

# THE ISLINGTON SOCIETY

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Response to Consultation on

Islington Local Plan

Modifications to Strategic and Development Management Policies

June 2022

October 2022

The Islington Society's comments on the original Review of the Local Plan and the draft Plan, submitted in October 2019, are attached as Appendix A for reference.

We are responding here to the Main Modifications Consultation, June 2022, including any modifications that might be appropriate in the light of contemporary issues arising since the 2019 Review.

## **Main Modifications to Local Plan**

### **Section 3 : Thriving Communities**

#### **Housing**

The Islington Society supports the Local Plan aspirations to improve the supply of better homes where people of different incomes, tenures and backgrounds can live in mixed and balanced communities (Policy H1, Para A) except insofar as the demand for 'high density' (Para C)

- i) impacts upon the building heights policy (Section 8, below) and the provision of Green space (section 5, below) and
- ii) militates against the environmentally and socially healthy communities envisaged in Para A

#### **Private Rental Sector**

There is now considerable stress on the private rental sector for all renters.

Savills have reported that, between 1 January and the end of September this year, rents grew by 13.7 per cent across prime London districts like Islington – the steepest increase since the firm's records began in 1979 with average rent across all property types in London at £2,257 per month between April and June. This has a serious impact on families living in private rental accommodation who are finding increasing difficulty in remaining in Islington.

There is a crisis in rental provision for young, economically active working renters. Last week, as we write, the New Statesman reported that there are 106,000 people searching for rooms in the capital, but fewer than 15,000 available.

These renters contribute significantly both economically and socially to Thriving Communities throughout Islington.

This is a serious issue that is only touched upon in the Local Plan. In this respect we agree with the amendments to Policy H1, Para N and Policy H11, Para A and would wish to see them strengthened to encourage good, decent private rental premises.

**We recommend that :**

the wording of the introduction to amended Policy H11, Para A be altered to delete "permitted" and insert instead "encouraged". The compliance provisions will ensure that good private rental accommodation is provided.

## Section 4 : Inclusive Economy

### Business Floor Space

The Islington Society supports and encourages the Local Plan emphasis on retention of existing and the provision of new affordable workspaces.

Local dispersed workspaces.

In addition to the arguments set out in Policy B1, Para A. seeking to cultivate a diverse and vibrant economic base, we would stress the need to retain and provide workspaces *locally* with the benefit of providing local employment for the people of Islington. We would wish to encourage a 'walk-to-work' approach with work places within walking or cycling distance of where people live.

Local workplaces as a 'dispersed use' do and will 'provide a valuable service to local communities outside specifically designated areas' equivalent to Policy R1, Para E for Retail, etc. uses

**We recommend that :**

- a) a clause (iv) be added to Policy B2, Para A to include, encourage and control dispersed local businesses and employment uses in non-designated areas and
- b) the phrase "dispersed uses In" be inserted between "and" and "non-designated locations" in the second line of Policy B3, Para B in order to, in the words of Para A, protect existing business workspace throughout the borough.

Marketing and vacancy Periods.

See comments on Appendix 1 Below

### Retail, Leisure and Services, Culture etc.

The Islington Society agrees with the Local Plan approach to strengthening the uses in this Section.

Local shops

The Islington Society has long promoted the benefits of Local Shops<sup>1</sup>. In this respect we strongly support Policy R5 except that the period of vacancy in Para A(i) is not long enough. The survival of local shops and services is often precarious, relying frequently on imaginative uses. These may often not be conventional nor susceptible to ordinary marketing, requiring longer periods of gestation.

In addition, the introduction of a non-retail uses will stymie the viability of a local shopping area which is unlikely to be recovered. So as long a period as possible is

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1 ref.: <https://isingtonsociety.org.uk/wp-content/uploads/2018/02/ISOC-2004-Winter.pdf>.

needed to ensure that the retail use is not lost

**We recommend that :**

The vacancy period set out in Policy R5, Para A(i) is increased to "at least two years".

**Cultural Uses**

The Islington Society does not agree with the statement in Policy R10, Para A as amended that new cultural uses "should be located in the CAZ or Town Centres [and] Cultural Quarters". Restrictive zoning is not conducive to the development of a lively, thriving borough as a whole. Small, local 'cultural' uses provide a diversity of activity and a general sense of excitement and local 'colour' and can develop into a new hub of interest.

