

# Regulation 12(a) Consultation Statement

**Urban Design Guide**  
**Supplementary Planning Document**  
December 2016



## **PART A: FORMAL CONSULTATION ON DRAFT SPD**

# Draft Urban Design Guide SPD Consultation Statement

## 1. Purpose and background

The statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the requirements for public participation and for preparing a consultation statement.

It accompanies the Supplementary Planning Document (SPD), prepared for adoption, which provides guidance on how urban design principles should be applied to ensure that new development successfully contributes to making the borough a better place. The SPD is applicable to all new developments, including alterations and extensions to existing buildings.

This statement sets out details of the formal public consultation that has taken place which has informed the development and refinement of the Urban Design Guide Supplementary Planning Document (SPD). It provides details of who was consulted, how and when to inform the preparation of the SPD, what main issues were raised during the public consultation stage and how those issues have been addressed in the SPD.

## 2. Formal public consultation

The council conducted a formal public consultation exercise on the draft SPD between 29 July and 23 September 2016. Respondents were invited to submit comments on the draft SPD. The document was accessible via the SPD webpage on the council's website.

All individuals and organisations registered on planning policy consultation database (over 1700 registered) were alerted to the process by email or post. Where email addresses were not available, letters were sent.

In total, 20 responses were received; for the most part those responses were supportive and simply sought clarification or to correct minor details. These comments, and the council's response to them, are collated in the table in Appendix 1. All the issues raised have been taken into account in the preparation of the final SPD.

## 3. Analysis of formal public consultation responses

The 20 responses were received from a range of individuals, private companies and campaign groups. Detailed responses were received from: The Upper Street Association; The Canonbury Society; The Islington Society; Berkeley Group; St William; Sport England; The Woodland Trust; London Cycling Campaign; and Islington Play.

Responses, broadly speaking, fell into the following categories:

- The importance of the borough's community profile and social history in shaping development.
- A welcome for the site specific, objective-based approach to policy compliance and concern around residual arbitrary prescription.
- The scope and status of the document.
- The precision of language used.
- The importance of play and the promotion of active lifestyles.

#### **4. Conclusion**

Minor changes to the SPD were made in response to the consultation feedback on the draft SPD to improve the clarity of the document. The style and tone adopted the SPD are intended to empower designers and developers to reach the best site specific design solutions that are sustainable and inclusive in their own right whilst contributing to the physical, social and environmental qualities of the neighbourhood and borough at large.

The SPD will be taken to Executive for approval to adopt in early 2017. The SPD will be a material planning consideration following its formal adoption.

The review of the Urban Design Guide SPD has involved extensive and ongoing consultation which has influenced both early development and later refinement of the document. The process has complied with the relevant Regulations.

**Table 1: Consultation responses on Draft Urban Design Guide SPD**

Respondent	Summary of Response	Response from Council
<p>Charles Wood The Upper Street Association</p>	<p>3.2 <u>Understanding Islington Today</u>. It would be helpful here to include an iteration of the present density of population, in terms of both per sq hectare and in terms of green space. In terms of the Council's fairness policy that data could include comparative national and London wide figures.</p> <p>5.1 <u>Site Layout</u>, esp 5.2.1. We continue to support the comments on gated communities. This is however a difficult subject for some elsewhere, who feel vulnerable to anti-social activities.</p> <p>5.2.9 and 5.2.11 <u>Emphasising Junctions</u>. We would question the ready acceptance of curved frontages, regarding them as often a hackneyed solution. We suggest that curves in the City of London, for instance, have been overused.</p> <p>5.2.16 and 5.2.18 <u>Rooflines</u> We strongly support the comments on restraining alteration here. In our view, all too easily, the inherited built townscape can be irretrievable changed without care.</p> <p>5.2.19 <u>Relationship of Roofline to elevation</u>. There have of course been many damaging example of past eras of</p>	<p>New text has been added describing the borough's demographic in terms of its diversity, wealth and deprivation. New text has also been added describing the quality and quantity of the borough's green space.</p> <p>The Association's support is noted. It is a principle of this document and the Streetbook SPD that it is by encouraging more – and more – diverse users to make use of the public realm and pedestrian routes that safety and security will be enhanced and anti-social behaviour discouraged. Further detail/clarification has been added to the relevant paragraph.</p> <p>The text has been updated: the phrase 'is usually best' has been replaced by 'can be' and the use of these devices is qualified by the need for 'carefully execution'.</p> <p>Noted</p> <p>It is an overarching policy objective that design should be of a high quality and contextual; this expectation is</p>

	<p>infilling: parts of Liverpool Road come to mind. We would like to see an express reference to presumption against reckless in fill.</p> <p>5.2.24 <u>Window Arrangement and style</u>. We support these clear comments.</p> <p>5.5.57 <u>Aerials and telecoms equipment</u>. We certainly support the policies set out here. However it seems from local experience, for instance our own, that control of aerials is not in practice normally enforceable, if ignored by developers. We suggest that this section is strengthened.</p> <p>5.6 <u>Shopfront design</u>. We welcome the revisions.</p> <p><u>Conservation Areas</u>, we support concern that the Council reiterates its control of development here.</p>	<p>supplemented by nine specific situations where an alteration to the roofline is unlikely to be acceptable. .</p> <p>Noted</p> <p>The policy requirement is: 'Proposed building technologies should be demonstrably effective and appropriate to their setting'. We cannot insist that an aerial is located out of sight if that would render it ineffective, and the text has been clarified to reflect this.</p> <p>Noted</p> <p>Noted</p>
<p>Philip Walker The Canonbury Society</p>	<p>In general, we welcome this revision and note that many of the comments that we and other respondents communicated to you in January 2015 have been addressed.</p> <p>Under 1.1.2, you usefully set out the relationship between Islington's Development Plan, Local Plan and SPDs with the London Plan situated at the top of this hierarchy but in the diagram National Planning Policy and Guidance (NPPF) is not featured. We accept there is a full explanation of NPPF in Chapter 2 which is informative but somewhat confusing, particularly paragraph 2.1 3.</p> <p>We are pleased to note that for existing residential buildings, 5.3 – Residential Extensions and Alterations in general provides helpful guidance on what is acceptable</p>	<p>Noted</p> <p>The diagram is intended simply to illustrate the structure of the local plan.</p> <p>The paragraph has has been redrafted to clarify the intention of the NPPF.</p> <p>Noted</p>

	<p>and what is not acceptable. Side extensions are fully covered under 5.3.11 to 5.3.13 which in Canonbury is important because of the significant number of semi-detached houses where views of greenery at the rear need to be preserved.</p> <p>With regard to garden rooms and outbuildings, we think there is room for confusion over the phrase ‘a sufficiently large proportion of the original garden’. Moreover, permitted development rights (which the Council refers to in its response to earlier comments) allow residents to cover 50% of the garden with a garden building, provided that the property is not listed. How does the Council reconcile this with the illustration in the guide?</p> <p>We also take issue with the guidance on garden buildings (5.3.34) which states that they should be set back from boundaries. We think that this leaves a visually and practically unusable strip between the garden building and the wall and reduces the beneficial area of green space.</p> <p>As a society focussed on the Canonbury Conservation Area, we are concerned at the ability of applicants to develop and extend under permitted development rights. In our view the national relaxation to remove the need for planning permission for garden buildings in conservation areas is a serious mistake and the Council should issue Article 4 Directions to give it more control over development in conservation areas. As we’ve said before, it is essential that the existing policies applicable to conservation areas are not watered down, relaxed or made less precise by any of the revisions.</p>	<p>The relevant paragraphs have been amended to acknowledge the existence of PD rights and to define ‘sufficiently’ in regards to the need to provide high quality and usable amenity space that provides for day to day use and does not result in fragmented areas incapable of supporting planting.</p> <p>Noted</p>
Big Yellow Self Storage Company	Both BYSS and CPP welcome the production of new supplementary planning guidance by the Council, updating	Noted

