develop new council housing in the borough. We do not agree with the general strong encouragement for flexibility for payment prior to occupation, which the plan suggests should be the standard collection method. Islington require payment on commencement but there is flexibility for other payment structures as well as opportunity for applicants</li> </ul>

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		<p>to justify a lesser payment, through agreed viability evidence. The policy should be reworded to require payment on commencement unless agreed evidence is provided to justify other payment structure. Payment on occupation creates significant collection issues and creates issues with programming contributions for future housing developments.</p> <ul style="list-style-type: none"> <li>• Para 4.2.8 – architectural innovation should not override valid policy concerns. Such justification is often used in relation to basement development, but is not in itself a particularly valid reason. We would be concerned about any policy or guidance which placed architectural innovation ahead of other considerations.</li> </ul>
	Policy H3 – Monitoring housing targets	<p>Part C of the policy states that, for monitoring purposes, student accommodation should be counted on a 3:1 ratio, with 3 bedrooms equalling one unit. This differs from the existing approach of 1:1. We have no issue with this in principle, as the contribution to meeting housing targets will be a consideration as part of any future determination. However, for any schemes permitted under the current 1:1 guidance, there should be some allowance to continue to monitor these as 1:1. Otherwise, the level of delivery will not reflect what was permitted.</p> <p>We support the Mayor’s position on the housing delivery test, set out in para 4.3.3.</p>
	Policy H5 – Delivering affordable housing	<p>We support this policy and in particular the reference in para 4.5.4, that delivery of overall housing targets should not be relied on as a reason for reducing affordable housing delivery. We commonly see the argument that “50% of nothing is nothing” as an attempted justification for accepting low amounts of affordable housing, but para 4.5.4 provides a direct rebuttal to such arguments.</p>
	Policy H6 – Threshold approach to applications	<p>The draft London Plan confirms the “threshold approach” to affordable housing which is already set out in the Mayor’s Affordable Housing and Viability Supplementary Planning Guidance (2017). This means that schemes meeting or exceeding a defined threshold percentage of affordable housing (without public subsidy such as grant funding) and consistent with other plan requirements are not required to submit viability information. The overarching strategic affordable housing target is 50% of all new homes delivered across London. The threshold is initially set at 35% affordable housing delivery on private sites and 50% affordable housing delivery on industrial sites and surplus publically owned land (even if the land has already been sold). We support the thrust of this approach but we consider that the Mayor’s policy needs to explicitly refer to boroughs being able to set out higher affordable housing requirements (i.e. more than 35%) where supported by local evidence. Islington are currently producing evidence to support the affordable housing target in the new Local Plan</p>



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		<p>Part B(3) requires LSIS and other industrial sites to provide 50% affordable housing. While we support the higher threshold on such sites, it should be made explicit that the level of affordable housing is not in itself justification to justify loss of LSIS or other industrial sites.</p> <p>Where schemes do not meet the threshold approach, the London Plan should be clear that, in addition to the requirements in policy H6(E), local level viability requirements may also apply. Islington’s Development Viability SPD has detailed guidance on requirements, including review mechanisms.</p> <p>We would welcome further clarity on para 4.6.5 with regard to land that has been released from public ownership. We fully support such land being required to deliver 50%+ affordable housing but envisage that there will be a lot of debate about what constitutes ‘released from public ownership’, e.g. does it include sites sold a number of years ago? Does it include sites which are then subsequently sold on once or multiple times? We would argue that any site that has been in public ownership in at least the last 10 years should fall under remit.</p> <p>Regarding para 4.6.9, we would support a stronger requirement for an RP to be formally involved in a scheme prior to submission of a planning application.</p> <p>We support the EUV+ approach to determining benchmark land value, as set out in para 4.6.11.</p>
	Policy H7 – Affordable housing tenure	<p>We support policy H7 as it allows local flexibility for tenure split and would allow Islington to retain a 70:30 social rent/intermediate split as we have currently, or adjust it slightly in line with updated evidence.</p> <p>With regard to H7(B), we would advise adding an additional reference to clarify that only schemes with a tenure split that meets Part A <u>and which addresses other requirements of policy H6(C)</u> can follow the fast track route.</p>
	Policy H9 – Vacant Building Credit	<p>We fully support policy H9 and note the potential adverse impact that the VBC could have in London. The London Plan could also include mechanisms for calculating VBC where it is applicable.</p>
	Policy H10 – Redevelopment of existing	<p>We are not clear from the wording of the policy whether the requirement in Part A to re-provide accommodation at an equivalent or better standard applies to all existing housing or solely NSC accommodation such as the types listed. We consider that the requirement should apply to any conventional or NSC housing.</p>

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	housing and estate regeneration	<p>Part C requires replacement on a like-for-like basis and gives the example of social rented floorspace replaced with general needs rented accommodation, which is not defined in the plan but would be commonly considered to be social rent. The definition must be explicit here, to avoid any misunderstanding.</p>
	Policy H11 Ensuring the best use of stock	<p>The Council supports the scope of policy H11, although the policy itself is no more than a broad statement of support for various policy approaches. Islington have an adopted SPD which aims to limit the 'buy-to-leave' phenomenon, and we would welcome further discussions on how this approach can be more definitively incorporated into the London Plan.</p> <p>London boroughs have no meaningful ability to limit the impact of short-term lettings due to the changes in the Deregulation Act. We would support reinstatement of the previous restrictive provisions, and the Mayor could use his lobbying role to advocate for this with Government.</p> <p>We note that Part C of the policy is potentially at odds with policy E10(F) which is seemingly more supportive of short term lettings. We would support a restrictive approach to limit any impacts on housing stock.</p>
	Policy H12 – Housing Size Mix	<p>We broadly support policy H12. We currently have a prescriptive size mix requirement (based on percentages for different tenures), which has proven difficult to implement. While we won't seek to reinstate a percentage requirement, we consider there is merit in setting out broad, non-prescriptive size preferences, perhaps based on a high, medium or low priority. Clarity on the suitability of this approach in the London Plan would be welcome.</p> <p>H12(A)(8) is potentially at odds with policy H2(D)(2) which identifies conversions as a potential component of small sites supply.</p> <p>We agree with para 4.12.3 that two-bedroom units should be classified as family units.</p> <p>Para 4.12.6 considers that availability of grant funding should be taken into account when formulating affordable size mix policies. While we agree in principle, grant funding is distributed in short-term funding cycles, while Local Plans generally cover 15 year periods, hence grant funding availability should not be particularly determinative.</p>

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	Policy H13 Build to rent	<p>Whilst we understand the need to increase delivery in London as a whole, we continue to have significant concerns that proactive promotion of build to rent, particularly in a borough like Islington where the number of housing sites is not as great as elsewhere, could reduce the ability to secure genuinely affordable housing. The policy suggests discounted market rented properties are a suitable tenure for build to rent developments. Therefore, we consider that our ability to secure genuinely affordable social housing on each and every site in the borough could be jeopardised. The Mayor’s support is undue and masks a development model which does not stack up without significant policy compromises.</p> <p>Boroughs should have flexibility to put in place local criteria, based on part B but also additional criteria where required. Build to rent could be a more agreeable proposition with stronger AH requirements, longer covenants and stronger clawback mechanisms.</p> <p>With regard to Part E, this would seemingly allow all affordable units to be provided on the Build to rent portion of development (as DMR) and the market element to provide none. The policy should be clarified to require each tenure element to have proportionate AH requirements, e.g. 50% on BTR and 50% on market element.</p>
	Policy H15 – Specialist older persons housing	<p>The policy priority for meeting the need for older persons accommodation should be through delivery of conventional C3 residential accommodation which is designed from the outset to be adaptable to changing needs over time. Para 4.15.2 recognises this, but it should be upfront in the policy itself.</p>
	Policy H16 – Gypsy and Traveller accommodation	<p>Policy H16 introduces a new definition of gypsies and travellers, which includes those who live in bricks and mortar accommodation (unlike the Government definition). Islington’s need is entirely from bricks and mortar families, with no existing sites. The approach in the London Plan requires boroughs to undertake a new assessment as part of the Local Plan review, but in the interim to use a figure derived from the previous London-wide assessment from 2008; Islington’s figure is 2 pitches. Islington’s current approach is to allocate a site where defined need becomes evident, which based on the draft London Plan we now have. However, using the Government’s definition would mean Islington may not have any need currently, although there would still be an emphasis on us to do an updated assessment. Using the new GLA definition may mean that Islington have to identify pitches, despite having no existing sites. Given the significant constraints on land in the borough there is an argument that delivery may not be available; in addition, need may not be sufficient to create a realistically viable site in terms of scale and also quality. We would suggest that the policy approach for boroughs with no existing sites, low levels of identified need and where significant land constraints exist should be identified by the policy and alternative approaches considered.</p>

