

# Bunhill and Clerkenwell Area Action Plan Modifications for consultation



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# 1 Introduction

- 1.1 This document contains all the changes (known as modifications) to the Finsbury Local Plan proposed since the document was submitted to the Planning Inspectorate for Examination in February 2020.
- 1.2 Modifications are identified as being 'Main' or 'Minor'. The Minor Modifications do not materially affect the substance of the plan, its overall soundness or the submitted sustainability appraisal. The Minor Modifications relate to points of clarification, factual updates and typographical or grammatical errors. The reasons for making each of the changes are clearly set out.
- 1.3 This document is accompanied by schedules setting out relevant changes on the Site Allocations and Bunhill and Clerkenwell Area Action Plan. An update to the Sustainability Appraisal/IIA and relevant changes to the Policies Map have also been published.

## **Format of changes**

The following format has been used to set out what the changes are and distinguish between existing and new text

**Bold blue** – new text proposed

~~Strikethrough red text~~ – text proposed for removal

Changes to diagrams, tables etc described in *italic text*

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
BC-MO1	11	1.36	<p><i>Amend text as follows:</i></p> <p>There are 11 conservation areas either fully or partially within the AAP area, covering 50% of the area. Each of these conservation areas have detailed <del>management plans</del> <b>design guidelines</b> to guide development.</p>	Clarification. Islington has design guidelines for all conservation areas but no separate appraisals or management plans.	Minor
BC-MO2	18	BC1 d(ii)	<p><i>Amend text as follows:</i></p> <p>(ii) where a particular site is considered more suitable for other types of business floorspace such as <del>B1(c)light industrial or research and development</del> space. In such cases, the relevant percentage/requirement set out in Part B or C would apply to total business floorspace rather than office;</p>	Update to reflect introduction of Class E	Main
BC-MO3	19	BC1, supporting text New paragraph 2.7 and 2.8	<p><i>Amend text as follows:</i></p> <p><b>2.7 On 1 September 2020 the Government introduced new Use Class Order changes, including the creation of the new commercial Class E. Class E now includes office use alongside a broad range of other commercial uses including light industrial, retail, café, indoor leisure activities and health facilities.</b></p> <p><b>2.8 Class E means office floorspace in the area can change to other Class E uses without requiring planning permission. Large scale loss of office floorspace would impact the important employment, office, and knowledge economy function of Bunhill and Clerkenwell, Islington, and the Central Activities Zone. The knowledge economy is a key driver of job creation and prosperity in Islington and supports a network of service and related industries. Development of office floorspace is also essential to support small and medium enterprises, provide affordable workspace, and to provide training opportunities. The Bunhill and Clerkenwell Area Action Plan recognises how supporting uses, including those in Class E such as cafes, restaurants, bars, pubs, shops, and gyms add vitality and viability to the area. Development of these supporting uses is encouraged as part of office led mixed use schemes under policy BC1. Due to the constrained number of new development opportunities in Central London the Council's approach is to allow smaller proportions of these supporting uses alongside larger amounts of office floorspace to protect the employment function of the area. The flexibility class E provides is recognised, however without some proportionate measures, Class E would significantly reduce the Council's ability to proactively plan for Bunhill and Clerkenwell and meet identified employment needs as required by national policy. The Council has no powers to prevent existing office stock from changing to other Class E uses, however new build office floorspace will be secured as office use through the use of planning conditions. The Council will secure this new office floorspace to meet demand for employment floorspace which will support business, economic growth, and create jobs, in line with objective 2 of the Local Plan to deliver an inclusive economy. This policy, in addition to policies B1 and B2 in the Strategic and Development Management Policies is a targeted approach where business floorspace is delivered and retained where it is most needed. Policy BC1 will secure development of new high specification office accommodation in the Bunhill and Clerkenwell AAP area, ensuring supply and allowing business to take advantage of the central London agglomeration benefits..</b></p>	Update to reflect introduction of Class E	Main