<p>Ltd (“BYSS”) and City &amp; Provincial Properties PLC</p>	<p>2006 urban design guidance.</p> <p>It is considered imperative that that the document’s content and tone should not be overly prescriptive. It should provide sufficient flexibility to allow for the pragmatic assessment of developments on their own merits. It is therefore suggested that the SPD should be redrafted to include words like “encourage” and “support”.</p> <p>We welcome the document’s recognition at paragraph 3.2.3 of the importance of the creative cluster of music related uses at Tileyard, and its contribution to the established character of the Vale Royal &amp; Brewery Road area. We would also like to offer some additional information regarding the character of the Tileyard area which could be included within the document to supplement the existing text, as set out below.</p> <p>The traditional character of the Vale Royal/Tileyard Road area has been lost through post-war reconstruction resulting in a compromised public realm with buildings of little individual architectural merit. There is no strong urban grain with very little consistency in terms of set-back, scale or building line. The frontage along York Road is staggered and inconsistent. The character of the area is largely defined by land use, not by an established coherent architectural style. The style of building is varied ranging from a mixture of contemporary metal sheds and yellow London brick commercial office buildings, all of which are modern in appearance and of their time.</p> <p>2.1.4 Reference to “online Planning Practice Guidance (PPG)” should fully acknowledge that the online PPG is not part of the Development Plan.</p>	<p>The guidance is based on objectives to be met and considerations to be taken into account; prescription is assiduously avoided. Design solutions are provided to illustrate a point rather than to dictate a blueprint.</p> <p>Noted</p> <p>This is an inappropriate level of details for this document. The opinion has been passed to the team responsible for drawing up area character appraisals.</p> <p>The section is titled ‘National planning policy and guidance’ reads ‘Planning Practice Guidance (PPG) is an online resource that provides further guidance on the interpretation and implementation of the NPPF’.</p>
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	<p>4.1.1 Amend to recognise role of contextual analysis</p> <p>4.1.6 Amend to acknowledge viability</p> <p>5.2.48 Remove sentence advising that “the council will generally seek material samples that show how materials appear after they have been weathered”</p> <p>5.2.2 Amend to acknowledge exceptions to application of these height and width ratios</p> <p>5.2.3 Add following sentence to the end the paragraph: “Whilst this is general approach, each development must be assessed on its own merits and context.”</p> <p>5.2.4 Replace paragraph with the following: “High sided frontages along comparatively narrow streets will therefore normally be acceptable where they enhance the character of the area”</p>	<p>Noted</p> <p>The SPD provides guidance on adopted Local Plan policies, which have been subject to viability testing. Further guidance on the council’s approach to viability on individual applications is provided in the Development Viability SPD.</p> <p>Amended to allow for ‘in situ photographic evidence’</p> <p>The relevant paragraphs have been amended to clarify the considerations to be taken into account when determining an appropriate height to width ratio.</p> <p>This is allowed for by the use of the word ‘normally’ to qualify the statement.</p> <p>This section has been redrafted to improve clarity of guidance and remove prescribed ratios. It sets out objectives to be met and design considerations to be taken into account.</p>
<p>David Gibson Islington Society Planning Group</p>	<p>The SPD is as a well-formulated guidance document and we do not wish to comment on a paragraph-by-paragraph basis except in the case of paragraph 5.3.28 where in the second sentence, the phrase “they should be positioned to line up with the windows below” is just wrong and should be removed.</p>	<p>The guidance has been reconsidered and rephrased to emphasise the principle of the subservient dormer and the importance of symmetry and an order that reflect/is consistent with that of the host property.</p>

	<p>We note and agree with your comments, particularly in paragraph 1.2.2, reflecting that the SPD is <i>guidance</i> and may not be appropriate in some individual cases. We would like to see in para 1.2.2 or elsewhere the commonly recognised phrase “judged on its merits” to emphasise the point.</p> <p>There should be a stronger link between this document and the Conservation Area Design Guidelines (and forthcoming Conservation Area Assessments). We recommend adding a new paragraph 3.0.2 setting out the significance and importance of the Conservation Area Design Guides.</p> <p>There is no reference to the damaging effect that can be caused by the thoughtless application of Permitted Development Rights ...We recommend adding a new paragraph in Section 1.3 drawing attention to Article 4 Directions.</p> <p>We recommend including the NPPF in Appendix B</p>	<p>This phrase has been added</p> <p>This link is made clear in the introductory section</p> <p>A new paragraph has been added to this effect</p> <p>This has been included</p>
James Dunnett Islington Society	<p>The SPD avoids laying down the law by its frequent use of phrases such as 'will normally be sought' and 'will be encouraged' rather than 'should'. This is welcome.</p> <p>However... the UDG may prove difficult to use. I personally do not like the decorative panels that get a green tick in illustration 16, nor the slate 'mansard' behind a retained 'butterfly' parapet in Fig 24, where I think a level parapet or even raising the brickwork to full height would look much better: there is no point in trying to hang on to aspects of a previous set up when it prevents the new set up working properly.</p>	<p>Noted</p> <p>Noted. The examples simply illustrate one way of meeting the objectives and design considerations set out in the document. The council does not seek to impose any one style or taste; individual responses will always be expected to be contextual.</p>

	<p>There is frequent and I think unrealistic reference to the desirability of 'surveillance'.</p> <p>When it comes to discussing heights of buildings in relation to street widths it says (5.2.2-4) that 'Victorian streets have a height to width ratio of between 0.5 to 1 and 0.7 to 1... Streets with a ratio of between 0.5 to 1 and 1 to 1 normally provide a well proportioned street frontage... However, [in] the south of the borough...' , and it then goes on to admit so many exceptions that it would be difficult for anyone to get any guidance at all.</p>	<p>In the council's experience, natural surveillance is the best strategy to promote positive behaviours and defend against the contrary.</p> <p>This section has been redrafted to improve clarity of guidance and remove prescribed ratios. It sets out objectives to be met and design considerations to be taken into account.</p>
<p>Daniel Palman Berkeley Group</p>	<p>We are supportive of the general direction of travel of the SPD and the transparency it provides.</p> <p>The Key Principles for High Quality Design should take into account viability and deliverability.</p> <p>A more pragmatic approach is suggested to avoid imposing architectural style or stifling innovation. Greater weight should also be given to the 'weight which should be given to outstanding or innovative designs which help to raise the standard of design more generally in the area"</p> <p>Paragraph 5.2.56 should be amended to remove reference to specific materials (ie brick slips)</p>	<p>Noted</p> <p>The SPD provides guidance on adopted Local Plan policies, which have been subject to viability testing. Further guidance on the council's approach to viability on individual applications is provided in the Development Viability SPD.</p> <p>Examples included simply illustrate one way in which those objectives can be met; prescription is assiduously avoided.</p> <p>These are examples only of what is generally discouraged or generally encouraged as appropriate to the local context.</p>
<p>Canal and River Trust</p>	<p>We are pleased to see, at paragraph 5.1.37, reference to development providing an active frontage (or waterside).</p>	<p>Noted</p>

	<p>We believe the design of waterside development should begin at the waterspace, to make the most of this unique asset.</p>	
<p>Mark Furnish Sport England</p>	<p>Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport and recreation, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing, employment land and community facilities provision is important. It is therefore key that the Urban Design Guidance reflects this aim</p> <p>Sport England and Public Health England have produced Active Design Guidance that aims to inform the urban design of places, neighbourhoods, buildings, streets and open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities and it is strongly recommended that these principles and concepts are reflected in the Urban Design Guidance. More information, including the guidance, can be found via the following link;</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p> <p>The design and layout of places should promote communities to become active therefore the requirement in paragraphs 5.1.44 and 5.145 for redevelopment sites to create open spaces that promote activity and playable spaces is encouraging and supported by Sport England.</p>	<p>These points are more appropriately incorporated into the council's Local Plan; the comments have been passed on to the relevant team.</p> <p>New text has been added highlighting the importance of promoting active lifestyles. Sport England's guidance is included as a useful reference in the appendices.</p> <p>Noted</p>

<p>Tom Bogdanowicz Cycle Islington and the London Cycling Campaign</p>	<p>General point on cycle route design and standards to add: <i>Developments and traffic schemes in Islington must comply with the London Cycle Design Standards (2014 and subsequent revisions) and London Plan (March 2016 and subsequent revisions) cycle parking guidance.</i></p> <p>Most Islington SPD documents pre-date the latest March 2016 edition of the London Plan and the London Cycle Design Standards, December 2014. As a consequence, developments and traffic schemes may not meet the requirements contained in the London Plan on cycle route design (pages 259 -263 ) and cycle parking (Table 6.3 and notes 6A.11 -6A.13)</p> <p>Route making <i>change ‘should to ‘must’ in paragraphs 5.1.2 and 5.1.4’</i>. We note and welcome the guidance to provide developments that are permeable to cycling and walking. This ‘suggestion’ needs to be strengthened in order to prevent it being disregarded. Replacing ‘should’ with ‘must’ would enable officers to expect developers to submit relevant improvements and allow variations where appropriate.</p>	<p>These are points more appropriately incorporated into the Streetbook SPD and the Local Plan; the comments have been passed on to the relevant team.</p> <p>This is an inappropriate level of detail to seek to include in the SPD.</p>
<p>Richard Barnes Woodland Trust</p>	<p>London Policy - This section omits reference to London Plan Policy 7.21 Trees and woodlands and the associated SPG on Preparing Borough Tree and Woodland Strategies and London Tree and Woodland Framework.</p> <p>A new Paragraph 2.2.8 is suggested, with the following wording: “The Preparing Borough Tree and Woodland Strategies SPG (2013) gives guidance on the implementation of the London Plan Policy 7.21 to protect, maintain and enhance trees and woodland in London, in accordance with the principles of the London Tree and</p>	<p>The section provides a quick reference point and mentions Chapter 7 ‘London’s Living Places and Spaces’.</p> <p>These are points more appropriately incorporated into the Streetbook SPD and the Local Plan; the comments have been passed on to the relevant team.</p>