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	<p>Policy H17 Purpose built student accommodation</p>	<p>The new London Plan policy on student housing carries forward the current policy which specifically seeks ‘dispersal’ of such accommodation away from Central London boroughs such as Islington. The policy has been expanded to include requirement for affordable student accommodation which provides a proportion of rooms at a discounted rent. While the principle of securing affordable accommodation would normally be supported, we are concerned that this effectively amounts to a subsidy to allow people to live in what is often fairly luxurious and expensive accommodation, which may not be the best use of such subsidy. There should be some flexibility to secure equivalent off-site AH contributions which could then be used to deliver genuinely affordable housing.</p> <p>Our main concern with this policy is that our ability to continue with our policy of securing student bursaries from student accommodation schemes might be jeopardised. We are the only borough in the country that requires a proportion of annual rent to be provided in order to fund bursaries for Islington students in hardship. The new London Plan policy should recognise the importance of local approaches to increasing opportunities to access higher education, and that the requirement for affordable student accommodation may need to be balanced against this.</p> <p>The supporting text, para 4.17.2 encourages boroughs to allow temporary use of student accommodation during vacation periods, for ancillary uses. There is often pressure to use accommodation for general short-term letting (akin to a hotel), which can cause amenity impacts. While we note that para 4.17.2 does not use this example, it is not an exhaustive list, and we would fully expect operators to argue that a vast array of uses would be ancillary. The paragraph should be amended to explicitly rule out use as general visitor accommodation and state clearly that any ancillary use must be a specific use related to a university activity.</p>
	<p>Policy H18 Large Scale purpose-built shared living</p>	<p>Policy H18 is less permissive towards this type of development than build to rent, but it does open up an avenue for this type of development to be delivered We have significant concerns about the affordability and quality of accommodation for large scale shared living, as well as the impact that such developments have on the achievement of mixed and balanced communities, which will continue to be a priority for Islington. The supporting text recognises the significant flaws with this type of development, yet the policy is still broadly permissive.</p> <p>Further, there is a real concern that this type of development will push land values up in a similar way to student accommodation in the past, as they are not required to comply with normal standards or provide on-site affordable housing. The policy should be amended to explicitly prioritise conventional housing above large-scale purpose built shared living, to</p>

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		<p>ensure that applications on sites capable of delivering conventional housing (and therefore on-site affordable housing) will not be permitted.</p> <p>If the Mayor continues with this policy, it is imperative that the additional guidance mentioned in para 4.18.6 is produced ASAP. This type of development will be of a much lower quality than comparative conventional dwellings, therefore any additional mechanism to improve quality should be put in place.</p>
Social Infrastructure	Policy S1 Developing London's social infrastructure	<p>The policy approach on loss of social infrastructure sets out that loss in areas of 'defined need' should be refused. Islington are unclear why 'defined need' is necessarily part of the policy, and we consider that the policy should have a general presumption of refusal unless criteria is met.</p> <p>In terms of said criteria, S1(F)(1) refers to facilities continuing to serve needs of the neighbourhood. We consider the term 'neighbourhood' be too specific an area which could limit the policy intention; we suggest replacing with "needs of the community" or similar, which links provision specifically to people rather than an area.</p> <p>Paragraph 5.1.4 notes potential extra protection via Asset of Community Value designation. While ACV can have material planning weight, they are not in themselves effective protection of continued social infrastructure use, and there should be a strong caveat to this effect in the supporting text.</p>
Social Infrastructure	Policy S2 Health and Social Care Facilities	<p>The policy sets out the approach to London's health care services including identifying needs, taking account of NHS plans and supporting provision of new high quality facilities. Whilst we welcome the shared use of infrastructure assets, experience has shown that this is not always straightforward; for example, where the NHS reimburses GP practice rent, it will not reimburse rent for other health uses such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with the lease, this is a significant barrier to sensible co-location of services.</p> <p>Other issues which could be made clear in the supporting text include making boroughs work with their CCGs to understand the implications of lease expiry on primary care premises leased from the commercial centre, as well as impacts on the primary care estate of retiring single-handed practices where the GP owns the premises. Finally, the policy approach needs to be clear and to state explicitly that loss of healthcare facilities will not be supported until it has been demonstrated that adequate alternative provision has been provided, or that the loss accords with Policy S1(F)(2).</p>

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Social Infrastructure	Policy S3 Education and Childcare Facilities	<p>S3(A)(3) encourages nursery provision but this should not be limited to just primary schools and should include secondary schools too – the provision helps the staff as well as more generally ensuring nurseries are provided in accessible locations reducing the need to travel. Also the London Plan could encourage boroughs to consider supporting provision of health services in an early years setting, particularly co-location of health visitors, breastfeeding support and other community health support services.</p> <p>S3(B)(8) and S3(B)(9) are strongly supported. Good quality parks and open spaces provide important opportunities for play and outdoor learning. Islington works in partnership with The Garden Classroom to support schools in accessing and making the best use of their outdoor learning resource.</p>
Social Infrastructure	Policy S4 Play and informal recreation	<p>The policy continues the approach set out in the existing London Plan which supports audits of play and informal recreation provision and promotes development of strategies to address need. The standard of 10 square metres per child remains the same and development detail is set out regarding implementation of provision of play space.</p> <p>Islington support the policy approach and the principle that safe and stimulating play is essential for children and young people, and we welcome the specific reference to provision for different age groups including older children and teenagers. The creation of playful landscapes within the wider public realm sends an important message for children and young people and others that they are welcome in public space and have a right to be there. This is a key theme for the Islington Fair Futures Commission. The emphasis on consulting children and young people regarding their changing needs is also commended as well as the emphasis on encouraging development to support children to move around freely through safe streets. The importance of doorstep provision not just for children but for young people too, who may be living in overcrowded conditions, and or are constrained by postcode issues from accessing recreational spaces further afield.</p> <p>The policy - rather than the supporting text (para 5.4.4) - should require that the needs of supervising adults are taken into consideration, having somewhere to sit and interact socially with other carers whilst supervising children</p>
	S5 – Sports & recreation facilities	<p>The policy approach sets out to ensure that there is sufficient supply of good quality sports and recreation facilities, continuing with the premise of no net loss of sporting facilities unless it can be demonstrated that there is no ongoing demand.</p>

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		<p>S5(B)(3) refers to increasing the existing lighting hours on sports pitches to extend their use. We support this policy as there may be opportunities in Islington to re-consider current restrictions set through planning conditions on some sport pitches, to enable wider social benefits from use of sports spaces later into the evening.</p> <p>Part C of the Policy should recognise that Sport England - as a statutory consultee - will likely reject on principle the loss of formal sports facilities even if it is part conversion to other recreational facilities, for example sports pitch to play space. Therefore, whilst the aim of this part of the policy is supported, the difficult balance that the planning system has to make in determining the appropriate mix of uses for both organised formal sports and more informal recreation needs to be adequately recognised in the supporting text.</p> <p>There is no direct mention of disabled access to sport, which is stated in current London Plan. This should be reinstated.</p>
	Policy S6 – Public Toilets	<p>We support the thrust of policy S6 but there should be consideration of practical difficulties with implementation. We consider that the policy could look to promote publicly accessible toilets standalone facilities in the first instance, but also that there could be a hierarchy which means that facilities could also be provided (through condition) as part of a Community Toilet Scheme (which operates in several boroughs).</p>
	Policy S7 Burial space	<p>While the policy is not something we have particular disagreement with, it needs to be recognised in the policy itself (particularly with regard to the principle of proximity) that this policy would cause considerable conflict with other plan objectives, particularly in a borough such as Islington with severe constraints on available land.</p> <p>Provision of burial space is an area where the Mayor should take a lead role, perhaps even identifying appropriate broad locations, given that it needs to be looked at on a multiple-borough, if not London-wide, level.</p>
Economy	Policy E1 - Offices	<p>Policies which seek to improve the quantity and quality of office space are strongly supported. In Islington, B1 use premises are the most numerous of employment use classes; almost three quarters of the Borough's commercial stock is office space. Increasing the provision of office floorspace is a key priority for the borough. The number of jobs in Islington is expected to increase by 50,500 up to 2036 and this is largely within the Professional and Technical Services sector, which generates the most demand for office space.</p>

