



# ISLINGTON

Planning and Development  
4<sup>th</sup> Floor, Municipal Offices  
222 Upper Street  
London N1 1YA

T 020 7527 2402

F 020 7527 2731

E [sakiba.gurda@islington.gov.uk](mailto:sakiba.gurda@islington.gov.uk)

W [www.islington.gov.uk](http://www.islington.gov.uk)

Sent by e-mail to: [yourviews@london.gov.uk](mailto:yourviews@london.gov.uk)

15 December 2016

Dear Sir/Madam,

## **A City for all Londoners – consultation document**

Please find attached London Borough of Islington's response to the City for all Londoners consultation document. This is an officer level response and has not been subject to sign off by elected members.

We hope that our comments made in response to the consultation document are given proper attention. The holistic nature of the consultation, considering the approach of all the Mayor's plans and strategies in the round, will enable proper strategic consideration of key issues and priorities. Care should be taken to ensure that this holistic approach continues through the actual production and implementation of the Mayor's strategies.

Our response is largely focused on the London Plan, given that this has statutory weight for planning decisions and documents, and is most relevant to the council's day-to-day operations. However, comments are applicable to other documents and the Mayor's general approach. Comments are grouped by relevant sub-headings as far as possible, although some relate to cross-cutting themes across multiple chapters of the consultation document.

If you have any queries regarding the response please do not hesitate to contact me.

Yours faithfully,

Sakiba Gurda  
Planning Policy Team Manager

## Part 1 – Accommodating Growth

### Competing and interrelated land use: Growth locations

1. The key challenge for Mayor, in the London Plan and all his other strategies, is determining what his priorities are and outlining policy responses to deliver these priorities. Determining priorities naturally means consideration of conflict between different land uses, something which is acknowledged by the first paragraph in Part 1. This paragraph alludes to conflict between meeting housing need, sustaining and promoting economic growth and providing green space and infrastructure of all kinds. Conflict generally relates to the finite availability of land to address these issues, but can also relate to the realistic prospect of certain types of development being financed.
2. Whilst we welcome much of the proposals outlined in the document, we are conscious that resolving conflicts between different priorities will not be easy and will require careful consideration translated into a robust policy approach that ensures delivery of key priorities. The ‘fuzzy’ approach of the current London Plan prepared by the previous Mayor does not provide a sufficiently robust basis to identify clear priorities and ensure that the right priorities are delivered on the ground. In many places, the current London Plan is too open to interpretation and hence manipulation. Prioritising certain land uses does not, however, mean abandoning lesser priorities, as policies and guidance can still provide a basis to deliver these where there is no conflict with main priorities.
3. It would be folly to think that there is a ‘magic bullet’ solution that can ensure that all needs across all land uses will be met. Therefore, certain land uses will need to be prioritised. For example, Islington’s priorities are meeting housing need, particularly through delivery of affordable housing; and also ensuring that projected jobs growth can be accommodated by maintaining and enhancing employment floorspace provision, particularly for office uses.
4. One of the most controversial issues that the London Plan needs to address is the issue of development in the Green Belt, and we appreciate that the Mayor has taken a decision not to review Green Belt boundaries or allow development in the Green Belt. 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.
5. Inner London boroughs have, for many years, delivered more than their fair share of housing, including through very high density developments. This has resulted in an ever-increasing density of population in boroughs such as Tower Hamlets, Hackney, Southwark and Islington (the most densely developed local authority area in the UK). Outer London boroughs on the other hand have often not explored all opportunities to increase housing delivery and many do not always meet their housing targets. Our view is that Outer London boroughs which have brownfield Green Belt land should explore all options to increase housing delivery, including brownfield Green Belt sites where justified. After having explored all other options, if these boroughs are unable to identify sufficient land to meet housing targets, brownfield sites in the Green Belt should then be considered. 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 release of brownfield Green Belt sites 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.
6. It is worth noting that the Government has proposed a slight relaxation of national policy on protection of Green Belt. The Mayor will also be aware that the Government has recently lifted a holding direction which was in place on Birmingham’s Local Plan, which effectively allows Birmingham to proceed with the release of Green Belt land to meet its housing target.
7. The amount of available space for housing, where it is located, its proximity to public transport and employment opportunities and its relationship with the existing townscape are all key inputs into the level of density that might be appropriate at a strategic and site-by-site level. We support higher density development in principle. Islington is the most densely populated locally authority area in the UK and the smallest London borough in terms of area, so it is already home to high density

development. Moreover, Islington continue to permit high levels of high density development, based on analysis of recent planning permissions.

8. However, we must stress the importance of ensuring that a move towards general higher density development is not carte blanche for tall buildings and development which is incongruous with the specific local context. Tall buildings (including those over 30m) can be a legitimate design solution where properly planned for and allocated in Local Plans; this plan-led approach avoids the ad-hoc conflicts and mitigates/prevents cumulative impacts that can arise from tall buildings emerging in proximity to each other.
9. Criteria for assessment of tall buildings are important, and this is something which Islington's Local Plan currently has in place. We would support the London Plan putting in place a framework to allow boroughs to develop locally tailored criteria.
10. Some limitations on density are essential, such as policy based criteria with regard to specific applications; and sensible assumptions which underpin the London Plan (e.g. the Strategic Housing Land Availability Assessment). We note the extensive research undertaken by the GLA into density, in particular Density Research Project 1 (prepared by LSE) which states that *"there is a clear case for setting minimum density standards... But it should be up to boroughs to determine any local maxima and the most suitable built form."*
11. Islington can see the benefits of changing the approach to the density matrix. As advocated in the LSE density research report, a minimum density requirement in the London Plan, with decisions on maximum density (either numerical or through robust height, massing and design policies and criteria) devolved to Local Plans, is a sensible approach and will allow consideration of specific local context.
12. Decisions at the borough level must be made on how to accommodate the growth in housing that is necessary and appropriate. A London Plan approach which gives high-level strategic guidance, particularly in proximity to the Thames and other central London landmarks, would give greater confidence to the public that the issue is being addressed at the Mayoral level. However, detailed policy on residential densities and typologies should be left to the local level.