The thriving, popular Park Theatre in Clifton Terrace, N4 is an excellent example. Such initiatives should not be discouraged.

The provisos in Para A(i) and A(ii) are sufficient to define the kind of areas where new cultural uses are best suited without necessarily limiting them to pre-defined CAZ, Town Centres or Cultural Quarters

**We recommend that :**

The restriction on the areas where New Cultural uses should be located is removed from Policy R10, Para A, or amended to encourage small innovative local cultural uses, provisos A(i) and A(ii) being sufficient to define the character of suitable locations.

**Public Houses**

The Islington Society wholly agrees with Policy R11 resisting the loss of any Public House and encouraging the use of non-operational upper floors for visitor accommodation.

Marketing and vacancy Periods.

See comments on Appendix 1 Below

## Appendix 1

### Table A1.1

The Islington Society welcomes the clarity provided by the introduction of Appendix 1, Table A1.1

As noted above, however, we consider that the shorter times in the table (and consequently in the policies referred to) are insufficient properly to test the demand and to encourage new, innovative uses within the use classes.

**We recommend that :**

Those periods in Table A1.1 of Appendix 1 marked as "6 months" should be changed to "12 months" and those periods marked as "12 months" should be changed to "24 months"

**Property Marketing**

We are wary of reliance upon sole agency advice recommended in Appendix 1 Para 4(a). We have frequently encountered contradictory alternative advice when supporting evidence of this nature is challenged,

**We recommend that :**

Appendix 1 Para 4(a) be amended to require "at least two .... property agents" to provide independent advice and discourage cosy relationships.

## Section 5 : Green Infrastructure

The Islington Society agrees with the aspirations for the protection and enhancement of the Green Infrastructure set out in the Local Plan but is very concerned by its application in practice. The sentiments are admirable, but the implementation is lacking.

### Green space / open space

We entirely agree with Policy G3 supporting text paragraph 5.18 that "*Access to green space has a positive influence on physical and mental health. Green space in a local area can also lead an increase in life expectancy. Green space is particularly beneficial when it is easily accessible and can be encountered as part of daily life*". This is crucial to considerations of the benefit of green space. It applies to the protection of existing green space, Policy G2, as much as to the provision of new open spaces and should be more prominent in this Section of the Local Plan.

There is an unresolved lack of clarity in the Local Plan. Policy G2 supporting text generally appears to use the terms 'green space' and 'open space' interchangeably (eg. (amended) para 5.14 says "(P)ivate open spaces ... are an integral part of the borough's green infrastructure"). This has resulted in recent planning developments misrepresenting the amount of open/green space provision with claims that, for instance, the amount of 'green' space has not been reduced because the total amount of 'open space' being provided is the same (ie. as the previous amount of 'green' space).

It is our view that the standard of open space set out in supporting paragraph 5.20 of 5.21 sqm per resident (and 2.6 sqm per employee) is inadequate. At any event this should be stated as a *minimum* permissible allocation, not an aim.

In this respect, in the case of redevelopment of existing places, Policy G1, Para C requiring that interventions should *improve* green infrastructure is relevant. Where there exists a good standard of open space/green space, this should not be reduced.

#### **We recommend that :**

- i) The substantive text of supporting Paragraph 5.18, as noted above, should likewise be incorporated into the supporting Paragraphs of Policy G2,
- ii) there should be clear definitions of the terms "green space" and "open space", that they should not be used interchangeably and that developments proposals should be required to differentiate between them and show the amount of each,
- iii) the word "minimum" should be inserted between "that a" and "standard of open space" in supporting paragraph 5.20 and
- iv) in order to demonstrate compliance with Policy G1, Para C and with paragraph 5.20 and for comparison, redevelopment proposals should state the area of green and open space per person *before* and *after* redevelopment.

## Section 6 : Sustainable Design

### Delivering sustainable design

#### Minimising greenhouse gas emissions

There is a significant growing understanding of the need to preserve embodied energy in existing buildings. The body of evidence in favour of 'retrofitting' existing buildings rather than demolishing on grounds both of Heritage Asset value and of loss of embodied energy increases daily.

The concept of retrofit is a familiar one.