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		<p>We would caution against some of the terminology used in policy E1, based on experience of how individual words are misused in planning applications. While the term ‘competitiveness’ is understood, it is not defined and could be misconstrued. Likewise, the requirement for ‘authoritative’ strategic and local evidence unnecessary; evidence will naturally need to be authoritative to stand up to scrutiny, and this will be tested through Local Plan examination and at planning applications. The ‘authoritative’ requirement could be seen as an additional, unnecessary hurdle.</p> <p>The borough’s most recent Employment Land Study from 2016 indicates a highly constrained supply-demand balance, whereby demand for office floorspace greatly exceeds supply. Land available for office development is outbid in value terms by residential use; this constrained supply is the biggest threat to economic growth in Islington. The Council intends to address this issue within new employment policies as part of the Local Plan review. Policies which seek to increase office stock, where justified by evidence of demand, are welcomed. We consider that E1(B) could be strengthened further by adding a spatial element, with stronger support/prioritisation for new space in the CAZ and other office-focused areas.</p> <p>Policy E1 supports the development and promotion of the capitals unique agglomerations and dynamic clusters of world city businesses. Islington is home to a number of economic clusters, including Tech City around Old Street; Clerkenwell Design Cluster; Medtech cluster along the Kings Cross - Moorfields Eye Hospital Corridor; and the Vale Royal / Brewery Road industrial cluster. These clusters are vital to the success of Islington’s economy and wider London / national economies. Policies which support them are welcomed, as is the recognition that improvements to walking, cycling and public transport connectivity and capacity should also be supported. The Council intends to address these issues within new employment policies as part of the Local Plan review. We note that the policy does not require protection of space in the identified areas. While this can clearly be inferred, a specific reference should be included.</p> <p>The distinction between criterion D(1) and D(4) should be clarified. We understand that D(4) is town centres not identified on Figure A1.4, but would welcome confirmation of this in the policy itself.</p> <p>Part E of Policy E1 states that office markets outside the CAZ should be consolidated and where viable, extended, focusing new development in town centres and other existing office clusters. Islington has several designated employment areas outside of the CAZ. These important employment areas largely serve Islington’s small business economy and are also helping service the central London economy. Policy E1(E) mentions release of surplus office capacity, but the term ‘surplus’ is not defined. Surplus in this instance needs to be accompanied with an additional caveat about the level of evidence required to truly justify space if surplus to requirements. The policy should defer to local guidance for requirements to justify loss of office floorspace.</p>



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		<p>Parts E and F of the policy set out support for Article 4 Directions in the CAZ and Tech City, and in local non-CAZ clusters. Islington will be consulting on a proposed Article 4 Direction to remove permitted development rights for the change of use from office to residential, and ongoing support from the GLA is welcomed.</p> <p>Part G is broadly supported, noting the comments above regarding evidence requirements to justify loss of office floorspace. We consider that Part G should be amended to explicitly operate as a hierarchy, and that (1) and (2) need to be thoroughly investigated before redevelopment, intensification and change of use can take place.</p> <p>With some minor amendments, the proposed policy would be effective in promoting and supporting the development of new offices, as well as sustaining the office function of key economic clusters. In order to link with Policy SD5, the GLA is asked to consider setting out specifically that offices in the CAZ will be protected, and new offices supported above other uses. Table 6.1 of the supporting text, which shows that almost 2/3 of growth is expected to come from the CAZ, surely justifies such specific protection.</p> <p>Para 6.1.3 notes there is broadly sufficient capacity to accommodate office demand in the CAZ and NIOD, complemented by Tech City and K &amp; C and future reserves. This statement does not truly reflect the LOPR 2017, and as such can be seen as a potentially dangerous undermining comment. The LOPR recognises the relatively low level of current outstanding consents, suggesting that vigilance will be needed to ensure that potential locations of office expansion are safeguarded and encouraged to come forward into the development pipeline. It also identifies some spatial imbalances in capacity, noting the relatively limited capacity in some CAZ boroughs such as Islington and Southwark. Para 6.1.3 should be reworded to reflect these strong caveats identified in evidence.</p>
	Policy E2 - Low-cost business space	Policy E2 seeks to provide and protect low-cost B1 business space which meets the needs of micro, small, and medium-sized enterprises, and firms wishing to start up or expand. The policy requires that development proposals which involve the loss of existing B1 space in areas where there is an identified shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for businesses purposes, or re-provide the equivalent amount of B1 space, or demonstrate that suitable alternative accommodation is available in reasonable proximity to the development proposal.

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		<p>We consider that the policy title is misleading, as it relates to space that is low cost by virtue of its location in secondary/tertiary areas, rather than any explicit affordability secured through planning, e.g. discounted rent. The policy should be titled ‘Small and Medium Enterprises’.</p> <p>Businesses in Islington are predominantly made up of micro and small sized enterprises; approximately 97% of enterprises fall within this category. To support these businesses, there needs to be an adequate supply of low-cost business space. Islington’s Local Plan includes a similar policy to Policy E2; Policy 5.4 of LBI Development Management Policies stipulates that within Employment Growth Areas and Town Centres, proposals for the redevelopment of existing low value workspace must incorporate an equivalent amount of affordable workspace and / or workspace suitable for occupation by micro and small enterprises. Policy E2 is therefore supported. However, it is unclear as to how this policy links with the affordable workspace policy. This is discussed further in response to Policy E3.</p> <p>The Council recognises that a significant proportion of businesses located in the Borough have particular needs that cannot be met by new Grade A office space, at market rent, and there is a great need for a variety workspace in terms of type, size and cost. Islington’s latest Employment Land Study (2016) confirms that this is still the case and highlights growth in firms seeking “hybrid space” (older, industrial style stock that has been refurbished not as Grade A office stock, but as studio / light production space or low specification office space - non-air conditioned; revealed ceilings, flexible and collaborative). It recommends that these type of spaces should be encouraged in order to nurture the small business sector. The ELS also recommends that new local policy should continue to reflect the small business economy and the diverse demand for premises ranging from secondary offices, to studios, to business centres and co-working space, particularly across the non-CAZ area of the Borough.</p> <p>Part B of Policy E2 is broadly in line with Islington’s existing policy and this is welcomed. Part B(3) requires proposals involving loss of B1 to demonstrate availability of suitable alternative accommodation in reasonable proximity. This could mean in adjacent boroughs (hence exacerbating borough specific supply issues) and it does nothing to address the broader supply imbalances as it increases demand for existing space (which could manifest in rent increases). This issue would partly be solved by operating Part B as a hierarchy, whereby part (1) must be satisfied, then part (2), then part (3).</p> <p>Paragraph 6.2.6 describes the evidence that is required to demonstrate that business space is obsolete. This includes strategic and local assessments of demand and supply, and evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size). The use of such evidence is an effective way of determining whether there is</p>

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		<p>demand for such space; this method is broadly in line with Islington’s current approach. However, Islington’s adopted policy requires a minimum period of 2 years marketing evidence, this is considered to be the minimum, appropriate timescale to demonstrate lack of demand. It is asked that the GLA consider extending this time frame from 12 months to 24 months, or explicitly defer to specific local requirements.</p> <p>We note that para 6.2.6 specifically identifies housing as an alternative use where business space is obsolete. This could conflict with policy SD5 for space in the CAZ, as SD5 does not identify housing as a CAZ strategic function. It may be more appropriate to prioritise other commercial uses where space is demonstrated to be obsolete.</p> <p>On the definition of low-cost business space, we agree with the definitions in relation to secondary and tertiary space. Low cost business space should not be defined based on rental values, as there are spaces in Islington, particularly the CAZ, which may be considered secondary but are able to achieve close to prime rents. If the definition was based on rental values, then such space would not be protected by this policy.</p> <p>Part C of the policy stipulates that development proposals comprising 2,500 sqm or more of B1 business floorspace should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises. Islington’s current adopted policy requires an appropriate amount of affordable workspace and / or workspace suitable for occupation by micro and small enterprises from all major developments. Major development in the Development Management Policies is defined as set out in the Town and Country Planning (General Development Procedure) Order 1995; where the building or buildings where the floorspace to be created by the development is 1,000 square metres or more; or where development is carried out on a site with an area of 1 hectare or more. A threshold of 1,000 sqm is more considered appropriate than 2,500 sqm for Islington. It is asked that the GLA consider either lowering the threshold to 1,000 sqm, having different thresholds for inner and outer London boroughs, or leaving this for boroughs to set out within Local Plan policies.</p>
	Policy E3 - Affordable workspace	<p>The introduction of an affordable workspace policy in the draft London Plan is welcomed. The policy sets out that affordable workspace should be for a specific social, cultural or economic development purpose. Affordable workspace for sectors that have social value, such as charities; cultural value such as artists’ studios and designer-maker space are prioritised. As well as space which is for disadvantaged groups starting up in any sector, and those which provide educational outcomes and support start-up businesses or regeneration. The policy also lists instances of when affordable workspace would be expected, this includes where there is existing affordable workspace on site, in areas where cost pressures could lead to the loss of</p>