	<p>Woodland Framework (2005). This Framework identifies that in order to maximize the economic, environmental and social well-being benefits that London receives from its trees, this resource should be considered as an urban forest, and protected and expanded.”</p> <p>The Trust supports Islington’s commitment to retaining and enhancing Green Infrastructure. However, there isn’t an explicit reference in the opening section or the section on Open Spaces to the particular benefits from trees and enhancing tree canopy cover in the borough. Tree planting does much more than mentioned in paragraph 5.1.47 (“softening the built environment” and “providing order and defining space”)</p> <p>I suggest a new paragraph should be added before paragraph 17.22: “There is now a wealth of evidence on the many benefits of planting more trees to increase high canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. Guidance on the retention and planting of trees in new development can be found in the report Residential Development and Trees published by the Woodland Trust”</p> <p>Paragraph 5.1.47 should refer to BS 5837: 2012 Trees in relation to design, demolition and construction:  <a href="http://shop.bsigroup.com/ProductDetail/?pid=000000000030213642">http://shop.bsigroup.com/ProductDetail/?pid=000000000030213642</a></p> <p>Furthermore, for the planting of new trees you should reference BS 8545:2014 Trees: from nursery to independence in the landscape:</p>	<p>A statement has been describing the quality and quantity of the borough’s green space.</p> <p>These are points more appropriately incorporated into the Streetbook SPD and the Local Plan; the comments have been passed on to the relevant team.</p> <p>It is not considered appropriate to reference a British Standard in the SPD in this instance. However, the Woodland Trust’s own guidance will be included as a useful reference in the appendices.</p>
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<http://shop.bsigroup.com/ProductDetail/?pid=000000000030219672>

Flood risk - Trees can reduce the likelihood of surface water flooding in urban situations, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. There is a positive role here for the use of trees with SUDS initiatives.

The Woodland Trust believes that trees and woodlands can also deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events - see the Woodland Trust publications Stemming the flow.

Therefore, the Woodland Trust would like to see trees and woodland more explicitly acknowledged in a new paragraph on Flood Risk, Sustainable Urban Drainage Systems and Water Quality.

Trees and woodland improve air quality by adsorbing pollutants such as sulphur dioxide and ozone, intercepting harmful particulates from vehicle emission, smoke, pollen and dust and of course release oxygen through photosynthesis. This helps to reduce the occurrence of the problems caused by chronic respiratory disease.

Suggest an additional paragraph is added on the benefits of trees and woodland in improving air quality, and Urban Air Quality added as a reference

Furthermore increasing tree cover in urban areas can help mitigate the 'urban heat island effect'.The problem is

These points are covered in the Streetbook and Environmental Design SPDs. Trees are, in this context, considered integral to 'green infrastructure'.

	<p>exacerbated by a lack of green space. Natural green space, and trees in particular, provide both direct cooling from shade (protection from radiant heat and UV radiation) and reduce the ambient temperature through the cooling effect of evaporation and transpiration from the soil and plant leaves.</p> <p>Trees and canopy cover should be explicitly acknowledged within the SPD as being able to help combat the urban heat island effect.</p> <p>The Woodland Trust is a member of the Trees and Design Action Group (TDAG), whose publications are noted in London Plan Policy 7.21. These include Trees in the Townscape8 (TDAG, June 2012) and most recently a practical guide for the retention and planting of trees in urban situations, including new development Trees in the Hard Landscape (TDAG, September 2014).</p>	<p>Relevant documents are included Appendix B References</p>
<p>Philippa Dalton Petchey Islington Ltd Galliard Homes</p>	<p>Section 5.1 of the draft Islington Urban Design Guide (IUDG) giving guidance on Design, specifically Site Layout. Under the sub heading “Natural Surveillance” paragraph 5.1.21 states that:</p> <p><i>"The provision of good pedestrian routes with clear sight lines is a priority. Gated developments fundamentally undermine this principle by obstructing routes, jeopardising safety and security and effectively dividing communities. Gated developments are not supported in Islington, and gating routes is not considered an acceptable solution to overcome the shortcomings of poor site layout."</i></p> <p>The proposed wording represents "<i>absolute prescription</i>" contrary to paragraph 1.2.2 of the draft IUDG</p>	<p>It is a clear priority (in terms of connectivity – promoting walking and cycling – personal safety and social cohesion) to ensure the new developments are integrated within the existing street pattern.</p> <p>The relevant policy ‘objective’ within the SPD (taken from DMP 2.1) is “Development should restore and/or enhance connections between places and tie in with the existing street pattern”. Developers may achieve this in different ways (and each development will be expected to respond positively to its surroundings), however it is the council’s clear view that gated development is counter-productive in this regard as set out in Core Strategy Policy CS9.</p>

	<p>on how the SPD should be used.</p> <p>It provides no flexibility to enable each individual site and context to be considered. For example sites where there are no pedestrian or any other kind of through routes, but there is a need to create secure private spaces (advised at paragraph 5.1.17) and eliminate recesses that offer concealment opportunities (advised at paragraph 5.1.27).</p> <p>Recommend that the word “<i>normally</i>” is inserted before “<i>are not supported in Islington</i>”. This will introduce appropriate flexibility to enable proposals to be considered on a site by site basis and ensure consistency with the stated aims on how the SPD should be used.</p>	
<p>Lucy Bird St William (Berkeley Homes + National Grid)</p>	<p>Whilst Sections 1: Introduction, 2: Planning Policy Context and 3: Islington’s Character provide useful context it is considered that they are too long and could be condensed.</p> <p>Section 4: Key Principles for High Quality Design - Contextual; Connected; Sustainable; and Inclusive. These principles should be balanced with the need to ensure the viability and deliverability of new development.</p> <p>Section 5.1: Urban Structure - It is considered that the Draft SPD is overly focused on ensuring that development is in keeping with the character and built form of the surrounding area. The Draft SPD should recognise that new development can accentuate the sense of place, streetscape and quality of the surrounding built environment and should not seek to stifle architectural ambition.</p>	<p>Noted. It is considered that these sections provide an appropriate level of relevant detail for the SPD.</p> <p>The SPD provides guidance on adopted Local Plan policies, which have been subject to viability testing. Further guidance on the council’s approach to viability on individual applications is provided in the Development Viability SPD.</p> <p>The relevant ‘objective’ that must be achieved is ‘development should address the traditional building hierarchy, respect the established order and local character’ and ‘Development should create and/or enhance good quality public and private open space’. It is possible to ‘address the local character’, on the basis of a sound contextual analysis, without being forced to replicate the neighbouring styles of architecture.</p>