#### Employment land in central London

13. The Mayor talks about resisting moves to convert offices to housing without justification, in order to protect areas of national and international importance for employment. Islington support such moves unequivocally and would encourage the Mayor to put in place strong policies to resist such loss in the new London Plan. In addition, the Mayor can play the central role – e.g. producing evidence and liaising with Central Government - in ensuring that co-ordinated Article 4 Directions are put in place to replace the CAZ exemption for the office to residential Permitted Development (PD) rights when this expires in May 2019. Islington have significant experience of the Article 4 Direction process and would be happy to work closely with the Mayor on this matter.

#### Employment land across the city

14. A more compact and connected city is one where employment opportunities are not located many miles away from where people live. An integrated approach between transport, housing and employment land policies is necessary for the new London Plan. For example, ensuring that valuable employment land is not lost to housing both in inner London boroughs such as Islington and also where healthy and viable employment land exists in Outer London. A city in which central London is surrounded by dormitory suburbs would be more dependent on transport in general, placing a greater strain on the TfL network as well as being likely to create more demand for car trips, which would frustrate the positive approach proposed in the document as well as progress towards zero carbon development.
15. Islington supports measures to reduce car dependency and encourage modal shift to more sustainable forms of transport. It will be important that the London Plan reflects this ambition with robust policies that enable boroughs to effectively promote sustainable transport and actively intervene against car-dependency. For example, the Mayor could use the new London Plan to set

out an Inner London position on car-free development. Car-free development has multiple benefits, including reducing congestion and improving air quality.

16. The Written Ministerial Statement (WMS) of 25 March 2015 is a material consideration for plan-making, and states that parking standards should only be imposed where there is clear and compelling justification that it is necessary to manage the local road network. A London Plan policy strongly advocating car-free development, coupled with strategic evidence which boroughs could draw upon when justifying car-free policies in their Local Plans (should they wish to pursue such policies), would be useful, particularly in light of the WMS requirements. In particular, the experience of Camden Council at their recent Local Plan examination<sup>1</sup>, where they were made to modify their proposed car-free approach in Town Centres as a result of the WMS, shows the need for such evidence.
17. Islington has been operating a successful 'car-free' policy<sup>2</sup> since the adoption of our Core Strategy in 2011. Such an approach is justified due to the need to tackle problems associated with congestion and air pollution, and due to the very high level of public transport accessibility throughout the borough which drastically reduces the need for a car. It is worth pointing out that the car-free requirement has helped Islington facilitate housing growth rather than restricting it, as the policy critics suggested would be the case. When any housing development is proposed, one of the main concerns of existing residents is that the development will create additional parking pressure. The car-free requirement enables the local authority to reassure residents that there will be no (or very little) parking pressures resulting from the development; residents are therefore much more accepting of new housing growth. It is vital that the London Plan continues to support this approach, particularly in the face of the more stringent requirements set out in the WMS. There is a clear synergy between the Mayor's ambition to improve London's air quality and the London Plan's approach to vehicle parking.

#### Housing and mixed-use land

18. Any land that is surplus to requirements, including industrial land, would naturally form part of strategic plans for development. The key issue is how the Mayor defines surplus. With regard to industrial land specifically, Islington has experienced significant losses of industrial land in the last decade, and there is significant ongoing pressure to redevelop industrial land that remains. To be surplus, we would expect land to have been vacant (or mostly vacant) for an extended period of time, with little prospect of future industrial occupation (based on marketing).
19. It is important to recognise that some boroughs, particularly Inner/Central London boroughs, have a job-creating role of strategic national importance. In Islington, there is very little (if any) surplus industrial land. The 2016 Islington Employment Study and the London Industrial Land Supply & Economy Study 2015, prepared by AECOM for the Greater London Authority, both show that Islington has extremely low levels of industrial vacancy, well below the frictional target rate of 5% which allows for effective market operation.
20. According to the GLA study, the vacancy rate for core industrial uses in the borough (which includes B1(c) uses) is 0.7%, while vacancy rates in the LSIS (Locally Significant Industrial Site) is 0.9%. In addition, the GLA study shows that, between 2001 and 2015, industrial rents have increased by 61%, which is another indicator of constrained supply; while the overall amount of vacant industrial land has fallen by 91% over the same period, indicating significant demand for industrial space.
21. Islington has lost significant employment space capacity in recent years. If current trends carry on, loss of B-use space is forecast to continue (and speed up), particularly in industrial property. This contraction of available space contrasts markedly with the forecast jobs growth and associated space requirement and the low vacancy rates evident across the full range of B-use (B1, B2, B8) space. In light of these factors, Islington's 2016 Employment Study recommends that local planning policy should afford strong protection to all types of business floorspace across the Borough.

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<sup>1</sup> [http://camden.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=3513429&](http://camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3513429&)

<sup>2</sup> Car-free development means no off-site parking is permitted and no parking permits are granted for new properties (wheelchair accessible units are exempt from this requirement).