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		<p>affordable workspace for SMEs and in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.</p> <p>In Islington, there is an identified need for affordable workspace. Our current Local Plan requires either a proportion of affordable workspace or space suitable for the occupation by micro and small enterprises. The policy in the new Local Plan will comprise a direct requirement for affordable workspace, and It is the intention to be more prescriptive, through setting out the amount, type and terms of new affordable workspace.</p> <p>The policy encourages boroughs to develop more detailed policies which reflect local evidence. The level of detail set out in the draft London Plan policy is appropriate, and putting the onus on boroughs to develop locally specific policies is supported. We suggest a small amendment to Part C to clarify that Parts A and B do not apply where borough plans set out more detailed policies.</p> <p>The policy also requires local affordable workspace policies to include ways of monitoring the objectives, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Further, leases or transfers to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A of the policy. Finally, that affordable workspace elements of a mixed use scheme should be operational prior to residential elements being occupied. These elements of the policy are supported.</p> <p>The Council's forthcoming Affordable Workspace Strategy is developing the Councils detailed approach which is designed to bring significant social value outcomes and to ensure that these provide long-term benefits for the local community. The Strategy is related in particular to part D, point 6.3.2 on supporting the educational sector and 6.3.3 on supporting sectors that have cultural social value.</p> <p>To ensure that there is a link between Policy E2 and this policy, the Council would like to suggest a cross reference in the affordable workspace policy. This would be appropriate under Part B, which stipulates situations and areas of when affordable workspace should be considered, specifically under point 2.</p>
	Policy E4 - Land for industry,	Like many London Borough's, Islington has experienced ongoing losses of industrial space; according to ONS data, Islington's stock of warehouses and factories was 810,000 sqm in 2000; 531,000 sqm in 2005 and 374,000 sqm in 2012: a loss of 436,000

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	logistics and services to support London's economic function	<p>sqm over a twelve-year period. Much of this loss can be attributed to industrial restructuring, which has been underway for many years across the UK. Islington's Employment Land Study forecasts further losses up to 2036 totalling 90,000 sqm<sup>5</sup>. Nearly a third of this total is already in the planning system through existing permissions, meaning that the Council must strengthen its policies to avoid further losses of the limited industrial land stock. With this in mind, the Council intends to continue designating the Vale Royal / Brewery Road area as an LSIS, so that it is able to continue to service the Central London economy, and aim to promote further intensification of appropriate uses in this area. The Council therefore strongly supports policies which promote the retention and provision of additional industrial capacity.</p> <p>We particularly welcome Part C which proposes a 'no net loss' approach toward industrial floorspace capacity. However, we feel that Part C could be further strengthened by making it clear that release of industrial land should be through Local Plans rather than ad hoc applications, and that plan-led release should only be considered in 'limited release' boroughs. This is particularly important due to the cross-reference in Part E, which opens up the potential for ad hoc proposals being permitted where they address other policy priorities.</p> <p>Part E should be amended so that any release is only suitable through Local Plan allocations which explicitly prioritise other plan priorities. This would preclude ad hoc release which poses a significant danger to industrial land, even with the policy strengthening evident in the draft London Plan.</p> <p>The definition of floorspace capacity in para 6.4.5 should, for the avoidance of doubt, refer to B1c, B2 and B8 use classes.</p>
	Policy E6 - Locally Significant Industrial Sites	<p>The policy recommends that boroughs define detailed boundaries of LSIS, as justified by local evidence. It advises that Policy E7 is taken in account when considering the scope for intensification, co-location and substitution. It then sets out that the development plans should make clear the uses that are acceptable in LSIS, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs, and distinguish these from local employment areas that can accommodate a wider range of business uses. We support the introduction of policy specifically for LSIS which we consider an important source of industrial land in London, and we welcome the scope for identifying new LSIS designations where supported by evidence.</p> <p>Islington's only locally significant concentration of industrial / warehousing employment land is located adjacent to the northern boundary of the CAZ near Kings Cross. The Vale Royal / Brewery Road LSIS is by far the largest concentration of</p>

<sup>5</sup> Paragraph 7.8.5, Islington Employment Land Study, 2016

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		<p>industrial activity and its significance will be strengthened in the review of the Local Plan by including a specific spatial strategy to guide the future for the area.</p> <p>The London Plan no longer refers to ‘other industrial sites’. Islington has some local – non-LSIS - industrial sites which will no longer have a degree of strategic policy protection. We would support reinstating policy on these areas, deferring to Local Plans for detailed guidance.</p>
	<p>Policy E7 - Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function</p>	<p>The policy advises that development plans and proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8. Islington’s Employment Land Study forecasts that approximately 3,200 jobs occupying industrial land will be lost over the period 2014 - 2036<sup>6</sup>, this equates to approximately 90,000 sqm. This figure is broadly compatible with the Borough’s current industrial land release benchmark figure; 5ha over the period 2011 – 2031, as set out in the London Industrial Land Supply and Economy Study<sup>7</sup>. E7(A) identifies potential options for intensification, which includes development of multi-storey schemes and the addition of basements. While we broadly support such options, there should be a caveat noting that height increases or basement expansion will be subject to other relevant plan policies.</p> <p>Regarding the LSIS, the policy advises that Development Plans and planning frameworks should be proactive and consider whether certain LSIS functions could be intensified and / or co-located with residential and other uses. Islington’s Employment Land Study recommends that the review of the Local Plan should include policies which protect and nurture a range of businesses in the Vale Royal / Brewery Road LSIS. Opportunities for intensification of business uses in this area are being explored in line with recommendations set out in the Employment Land Study, and as advised in Part C of the draft London Plan policy. With regard to co-location with residential, we remain sceptical about the degree to which residential can co-exist with industrial uses without compromising the ongoing function of industrial areas. We note (and support) that the policy proposes that co-location is done through the plan process and not ad hoc planning applications.</p> <p>As noted above, non-designated industrial sites are no longer conferred with any protection in the London Plan. While some of the criteria in Part D are robust, others are easier to address and could lead to loss of local industrial sites with little evidence. We consider that D(1) and D(2) should <u>both</u> apply to proposals, and then an applicant can choose to comply with either D(3) or D(4). Separate to this issue we consider the criteria in Part D are missing the consideration of contaminated</p>