	<p>Similarly, the Draft SPD acknowledges the diversity of the Borough's built environment but fails to promote this sense of diversity in new development, instead focusing on new development replicating existing. In this respect, the Council should ensure that paragraph 2.1.3 is reflected throughout the document.</p> <p>Section 5.1 fails to fully consider circumstances where the existing built environment is of a poor quality. As such it is suggested that the fourth bullet point listed under the Key UDG Objectives (page 21) is amended as follows:</p> <p>“Development should address the traditional building hierarchy, respect the established order and local character provided that they are of a high existing quality.”</p> <p>A new bullet point should also be added to replicate paragraph 65 of the NPPF.</p> <p>Section 5.2 is considered to be overly prescriptive and thus conflicting with paragraph 1.2.2. In particular, there is an over focus on expressing verticality, uniformity and maintaining consistent rooflines which should be balanced with the need to add articulation, variety and interest to new development.</p> <p>Whilst it is understood that more prescriptive planning</p>	<p>The council considers that this paragraph is reflected through the document. Specifically, the introductory paragraphs to Section 4 read: “The SPD draws these threads (<i>contextual, connected, sustainable and inclusive</i>) together by putting forward objectives and design considerations for new development that together aim to create safe and attractive places that are sensitive to Islington's special character, sustainable and inclusive, while also enabling positive changes and allowing creative, contemporary design solutions.”</p> <p>The objective has been clarified to states that development should ‘address the qualities of the traditional building hierarchy.....’</p> <p>There is no need to repeat paragraph 65 of the NPPF, which has already been referenced earlier in the SPD.</p> <p>It is not considered that the section is too prescriptive; all that is required is that proposals achieve the key UDG objectives and the remainder of the chapter provides guidance on how the objectives can be met. All development is expected to be contextual, and references to vertical articulation simply reflect the prevailing residential style in much of the borough.</p> <p>The document simply seeks to amplify policy requirements (by way of objectives to be met and design considerations</p>
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	<p>guidance could be needed within Conservation Areas or other places of heritage merit, it is considered that paragraphs 5.2.56 – 5.2.58 should allow for greater flexibility with regards to materials. It is considered that paragraphs 5.2.56 and 5.2.57 should be amended to remove reference to specific materials, the appropriateness of which will vary for each Development (ie Brick slips, Lime based mortar and traditional bonds such as Flemish or English bonds)</p>	<p>to be taken into account) that are established in DMP 2.1 and provide useful good practice examples. These are examples only of what is generally discouraged or generally encouraged as appropriate to the local context.</p>
<p>Anita Grant Islington Play</p>	<p>I have looked at the document from the point of view of our most vulnerable residents – children</p> <p>Children need to be able to play together with peers and neighbours both for personal development and also to encourage community cohesion- in a borough as divided as Islington this should surely be a core purpose of the authority in all its departments and guises. We have problems with residents complaining about the noise and disturbance of children and young people engaging with their environments and this needs to be challenged at every level by an authority that wishes the best for its youngest residents and indeed for the community at large.</p> <p>The biggest impact on children’s outside play is the car and Islington is very forward thinking in relation to this both in reducing convenience and ensuring good transport links. The next stage is to prioritise children and young people’s well-being over the vehicle. It is well known in social housing that slowing traffic increases social interaction and social wellbeing.</p> <p>It is proven that children who play out often and together with others are incidentally ‘exercising’ as well as developing a myriad of other skills. In a borough with a</p>	<p>Noted</p> <p>Added ‘ car-free... to reduce emissions, improve community safety, deliver playable spaces and promote social cohesion..’ to the section on Movement and Connectivity</p> <p>Noted</p>

	<p>problem of childhood obesity rife a focus on getting children playing is a priority.</p> <p>Children playing outside allows parents to meet their neighbours, installing a sense of camaraderie and forging community links. Children up to the age of 10, and often older, prefer to play outside within sight and sound of their own home. Their parents also feel happier. It is there that they feel secure and know they can run home if they feel in any way threatened or if they've fallen over and grazed a knee.</p> <p>Specific suggestions for additions: More emphasis on the UDG objective DM2.1A(viii) which talks about playable space.</p> <p>2.1.5 add to give consideration to children</p> <p>3.0.1 mention the projected increase in children numbers as outlined by LBI</p> <p>3.2.6 unfairness- this should mention impact on children and young people.</p> <p>4.1.6 Specifically encouraging children to feel able to move around the borough.</p> <p>4.1.11 add children to vulnerable groups.</p>	<p>Noted</p> <p>Noted – this point is developed in the council’s Streetbook SPD and Inclusive Landscape Design SPD</p> <p>This paragraph describes a piece of national planning guidance and transcribes the considerations listed in that document –consideration of and benefits to children are implicit but not explicit in that national guidance.</p> <p>This is an inappropriate level of detail for the SPD. Information on the borough’s demographic (diversity, wealth and deprivation) has been added to the ‘Islington Today’ section</p> <p>Added ‘for all (including children and young people)’</p> <p>Added road safety and legibility at paragraph</p> <p>Children added as a vulnerable group at paragraph</p>
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	<p>5.1.13 add playable (as referenced at 5.1.45)</p> <p>5.1.19 include allowing the children to play.</p>	<p>Reference to playability added at paragraph</p> <p>Playable space added at paragraph</p>
Tristan Gielen Transport for London	No comment	
Cameron Gray	<p>The design criteria for roof extensions in non-conservation areas should be more supportive of mansard roof extensions when it would change an unbroken roofline.</p> <p><i>5.3.22 Where a street frontage benefits from a consistent and unbroken roofline, alterations which would disrupt this consistent roofline and be visible from the public realm need to be designed in a style appropriate to the host building (see below regarding main types of roof extensions characteristic to the borough). Where the extension is not visible from the public realm, for example if it is generously setback from the front parapet, there may be more scope for flexibility in the design.</i></p> <p>The key criterion for me is standardisation of design of the roof extensions when it comes to parapet walls and butterfly roofs. If the designs follow the guidelines it should be written more positively as being acceptable for planning. The reading of it at the moment is still unclear to me. When mansard extensions are done in a standardised way - as per some of the pictures and drawings in the draft Urban Design Guide - they can efficiently increase the stock of family houses in Islington plus enhance the street scape. Additionally by having standardization the planning process will be smoother for residents and the council.</p>	<p>This paragraph and the one before have been rewritten to clarify the guidance, which is that outside conservation areas single storey roof extensions are acceptable in principle, subject to the usual design criteria.</p> <p>It is an important principle of this document that it is not prescriptive; it sets objectives, discussed those aspects of design that should be taken into account and provides good practice guidance.</p>
Elizabeth Dabell	5.1.42 - Where this refers to Category 2 or 3 of the National Housing Standard I think this is incorrect and	The paragraph has been amended.

	<p>should refer to M4(2) or M4(3) of the National Building Regulations Approved Document M. There is no category 2 or 3 referred to in the National Housing Standard.</p> <p>5.2.27 - The penultimate line '...which relied less vertical height differences...' doesn't make sense and needs to be corrected.</p>	<p>The paragraph has been amended to clarify the guidance.</p>
<p>Carla Wright Natural England</p>	<p>We do not wish to provide specific comments, but advise you to consider the following issues:</p> <ul style="list-style-type: none"> <li>• Green infrastructure</li> <li>• Biodiversity enhancement</li> <li>• Landscape enhancement</li> </ul>	<p>These issues are addressed in more detail in the Streetbook SPD and Environmental Design SPD. In this SPD, 'sustainability' is highlighted as a key principle of high quality design and biodiversity considered an important aspect of place making.</p>
<p>Janice Burgess Highways England</p>	<p>No comment</p>	
<p>Keira Murphy Environment Agency</p>	<p>No comment</p>	
<p>Chris Thomas Outdoor Advertising Consultants for British Sign and Graphics Association</p>	<p>We have studied the draft very closely and consider that much of it has merit.</p> <p>Suggest shop front section is renamed 'shop front and advertisement guide'.</p> <p>In paragraphs 5.6.9 and 5.6.20, we agree that fascias should indeed be well-proportioned and in harmony with the other elements of the shopfront (rather than building, although this is also a consideration). But there should not be a requirement that they be 'hand painted on the fascia' or 'individual lettering'. This is excessive as a general requirement, overly prescriptive, impractical in many circumstances. We would suggest that painted or individually applied lettering might be given as examples of</p>	<p>The Association's support is noted.</p> <p>Section subheadings will be revised to reflect the relevance of particular sections to advertisers.</p> <p>The objective to be met is that "New or refurbished shop front designs should respect the local street scene, the building as a whole and its design detail". The further advice provided suggests ways in which that objective can be met in particular in relation to historic/traditional shopfronts. The guidance provided does not only require painted wood, but has also indicated that applied lettering may be appropriate. The text has been amended to remove the word "metal" and replaced with "individually applied</p>