22. Where land is surplus for industrial uses, it should not be automatically assumed that change to housing is the obvious way forward. An employment function should be continued on such sites. Many existing industrial buildings are highly suitable for conversion to accommodate modern industrial uses such as film production spaces, music production facilities and artisan food and drink producers (e.g. microbreweries).
23. Further, with regard to relocating industrial land to other areas, this would give rise to various adverse impacts, notably related to increases in vehicle mileage and number of vehicles (and congestion) on London's roads, especially where industrial uses cater for the Central London market and therefore they would have to travel greater distances; and also would lead to adverse environmental impacts, largely due to the associated increase in emissions that would arise from additional vehicle miles.
24. Relocation of viable, functioning industrial areas also risks affecting the character of areas and the livelihoods of local businesses that depend on industrial areas in close proximity to their businesses as part of their supply chain and to facilitate better stock management. Logistics sites are essential in allowing just-in-time delivery for many businesses; without adequate supply of land for logistics in central, accessible locations, there would be a real risk that many businesses would find their operations constrained and would be unable to operate effectively.
25. For these reasons we consider relocation of industrial uses would be unsuitable in many cases. Any potential for relocation is likely to be limited to very few areas and should be determined through the Local Plan process based on robust local evidence. We would therefore caution against proposing widespread relocation at a strategic level, as it is likely to increase the hope value for such sites and incentivise landowners to evict viable existing businesses.
26. As regards co-location, this might be a more appropriate option for utilising land in some cases but there are inherent risks with this also. Certain industrial uses, particularly B1(c) lend themselves to co-location given that their amenity impacts are more limited. More intensive industrial uses are generally unsuitable for location in close proximity to residential uses. Our evidence suggests that the marketability of industrial stock is being compromised as plots are lost to residential, reducing their critical mass, and making them more isolated and less self-sustaining in market terms. Any approach which encourages co-location must be accompanied by strict, detailed parameters which put the onus squarely on developers to justify that the function and ongoing operation of industrial areas would be unaffected by the introduction of new uses, similar to the 'agents-of-change' principle often discussed in relation to the night-time economy.
27. In Inner London, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) play an important role, but there are numerous smaller, dispersed industrial uses and sites which also play a critical role in the local and London economy. Any weakening of protection for such uses is problematic for local authorities such as Islington, who have to accommodate significant jobs projections and also ensure that sufficient land is available to service existing and future businesses. It is worth noting that the existing London Plan identifies Islington (and several other Inner London boroughs) as boroughs of restricted transfer; this is the highest level of protection for industrial land and encourages relevant boroughs to implement a restrictive approach to the transfer of industrial sites to other uses.
28. In recent years, Islington have experienced unprecedented loss of industrial land to other uses, totalling nearly 100,000sqm between 2005 and 2015. Any relaxation of policy by the Mayor to allow industrial land to more easily change use to residential use would limit the possible future pool of premises available for intensification of modern industrial uses (as discussed above) and would ultimately undermine the local economy. It would also mean that Islington would increasingly become a dormitory borough with residential uses dominating above all others.
29. There may be merit in taking a different approach for Inner London given the distinct issues discussed above. The Mayor should recognise that housing is not appropriate on certain sites and that these should be clearly set out in planning policies at the local and London levels in order to meet employment needs. The need to meet housing targets should not be used as the sole reason for eroding employment land.

30. The Mayor notes that it makes sense to focus housing development in Town Centres as it can, in some cases, help high streets adapt. While we recognise that Town Centres, which are centres of commerce and civic life, can be a suitable location for residential development in principle, it should not be assumed that residential development is automatically beneficial to the function of Town Centres. Perceived benefits such as increases in footfall are potentially outweighed by the potential adverse impacts on the operation of existing businesses, e.g. due to increased noise complaints from new residents. Such adverse impacts can be mitigated – e.g. through design - in some circumstances, but it is difficult to completely rule out future impacts.
31. The issue of utilising housing to help high streets adapt is more of an issue for Outer London and other parts of the country. In these areas, out-of-centre shopping parks have directly affected traditional centres and have led to high vacancy levels and other signs of blight. Such areas are often desolate in the evening, reflecting a lack of diversity of uses. Inner London does not generally have these problems. Therefore, a careful approach is needed to ensure that housing development in Town Centres can be optimised in a sustainable way. If a more laissez faire approach is put in place, this would risk creating the problem which is trying to be solved, i.e. increases in residential uses would lessen vibrancy in Town Centres and restrict the operation of businesses forcing them to close.
32. Any benefits of intensified residential use in Town Centres will only be realised where potential adverse impacts are fully understood and considered, and clear guidance is provided to direct an appropriate quantum of development of residential uses to appropriate Town Centre locations, designed to appropriate standards. Any approach to Town Centre intensification with the sole objective of increasing housing numbers, without detailed consideration of adverse impacts, would be reckless and would endanger the vitality and viability of centres and their often fragile balance of uses.
33. We very much welcome and support measures to increase the level of genuinely affordable housing delivery. The proposal to institute a 50% target is supported. It will also be necessary to provide clear guidance on tenure split, with social rent (or properties let at social rent levels) maximised. The Mayor must give clear signals to the market on what kind of housing needs to be delivered, in order to ensure that price paid for land reflects realistic expectations of planning policies.