BC-MO4	19	2.8, 2.9, 2.10,	<p><i>Amend text as follows:</i></p>	To reflect introduction of Class E	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			<p>2.8 Considering this context, the key objective for the Bunhill and Clerkenwell AAP is to protect the predominant business role of the area by affording strong protection to existing business floorspace and prioritising growth in new business floorspace – particularly <b>B1(a)</b> office floorspace – across the area. The AAP provides further detail to heighten the priority for business uses in the area.</p> <p>2.9 Development of <b>B1(a)</b> office uses in the AAP area is also essential to contribute to the unique agglomeration of business and supporting uses of the CAZ, Tech City, and the City Fringe Opportunity Area, contributing to London’s role as a world city and maximising the competitiveness of the economy of the borough.</p> <p>2.10 There may be limited circumstances where the Council will prioritise uses other than <b>B1(a)</b> office in the AAP area, as set out in policy BC1 Part D. This may include locations where other typologies of business space are preferable to meet specific demand, such as <b>B1(c)</b> light industrial, <del>and/or</del> hybrid space, <b>or research and development space.</b></p>		
BC-MO5	21	BC2 Culture, retail and leisure uses	<p><i>Amend text as follows:</i></p> <p><b>Retail and leisure uses:</b>  A. The Council encourages <del>development</del> <b>the locating of new of</b> retail and leisure uses <b>in the AAP area</b> in <del>predominantly commercial areas, including</del> the four Local Shopping Areas.</p> <p><b>Cultural uses:</b>  B. The Clerkenwell/Farringdon Cultural Quarter is the focus for cultural uses <b>in the AAP area. In the AAP area</b> <del>Such cultural</del> uses <b>should only be located</b> <del>may also be suitable in other</del> <b>outside of the Clerkenwell/Farringdon Cultural Quarter if no suitable sites can be identified within this area as demonstrated by a sequential assessment provided by the applicant.</b> <del>predominantly commercial areas, pending assessment of sequentially preferable sites within the cultural quarter.</del></p> <p><b>Retail, leisure, and cultural uses in the AAP area:</b>  C. Areas which are predominantly residential will be considered less appropriate locations for retail, <del>food and drink, cultural,</del> leisure, and <del>entertainment</del> <b>cultural</b> uses.  D. Where suitable in line with Parts A <del>and/or</del> B, proposals involving new retail, <del>food, drink, entertainment and/or leisure, and</del> cultural uses in the AAP area will be permitted where:  (i) they would not individually or cumulatively harm the vitality, viability, character, function or amenity of the area, in particular residential amenity or the primary office function;  (ii) they would not result in a harmful concentration of night time economy uses, particularly premises licensed to sell alcohol; and  (iii) the operation of the use does not impact affect use of the public realm by other users, particularly more vulnerable users.  E. Active frontages must be provided for proposals for <b>retail, leisure, and</b> cultural uses. <del>e, retail and leisure uses.</del></p> <p>2.132.15 <b>Retail, leisure, and C</b><del>cultural uses</del><del>e, retail and leisure uses</del> are important for the functioning of the AAP area. They are employment generating and contribute to economic growth, although in the context of the area, they are considered to be supporting uses for the primary office function.</p>	Consistency and clarity , and to reflect introduction of Class E	Main
BC-M06	21	Footnote 10:	<p><i>Amend text as follows:</i></p>	Update to reflect introduction of Class E	Main