<p>good practice, but not as a general requirement. And why should the fascia be wood and any applied letters be metal? If they are painted or powder coated, the underlying material will not be obvious. Any more modern materials can be finished in matt and give no appearance of being any different to a gloss painted wood or metal. They also have the advantage of being far more sustainable, needing less maintenance than painted wood which will discolour crack and peel over time (particularly in direct sunlight).</p> <p>In paragraph 5.6.20, the SPD might discourage vinyl signage to the inside of shop windows. But such signs have deemed consent under Class 12 in Schedule 3, Part 1 to the Regulations. The SPD should make this clear.</p> <p>Paragraph 5.6.21 Hanging signs with attached lighting troughs and these need not necessarily be “overly bulky”. Each can be determined on merit. The suggested alternative of spotlights on the fascia could create clutter through additional fittings on the fascia along with the necessary wiring etc. On shopfronts without pilasters, cornice or console brackets etc there would be nowhere to conceal of ‘discretely’ attach light fittings. So this restriction should be deleted and left to individual choice of design (and practicality).</p> <p>There should be no absolute restriction on signage to upper floors. This may well be acceptable depending on the circumstances and hanging signs are often (and “traditionally”) displayed above the fascia. Again, this should be determined on merit.</p>	<p>letters”.</p> <p>While it is acknowledged that deemed consent exists, the purpose of the guidance in this section is to set out the council’s view on how shops can best make a positive contribution to the local streetscene and area.</p> <p>The suitability of each proposal will be judged individual merit. The SPD seeks to provide advice on best practice and ideal designs. Spotlights should not attract additional clutter if properly installed, as wiring should be concealed.</p> <p>The proliferation of adverts at higher levels can be detrimental to an area and the SPD seeks to avoid visual clutter. This guidance is in accordance with best practice and in line with adopted policies relating to overall design, shopfronts and adverts.</p>
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	<p>In paragraph 5.6.22, there should be no absolute restriction on internally illuminated signs. Both fascia and projecting internally illuminated signs are commonly now of slimline construction, often fret-cut so that illumination shows through the lettering only, and can be produced in matt finishes. Where possible, fascia signs can also be recessed into the fascia so as to be flush with the shopfront. We accept that such signs should not be “bulky” and we think that this is the main concern. This also applies to trough lighting’ and the same concerns with individual fittings also arise (and what are “traditional” light fittings – surely not swan-neck lamps?!). We therefore suggest that the first sentence of paragraph 5.6.22 be deleted and replaced with:</p> <p><i>“Flashing internally or externally illuminated signs will not be permitted. Bulky fascia or projecting box signs, crudely attached to an existing fascia will also not be permitted. Carefully designed internal illumination, perhaps through individually lit lettering, fascia fret cutting or by ‘halo’, will generally be acceptable, particularly on modern shopfronts. Lighting troughs or other fitments should be discretely designed and sited.”</i></p> <p>In paragraph 5.6.30, we do not generally disagree with the Guidance on corporate styles. But corporate designs do not inevitably have to be adapted as the guidance would suggest. We think that “where necessary” should be added to the end of the last sentence of this paragraph.</p>	<p>Internally illuminated signs can have a detrimental impact, they are generally bulky and detract from historic areas in particular. Modern lighting which does not cause visual clutter and does not result in a bulky sign will generally be acceptable. The text clearly refers to ‘bulky’ through lights and should remain. The text has been amended as follows to reflect suggestions:</p> <p>“Flashing internally or externally illuminated signs and bulky fascia or projecting signs will not be permitted. Internally illuminated signs are often bulky, detract from historic areas and will generally be resisted. However, individually lit lettering, fascia fret cutting or ‘halo’ lighting may be appropriate in some cases particularly on modern shopfronts. Bulky trough lights will not be permitted in sensitive areas and are discouraged elsewhere. Shopfronts should generally be illuminated with either traditional or discrete contemporary light fittings”</p> <p>Signage should always take account of the host building and area.</p>
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## **PART B: PRELIMINARY CONSULTATION**

# Urban Design Guide SPD Preliminary Consultation Statement

## 1. Purpose and background

The statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the requirements for public participation and for preparing a consultation statement. It accompanies a draft Supplementary Planning Document (SPD) which provides guidance on how urban design principles should be applied to ensure that new development successfully contributes to making the borough a better place. The SPD is applicable to all new developments, including alterations and extensions to existing buildings.

This statement sets out details of the preliminary consultation that has taken place which has informed the development and refinement of the draft Urban Design Guide Supplementary Planning Document (SPD). It provides details of who was consulted, how and when to inform the preparation of the SPD, what main issues were raised during the public consultation stage and how those issues have been addressed in the draft SPD.

## 2. Preliminary consultation

The council conducted a preliminary consultation exercise on a discussion paper between 8 December 2014 and 30 January 2015. Respondents were invited to answer ten questions, and an online questionnaire mirroring the questions posed in the discussion paper was also set up using Survey Monkey. This was accessible via the SPD webpage on the council's website.

The council targeted this public consultation to all of those individuals and organisations registered on planning policy consultation database (over 1700 registered). Where email addresses were not available, letters were sent.

In total, 22 responses were received; 15 written consultation responses and seven online questionnaire responses. These responses, and the council's response to them, are collated in the table in Appendix 1. A meeting with Islington amenity groups was also held, with the Islington Society, Amwell Society, Canonbury Society, DOCOMOMO and Upper Street Association in attendance, and the issues raised at this meeting have also been taken into account in the draft SPD.

## 3. Analysis of preliminary consultation responses

The 22 responses were received from a range of respondents. Detailed responses were received from: The Islington Society; English Heritage; Montagu Evans; Savills; and DOCOMOMO. There were 10 other, essentially single issue, responses, and seven local residents responded to the online survey. Responses, broadly speaking, fell into the following categories:

- The level of prescription perceived in the advice given.
- The precision of language used
- Resistance to gated development
- A desire to see greater emphasis on contemporary and alternative site layouts
- The importance of developments' environmental/thermal performance
- The economic realities of redevelopment/refurbishment/home/estate improvement
- The need for a relaxation of domestic design restrictions to meet burgeoning demand

## 4. Next Steps

This consultation statement will be updated following public consultation on the draft SPD. A full consultation statement detailing work undertaken and responses received at both preliminary consultation and full consultation stages will be published alongside the final Urban Design Guide SPD.

**Appendix 1: Council response to written and online consultation responses to Discussion Paper and issues raised during public meetings**