<sup>6</sup> Paragraph 7.2.4, Islington Employment Land Study, 2016

<sup>7</sup> Table 2-8, London Industrial Land Supply and Economy Study, 2015

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		<p>land on health and wider environmental impacts. The issue has been identified in the relevant health and environmental risks identified in the Integrated Impact Assessment (IIA) Scoping Report and have not been carried forward into the formation of policies in the draft new London Plan and are particularly relevant to the redevelopment of industrial land.</p> <p>In Part E, the clear priority should be for an increase in space unless it can be justified why this is not appropriate/feasible/possible. By referencing the potential for no net loss, the policy sets a lower bar.</p> <p>Part F should recognise that there are some types of industrial capacity, in particular ‘last-mile’ facilities, that are unsuitable for substitution. In terms of Part F(2), substitution will in all cases lead to increased congestion, pollution and vehicle miles where central London facilities are substituted to Outer London and beyond.</p>
	<p>Policy E8 - Sector growth opportunities and clusters</p>	<p>The policy offers broad support to businesses across all sectors and promotes employment opportunities for Londoners. Leadership in tech across all sectors is to be maximised. Research and development and collaboration with higher education institutions is encouraged. The development of higher and further education institutions and their integration into regeneration and development opportunities to support social mobility is also encouraged. These elements of the policy are supported.</p> <p>Part C of the policy seeks to ensure the availability of suitable workspaces, including start-up, incubation and accelerator space, for micro, small and medium-sized enterprises; flexible workspace such as co-working space and serviced offices; conventional space for expanding businesses to grow or move on; laboratory space and theatre, television and film studio capacity; and affordable workspace. This is welcomed by Islington and is in line with the recommendations set out in the Islington Employment Land Study. The study reports that economic change is creating new demands on building usage and design, which has led to a strong growth in firms seeking ‘hybrid space’, which can be described as space which often straddles traditional B-Use classifications - older, industrial style stock that has been refurbished not as Grade A office stock, but as studio / light production space or low specification office space - non-air conditioned; revealed ceilings, flexible and collaborative.</p> <p>Part F of the policy promotes clusters such as Tech City and MedCity, as well as the development of new clusters where opportunities exist, including Creative Enterprise Zones. This is supported and Islington has submitted a bid for funding from the GLA to investigate Clerkenwell as a Creative Enterprise Zone. As set out above, the Borough accommodates a number of key growth sectors and economic clusters including Tech City around Old Street, Clerkenwell Design Cluster, Medtech cluster</p>

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		<p>along the Kings Cross / Moorfields Eye Hospital Corridor, and the Vale Royal / Brewery Road industrial cluster. These diverse economic clusters are crucial to the continued success of Islington’s economy. The Council notes that TechCity and MedCity are specifically mentioned in the policy, however, the GLA is asked to whether this policy should include a reference in support of the promotion and identification of other economic clusters at local level, to give these other clusters equivalent status.</p>
	<p>E9 Retail, markets and hot food takeaways</p>	<p>We strongly support the draft London Plan approach to limiting hot food takeaways in close proximity to schools, and we note the ability to set a locally determined boundary. Islington’s current policy specifies that hot food takeaways will be resisted within 200m of a school. We note that this radius is half that recommended in the draft London Plan. Islington is the second smallest London borough and this spatial constraint means a 400m radius would effectively mean a total ban in Islington, which we may not be able to defend on future appeals. We therefore would continue to operate the current 200m threshold in Islington.</p> <p>We also note that the policy places the burden of proof in terms of defending this policy squarely on boroughs. Although there is evidence to suggest that limiting hot food takeaways near schools could achieve health benefits, there is little direct causal evidence and a lot of the justification rests on a precautionary principle. It is often a contentious issue that the fast food industry pursues vigorously. We request that the Mayor provides support to boroughs to assist with policy implementation.</p> <p>We support the Healthy Catering Commitment (HCC) approach to takeaways and encourage the Mayor to raise the profile of HCC across food businesses in London. We note that Islington already operate a policy to condition new A5 units to require HCC accreditation.</p> <p>Para 6.9.5 supports the careful management of uses like pay day loan shops, betting shops and hot food takeaways, in particular in strategic areas of regeneration. This is welcomed by the Council, although we note issues with justifying over-concentration on a case-by-case basis. As noted above in relation to hot food takeaways, the Mayor should provide additional support/guidance to assist with implementing this policy. We also consider that the text should refer to areas with higher levels of deprivation based on up-to-date IMD, rather than strategic areas of regeneration which are based on current IMD and will quickly be out-of-date.</p> <p>With regard to betting shops and payday loans, Islington’s have local guidance to require these uses to provide detailed statements as part of planning applications to clarify how the uses will operate; and require the display of information such as</p>



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		<p>interest rates, debt support and gambling addiction charity contact details. While this information does not, by itself, prevent harm, it does mean that decision makers have sufficient information to fully consider impacts. We encourage the London Plan to take a similar approach. We would also support such uses being required to produce a Health Impact Assessment.</p> <p>In addition, policy E9(B)(4) needs supporting text to clarify the importance of maintaining sufficient convenience shopping, particularly in local and district centres, to maintain local services. There may be structural changes in retail and people may be changing their shopping habits but making clear that demand for local convenience is still strong is important to help support ensuring sufficient space for convenience provision is maintained. Also, shopping as an activity has other benefits than the just obtaining goods, older people for example like to shop daily just to get out and meet people.</p> <p>Policy E9(E) requires provision of small shops and potentially affordable retail units, which we support.</p> <p>We support the principle of policy E9(F) which prioritises re-provision of town centre uses at ground floor where retail space is considered surplus. We suggest that the reference to residential development in the policy should be clear that this relates to upper floors, in order to maintain active frontages.</p>
	<p>Policy E10 Visitor infrastructure</p>	<p>Islington have a very strong record of delivering visitor accommodation, with a number of visitor accommodation schemes in the development pipeline. Business floorspace, particularly B1 floorspace, is the main driver of economic growth in the borough and is considered the best means to meet Islington’s significant jobs projection. Therefore, in Islington we consider visitor accommodation should be restricted to ensure that it does not limit the achievement of other priorities, particularly economic growth. We also note the demand for other competing objectives such as designation for the Creative Enterprise Zone and the retail cluster at Farringdon, which could both be affected by a more laissez faire approach to hotel provision. Our own up-to-date local evidence supports this and notes that hotels can squeeze out office uses, something which has materialised in several planning appeals. There should be a specific reference to policy conflict, particularly in the CAZ, upfront in Part A of the policy. We consider that the Mayor should defer prioritisation to boroughs based on local evidence.</p> <p>Part C specifically references accommodation for business visitors, but this is impossible to distinguish when planning for visitor accommodation. Even where specific business visitor need could be identified, it could not be effectively managed through planning, for example you could not condition a hotel to be exclusively for business users. Part C reads more like supporting text and would fit well as part of para 6.10.2, if reworded to discuss the need to consider business visitors as well as tourists when planning for visitor accommodation.</p>

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		<p>Part D directs strategically important serviced accommodation to Opportunity Areas with smaller scale provision in the commercial core parts of the CAZ subject to the impact on strategic office space; in Islington this is the core parts of the City Fringe/Tech City Opportunity Area. Therefore, Part D directs both strategic and smaller scale provision to the same place in Islington, which is also the area where office uses are most strongly prioritised in local and London policy. This is a significant conflict which will be particularly damaging to policies which look to protect and promote offices in these areas, and therefore will have knock on effects on the ability to secure affordable workspace. The policy should allow boroughs to put in place more restrictive local policies where supported by detailed evidence, particularly evidence supporting new office provision.</p> <p>The wording of the last sentence of Part D need to be much clearer, with removal of the double negative. It should also refer to intensification of provision generally, rather than in areas of existing concentration. Concentration is a subjective concept which can only be determined on a case-by-case basis, and therefore is at odds with planning strategically for areas. A simpler sentence such as the following is more suitable:</p> <p><i>“Intensification of provision of serviced accommodation should be resisted where it compromises local amenity or the balance of local land uses,”</i></p> <p>Part F supports short-term lettings where they do not compromise housing provision. Due to the changes in the Deregulation Act, local authorities have little scope to resist short-term lets of 90 days or less, but where a planning application is required (i.e. where use is for more than 90 days), such a change will always affect housing provision. Therefore, we do not understand why the Mayor has expressed such broad support. We consider that the policy should be amended to directly acknowledge this impact</p> <p>Para 6.10.2 refers to the estimated strategic need of 58,000 bedrooms of serviced accommodation by 2041, which has been derived from a GLA Economics paper. This paper has some significant flaws which undermines the estimated level of strategic need. Firstly, it doesn’t reflect the deregulation of short term lets in projections, which could help meet a lot of demand for visitor accommodation. In Islington, there are over 1,800 AirBnB listings for a whole home/flat in Islington, let at an average 92 days per annum (around a quarter of a year). These listings could be considered analogous to around 450 hotel rooms (in terms of available supply over a full year), which is a significant stream of supply (and which relates to just one operator in the market – there are numerous others).</p>