Currently, as we write, the case of Marks & Spencer's in Oxford Street provides an excellent example. In his evidence to the enquiry, Ian Richie writes:

*"At the beginning of this millennium, it became clear that retention of the fabric of buildings was becoming an imperative to reduce energy consumption, reduce material waste and reduce atmospheric carbon. It also serves to keep urban memories, through façades, but also to exploit the structure and internal volumes. Retro-fit, re-use and re-purposing buildings remains a vitally important challenge for architecture, especially the integration of up-to-date energy systems and sustainable performance."*

The Islington Society urges the Council to include a presumption in favour of and emphasis on the retention and 'retrofitting' of good existing buildings instead of demolition and re-building.

**We recommend that :**

1. A new clause B. should be inserted in Policy S1 (and the remaining clauses renumbered) to the effect that "The Council will give preference to proposals to retain or repurpose retrofitted existing buildings over demolition and rebuilding anew."
2. A new clause B. should be added to Policy S4 (and the remaining clauses renumbered) to the effect that "All new development proposals are required to demonstrate that proposals on sites with existing buildings must provide a robust basis for decision making on the carbon impacts of the proposals and alternatives to minimise greenhouse gas emission, and must i) follow the required methodology in the London Plan 2021 policy SI2 (CD 6.02) and associated guidance<sup>2</sup> ".

## **Section 7 : Public Realm and Transport**

### **Delivering Sustainable Transport**

The Islington Society notes that the Local Plan is falling somewhat behind in the fluid developments in transport choices, particularly in respect of reduction in the number of journeys to places of work, increased local deliveries and the rapid rise in electric vehicle ownership with the consequent need for charging points (EVCPs).

These matters need to be more fully dealt with in the Council's Transport Strategy, to which we responded in September 2019.

## **Section 8 : Design and Heritage**

This part of the Local Plan addresses one of the core concerns of the Islington Society. As such the Policies in Section 8 are seen as of high importance. We comment regularly on their implementation in Planning matters, particularly Planning Applications, throughout the Borough.

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<sup>2</sup> From Dr Julie Godefroy evidence to the Planning Inspectorate (re. Marks & Spencer, 456-472 Oxford Street, London W1)

## Innovation and the Historic Environment

In general, the Islington Society is supportive of the intention in Section 8 of the Local Plan to seek innovative approaches to development whilst avoiding adverse heritage impacts and protecting and enhancing the unique character of the borough.

- We particularly agree with Policy DH1, (new) Para E. (Conserve and Enhance Heritage etc.). We will work with the Council to monitor adherence to this policy.
- We are less convinced by Policy DH1, (new) Para G. (Tall Buildings etc.) noting that 'they can also have significant adverse impacts'. We will work with the Council to monitor adherence to this policy.
- We do not agree with the removal of supporting text paragraph 8.5 setting out the criteria for successful new developments. It is essential to the continuing community well-being, diversity, vibrancy and attractiveness of the borough that new developments are of "high quality, reinforce and positively contribute to Islington's character and distinctiveness and preserve and enhance the borough's heritage".

**We recommend that :**

Policy DH1 supporting text Paragraph 8.5 is retained

## Listed Buildings / Heritage Assets

The Islington Society is jealously protective of the Borough's Heritage Assets, in particular its Locally Listed Buildings and Shopfronts. We, with others, have put a considerable amount of effort into reviewing, analysing and recording the Locally Listed Buildings and Shopfronts in the Borough and maintains a detailed database of them<sup>3</sup>.

The Locally Listed Buildings and Shopfronts are an essential part of Islington's character and distinctiveness and must be protected as much as Statutory Listed Buildings.

**We recommend that :**

Policy DH2, Para D be expanded to include Locally Listed Buildings and Shopfronts as a Heritage Asset for consistency with the wording of Policy DH1, (new) Para E. *and* that the words "Locally Listed Buildings," be inserted between "and can include" and "spaces" in supporting Paragraph 8.13 together with a new footnote to provide a link to the review of Locally Listed buildings at <https://islingtonsociety.org.uk/wp-content/uploads/2021/07/ISOC-Islington-Local-List-Website-Version-July-2021.pdf>.