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
<b>Written responses</b>		
<p><b>Islington Society</b></p>	<p>We are not convinced that the revised SPD should be called the Islington Design Guide (para 2.6). ‘Design’ is a broad church covering areas not associated with the built environment, such as interior design of offices and reception areas and such as graphic design of leaflets and signage, amongst others. Islington <i>is</i> an urban area and the appendage ‘Urban’ seems appropriate to this guide to the quality of the built environment.</p> <p>We agree that the aim should be to avoid unnecessary <i>prescription</i>, so long as the <i>guidance</i> is clear and robust</p> <p><b>Section 3.3</b> Para 1. Remove the specific reference to ‘brick slips’ and replace with ‘thin brick cladding’.</p> <p>Remove prohibition on ‘metal cladding and .... rendered surfaces ...’. <i>Well designed and detailed</i> contemporary treatments and materials <i>might</i> be permitted.</p> <p>Para 2. Contradicts prohibition in para 1.</p> <p>Para 3. We entirely agree with the ‘tenure blind’ policy.</p> <p><b>Section 3.4</b> A distinction needs to be made between outbuildings ancillary to the residential use that are permitted under PD rights and Garden Rooms that need Planning Permission.</p> <p><b>Section 3.5</b> A ‘good proportion of the original garden’ is a bit vague and may need clarification.</p> <p>It should be made clear that ‘keeping something low’ doesn’t mean that sinking it or digging a basement.</p> <p>We don’t agree that a garden room <i>has</i> to be kept well away from a</p>	<p>The document will retain the title ‘Islington’s Urban Design Guide SPD’</p> <p>Guidance is based on achieving clear outcomes.</p> <p>Guidance on the use and detailing of particular materials has been updated in the draft SPD to improve clarity. There is a greater emphasis on detailing and workmanship in the revised draft.</p> <p>The guidance refers only to those developments that require planning permission; the distinction is made clear in the draft.</p> <p>Diagrams are provided to clarify the criteria set, whilst avoiding unnecessary prescription. There is an emphasis throughout on the importance of sustainable and inclusive design.</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p>boundary wall, if it doesn't involve raising the boundary wall in any harmful way. A shed tucked away at the bottom of a garden is often a good place for it, as is a building across the bottom of a garden.</p> <p><b>Section 3.6</b> We agree that a balance between reducing energy consumption and safeguarding the visual and historic environment is needed.</p> <p><b>Section 3.7</b> Para 3. We recommend that a requirement to demonstrate a positive energy reduction benefit is included in any application to permit them, especially in the case of Listed Buildings.</p> <p>Paras 4 &amp; 5. In the case of existing buildings, there should be a presumption in favour of retaining existing. Decayed windows, both timber and metal, can be readily repaired, usually more cost effectively (cheaply) than replacement windows, retaining their embedded energy.</p> <p>Para 6, etc. We welcome the guidance demanding a justification of the use of uPVC windows.</p> <p><b>Sections 3.8 to 3.13</b> Para 3.11 Add "and damage to tree roots" after "vegetation in gardens".</p> <p><b>Section 3.14</b> We agree that it is sensible to incorporate the Shopfront Design Guide in this SPD.</p> <p><b>Section 4.2</b> We entirely support the presumption against gated communities. This applies equally to retro-fitting to existing residential developments. We specially deplore the Council's installation of defensive barriers to its own estates; examples are at Popham Street, N1 and Holbrooke Court, N7</p> <p><b>Section 4.3</b> In principle, we agree that such a revision appears sensible, but we await the revised guidance for comment.</p> <p><b>Section 4.4</b> In some Conservation Areas, too, there may be scope for revising the guidance for rear roof extensions by a clearer definition of 'long views' (as distinguished from 'distant views across gardens')</p>	<p>The guidance provided in the draft SPD balances the council's conservation, environmental and inclusive design priorities</p> <p>The Basement SPD (adopted January 2016) sets out comprehensive guidance on where and how subterranean development is acceptable.</p> <p>Support for strengthening guidance in respect to gated developments noted.</p> <p>This scope for a clearer definition of "long views" will be considered when the relevant Conservation Area Guidelines documents are</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p><b>Section 4.9</b> The wording of the proposed guidance is good.</p> <p><b>Section 4.11</b> Remove “both above and below ground”, which is unnecessary and implies acceptance of subterranean developments.</p> <p>Remove “the street scene” (since by definition rear extensions are not on the street); add instead “adjacent and surrounding buildings”</p> <p><b>Section 4.13</b> Change “(overlooking and visual amenity)” in last line to “(visual amenity and overlooking, including gardens and their peaceful enjoyment)”</p>	<p>revised.</p> <p>The relevant guidance in the current draft refers to the impact on neighbouring properties. This is considered a sufficient and appropriate planning consideration.</p>
<p><b>Amwell Society</b></p>	<p>It may make sense to consider applications for two-storey, full-width rear extensions on their merits outside of conservation areas. We can see no benefit in encouraging such applications within conservation areas, where they are almost certain to be turned down.</p> <p>We are strongly opposed to gated developments, not only in the area surrounding Amwell Street, but throughout the Borough. We support your aim of strengthening the guidelines in this respect</p>	<p>Diagrams are provided to clarify where and how rear extensions may be acceptable.</p> <p>Support for strengthening guidance in respect to gated developments noted.</p>
<p><b>The Upper Street Association</b></p>	<p>We strongly support the Council’s decision to review the Guide.</p> <p>Welcome new firmer guidance on shop fronts.</p> <p>Agree firm guidance needed on materials to protect context and quality.</p> <p>Support suggested guidance on garden rooms</p> <p>Disagree with the relaxation of protection of designated protected rooflines</p> <p>Would like the amenity of neighbours’ expressly to be taken into account in any application for extensions.</p> <p>Context must be taken into account, and neighbours’ views and amenity re balconies and roof terraces.</p>	<p>General support noted.</p> <p>The revised guidance continues to protect unbroken roof lines in conservation areas but only unbroken front rooflines elsewhere. Proposals to alter rear rooflines will be permitted in principle but will be subject to the usual quality controls.</p> <p>The amenity of neighbouring properties is a key consideration in the guidance provided on the design and detailing of rear extensions and balconies/roof terraces.</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
<p><b>The Canonbury Society</b></p>	<p>The current guide is useful because it is prescriptive – e.g. it comments on heights of extensions and the referencing of space between side extensions and the next door house.</p> <p>We don't agree that 'self-coloured' rendered surfaces are always preferable to painted cement or lime based render. In the Canonbury Conservation Area, there are a lot of houses whose lower and upper ground floors are front rendered and painted in this way. We don't believe this is particularly onerous in terms of maintenance and can look much more attractive than self-coloured surfaces.</p> <p>We welcome the tightening of policy on garden rooms</p> <p>The proposed guidance on basements is inadequate and insufficient. In particular, the proposed guidance does not include the point about gardens in paragraph 3.11</p> <p>We welcome the greater planning status afforded to shop front design.</p> <p>We welcome the slight tightening of policy on rear extensions.</p> <p>We support your three main considerations re balconies and terraces.</p>	<p>General support noted. However, an overly prescriptive approach is counter to the National Planning Policy Framework (NPPF). The draft SPD sets out clear criteria-based guidance.</p> <p>Guidance on the use and detailing of particular materials has been updated in the draft SPD to improve clarity. There is a greater emphasis on detailing and workmanship in the revised draft.</p> <p>The Basement SPD (adopted January 2016) this sets out comprehensive guidance on where and how subterranean development is acceptable.</p>
<p><b>English Heritage</b></p>	<p>English Heritage supports the creation of this document and we are generally of the view that it supports the Borough's Core Strategy Policy CS9.</p> <p>Materials - in the context of heritage assets "new materials should be appropriate to the significance of the heritage assets".</p> <p>What is meant by the test of "demonstrable value" in respect of external cladding?</p> <p>It is inappropriate to say that uPVC windows are unacceptable in the setting of heritage assets (re NPPF and PD rights). Suggest uPVC use is tested against the significance of heritage assets including their setting. See Climate Change and Your Home website <a href="http://www.climatechangeandyourhome.org.uk/live/">www.climatechangeandyourhome.org.uk/live/</a></p>	<p>General support noted.</p> <p>Guidance on the use and detailing of particular materials has been updated in the draft SPD to improve clarity. There is a greater emphasis on detailing and workmanship in the revised draft.</p> <p>Guidance on the specification of replacement windows has been updated in the draft SPD to improve clarity.</p> <p>The Basement SPD (adopted January 2016) sets out comprehensive guidance on where and how subterranean development is acceptable, including in regard to listed buildings.</p> <p>Improved illustration has been a key objective in the production of the revised draft.</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p><b>Section 3.12</b> We would recommend that the following sentence is amended to read “The significance of listed buildings may include...that potential”. This better acknowledges the wider range of significance that may be present in a designated heritage asset and the possibility that the plan form in some instances may not be of significance.</p> <p>Basements – please add “the proposed development’s ability to conserve the historic interest of the building” ... This would ensure that in the case of an existing historic basement any features of historic interest would be conserved or enhanced.</p> <p>We support the inclusion of the shop front design guidance.</p> <p>Guidance on the design and construction of rooflines not covered by a designation is welcome.</p> <p>Good practice/implementation illustrations should include examples of historic building</p> <p>Reference should be made to the Building Heights Planning Advice Note.</p>	
<b>Canal and River Trust</b>	The guide should promote the use of the canal for heating and cooling canal side development	This is outside the scope of the SPD.
<b>Local resident</b>	The eighteenth and nineteenth century conception was that the roofs and the dormers within them were subservient to the grand architectural composition of the public, set-piece, uniform composition of Georgian houses in terraces. In terraces like those in Islington, Lambeth, Southwark, Hackney etc. dormers, where there were any, were <i>informal</i> elements and generally <i>mismatched</i> the formal arrangement and regular composition of the houses below. They were regarded as utilitarian illumination of the service rooms located in the attic. English Heritage’s December 1989 “Mansard Roofs” guide illustrates seven examples.	It is understood that historically windows to mansards were often off centre in relation to the windows to the main elevation. However, it would be difficult to demonstrate harm from windows aligned with windows to the main elevation.
<b>Montagu Evans</b>	Character can vary greatly across a borough such as Islington and it is necessary to have a degree of flexibility in policies so that the local	