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		<p>Like most projections, there are a significant number of variables which underpin the target identified in the paper. However, in the case of visitor accommodation, the variables are complex and dependent on macro-economic and political issues. Therefore, there should be considerable caution when using the outputs of the paper. For the gross scenario, the paper applies a rate of closure of 0.4% uniformly across boroughs; this is based on the average share of the total serviced rooms supply that has closed over the past five years. However, the closure rate from borough to borough could be significantly different, and in boroughs where hotels are more viable (like Islington), it is reasonable to expect that closures would be less than average. Even a minor change to the modelled closure rate could have a significant impact on the gross figure.</p> <p>The council are supportive of the need for accessible visitor accommodation for disabled people. However, we feel the very prescriptive list of requirements for providing 15% of bedrooms with varying degrees of accessibility will be very challenging to monitor and could contribute to a potential demise of the quality of disability accessible accommodation, given many of the criteria refer to interior adaptations such as hand rails. We consider that the 10% wheelchair accessible room requirement in Part G(1) should apply unless boroughs choose to put in place the more prescriptive requirements; the requirements in Part G(2) could be given as an example of more prescriptive requirements in the supporting text.</p> <p>Para 6.10.4 supports use of student halls as visitor accommodation during university vacation periods. This conflicts with policy H17 which supports use of such accommodation for ancillary uses during vacation periods. General visitor accommodation would not be ancillary to student accommodation; any ancillary use must be a specific use related to a university activity. Reference to student halls in para 6.10.4 (the last two sentences) should be removed.</p>
Heritage and Culture	Policy HC1 Heritage Conservation and Growth	<p>We support the efforts to protect the historic environment of London presented in its built form, landscape, heritage and archaeology.</p> <p>Islington considers it is not clear whether the policy HC1 (A) is suggesting a new approach to evidencing and understanding the protection of the historical environment or whether this is use of existing evidence of heritage assets – lists of these assets and their condition and risks to, conservation area character appraisals.</p> <p>Paragraph 7.1.3 references a 'blend of old and new that gives capital its unique character'. This is a simplification of the capitals character and could either be revised and/or cross reference to new policy D2: Delivering Good Design part A initial evaluation which sets out a list of elements that could all be considered contributing to character.</p>

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		<p>Part HC1D and paragraph 7.1.9 reference an expectation to develop up-to-date Archaeological Priority Areas for plan-making and decision-taking. Islington’s Archaeological Areas are currently being revised by Historic England and we will update our records when the new data are available.</p>
Heritage and Culture	Policy HC5 supporting London’s culture and creative industries	<p>Policy HC5 aims to support the continued growth and evolution of London’s diverse cultural facilities and creative industries through protecting existing venues, and supporting the development of new venues in town centres and the CAZ. We support the definition of culture set out in para 7.5.1, but it does highlight the issue that creative and cultural can be indivisible. This could create problems when implementing policy HC5, with significant overlap between designations.</p> <p>The policy introduces the possibility to define locally-distinct clusters of cultural facilities as cultural quarters and protect and enhance strategic clusters of cultural attractions. While we acknowledge the distinction between local and strategic clusters, in practice they are likely to overlap, and therefore implementation of Part A (2 and 3) could be confusing.</p> <p>Part A (or possibly the supporting text) should include reference to the following cultural infrastructure:</p> <ul style="list-style-type: none"> <li>• the need for affordable, larger and/or grow-on spaces</li> <li>• need for cultural rehearsal spaces – new buildings or improved access to current facilities</li> <li>• need for film company unit bases to safely and non-disruptively enable film and TV production. Film London and industry partners recognise this as a huge issue.</li> </ul> <p>Regarding Part A(5), we support the general focus but consider that there should be a caveat related to outdoor cultural space to ensure protection of designated open space.</p> <p>Creative Enterprise Zones are introduced with appropriate policy to support CEZ development and the delivery of regeneration benefits. The council welcomes the opportunity to bid for CEZ funding and support the introduction of Creative Enterprise Zones as another mechanism to enhance our creative industries and implement creative, business led regeneration. The council’s CEZ bid aims to align with the emerging policies in the Local Plan review and establish comprehensive strategies for creative and cultural designations.</p> <p>There is some ambiguity relating to the aims of a CEZ in terms of enabling creative enterprise on the one hand and enabling leisure, recreation and community facility provision as outlined in Part C of policy HC5 on the other. Additionally, policy HC7 in the draft London Plan refers to the need to protect pubs where they contribute to objectives of a CEZ. The council support and understand the need for a range of measures to make CEZ’s attractive places for creative enterprises to establish but the</p>

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		<p>conflict of different land uses could potentially undermine the core function of the CEZ and we would request some further clarity on this. There does not seem to be guidance for CEZ bidding cross referenced in the London Plan and if this is intended to be an ongoing mechanism this reference may be advantageous for clarity.</p> <p>CEZ policy promotes new cultural venues but is silent on visitor accommodation, which means that policy E10 could be used to justify new hotels and hence potentially undermine the function of a CEZ, or at least diminish land available for more suitable uses identified in HC5(C). The policy should be amended to resist visitor accommodation within a designated CEZ.</p> <p>We strongly support the principle of improving the cultural offer for different groups of people, set out in para 7.5.4, but we question how effectively this offer can be protected and promoted through the planning system. Further guidance/good practice would be welcome.</p> <p>Para 7.5.5 refers to Assets of Community Value. As noted in our response to policy S1, while ACV can have material planning weight, they are not in themselves effective protection of a specific use, and there should be a strong caveat to this effect in the supporting text.</p>
Heritage and Culture	Policy HC6 Supporting the night time economy	<p>HC6 introduces a definition of the night time economy which is defined as all economic activity taking place between the hours of 6pm and 6am. Criteria are introduced against which decisions on night time economy can be judged</p> <p>The definition of night time economy (NTE), for planning purposes, is welcomed and we support the aim for a more integrated approach between planning and licensing, although recognising that they are separate legislative regimes. The Council would always expect local context to be a factor in decision making around NTE and Licensing Policy already defines strategic NTE areas alongside different definitions for evening economy (ending before midnight) and late night/ NTE for activities extending beyond midnight. Licensing Policy also supports the Mayors approach to encourage the 24-hour city vision by setting out approach to encouraging and supporting a diverse, safe and welcoming evening and night time economy for example through encouraging mixed use venues, coffee shops selling alcohol in the evenings, promoting live music venues and women’s safety in the NTE.</p> <p>Policy HC6(B)(4) refers to residents experiencing negative cumulative impacts of high concentrations of licensed premises. However, it is not just residents, its other land uses which may be impacted by cumulative impacts of concentrations of licensed premises such as places of worship and community orientated uses. We ask that this aspect of policy to be reconsidered.</p>

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Heritage and Culture	HC7 Protecting public houses	<p>The council are supportive of the draft London Plan public houses policy and welcome the extension of this policy to address the promotion of new public houses as well as the protection of existing ones. While determination of a planning application can have consideration of licensing, the existence of a cumulative impact zone does not give license to refuse a planning application outright.</p> <p>Para 7.7.5 refers to Assets of Community Value. As noted in our response to policies S1 and HC5, while ACV can have material planning weight, they are not in themselves effective protection of a specific use, and there should be a strong caveat to this effect in the supporting text.</p> <p>Para 7.7.6 lists a broad range of characteristics that can determine whether a pub has specific value. There should be explicit recognition that these characteristics are not exhaustive and there may be other valid considerations.</p> <p>We support the requirement as stated in the draft London Plan for two years of marketing evidence to show that the building being used as a pub is no longer viable. The council already require 24-month marketing (and vacancy) period when assessing the change of use of a pub, so inclusion in the London Plan is welcome.</p>
Green Infrastructure and the Natural Environment	Policy G1 Green Infrastructure	<p>The target to make London at least 50% green (green cover) by 2050 is set out. A requirement for urban greening is proposed to deliver this target in a new policy, which focuses on development delivering increased green features through a variety of greening factors such as green roofs and vegetation. The broad policy approach is supported albeit implementation in Islington will be challenging. We consider that further examples of green and open spaces should be detailed in the policy, particularly private gardens, private trees and public trees in areas other than streets. Reference to 'street trees' should be amended to 'trees', as all trees are an integral part of GI strategies and GI targets.</p> <p>We consider that there is need for strategic policy which brings the elements of Green Infrastructure together and relates to open space, biodiversity conservation, flood management, health and well-being and sport and recreation. Chapter 2 presents that opportunity, for example expanding Policy GG2 and Policy GG3 to include reference to maintaining and enhancing as well as growing.</p> <p>The Council supports integrated planning for green infrastructure but we consider that a requirement for the production of specific green infrastructure strategies in all instances may be unnecessary. A Local Plan is essentially such a strategy,</p>