#### Housing and infrastructure investment

34. In principle we support the development of Crossrail 2, with a proposed station at Angel. The Mayor needs to be clear on development related to Crossrail 2, in particular development required to fund the project. However, there should be recognition that in some locations – e.g. Angel – there are significant constraints, such as heritage assets, which means that significant amounts of new development is unlikely to be appropriate.
35. We support the Mayor's approach to deliver different kinds of development in the various Opportunity Areas across London, although this does not mean that all areas are suitable for a multitude of uses. Some Opportunity Areas are dominated by specific uses and would not be suitable for intensive development of other uses. The City Fringe Opportunity Area is one such area, being dominated by business uses with small-scale amounts of supporting uses, and this is reflected in the adopted planning framework for the area. Any approach to opportunity areas in the new London Plan must continue to reflect local context and be developed in partnership with relevant boroughs.

#### Good growth

36. While we fully agree with the sentiments behind what the Mayor terms 'good growth' – i.e. looking at the bigger picture and planning for broader purposes – this term could be interpreted to mean a range of things depending on particular interests of certain parties. It will be necessary for the Mayor, together with boroughs, to develop a clear set of priorities in terms of different land uses in different locations, in order to give certainty and ensure robust delivery of these priorities. Changes proposed in the draft Neighbourhood Planning bill will require Local Plans to specifically identify policy priorities, which will necessitate strategic thinking across policy areas.
37. We welcome the Mayor's commitment to providing accessible and affordable housing in new developments and ensuring that all new homes are of good design and quality and meet decent

space standards. The Mayor's approach should reflect the current London Plan's universal concept of 'visitable' and adaptable homes for all, and should ensure that development will be inclusive and tenure blind.

38. We fully support the Mayor's proposals to protect and enhance London's cultural infrastructure. Cultural uses are employment generating and can add vibrancy to local areas, particularly Town Centres. The Mayor cites the 'agents-of-change' principle as a way of minimising impacts on cultural infrastructure from new development, and we would support this.
39. The most common 'agents-of-change' example, also cited in the consultation document, is developers paying for soundproofing, but there is an opportunity to broaden the scope and include other requirements. In particular, we would be keen for the London Plan to advocate a standardised approach to deed of easement - where rights of future residents to complain about noise from existing uses is limited - for residential developments of a certain size which are proposed in close proximity to cultural uses. Whilst this mitigation might work in some instances, there will be cases where allowing residential uses near cultural premises will simply not be appropriate and should be refused outright.
40. The Mayor proposes that detailed guidance will be set out in a Night-Time Economy Supplementary Planning Guidance (SPG) document to be produced in the coming months. Islington encourage the Mayor to focus on setting the core night-time economy policies within the London Plan itself, with his cultural strategy alongside this drawing together multi-disciplinary approaches to culture. Further guidance should be produced only where necessary, for instance where a new London Plan policy is not being implemented effectively.
41. We agree with the Mayor that social infrastructure is vitally important for maintaining London's social fabric, and that a strategic overview of social infrastructure requirements is needed. There are significant difficulties in meeting social infrastructure requirements for a variety of reasons, for example, Government restrictions on new school development and pressure for competing (higher value) land uses. Coupled with this is funding pressures on social infrastructure providers, which incentivises diminution of services to a bare minimum level and extracting maximum value from assets (i.e. land) which then constrains the range of development which is possible on the site.
42. Providing necessary social infrastructure is absolutely critical in terms of accommodating new housing growth, and is often the first concern raised by existing residents in relation to new housing development. Whilst we recognise that the Mayor has limited power with regard to provision of most types of social infrastructure, it is nevertheless important that the Mayor considers these issues when formulating new policy, and uses his status to encourage and lobby government departments with large existing social infrastructure land holdings (e.g. Department of Health, Department of Justice) to build in consideration of replacement uses when selling land.
43. The section on 'changing the way we travel' (page 29) is extremely welcome. For this to be effective it needs to be supported by a robust, holistic approach in the London Plan and the Mayor's other strategies. We encourage the Mayor's commitment to better manage vehicle use in the city. As discussed above, we also highlight that van use increases where industrial land is located in non-central locations, which necessitates retention/provision of industrial land in central locations.
44. A key challenge for the Mayor's Transport Strategy is the need to increase capacity and efficiency of the public transport network to reduce crowding and improve reliability. Based on current forecasts, recent and planned capacity increases e.g. on Crossrail 1 and on various London Underground lines (Northern and Victoria) may not change the overall levels of congestion and it may worsen on some lines over the next fifteen years. Ensuring adequate capacity and efficiency is critical to addressing the challenges of population and employment growth in London.
45. There is no mention in the document of plans for continuing Mayoral CIL. The March 2016 update to the Crossrail Funding SPG has some discussion of MCIL2, but we would expect this to be an important consideration in the City for all Londoners document, given the impact (both positive and negative) that MCIL2 could have on delivering the Mayor's various priorities.