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3 Refer to : <https://islingtonsociety.org.uk/wp-content/uploads/2021/07/ISOC-Islington-Local-List-Website-Version-July-2021.pdf>

**APPENDIX A**

**The Islington Society Comments on the Draft Local Plan : October 2019**

*THE*  
**ISLINGTON SOCIETY**

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Planning Policy Team  
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Response to Consultation on  
**Islington Local Plan**  
**Strategic and Development Management Policies : Regulation 19**  
**September 2019**

October 2019

Please refer to the Islington Society's comments on our comments the November 2018 Regulation 18 Consultation, tabulated with our response to the Draft Regulation Consultation as follows

January 2019 Comment	October 2019 Comment
<p><b>1. Locally Listed Buildings</b></p> <p>We are committed to the protection of the environment of Islington and its heritage, and to enhancing the quality of design in the borough.</p> <p>We are especially aware of the wealth of locally listed heritage assets (in addition to the statutory listed ones), thanks to the current review of the local list. In this respect, the sub-reference to locally listed buildings and shopfronts in policies DH1 Part E &amp; DH2 Part D is welcome. We would like to see this strengthened by a wider reference to and definition of "local listed buildings and shopfronts and other non-designated assets" in the second point in the Site Appraisal and Design Process core statements in Para 1.59 [incidentally, there is a typographical erroring that section : it should read "non-designated" not "non-undesigned"]</p> <p>However, we are also aware from the local list review of the large number of locally listed shopfronts, especially those outside conservation areas, that have been lost. We would like to see a statement in Policy DH2 Part D noting that the council will be vigilant in preventing unauthorised loss of listed buildings and non-designated assets, including locally listed shopfronts-undesigned"]</p> <p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>Change "non-undesigned (<i>sic</i>) heritage assets" to "non-designated heritage assets (including locally listed buildings and shopfronts)" in Para 1.59.</li> <li>Add "The council will be vigilant in preventing unauthorised loss of listed buildings and non-designated assets, including locally listed shopfronts" to Policy DH2 Part D.</li> <li>Add "C. Locally Listed Shopfronts will be protected and the council will be vigilant in preventing unauthorised loss of locally listed shopfronts" to Policy DH7.</li> </ol>	<p>Locally listed buildings</p> <p>We welcome the rewording of policy DH2 Part I to strengthen the significance of Locally Listed Buildings and shopfronts</p> <p>We welcome the inclusion of a definition of non-designated heritage assets in Appendix 9: Glossary and abbreviations</p>

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<p>2. Sustainable Buildings 1 : Building Life expectancy</p> <p>We note that Policy H11 Part B iv refers to “the lifetime of the building” as “generally not less than 50 Years”. The general residential building stock in Islington is more than 125 years and looks set to survive and be revived into the foreseeable future. From this perspective, a suggested lifetime of not less than 50 seems modest.</p> <p>A statement of the expected longevity of the residential building stock should be included in Section 6 : Sustainable Design. Policy S3 Sustainable Design Standards would be a suitable location. We suggest a life of greater than 75 years</p> <p>Recommendation: Add Section I to Policy S3, “All Residential and non-residential building should be capable of an expected life of greater than 75 years”</p>	<p>Sustainable Buildings 1 : Building Life expectancy</p> <p>Based on the life-time use of existing stock, we continue to a recommend a sustainable lifetime of greater than 75 years</p> <p>Recommendation: Add Section I to Policy S3, “All Residential and non-residential building should be capable of an expected life of greater than 75 years”</p>
<p>3. Sustainable Buildings 2 : Zero Carbon</p> <p>Policy S1 Part B is ambiguous. It refers variously in the text to “design”, “development” and “construction”. This implies that the policy is specifically applicable to new-build construction. In this respect, therefore, it cannot be inferred that “all buildings in Islington” will be zero carbon. An aspiration to apply zero-carbon status to the existing building stock by any deadline date is laudable but unrealistic.</p> <p>In that case, the stated deadline for design, development and new construction is too long and should be changed to 2025.</p> <p>Recommendation: Change “all buildings in Islington will be zero carbon by 2050” to “all new buildings in Islington will be zero carbon by 2025”</p>	<p>Sustainable Buildings 2 : Zero Carbon</p> <p>Policy S1 Part B does not differentiate between New Buildings and Existing Building Stock New buildings should aim higher.</p> <p>Recommendation: Add after “all buildings in Islington will be zero carbon by 2050”, “and all new buildings will be zero carbon by 2025”.</p>
<p>4. Buy-to-Leave</p> <p>The phenomenon of buying residential property and leaving it vacant for investment purposes has become-all-too familiar. It is wholly unwelcome and militates against Thriving Communities. The Local Plan should make it clear that this is entirely unacceptable.</p> <p>Recommendation: Add: “The council will take action to prevent leaving residential premises vacant (so-called Buy to Leave)” to policy H1.</p>	<p>Buy-to-Leave</p> <p>Covered by Policy H2 Part H</p>
<p>5. Basements</p> <p>The Islington Society is sensitive to the significant adverse impacts that basement development has on neighbouring properties and the wider area. Whilst we recognise and</p>	<p>Basements</p> <p>The polices remain unchanged. This comment by the Islington Society</p>