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		<p>underpinned by up-to-date separate evidence reports (e.g. Open Space Study, Sport and Recreation Study, Strategic Flood Risk Assessment). The Council recommends changing Policy G1(B) accordingly.</p> <p>With regard to paragraph 8.1.3. there is no explanation of how the achievement of manifesto target to make London at least 50% green by 2050 will stack up quantitatively. Islington would like to see more information to explain how this is intended to work, in particular what constitutes 'green' in the context of 'green cover'. We presume that this is primarily the greening methods in table 8.2. It would also be useful to have an idea of where are we now in relation to the target. Islington is the most densely populated local authority in the country with around 15,000 people per square kilometre and has one of the smallest amounts of open space per person. Within the context of both continued population and employment growth, the pressure on existing spaces within the borough is likely to intensify. Any increase in overall ground level open space will be difficult to achieve in Islington, especially when balanced against other planning objectives, particularly building new homes and increased floorspace for business.</p>
	Policy G3 – Metropolitan Open Land (MOL)	We support the policy to protect MOL from inappropriate development, which will help protect Islington's two designated areas of MOL
	Policy G4 Local green and open space	<p>The policy approach protects green and open spaces, promotes the provision of new areas of publicly accessible green and open space, as well as retaining the expectation for an assessment of need to be undertaken to inform policy. The principle remains of loss occurring only where there is no deficiency and where equivalent or better quality provision is provided. The wide range of benefits that green and open spaces provide is recognised as well as the importance of these spaces at a neighbourhood level. We support this policy.</p> <p>The approach does not clearly define what local green space is and whether it is different to publicly accessible public open space and whether it should be considered differently as part of an assessment of need. Publicly accessible open space is set out in table 8.1 and the use of the categorisation is clear in terms of assessment. The link then between assessment of local green space and then the target to make London at least 50% green by 2050 is not clear - does local green and open space contribute to this target.</p> <p>New developments in areas of publicly accessible open space which provide green and open space should be required to ensure that the green spaces are designed to provide residents a range of benefits and that developers should not be allowed</p>

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		to restrict access to green areas on the basis of tenure. These green spaces could include landscaped areas for bio-diversity, for relaxation, and formal and informal play spaces for children. The more residents can benefit from and enjoy their own green spaces, the less pressure there will be on existing public spaces.
	Policy G5 Urban greening	<p>The Council supports the policy approach to Urban Greening and welcomes the recognition of the benefits of urban greening including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity. As the approach acknowledges, the impact on amenity in Islington is especially relevant where traditional green space is limited. Development needs to innovate to incorporate green features / access to green space, in particular in Islington and the London Plan needs strong policies like this; we would like to see ambitious targets set as it is the main way of creating new habitat and enhancing biodiversity in the borough. Consideration should be given for including other non-green biodiversity improvements such as swift and bat boxes so they can be more explicitly encouraged in new developments.</p> <p>We would welcome the Urban Greening Factor process set out in supporting text and table 8.2. This implicitly prioritises traditional green space (through higher scores) but also rewards a range of other greening factors. We consider that this balance is correct.</p> <p>We consider that the policy should also apply to minor developments, although we acknowledge issues related to viability and information requirements are more acute with minors. However, to remain silent means that a potentially significant opportunity for further greening is missed. There is no reason why a development of 5-9 flats cannot incorporate a green roof for example.</p>
	Policy G6 – Biodiversity and access to nature	We welcome the approach set out in policy G6, particularly with regard to SINC. We would welcome further guidance on the procedures for designating new/amended SINC. While we understand the need for Metropolitan grade SINC to consult extensively, there should be more flexibility in designating/amending lower grade SINC, where informed by robust local evidence and consulted through the Local Plan process.
	Policy G7 Trees & woodland	Part A: Whilst the policy appears similar to the existing policy, the word ‘maintained’ has been removed. We would welcome clarity on this and suggest it should be reinstated to ensure that the ongoing protection of trees is prioritised, as protected can be read solely in relation to development proposals.



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		<p>Part B(2): The difficulty in achieving this in a dense urban borough like Islington should be recognised. More planting could take place in parks but this needs to be balanced with the need to have spaces that are open and not all shaded, as this can impact upon grass growth and other important meadow habitats. This could have implications for development design policies, for example tall buildings and policies optimising housing density.</p> <p>Part C: The policy refers to existing trees of 'quality'. We feel the term existing trees of 'value' - that is used in the current London Plan - is more appropriate as it encompasses biodiversity, amenity, ecosystem service benefits. Also, the use of BS 5837 is a poor reference; we would recommend this is not used, as it is subjective whether trees are category A or B and it does not say this in the BS.</p> <p>CAVAT and i-tree are not designed for individual trees on development sites. The equivalent land value works instead. CAVAT should be removed and more explanation about i-tree is needed about providing ecosystem services. We would also like to see reference to adequate replacement 'tree planting' added into the text, as it needs to be clear it is talking about tree planting.</p> <p>Finally, in paragraph 8.7.2 should tree cover mean canopy cover? TDAG and Right Tree do not have statutory weight, so they should not be referenced. We suggest the wording should be changed to 'boroughs should consult their own professional arboriculturalist'.</p>
	Policy G8 Food Growing	We support the policy and welcome reference to small scale food growing and re-utilising existing under-used spaces. Islington has a rich history of supporting and encouraging community gardening and food growing. We are currently working in partnership with the Octopus Community Network's Wild Places, We Can Grow project supporting food growing projects on estates.
	Policy G9 - Geodiversity	The policy should clarify the process for boroughs to identify RIGs and LIGs, in particular any procedures and consultation required with relevant stakeholders.
Sustainable Infrastructure	Policy SI1	The Council support the policy, in particular the requirement for all major developments to provide an Air Quality Assessment, the introduction of the 'Air Quality Positive' standard and the potential for offsetting requirements, although we consider the latter needs further explanation in terms of process and more guidance would be welcomed.

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		<p>Consideration of air quality at an early stage in the design process is important to ensure that effects and mitigation are properly considered for a development proposal. The Council welcomes the reference to the effects of poor quality on deprived neighbourhoods and the acknowledgement that low or zero-emission heating and energy will help achieve Air Quality Positive standard.</p> <p>As noted in our response to the Mayor’s Transport Strategy, we support restrictions on diesel vehicles in London.</p>
	<p>Policy SI2 Minimising greenhouse gas emissions</p>	<p>The Council supports the policy approach, in particular the focus on maximising the co-benefits between climate change and air quality.</p> <p>The Council welcomes the presentation of the zero carbon targets and the minimum on-site reduction target of 35% in policy. Islington’s Energy Study (2017) found that carbon emissions and reductions identified at planning stage are not accurate assessments of future carbon emissions/reductions. Part L of the Building Regulations currently uses outdated carbon factors for electricity. The Study suggests that applicants should be required to calculate the carbon content of heat using more accurate carbon emission factors, in addition to Part L calculations. A specific maximum carbon content for heat supply could also potentially be set. We consider it would be helpful if the London Plan could provide guidance on calculating the carbon content and acknowledge that additional information is required to supplement the Building Regulations.</p> <p>In terms of on-site reductions, we consider that a greater proportion should come from energy efficiency measures. While we fully support provision of renewables, siting of some renewables – e.g. solar panels - can often cause conflict with other policy priorities, e.g. green roofs. By ensuring reductions through energy efficiency are maximised, such conflicts may be avoided.</p> <p>Further to this, Islington’s Energy Study (2017) notes the benefits of Fabric Energy Efficiency and the importance of ensuring consideration at the earliest design stage in order to influence building form factor. We would support the introduction of FEES requirements in the London Plan, as a way of achieving on-site reductions.</p> <p>The requirement boroughs for reporting on the administration of carbon offset fund and the ring-fenced to greenhouse gas reductions, as opposed to just ‘carbon dioxide savings’ in the current plan, is also supported.</p>