## Part 2 - Housing

### Affordable housing

46. Affordable housing is a key priority of Islington Council, and we support the Mayor's intention to substantially increase its provision. As part of this it is important that any development on TfL land maximises the provision of affordable housing. Where NHS and other public sector land holdings are considered suitable for redevelopment including housing, we believe that maximising the amount of genuinely affordable housing, e.g. housing for rent that is affordable for people on lower incomes, should be of paramount importance.
47. We recognise that the Mayor has limited direct influence on how other public sector bodies dispose of land, but he is in a unique position to advocate strongly for affordable housing to be built into the value of public sector sites. This would prevent situations seen in Islington, namely the Parkhurst Road site previously owned the Ministry of Defence, where public sector sites were sold for significant sums and subsequent development proposals which have come forward have used this as a factor to argue for delivery of less affordable housing.
48. Incorporation of planning policy requirements into land value is a wider scale issue than just public sector land. The Mayor has an opportunity, through the London Plan, to set out clear, unambiguous requirements relating to affordable housing, which will, over time, factor into land transactions and viability appraisals. The price paid for land cannot be used as an excuse to negotiate affordable housing levels down (or waive them entirely) if affordable housing requirements were not taken into account when formulating the offer price – the decision to purchase land at a certain price is made at the developer's risk, and that risk should not be passed on to local communities who have an acute need for genuinely affordable homes. The Mayor's draft Affordable Housing and Viability SPG grapples with some of these issues, and this is welcome.
49. Islington support the London Living Rent (LLR) product in principle, as it will provide more secure renting options for low and middle income earners. However, our full support is dependent on the specific details, particularly the rental levels and the length of the covenant period. Regarding the latter, it is disappointing that the Mayor's Affordable Homes Programme Funding Guidance 2016-2021<sup>3</sup> proposes that this covenant period will be only ten years after which point it becomes an ownership product.
50. The provision of LLR (the levels of rent as well as the proportion of units on schemes) needs to be looked at in the round in conjunction with other forms of affordable housing, with an understanding of how it impacts on other forms of affordable housing. The Mayor's aim should be to maximise genuinely affordable housing in perpetuity rather than for a relatively short period of time; otherwise, this will be a wasted opportunity, particularly given the scarcity of land available in places like Islington. We will provide more detailed comments on this issue in response to the draft SPG.
51. As regards review mechanisms, we are very supportive of these as they increase potential for maximising affordable housing provision. There is an argument for widening the role of review mechanisms to incentivise development coming forward and mitigate for low levels of affordable housing being offered at the application stage. The Mayor has proposed such an approach in his draft Affordable Housing and Viability SPG, but there is scope for clear policy on the use of review mechanisms within the London Plan itself. This is not just on long-term, phased developments but also on single phased developments which haven't come forward within a specified period of time. It should be noted that viability appraisals quickly go out of date and therefore a requirement for further updates at certain intervals - to reflect changing circumstances – would be eminently sensible.
52. The Mayor could play an important role in maximising affordable housing delivery by setting out a clear position with regard to small sites affordable housing contributions and the vacant building credit. The WMS of 28 November 2014 limits the ability of local authorities to seek small sites affordable housing contributions; and also allows for a financial credit, equivalent to the existing gross floorspace of any vacant buildings brought back into any lawful use or demolished for re-development, to be deducted from the calculation of any affordable housing contributions sought from relevant development schemes.

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<sup>3</sup> <https://www.london.gov.uk/sites/default/files/homesforlondoners-affordablehomesprogrammeffundingguidance.pdf>



53. The WMS and associated changes to national Planning Practice Guidance (PPG) are material considerations in the determination of planning applications but do not automatically override the adopted Development Plan. Appeal decisions (particularly relating to small sites contributions) have been very inconsistent and have shown that planning inspectors do give significant weight to the WMS/PPG even in boroughs with acute need for affordable housing.
54. Islington have successfully defended the small sites requirement at two recent appeals, but additional support from the Mayor in the London Plan would add extra impetus and material weight to arguments put forward by boroughs continuing to seek small sites contributions. With regard to the VBC, the same principle applies; we welcome the wording in the Mayor's draft SPG with regard to this but would support this being enshrined in the London Plan proper.
55. Without such support, there is a risk that delivery of affordable housing will be affected, as there will be less funding for boroughs to directly or indirectly fund new affordable homes.

#### Building more and increasing housing supply

56. It will also be important to support a range of developers to build the homes we need. The Mayor should use his position to convene cross-industry discussions, including public and private sector practitioners, to exhaust all reasonable measures for increasing housing supply. This links to our points made above in relation to brownfield Green Belt land and the need for various types of land to be 'on-the-table' in order to meet housing need.
57. We would support an increased role for smaller housebuilders in delivering housing, but seek clarity on how the Mayor would promote this through planning policies. We would not support significant watering down of key policy requirements, such as affordable housing or housing standards, solely to allow small sites to come forward. In boroughs such as Islington, small sites make up a high proportion of overall housing delivery, which highlights the importance of maintaining standards for small sites. In Islington particularly, we have successfully upheld these standards on small sites for many years.
58. The review of the London Plan also offers an opportunity to formalise requirements for construction skills training opportunities through planning obligations. Such requirements can benefit developers and local communities alike.

#### Private rented sector

59. We agree that better regulation, such as licensing schemes, are essential to improve the quality of private rented accommodation and we agree that the Mayor should play a leadership role in facilitating this.
60. We have significant concerns about certain aspects of so-called 'build-to-rent' development. Such development has been used as an opportunity for developers to erode space standards or avoid affordable housing requirements, due to the 'distinct economics' involved.
61. Build-to-rent products are a form of market housing which is not affordable, and should be subject to planning requirements – e.g. affordable housing, space standards – similar to any other form of market housing. If build-to-rent was providing a form of affordable housing – i.e. rents significantly lower than market rent secured for a long period of time – it may be justifiable to apply flexibility when assessing such schemes.
62. The London Plan must be clear that space standards and other qualitative standards apply to all tenures; 'build-to-rent' has no special characteristics which would justify lesser standards. Linked to this, small units are often used as a way for 'build-to-rent' operators to claim that their product will be affordable; this is where the price per square foot is claimed to be the same as other market rented properties in a locality but, as units are small, they appear more affordable by virtue of their size.
63. There is a danger that, unless there are robust standards in place, this form of housing will result in sub-standard, unaffordable, unsecure accommodation which is at odds with the principles

underpinning existing London Plan housing standards, e.g. the idea of a home being a place of retreat, adherence to social inclusion objectives.