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			<p>“See policies R1 and R10 of the Local Plan - Strategic and Development Management Policies DPD for information on identifying what constitutes a cultural use. <b>Retail use is for the retail sale of goods, other than hot food shops as defined in Class E(A). This includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes. Leisure uses refer to food and drink uses as defined within Class E(b) some indoor recreational activities falling within E(d) and some Sui Generis uses including drinking establishments including pubs and wine bars, hot food take aways, live music venues, cinemas, concert halls, nightclubs and theatres. Retail and leisure uses fall within the A1-A5 and D2 Use Classes, and some Sui Generis uses akin to these uses, such as nightclubs and theatres</b>”</p>		
BC-M07	23	2.20	<p>The AAP area borders the City of London’s Culture Mile to the south, which is developing as a major destination for culture and creativity in the Square Mile and stretches from Farringdon to Moorgate. The area will be host to a programme of events and installations and will also benefit from further investment including public realm improvements. Significant changes are anticipated as part of the Culture Mile project, including the <b>proposed</b> relocation of the Museum of London to Smithfield; the potential development of a new Centre for Music on the site of the existing Museum of London, and the <b>possible</b> moving of Smithfield Meat Market from its current location. These changes will likely result in increased pedestrian activity and footfall in the area.</p>	Responding to the City of London representation.	Minor
BC-M08	28	BC3 supporting text	<p><i>Amend text as follows:</i></p> <p>3.11 Given its location, and given the limited number of potential large development sites in the area, the Moorfields site represents a unique opportunity to provide a large quantum of additional <b>B-use office</b> floorspace, which would enable the expansion of this internationally important business location. The Council’s ambition for the Moorfields site is to create a new business quarter, with a diverse range of business premises and a high quality public realm, in line with key principles set out in Site Allocation BC38.</p>	Update to reflect introduction of Class E	Main
BC-M09	33	BC4 and supporting text	<p><i>Amend text as follows:</i></p> <p>G: The Council supports greater public access around the basin with a wider ambition to link into the Regent’s Canal pathways. Proposals for <b>boater facilities and</b> residential moorings, including those which meet an identified housing need for boat dwellers, will <b>only</b> be permitted where:</p> <ul style="list-style-type: none"> <li>(i) supporting uses and facilities are in place from the first use of the mooring;</li> <li>(ii) public access to and along the towpath is not impeded;</li> <li>(iii) they do not hinder navigation along the waterway;</li> <li>(iv) there is no impact on leisure provision; and</li> <li><b>(v) there is no detrimental impact on air quality, nature conservation/ and biodiversity value of and the character and amenity of the waterway corridor, including its function as public open space.</b></li> </ul> <p><b>H: In addition to part G above:</b></p> <ul style="list-style-type: none"> <li><b>(i) Development in the canal corridor should be consistent with the City Road Basic Waterspace Strategy.</b></li> <li><b>(ii) Development of boater facilities will only be acceptable where there is an identified need, which may include being identified in the London Mooring Strategy.</b></li> <li><b>(iii) Development of residential moorings must be located on the south of the canal (off-side) and supporting uses and facilities must be in place before the first use of the mooring.</b></li> </ul>	In response to the representation from the Canal and River Trust	Main

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			<p>Supporting text (new paragraph added):</p> <p><b>13.32 The Council will undertake a waterspace strategy for use of the City Road Basin in partnership with the Canal and River Trust. This will provide a framework for making future decisions about the operation of the City Road Basin waterspace for different uses. Residential Moorings including those which meet an identified housing need for boat dwellers. Boater facilities for the canal corridor includes infrastructure such as mooring points, water and electrical supply, and waste collection and does not include the development of buildings, which in accordance with policy G2 should not be developed on significant private open spaces including the canal corridor.</b></p>		
BC-M10	38	3.37	<p><i>Amend text as follows:</i></p> <p>An improved, high quality public realm should create a series of integrated, linked and high quality public spaces, including neighbouring spaces such as Clerkenwell Green. The provision of adequate facilities for passengers is also important, including a need for publicly accessible toilets. <b>The Council will work with the City of London to manage the likely significant increase in pedestrian movements in the vicinity.</b></p>	Responding to the City of London representation.	Minor
BC-M11	48	3.66	<p><i>Change to update Scheduled Monuments information. St John's Gate was de-scheduled from being a scheduled monument, but remains a Grade I listed building. Changes are set out below and reflected in policies map changes. Amend text as follows:</i></p> <p>3.66 The area includes a number of Conservation Areas, <del>and</del> listed buildings, and a <del>two</del> Scheduled Monuments <b>(the Benedictine nunnery of St Mary, Clerkenwell the Nunnery of St. Mary de Fonte and St. John's Gate,</b> as shown on the Policies Map). Its significant historic value (which is acknowledged to be of London-wide importance) is well recognised, but is undermined in some places by the poor quality of the public realm and dominance of vehicular traffic. Development which comes forward within the Spatial Strategy area should, as a starting point, be based on the principle of conserving heritage assets, i.e. historic buildings, structures or places). Heritage assets can add to the economic viability of development and improve the cultural offer to both local residents and visitors. Policy DH2 of the Strategic and Development Management Policies DPD requires submission of a heritage statement as part of planning applications.</p>	In response to Historic England Regulation 19 comments, and to update the BCAAP to reflect current heritage status of sites.	Main
BC-M12	52	Policy AAP1 and supporting text	<p><i>Amend text as follows:</i></p> <p>A. The Local Plan will deliver its objectives and priorities by ensuring that sites allocated for specific uses <b>within Bunhill and Clerkenwell AAP</b> actually deliver particular types of development in line with the allocations. Proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted.</p> <p>B. <b>Allocated uses which fall within a broader use class (i.e. office or retail uses which sit within use class E) will be secured for the specific allocated use at planning stage. This is to ensure that development contributes towards meeting Islington's identified development needs.</b> Where <del>the</del> site allocations are expressed more broadly in terms of use class, there may be some flexibility regarding a range of acceptable uses, subject to compliance with all relevant Local Plan policies.</p>	Update to reflect introduction of Class E	Main