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		<p>We welcome the inclusion of the importance of secondary heat sources, both in relation to the energy hierarchy (be clean) and energy masterplanning.</p> <p>We also welcome reference to link between on-site energy production and reducing costs for residents (i.e. helping fuel poverty).</p>
	Policy S13 Energy Infrastructure	<p>Islington welcomes the policy which broadly aligns with the Local Plan approach currently adopted by the Council. We support the introduction of references to secondary heat sources, low temperature networks and the Heat Priority Areas. We note the relationship between Heat Priority Areas and areas where air quality limits have been exceeded. We support the focus on maximising co-benefits between climate change and air quality, particularly in relation to preventing impact of CHP and ultra-low NOx gas boilers on air quality. With regard heat sources, we consider it would be useful for the London Plan to set out guidance on a maximum target for carbon content for heat. We would support the introduction of a specific maximum carbon content for heat supply, which would apply to CHP and ensure low emission requirements are met.</p> <p>We note that part D of the policy refers to major development proposals, in some instances there maybe opportunities for smaller scale development to connect or consider connecting to a decentralised energy network, so reference to major development proposals would preclude this as currently drafted. In addition, for future connections - both to existing networks or a future network - it would be useful if the London Plan could provide guidance on the method for securing this connection.</p> <p>Part C of the policy supports expanding infrastructure although it states expansion should be identified in Development Plans. We consider that the policy should incorporate potential for major proposals to expand existing networks in a more ad hoc way, where circumstances dictate and in line with borough planned networks. For example, circumstances may change on an allocated site which means provision of an energy centre may become feasible where it previously wasn't.</p>
	Policy S14 – Managing heat risk	As noted in response to other policies, there should be consideration of requiring FEES, as building form has a direct influence on heat risk, particularly high form factor buildings which have increased heat loss areas and thermal bridges. Mechanical ventilation should be avoided.
	Policy S17 - Reducing waste and supporting	We support and endorse the response made on behalf of Islington by the North London Waste Plan team.

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	the circular economy	
	Policy SI8 – Waste capacity and net self-sufficiency	
	Policy SI9 – Safeguarded waste sites	
	Policy SI13 Sustainable drainage	The Council supports the strengthened wording and amendments to the hierarchy to ensure preference for green over grey features, and the role of green and blue roofs in the drainage hierarchy. We welcome the inclusion of the policy on refusing impermeable paving.
	Policy SI16 – Waterways – use and enjoyment	<p>All proposals for new mooring facilities should explicitly prioritise non-diesel vessels.</p> <p>We note policy SI17(E) which requires on-shore power facilities. This is supported as it means standing vessels have access to power without switching their engines on.</p>
	Policy SI17 – Protecting London’s waterways	
	Policy T1 Strategic Approach to transport	<p>We welcome the Strategic Approach to Transport and associated policies which set out a positive approach to improve London transport. We welcome the strategic target of 80% of all London trips to be made by foot, cycle or public transport by 2041. This will contribute to better health for communities through reductions in traffic and hence air pollution.</p> <p>We recognise the crucial link between transport and development and we agree that any assessment of the most effective use of land should reflect transport accessibility and connectivity. The competition between employment and housing is important and should be considered alongside need for other uses in particular social infrastructure, to ensure that transport is used to support good growth. We consider that the strategic approach to transport can be further strengthened by explicitly directing development that generates high levels of trips to locations with high level of public transport accessibility and encouraging patterns of development that reduce the need for travel.</p>

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		<p>In addition to supporting reducing need to travel, Islington support efforts to reduce traffic and as stated in response to Mayors Transport Strategy we believe it is important that individual local authorities' efforts to reduce traffic are co-ordinated by TfL so that their strategies work together. Islington already plan to propose a traffic reduction strategy for Islington, and we are open to proposing re-designs of key streets where reducing traffic is essential to protect vulnerable road users or improve a place as a destination for visitors and shoppers.</p> <p>Islington believes that traffic speeds and volumes can be reduced through a 'cellular' system in some neighbourhoods, permitting local vehicle access but preventing rat-running. We believe this approach could form a central part of a traffic reduction strategy for Islington, and would welcome reference in the London Plan and the opportunity to develop the concept with the Mayor and TfL.</p>
	Policy T2 Healthy Streets	<p>We particularly welcome the new Healthy Streets approach focusing on active transport, increasing safety "vision Zero", eliminate pollution, etc. Islington recommend that further elements could be strengthened:</p> <ol style="list-style-type: none"> <li>a. Emphasising the need to consider the built form of the street to improve the sense of the space and increase its potential as a space for people rather than as a vehicle path way only.</li> <li>b. maximise the green surface in street spaces. This is an important issue for densely populated boroughs such as Islington where streets can be a valuable asset to increase the provision of green spaces and where there are few opportunities for comprehensive development. The healthy streets indicators do not include green as an indicator in itself, though it is implied in other indicators.</li> <li>c. Accessibility and inclusivity seems also to be impeded in the policies and not explicitly highlighted. Para 10.2.1 says that "Successful streets are inclusive and provide for the various requirements of their users" and the healthy street indicators do not include accessibility as an indicator of itself. Further emphasis on this issue can be useful.</li> </ol>
	Policy T3 – Transport capacity, connectivity and safeguarding	<p>We consider that improvements and capacity upgrades to Finsbury Park station should be added to the list of transport schemes in table 10.1. We would welcome further discussions on this.</p>
	Policy T4 - Assessing and	<p>Transport for London used in the preparation of TfL's guidance, the Department for Transport (DfT) guidance document on the transport assessment process for local authorities and developers (2007). This document references in appendix B the</p>

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	mitigating transport impacts	indicative thresholds for the preparation of Transport Assessments. Islington currently applies lower thresholds for some land uses than those contained in the DfT guidance document. Specifically, A3 restaurant, C1 hotels and C3 residential have lower thresholds for Transport Assessment in Islington. It is noted that TfL suggests the use of this guidance but sometimes a greater level of analysis is necessary. We consider that local approaches to Transport Assessments could also be supported where appropriate.
	Policy T6 Car Parking	<p>Islington welcomes the Plan’s approach and already implement a borough-wide car-free policy. We note the Mayor’s support for boroughs to adopt borough-wide car-free policies but this could conflict with Table 10.3 as there will be parts of Islington and Inner London (PTAL 0-3) where it could be hard to resist parking due to the existence of maximum standards. Although we note that the standards are maximum, their existence will undoubtedly lead to pressure for parking and undermine the car-free approach. We also consider that PTAL is not particularly useful indicator for policy purposes, given that individual sites can sometimes have vastly different PTAL ratings. The policy should be amended to expressly prioritise car-free and highlight that local level car-free policy means that maximum parking standards are zero.</p> <p>On a minor note, the numbering convention for the parking policies (6.1, 6.2...) is different to any other policies in the plan, and could lead to problems (or indeed annoyance) when citing policies. The plan should revert to the numbering system seen throughout other policies.</p>
	Policy T6.3 – Retail parking	This policy applies to all retail development, but we feel that a size threshold (500sqm+) would be useful, as smaller shops, especially in Inner London, will not attract vehicular traffic and are on the whole accessible by sustainable modes.
	Policy T6.4 – Hotel and leisure uses parking	Parking, except for disabled spaces and operational parking, should be entirely precluded for hotel developments. Hotels attract significant trip generation and therefore parking is likely to increase congestion. The location of hotels is restricted to the most accessible areas in policy E10, so it is unlikely that hotels will be permitted in areas with poor public transport access, hence there is no need for parking.
	Policy T7 Freight and Servicing	Islington welcomes the new approach to develop freight and servicing strategies for opportunity areas and other area based plans. We are supportive of the approach to reduce freight in particular freight movements during the daytime including those identified in the Mayors draft Transport Strategy. Freight and servicing is essential to maintain businesses and the vitality of the town centres, and support the central London economy. Introducing servicing strategies are useful to mitigate the impact of

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		<p>freight and servicing while maintain the vitality of businesses. We will consider how this policy can be applied as part of the Local Plan review.</p> <p>We consider the safety of freight movements and construction management important and this should always be considered; any small scale consolidation of freight sites such as those referenced in paragraph 10.7.2 should always consider safety, given the Islington context. In addition, we consider supporting 24-hour of freight and servicing in Islington maybe difficult depending on location of residential or other uses and the potential for noise/amenity impact. Such impacts should be clearly identified as part of any plans/strategies. We would support the encouragement of the use of sustainable forms of transport to service such servicing centres.</p>
	Policy T9 – Funding transport infrastructure through planning	We have significant concerns about the proposed office rates in the MCIL2 draft charging schedule. We have responded to this consultation separately.
	Policy DF1 – Delivery of the plan and planning obligations	Culture should not be a priority obligation, especially on a par with affordable workspace.