### Housing in a global city

64. The consultation document highlights the tension between London being open to the world, and also making sure the city works for all Londoners, in relation to the number of new homes that are sold overseas and then left empty. Islington have been at the forefront of tackling the issue of so-called 'buy-to-leave' properties, but we note that we have no concern over nationality of owners. Our concern is, and always has been, the fact that properties are left empty for long periods (and therefore 'wasted' as a contributor to housing supply). It may be that there is a direct link between foreign-owned property and 'buy-to-leave' property but ultimately the latter is most important. If a unit is foreign owned but occupied, either by the owner or through private letting, then this should not be an issue.

## **Part 3 – Economy**

### Global city; opportunity and economic fairness

65. We support the Mayor's broad approach proposed in relation to London's economy, particularly utilising his powers to protect London's economic attributes and competitiveness and increasing the supply of affordable housing to accommodate London's growing workforce.
66. It is particularly encouraging that the Mayor places fairness and addressing inequality of opportunity at the heart of his approach to economic development implemented across his various strategies. Islington's Fairness and Employment Commissions have investigated these issues in detail in the past few years, and the Mayor's approach suggested aligns with recommendations set out in the Commissions' final reports, including support for local employment and ensuring that young people develop skills required to succeed in the jobs market of the future.

### Spreading economic benefits

67. Islington recognise the benefits that tourism brings to London. Catering for tourism, through protection of cultural assets and provision of visitor accommodation is therefore important to ensure that these benefits continue to be realised. Islington have contributed significantly to the delivery of visitor accommodation in recent years, and our development pipeline and sites allocated for hotels will, when fully built out, provide nearly 2,000 further hotel bedrooms. Given our significant recent delivery and pipeline of hotel development, there is a real sense that Islington have more than met our fair share of visitor accommodation requirements.
68. In addition, the deregulation of short term letting in London has led to surge in listings on sites such as AirBnB. We have significant concerns about the impact of this surge, particularly as it can lead to noise and anti-social behaviour complaints; and could lead to residential units being used to cater for tourism rather than meeting housing need. We would support the Mayor using his lobbying influence with Government to reverse this change or put in place stronger regulations to minimise harm and potentially allow for wider scale exemptions.
69. That said, while the deregulation does exist, it has the potential to change the way that visitors use accommodation in London and therefore must be taken into account when considering overall provision of visitor accommodation. Current figures suggest that there are over 3,000 properties available to let in Islington on AirBnB alone.
70. Islington places a strong priority on the delivery of housing – particularly affordable housing – and employment floorspace – particularly office space. Given the finite amount of land in the borough, and the significant development pressures because of this, we believe that other boroughs should be the focus of delivering further hotel provision, much like the 'dispersal' method set out in the current London Plan in relation to student accommodation, i.e. focus hotel development in well-connected locations within 30 minutes of specific tourist attractions and concentrations of employment uses.

### Night-time economy

71. The night-time economy is an important part of London's ecosystem, in economic terms but also with regard to the social value of various cultural institutions. Uses such as theatres, restaurants, pubs and clubs are the ubiquitous image of the night-time economy for many people. Such uses are supported where amenity impacts can be suitably mitigated or prevented entirely, following the 'agents-of-change' which we advocate earlier in this response.
72. The night-time economy is not just pubs and clubs however. It is the agglomeration of all uses and operations which operate throughout night-time hours, including transport and logistics associated with industrial areas. It is important to consider these myriad uses as part of the overall consideration of the night-time economy. Further, there would be significant benefits in considering the economy not just in daytime and night-time silos, but on an overall 24hr basis. This would allow for much better understanding of how certain uses work together and benefit each other at different times of the day, and would allow a better understanding of potential adverse impacts.

#### Small and medium-sized businesses

73. The Mayor's support for SMEs is welcomed and aligns with some of Islington's key priorities, in particular the protection of existing space and securing new, affordable workspace as part of new developments.
74. With the latter, affordability is a key issue with regard to accessing business space. Without affordable space in locations across central/inner London boroughs like Islington, there is a risk that local entrepreneurship will be stifled and people looking to start businesses will be forced out of such boroughs and perhaps out of London. We have operated an affordable workspace policy in recent years and therefore support the Mayor adopting a similar approach in the London Plan. We would stress that a requirement for on-site affordable workspace is key, as it helps to diversify the employment function of areas and allows relationships and information sharing to happen organically between different typologies of workspace, from a start-up operating on a single desk basis to large international companies.
75. The Mayor could play an important co-ordinating role with regard to affordable workspace, drawing together different approaches to implementation across boroughs. Islington operate a workspace providers list, and when affordable workspace is secured, the workspace is then managed by a provider on the list. How providers are chosen can vary, and can depend on the location of the space or specific expertise in certain sectors.
76. Affordable workspace can also be used to support the Mayor's aims related to the 'circular economy', as certain typologies of these workspaces often use new and innovative circular business models, e.g. incubator spaces.
77. The concept of Creative Enterprise Zones could be an important strand in delivering affordable workspace, albeit focused on certain artistic and creative sectors, although we reserve judgement on these zones until further detail is provided.

### **Part 4 – Environment, transport and public space**

#### My approach to the environment

78. Islington support the Mayor's proposed multi-functional approach with regard to environment policy. By avoiding policy siloes, the Mayor can maximise opportunities for achieving genuine improvements to environmental policy.
79. A multi-functional approach is particularly important for green infrastructure. The multifunctional role of London's open and green spaces will be an important consideration in planning for the future green infrastructure of the city and this should be reflected in relevant policy areas and across the Mayor's relevant strategies.
80. The focus on enhancing the environment is particularly important in dense urban areas where there can be limited opportunities for new open and green spaces, and where existing green infrastructure is required to support population and housing growth. It is important to stress that local environmental impacts should be mitigated wherever possible, not just minimised.