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p>character and distinctiveness can be responded to.</p> <p>In other words, we do not see the ability for there to be varying interpretations of design parameters to be necessarily negative as it can facilitate architects' and designers' creativity and ultimately result in better design.</p> <p>Materials – It is not clear what is meant by 'authentic'.</p> <p>Guidance should be positive - requesting that justification be given for the use of particular materials because the acceptability or otherwise of any material will depend on a variety of factors such as local context, the design rationale for the proposal, the type of building, use and energy-efficiency considerations.</p> <p>Garden rooms – 'a good proportion' is not an objective measure.</p> <p>Energy saving - there should be a clearer indication of how the sometimes-competing aims of the relevant 'parent' policies will be balanced against each other</p> <p>The proposed guidance states that alternatives to replacement windows will be encouraged, particularly in conservation areas. This ignores continued improvements in technology which may make replacement windows more appropriate. Conservation area designation should not be an impediment to their use.</p> <p>Gated communities – if the Council is to prescribe a set of layout considerations to which developers will have to pay regard then they must be consulted on</p> <p>Roof extensions - it should be acceptable to restore features such as dormer windows and roof lights on heritage assets even if they have been previously completely removed.</p> <p>Rear extensions – Do these provisions apply only to terraced houses or to all properties. If the latter then the guidance is over-restrictive.</p> <p>Balconies – The guidance that these should be integral to the building's</p>	<p>The section on Islington's character and distinctiveness has been significantly enhanced to account for recent development trends including social and economic factors.</p> <p>An overly prescriptive approach is counter to the NPPF. The draft SPD therefore sets out clear criteria-based guidance. The guidance provided balances the council's conservation, environmental and inclusive design priorities.</p> <p>Guidance on the use and detailing of particular materials has been updated in the draft SPD to improve clarity. There is a greater emphasis on detailing and workmanship in the revised draft.</p> <p>Guidance on the specification of replacement windows has been updated in the draft SPD to improve clarity.</p> <p>Guidance on the delivery of permeable development has been strengthened in the revised draft to clarify the approach to site layout and street design.</p> <p>Diagrams are provided to clarify where and how rear extensions and roof extensions may be acceptable.</p> <p>The guidance for the design of balconies and roof terraces is rooted in existing planning policies including those that seek to enhance the sustainability and accessibility of the built environment.</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	structure rather than hung off its elevation is unjustifiably prescriptive. And guidance that they should not compromise the thermal performance or accessibility of the facility is dealt with by building control.	
<b>Local resident</b>	All restrictions on rooflines should be removed and all roof extensions should be assessed on merit	A case by case approach to assessing applications without clear guidance would not address the cumulative impacts of such development in a clear, equitable or consistent manner, and therefore is not a reasonable approach that would support delivery of policy objectives and prevent unacceptable impacts. In the interest of preserving the quality and amenity of borough's conservation areas, restriction is necessary.
<b>Local resident</b>	Resistance to gated communities should be strengthened.  Dormers should be set within the roof plane.	Diagrams are provided, clarifying the criteria to be met when proposing roof extensions and dormer windows.
<b>Local resident</b>	All restrictions on rooflines should be removed and all roof extensions should be assessed on merit	A case by case approach to assessing applications without clear guidance would not address the cumulative impacts of such development in a clear, equitable or consistent manner, and therefore is not a reasonable approach that would support delivery of policy objectives and prevent unacceptable impacts. In the interest of preserving the quality and amenity of borough's conservation areas, restriction is necessary.
<b>Savills on behalf of Ashburton Trading, Islington Holdings Ltd, and Parkhurst Road Ltd</b>	There is a need for the Council to thoroughly review the guidance in light of the new policy and guidance context, and to consider whether the SPD can be withdrawn altogether.  If the guidance is to remain it must be sufficiently flexible to allow urban design to respond to changing circumstances and site specific circumstances.  Our primary concern relates to the intended revisions in relation to materials.  It is proposed that 'metal cladding, large areas of glazed curtain walling, and concrete or rendered surfaces' are unlikely to be acceptable'. However, the adopted Urban Design Guidance (2006) shows examples	The guidance provided is rooted in existing planning policies and provides clear criteria to enable developers to make successful applications.  An overly prescriptive approach is counter to the NPPF. The draft SPD therefore sets out clear criteria-based guidance. The guidance provided balances the council's conservation, environmental and inclusive design priorities.  The revised draft balances a concern for the borough's existing fabric with an appreciation of and vision for contemporary/future development.  Guidance on the use and detailing of particular materials has been

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p>of buildings that are clearly contemporary in design and use contemporary materials that reflect the construction used.</p> <p>Unless a conservation area appraisal specifically highlights brick as a characteristic of the area and thus its special character it is not appropriate to impose the use of materials generally across the borough</p> <p>The proposed wording is overly prescriptive, and fails to acknowledge the boroughs successful contemporary buildings, Finsbury Health Centre, Angel Building, City University School of Social Sciences, City and Islington College, St Mary Magdalene Academy and The Emirates Stadium and associated buildings.</p> <p>The emphasis must be on quality of materials and details.</p>	<p>updated in the draft SPD to improve clarity. There is a greater emphasis on detailing and workmanship in the revised draft.</p> <p>The section on Islington's character and distinctiveness has been significantly enhanced to account for recent development trends, including social and economic factors.</p>
<b>DOCOMOMO</b>	<p>I have strong reservations about the prescriptive approach and apparent certainty about what is good and bad in design in many areas of the Guide.</p> <p>The hostility of the Guide to incidental open spaces or open spaces on housing estates. This attitude has contributed to the loss of such spaces which have been a critical benefit -derived from a Modern Movement approach to design - which was subsequently lost by in-filling.</p> <p>The Borough has a substantial heritage of Modern Movement buildings by Tecton and successor practices, two of which are specifically criticised in the current UDG. Islington has a significant amount of Modern Movement development of quality, such as King Square, which is roundly criticised in para 2.2.5 of Section 2, and compared unfavourably to Highbury Fields. King Square is a dramatic composition which derives its drama from the contrasts of scale and provides a much increased amount of open space as compared to the former King Square central garden - a wonderful asset, even if the architecture itself is not of highest quality.</p> <p>The Modern Movement sought to get away from perimeter planning for</p>	<p>Concern noted. An overly prescriptive approach is counter to the NPPF. The draft SPD therefore sets out clear criteria-based guidance.</p> <p>Guidance on the preservation and enhancement of genuine greenspace has been strengthened in the revised draft.</p> <p>The section on Islington's character and distinctiveness has been significantly enhanced to account for recent development trends, including social and economic factors, and also to better articulate the objectives which various design approaches sought to archive. A best practice example has also been provided to demonstrate sensitive infill on a post-war housing estate that improves the quality of the open space.</p>

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	<p>various reasons:</p> <ul style="list-style-type: none"> <li>• The technical facility to build taller would result in dark/ canyon-like streets ... streets and courtyards would have to be much wider in order to compensate</li> <li>• Corridor streets are noisy and polluted – buildings need to withdraw from them.</li> <li>• A more spatially varied urban landscape is possible and preferable to the ‘endless spread of corridor streets’.</li> <li>• the ability to build taller facilitated the creation of more spacious layouts with greener space around each building and with lighter sunnier accommodation with a better view than was possible with ground-hugging 2-3 storey terrace housing..</li> </ul> <p>E.g. the Barnsbury Estate where the blocks are set back from the street and provide ‘ample green space, as compared to the rather dismal internal yards of the pre-war parts of the estate. These areas are not designated as public open space and so are vulnerable to development.</p> <p>E.g the Copenhagen Street frontage of the Barnsbury Estate and the courtyard between and green strip frontage to the ‘two-towers’ on Pentonville Road.</p> <p>The ‘Modern Movement’ approach can be disruptive when inserted into an established and coherent historic ‘perimeter’ area but the UDG also calls for the re-creation of it e.g. the streets in Isledon Village do not look very lively but rather lacking in greenery. The proposed layout for the Market Estate shows perimeter blocks ‘with a vengeance’, where only a small proportion of the flats to be built will look out over the green space and the remainder into narrow almost treeless streets or lifeless internal courtyards, and the ‘twin-fronted block’ illustrated on page 84 has always seemed to me absolutely deplorable - a cheap piece of building with vulgar anodised finishes and monotonous facades that fills its site completely with no shred of a concession to open space or greenery.</p> <p>The green space on the existing Market Estate (Page 86) with a cross as being undesirable looks to me rather attractive.</p>	<p>Guidance on the delivery of permeable development has been strengthened in the revised draft to clarify the approach to site layout and street design to ensure that new developments are permeable, safe and inclusive as well as providing for sufficient light and air to penetrate the buildings, surrounding streets and any open space, and an appropriate height: width ratio between the building frontage and the street.</p>

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	<p>At 250 City Road, we will get a 9-storey perimeter block around an inadequately small and overshadowed green space, with canyon-streets beyond, and with further 31-storey towers on top of that - disastrous for the urban environment all round and probably for the occupants....In this context the 'perimeter block' model is no longer viable or desirable...I cannot see how the IUDG policies could be applied to such a scheme at all, certainly none are shown.</p> <p>The old Perimeter Block model cannot and does not always meet the needs and pressures of the 21st century city.... the Urban Design Guide should show greater recognition of the merits and potential of the alternatives - of the Modern or Spatial City.</p>	
<b>Local Resident</b>	<p>Mansard roof extensions should be viewed more positively. Many families would much rather add a mansard to increase space (than move).</p> <p>The current requirement does not seem to make much sense because some streets are wider than others, so where all mansards in the Arlington area are visible, in St Peter's they are nearly always invisible.</p> <p>Mansards, in the view of some, enhance the style of buildings (and have been used in Britain since the 17<sup>th</sup> century), streets would look better with consistent mansards than they look today, given the inconsistency of previous consents.</p> <p>The design standard should enable mansards to be built with sufficient interior ceiling height so that the new accommodation is proportionate and comfortable. It is nonsensical to require, on grounds of exterior visibility, respecting such a low ridge-line that either one has to walk about stooped, or reduce the ceiling height of the rooms below</p>	Noted. Diagrams are provided, clarifying the criteria to be met when proposing roof extensions and dormer windows.
<b>Survey Monkey</b>		
7 respondents – all local residents	<p><i>Q1: Is the proposed guidance on the specification of materials adequate and sufficient?</i></p> <p>43% yes 57% no</p>	Guidance on the use and detailing of particular materials has been updated in the draft SPD to improve clarity. There is a greater emphasis on detailing and workmanship in the revised draft.