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<p>support the statement in Policy DH1 Part H that "any development involving basements will be strictly controlled", the Islington Society's position is that basement developments should not be permitted.</p> <p>Recommendation; That the Local Plan reflects a presumption that basement developments should not be permitted.</p> <p>Thus: a. Take out Part A and insert it as new item (i) to Part D. Renumber part D items (i) to (vii), renumber Parts to A to C. b. Change current Part B introduction from "The Council will only permit basement development where it is demonstrated ...." to "The Council will not permit basement development unless it can be demonstrated ...."</p>	<p>remains unchanged in response.</p> <p>We do not agree with the comments in the consultation Statement p.91. There should be a presumption <i>against</i> basements.</p> <p>Recommendation: Change "The Council will only permit basement development where it is demonstrated ...." to "The Council will not permit basement development unless it can be demonstrated ...."</p>
<p>6. Tall Buildings</p> <p>The Islington Society regrets and does not support the continued proliferation of tall buildings across the borough because of their adverse effect on the character and environment of Islington.</p> <p>We would prefer para 3.1.5 of the 2011 Plan</p>	<p>Tall Buildings</p> <p>No further comment</p>

Additional comments on:

Chapter 7: Public Realm & Transport

Policy T1 Enhancing the public realm and public transport

The most salient and welcome words in this section appear in paragraph 7.1: the reference to a reduction in travel distances. This is so important it must appear in the policy itself, not merely in the notes of explanation.

If it were followed, the Borough would not be supportive of Crossrail 2 in the terms used in paragraph 7.10. The originally safeguarded scheme was designed to reduce the need to travel by reducing the distances travelled on routes between one place and another, by the provision of new interchange points. This interchange of passengers would free space on overcrowded trains and facilitate the use of existing services at stations close to central London. It also brought Hackney and East Islington as close to central London and the west end as places a comparable distance away, in terms of travel time. Specifically in Islington, it relieved overcrowding on the Victoria line between Highbury and King's Cross and on the Great Northern electric line between Essex Road and Moorgate. The Council should continue to press for a metro scheme between north-east and south-west London with a station at Essex Road, rather than an ever longer distance project predicated on the misguided belief that property developers in places beyond the Greater London Boundary would fund such a project in return for the benefit it would derive.

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Islington needs to plan for jobs and homes to be closer together, but also to work with neighbouring Boroughs and the GLA to ensure that the same applies across London.

Policy T2 Sustainable Transport Choices

A. The "negative impacts" need to be prevented and those which have happened in the last ten years reversed. Mitigation is not sufficient.

F (iii). The reference to interchange is welcome but it has not been born out in practice. Interchange at Archway and Highbury Corner is significantly more difficult and unwelcoming, particularly for residents of Haringey and Hackney respectively. It seems likely that, to a lesser extent, the same will be true at Old Street. Bus passengers from New North Road (four bus routes) wishing to transfer to the Underground will face a longer walk and the need to cross one of two major roads – at present no road crossing is necessary though the pavement width is inadequate.

F (v) Again the reference to bus stop siting is welcome, but is not followed in practice. When these roundabouts previously operated with two way traffic, buses stopped at the junctions directly adjacent to the station entrance. The justification for not doing that now is that there is so much more traffic. That is precisely why we need to reduce traffic. A seamless interchange would make public transport more attractive than private cars.

G We welcome the emphasis on minimising non-sustainable modes, rather than maximising trips by sustainable mode. However, all the supporting commentary focuses on cycling and walking and there is little mention of public transport. There will be 32 million trips a day by 2041 if TfL projections are correct. 17 million will pass through inner London (TfL evidence to the London Plan EiP, fig. 77.2) and 7 million through Central London. This means well over a million trips a day in or through Islington. Even with a three fold increase in cycling and a small increase in walking, the vast majority of these will be made either by public transport or non-sustainable means. The Plan should contain proposals to ensure that it is the former.

Policy T3 Car free development

This is broadly welcome but the journeys that could equally well be made by bus, or a combination of bus and rail should be promoted in preference to car clubs (policy T3H).

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