81. Whilst we support the Mayor's focus on new development – particularly housing and employment land - the focus should not be purely on numbers. The Mayor should aim to create liveable communities within London with efficient, high quality homes that contribute to a holistic long term vision rather than a quick fix solution to a housing crisis. By taking a longer view, this will help to avoid repeating mistakes of the past, where little thought was put into how long building stock would survive or how it would adapt overtime to meet changing user expectations and external changes such as climate conditions. Development which is not cognisant of such issues risks inheriting significant problems in future with much more costly retrofit measures then likely to be necessary.
82. The Mayor's strategies should also address the vulnerability of residents due to housing conditions. Particular groups, such as those that are at home the most, tend to be more vulnerable to climate change impacts such as overheating and flooding.

#### A healthy, resilient, fair and green city – air quality

83. The proposals for a Toxicity Charge and the central London ULEZ are welcomed. Much of Islington's road congestion is due to vehicles passing through the borough on the way to and from central London. Islington has the second lowest rate of car ownership in London (second only to the City of London), but suffers directly from the negative effects of car use due to its inner London location. As noted above, clear policy supporting car-free development in the London Plan will ensure Islington and other London boroughs can continue to try to ensure new development minimises - as far as possible – the impact of car usage on climate change and human health.

#### A resource-efficient city – zero carbon by 2050

84. We welcome the support for emerging and diverse sectors with a focus on their contribution to the low-carbon and circular economy.
85. We support the Mayor's aim to reduce waste as part of a holistic approach to the environment. However, reduction of waste will not remove the need for waste facilities, at least in the near future. Concurrently with planning for reduction of waste, the Mayor should work with boroughs (and groups of boroughs) to ensure that sufficient waste management facilities are protected/developed to process London's waste arisings across all waste streams.
86. Islington are currently working on a joint waste plan with other North London boroughs. The Mayor could proactively support joint working across boroughs and help resolve issues where they arise by providing clear steer and consistent advice.

#### Cycling and walking

87. Aside from car-free policy, there are other transport issues that the London Plan should continue to address. The 'Healthy Streets' approach is welcomed; this is a 'whole street' approach to developing quality urban spaces which aims to make London's transport network more health-promoting, by promoting walking and cycling and making streets more inclusive, accessible, safer and environmentally cleaner, as well as more interesting and attractive to both visitors and existing residents. This approach has particular benefits as it brings together and integrates different elements and underlying principles into one framework/checklist that aims to balance and deliver the best outcomes depending on the needs of the local context.
88. The approach is similar to the previous Mayor's 'Better Street' initiative, but includes a stronger focus on tackling both the social and health inequalities of Londoners.
89. We note that there is an opportunity for the 'Healthy Streets' approach to be closely linked to promotion of Inclusive Neighbourhoods, and for both approaches to be key cross-cutting themes across relevant strategies. Islington have developed detailed guidance around the inclusive design of streets, which involves a number of considerations that are relevant to the Healthy Streets approach – further information about this can be found in the Streetbook SPD<sup>4</sup>.

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<sup>4</sup> <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20122013/20121022streetbookspdfinalversion.pdf>

90. The Mayor's broad approach to cycling and walking (as outlined on pages 62-65 of the consultation document) is also welcomed. In particular, the adoption of a 'Vision Zero' approach in the Mayor's strategies (including the London Plan) is supported. This approach will ensure that the dominance of motor vehicles is minimised in order to protect vulnerable road users, and will, by proxy, support other objectives relating to car-free development and the promotion of sustainable modes of transport (see below). The Mayor's proposed approach is in contrast to the Government's approach - set out in national Planning Practice Guidance - that takes car ownership and use as the 'norm', and a right to be protected.
91. Given its unique characteristics and the extreme issues that London faces, there is strong justification to depart from the national approach which promotes car use. It is therefore vital that the Mayor, through the London Plan and his other strategies, gives as strong support as possible to car-free approaches.
92. When implementing a 'Vision Zero' approach across relevant strategies, the Mayor must consider the impacts of closing off a street (or streets). This includes the effect of road closures on local roads in adjacent boroughs, and the potential impact (e.g. increases in congestion) of encouraging traffic onto main roads and surrounding local streets.
93. To ensure increases in cycling and walking don't plateau, prioritised support for modal shift towards active transport modes is essential. Continued investment to make cycling a mode of choice – including segregated cycling, quietways, cycle parking and increasing associated facilities such as showers, locker and bike maintenance provision - should be a key priority in relevant Mayoral strategies, and should form part of policy requirements set out in the London Plan. Investment that promotes walking (such as information provision/wayfinding to promote walking as an alternative to bus/tube journeys) and improves journey experience should be prioritised to encourage behaviour change.
94. We urge the Mayor to review TfL's approach to shared space, particularly the application of 'single surfaces'. 'Single surfaces' are not an effective solution in cases where vehicles, cycles and pedestrians share a route or place; clear definition and a guarantee of safety for all users (including those with visual, hearing and/or cognitive impairments) must be provided. The assumption is that ambiguous space users will negotiate their right to use it, but too often the result is either conflict between different users or, with regard to vulnerable users, avoidance of space entirely.
95. As noted above, we welcome the Mayor's 'Vision Zero' approach to road safety; this approach should inform an evaluation of existing and future shared space proposals. However, we do have concerns in relation to the expansion of the cycling superhighway network that cuts across pedestrian 'places' and 'routes' and between footways and bus stops where cyclists assume a priority that undermines pedestrian confidence. We refer to RNIB's objections<sup>5</sup> among others. We would welcome detailed discussions with the Mayor to find solutions to these issues.
96. We note the slight change to policy around quietways. The previous focus of quietways was for use by new and less confident cyclists whereas they are now proposed as 'ideal for all cyclists (including those who are new or less confident)'. This change better reflects how quietways are used in reality, but the Mayor needs to be sure that measures to encourage new cyclists/modal shift are effective.
97. While learning the lessons from construction impacts of previous cycling superhighways, particularly impacts on peak time traffic congestion is essential, approaches for tackling this - i.e. evening construction works - need careful consideration and management to balance the benefits of avoiding day-time traffic congestion against the potentially negative impacts of night-time construction on sensitive neighbours. The Mayor should ensure that where evening construction works do take place 'Considerate Contractor' best practice is put in place to mitigate any impacts.