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	<p>“Assuming only the section in bold is the new guidance, the terms used - authentic, high quality, robust, and sustainable are all very subjective and need a considerable amount of clarification to define what they mean. Specific examples should be set out. All materials can be done well or badly with the final result depending on the overall design and detailing. Even high quality e.g. expensive bricks can look terrible if the overall design is poor.”</p> <p>“The guidance on materials is not well informed. The presumption in favour of self-coloured renders is inappropriate and cannot be justified. Self-coloured renders age badly and attract atmospheric pollution giving facades a tired and dirty appearance soon after construction. There are many examples of this across Islington (see for example the N1 centre). Mineral/cement-based (and painted renders) retain their appearance much longer and can be maintained cheaply and easily by redecorating. Using mineral paints (rather than acrylic paints) on cement renders can extend a fresh and clean visual appearance of facades for many years. The presumption against metal cladding is too strong. Metal ages well, generally integrates well with a historic built context and performs very well as a component in contemporary sustainable construction systems. The presumption against exposed concrete is out-dated and should be removed. Some of London's most notable and innovative buildings – many of them now listed - feature exposed concrete surfaces”</p>	
	<p><i>Q2: Is the proposed guidance on the scale and quality of garden rooms adequate and sufficient?</i></p> <p>71% yes 29% no</p> <p>“clarity on what reasonable distances are and low height are required”</p> <p>“it should stress absolutely and categorically that garden rooms are NOT acceptable, unless severe reason is shown why it was needed. Then the remainder of the text in 3.5 can stand”</p>	<p>Diagrams are provided to demonstrate what might be considered reasonable.</p> <p>Garden rooms that occupy less than 50% of the garden and are less than 2.5m high are permitted development anywhere within the site boundary of a single dwelling house.</p>
	<p><i>Q3: Is the proposed guidance on the installation of energy saving measures adequate and sufficient?</i></p>	<p>Noted. An example has been provided.</p>

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	<p><b>71% yes 29% no</b></p> <p>“examples of successful over-cladding and retrofit works would be very helpful”</p> <p>“The guidance on windows is good.”</p> <p>“Double glazing is the only thing that produces a significant reduction in energy consumption and should be permitted (with sensible exceptions for listed buildings).”</p>	
	<p><i>Q4: Is the proposed guidance on the excavation of basements adequate and sufficient?</i></p> <p><b>71% yes 29% no</b></p> <p>“build times for basement extensions should be limited to 3 months, a has huge effect on neighbours”</p> <p>“The guidance on basements is adequate”</p> <p>“The issue of significance for listed buildings could be expanded on further”</p> <p>“It should be mentioned, that - under no circumstances - should trees be felled, roots cut off or gardens amended to enable the works to take place. It should be made as undesirable as possible to even consider basement extensions”.</p>	<p>The Basement SPD (adopted January 2016) sets out comprehensive guidance on where and how subterranean development is acceptable, including in relation to listed buildings and impact on trees.</p>
	<p><i>Q5: Is the proposal to incorporate the council’s guidance on the design of new and refurbished shop fronts within a revised IUDG SPD acceptable?</i></p> <p><b>100% yes</b></p>	
	<p><i>Q6: Are the designated protected rooflines adequate and sufficient?</i></p>	<p>Diagrams are provided on the acceptable configuration of mansard and other roof extensions.</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p><b>50% yes 50% no</b></p> <p><i>Q7: Is the proposed guidance on the design and construction of roof extensions adequate and sufficient?</i></p> <p><b>17% yes 83% no</b></p> <p>“full mansard extensions in keeping with traditional construction methods and window layouts should be approved automatically. The current policy of ‘set back extensions’ creates a mish-mash of compromised construction and reduces the habitable floor area of the borough. An approved design would create continuity and additional floor space that would benefit growing families in particular”</p> <p>“full width box extensions should be banned. This part of the guide will arguably have most potential impact on the urban scene, albeit mainly on the rear of terraces. As many examples good and bad should be provided to try and improve design quality and provide a reasonable extension without irreparably damaging the integrity of a building.”</p> <p>“London is experiencing unprecedented growth and a significant proportion of Islington residents are overcrowded. This impacts the well-being of a new generation of children growing up in Islington. In reality buildings are not perceived in elevation. Where roof extensions are carefully proportioned, set-back and of high quality design they are one of the most sustainable forms of development capable of providing additional living space with minimal impact on the townscape. Indeed, many of Islington's most elegant squares and streets have seen additional floors/roof extensions added during the 19th Century and these have become a regular feature in conservation areas. The guidance as proposed is still too restrictive. With much of Islington's housing in conservation areas, a pragmatic approach should be taken allowing roof extensions across Islington (except for listed buildings) whilst carefully controlling the design, proportions, materiality and arrangement in relation to the existing building. Haringey, Hammersmith and other London Councils are recognizing the pressure on residential space and are embracing the opportunities brought about by a pro-active and positive attitude towards roof extensions”</p>	<p>The revised guidance continues to protect unbroken roof lines in conservation areas but only unbroken front rooflines elsewhere. Proposals to alter rear rooflines will be permitted in principle but will be subject to the usual quality controls.</p>

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	<p>“it’s all a little too late. The damage is already being done.”</p> <p>“Mansard roof extensions should be relaxed. The reality of pressures on housing means they are increasingly necessary. Especially for two/three storey terraces an extension can make them a true family home. The council could provide a number of approved frontage designs that home owners would have to stick to so that uniformity is protected.”</p>	
	<p><i>Q8: Is the proposed guidance on the design and construction of rear extensions adequate and sufficient?</i></p> <p><b>29% yes 71% no</b></p> <p>“properties on the border of hackney should have more relaxed planning as hackney seems to have absolutely no consideration for their wellbeing and outlook”</p> <p>“What would typically constitute a "good proportion" of rear garden space?”</p> <p>“slightly larger extensions could be allowed if the design quality is good enough and as many examples of this as possible should be provided”</p> <p>“We benefit from a varied and diverse building stock in Islington. Favours rear extensions on the staircase side of a terraced building limits the potential for the design to recognize the restrictions and opportunities of each specific typology and site. Greater harm can be caused by prescribing the position of extensions rather than by judging the merit of individual proposals”</p> <p>“It should be made as undesirable as possible, with the introduction: "Rear extensions are only approved in extremely rare circumstances”</p> <p>“You should consider relaxing constraints on building extra levels on rear stacks.”</p>	<p>Diagrams are provided to clarify where and how rear extensions may be acceptable.</p> <p>An overly prescriptive approach is counter to the NPPF. The draft SPD sets out clear criteria-based guidance, and each proposal is assessed contextually with reference to these criteria.</p>

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
	<p><i>Q9: Is the proposed guidance on the design and construction of balconies and roof terraces adequate and sufficient?</i></p> <p><b>67% yes 33% no</b></p> <p>“expand on thermal performance and accessibility”</p> <p>“Projecting balconies maximise site-yield, positively animate facades and maximise self-policing of public spaces. Projecting balconies also enhance the amenity of the outside space created compared to inset balconies. There are myriad examples of award-winning contemporary buildings in London where projecting balconies positively enhance the street scene. A general presumption against projecting balconies is not justifiable and the requirement to integrate balconies in the building structure should be omitted”</p> <p>“Again, it needs to be made a difficult as possible to approve balconies and roof terraces, as noise restrictions and those governing light pollution would not be enforceable”</p>	<p>Criteria for accessibility and thermal performance are set out in the revised draft.</p> <p>An overly prescriptive approach is counter to the NPPF. The draft SPD sets out clear criteria-based guidance, and each proposal is assessed contextually with reference to these criteria.</p> <p>Such an approach would run counter to enabling principle of national policy direction.</p>
	<p><i>Q10: Are there any further changes to the guidance provided by the Islington Urban Design Guide would you like to see?</i></p> <p>“The requirement for new homes to provide dual aspect (CS9 – F) is desirable, but not achievable on many constrained sites in Islington. To maximise site yield smaller units should be exempt from having to be double aspect and site constraints should be taken into account where new homes are provided as change of use and/or infill development.”</p> <p>“It should be made as unattractive as possible and very, very expensive to undertake any work to modify existing buildings or landscapes, especially with the "Right to build". Also, noise and environmental protection impacts need to be carefully studied.”</p>	<p>In the interests of natural ventilation, the requirement that all new dwellings are dual aspect is an adopted Core Strategy and Development Management Policy. An SPD cannot change adopted development plan policies.</p> <p>An overly prescriptive approach is counter to the NPPF. The draft SPD sets out clear criteria-based guidance, and each proposal is assessed contextually with reference to these criteria.</p>