#### Public space

98. The document discusses public spaces and seeks to make the city green, resilient and attractive, in part through the 'Healthy Streets' approach. We support this in principle but request that there is

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<sup>5</sup> <http://www.rnib.org.uk/take-action-against-tfls-plans-extend-cycle-superhighway-past-rnib-offices>

specific recognition of other ways of valuing London's open and green spaces; for example, we would support a way to value London's green infrastructure as part of a 'natural capital accounting' process, which should be used to proactively plan, protect and enhance the city's valuable green infrastructure, not just with regard to the potential loss of environmental resources. Any future development of policy and evidence in this area should involve close consultation with boroughs.

99. The consultation document includes a broad definition of public space, which includes streets. It is presumed that public space as discussed in the document is coterminous with the more commonly used term 'public realm'. Irrespective of this, the broadening from the traditional/narrow view of streets - i.e. as a link whose primary function is to facilitate movement between public spaces - should change the way streets are regarded and designed (particularly in conjunction with the Healthy Streets approach) with the aim of making streets high quality, accessible, inclusive, desirable and attractive places to spend time and move through.
100. The Mayor should consider greater cross-discipline awareness raising and training on new approaches such as Healthy Streets, to address any challenges of bringing together different professional views, approaches and backgrounds (traditional vs. new and movement function vs. street function).
101. We agree that a London Plan policy on basements is necessary. We would encourage this policy to focus on any basement development which could cause adverse impacts, not just 'mega basements' which suggests that only larger basement applications would fall under the remit of the policy. Cumulative impacts of smaller basement extensions are perhaps the most significant adverse impact associated with basement development. For information, Islington have adopted the Basement Development SPD<sup>6</sup> which outlines the necessary information required to properly assess such applications.

#### Inclusive neighbourhoods

102. We welcome the importance the Mayor attaches to the development of Inclusive Neighbourhoods, which is broadly defined in the consultation document. It is not clear whether this is instead of or in addition to Lifetime Neighbourhoods as defined in the current London Plan. If it is intended as a replacement, we would encourage the concept of inclusive neighbourhoods to at least fully reflect lifetime neighbourhoods. A lifetime neighbourhood can meet the needs of all sections of a community now and in the future, and include inclusive design, convenient access by different transport modes, sustainable construction, energy generation, access to a range of employment, leisure and education opportunities, and creating neighbourhoods that have social well-being and social capital at their heart.

### **Part 5 – A city for all Londoners**

103. We welcome the Mayor's recognition of the opportunities and challenges faced by the growing number and diversity of London's population. However, we are uncertain about what the Mayor means by 'social integration'. In Part 5 of the document, the Mayor identifies social integration as an important priority, and the phrase is repeated in other parts the document. The London Plan and Islington's Local Plan both promote inclusion and welcome diversity. Planning policies should seek development of environments that are flexible and responsive, taking account of what different people say they need and want, so people can use them in different ways. They should also be realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all. This is an approach that has worked well in Islington and beyond, reflecting a richness of diversity and ensuring that designers and developers take into account the needs of all users, including those with specific protected characteristics.
104. Regarding the phrase 'social integration' the Mayor should properly define what is meant by social integration in the London context.

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<sup>6</sup> <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20152016/20160122basementdevelopmentspddadotedjan2016.pdf>

105. We welcome the Mayor's specific focus on children and young people in various sections of the document, including in terms of their housing, education and childcare. We would encourage the Mayor to also address the need for play space across the city. Play facilities are currently at a premium and many are at risk of redevelopment given the pressure to develop for other uses. Provision of space which allows children and young people to play together with peers and neighbours facilitates personal development and also encourages community cohesion.
106. We welcome the Mayor's commitment to a fairer, more equal city and the role of active citizenship as part of that vision. What appears to be missing is recognition of the impoverished state of much of the city's voluntary sector and many of its community groups. To a large degree this is due to recent and ongoing Government cuts. Support for these organisations is essential in order for them to effectively contribute to civic life, and to enable all Londoners to participate in the life of the city and the decisions that affect them. We recognise the Mayor has limited funding for voluntary sector, but we would nevertheless urge the Mayor to lobby the Government for increased funding and support.
107. We welcome the Mayor's commitment to improve the accessibility and affordability of public transport and the recognition of the continued value of door-to-door transport services for those whom public transport remains inaccessible. The objective to improve accessibility for disabled people on the Underground and rest of the transport network is strongly supported, as a vital area of policy for improving social justice in London. The Mayor might also consider the opportunities that Car Clubs offer, in particular how their services might be enhanced to benefit all Londoners including those with disabilities.