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			<p>4.4 On 1 September 2020 the Government introduced new Use Class Order changes, including the creation of the new commercial Class E. Class E now includes a broad range of commercial uses previously grouped in separate use classes. Class E includes office, light industrial, shops, cafés and restaurants, gyms, health facilities, day centres, creches, and nurseries. Under the new Use Class Order regulations change of uses within Class E do not require planning permission. This could have significant consequences for the Council’s ability to meet its evidenced development need, particularly for office floorspace, as well as for the availability of services valued by residents such as shops, health clinics and day centres.</p> <p>4.4 Islington is a geographically small with a dense built form, high population density, and high land values. The borough has a comparatively small supply of large development sites from which it can meet its identified needs including for homes and jobs. In response to this constrained supply the Council allocates a large number of development sites, including many smaller sites. In order for the Local Plan to deliver its objectives and priorities, and given the shortage of available land in the borough and the potential impacts of use class E, it is necessary to ensure that where sites are allocated for specific uses actually deliver particular types of development in line with the allocations. Therefore, on the majority of sites the allocations explicitly identify which uses are required, e.g. offices and residential. These uses have been established through consideration of priority development needs and the context of each site; proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted. <b>In line with this, to ensure that priority uses are delivered, where an allocated use (e.g. offices or retail) falls within a broader use class the Council will require the specific allocated use to be secured at planning stage.</b></p> <p>4.54.7 <del>In a small number of cases, the</del> <b>Some</b> site allocations are less specific, e.g. they allocate for “commercial uses”, which allows some flexibility regarding acceptable uses, subject to compliance with all relevant Local Plan policies.</p>																																																																																			
BC-M13	57	Table 4.2 Site Capacity Assumptions	<p>Delete existing table:</p> <table border="1"> <thead> <tr> <th></th> <th>Years 1-5</th> <th></th> <th>Years 6-10</th> <th></th> <th>Years 11-15</th> <th></th> <th>Total</th> <th></th> </tr> <tr> <th></th> <th>Homes</th> <th>Offices (sqm)</th> <th>Homes</th> <th>Offices (sqm)</th> <th>Homes</th> <th>Offices (sqm)</th> <th>Homes</th> <th>Offices (sqm)</th> </tr> </thead> <tbody> <tr> <td>B &amp; C: City Fringe Opportunity Area</td> <td>-60</td> <td>-63,100</td> <td>--</td> <td>-61,600</td> <td>--</td> <td>-18,500</td> <td>-60</td> <td>-143,200</td> </tr> <tr> <td>B &amp; C: City Road</td> <td>-340</td> <td>-21,500</td> <td>--</td> <td>-500</td> <td>--</td> <td>--</td> <td>-340</td> <td>-22,000</td> </tr> <tr> <td>B &amp; C: Farringdon</td> <td>--</td> <td>-13,300</td> <td>--</td> <td>--</td> <td>--</td> <td>-1,000</td> <td>--</td> <td>-14,300</td> </tr> <tr> <td>B &amp; C: Mount Pleasant and Exmouth Market</td> <td>-190</td> <td>-7,300</td> <td>--</td> <td>-1,600</td> <td>--</td> <td>--</td> <td>-190</td> <td>-8,900</td> </tr> <tr> <td>B &amp; C: Central Finsbury</td> <td>-250</td> <td>-6,100</td> <td>--</td> <td>-1,500</td> <td>--</td> <td>--</td> <td>-250</td> <td>-7,600</td> </tr> <tr> <td>B &amp; C: Historic Clerkenwell</td> <td>--</td> <td>-4,500</td> <td>--</td> <td>-900</td> <td>--</td> <td>--</td> <td>--</td> <td>-5,400</td> </tr> <tr> <td>Total</td> <td>-840</td> <td>-115,800</td> <td>--</td> <td>-66,100</td> <td>--</td> <td>-19,500</td> <td>-840</td> <td>-201,400</td> </tr> </tbody> </table> <p>Replace with the following table:</p>		Years 1-5		Years 6-10		Years 11-15		Total			Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)	B & C: City Fringe Opportunity Area	-60	-63,100	--	-61,600	--	-18,500	-60	-143,200	B & C: City Road	-340	-21,500	--	-500	--	--	-340	-22,000	B & C: Farringdon	--	-13,300	--	--	--	-1,000	--	-14,300	B & C: Mount Pleasant and Exmouth Market	-190	-7,300	--	-1,600	--	--	-190	-8,900	B & C: Central Finsbury	-250	-6,100	--	-1,500	--	--	-250	-7,600	B & C: Historic Clerkenwell	--	-4,500	--	-900	--	--	--	-5,400	Total	-840	-115,800	--	-66,100	--	-19,500	-840	-201,400	Updated to reflect current development progress.	Main
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				Years 1-5		Years 6-10		Years 11-15		Total			
			Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)			
			B & C: City Fringe Opportunity Area	60	72,200	-	61,600	-	18,500	60	152,300		
			B & C: City Road	690	21,500	-	500	-	-	690	22,000		
			B & C: Farringdon	-	22,700	-	-	-	1,000	-	23,700		
			B & C: Mount Pleasant and Exmouth Market	190	9,400	-	1,600	-	-	190	11,000		
			B & C: Central Finsbury	310	6,100	-	700	-	-	310	6,800		
			B & C: Historic Clerkenwell	-	4,500	-	900	-	-	-	5,400		
			<b>Total</b>	<b>1,260</b>	<b>136,500</b>	<b>-</b>	<b>65,400</b>	<b>-</b>	<b>19,600</b>	<b>1,260</b>	<b>221,200</b>		
BC-M14	58	Site Allocation BC1, BC2, BC3, BC4, BC5, BC6, BC7, BC9, BC10, BC11, BC13, BC14, BC15, BC16, BC17, BC18, BC21, BC23, BC24, BC25, BC26, BC28, BC29, BC30, BC31, BC34, BC35, BC37, BC38, BC39, BC40, BC41, BC42, BC43, BC47.	<p><i>Each of these site allocations has the same typographical error in the Development Considerations, amend text as follows:</i></p> <p>Upgrades to the wastewater network may be required as a result <b>of</b> development on this site</p>								Error	Minor	
BC-M15	59	Site Allocation BC2	<p><i>How the site was identified and relevant planning history, amend text as follows:</i></p> <p>2013 Site Allocation (BC6) and planning permission P2013/1089/FUL, <b>amended by P2016/2994/S73</b>.</p>								Updated details	Minor	
BC-M16	59	Site Allocation BC2	<p><i>Amend allocation and justification as follows:</i></p> <p>The site has hybrid planning permission for the development of four blocks ranging in height from 7 to 42 storeys to provide up to 995 residential units, <del>7,600</del> <b>8,413sqm</b> of B1 floorspace and a mix of other uses. Should the site be subject to further amendments or new applications, the Council will seek to maximise provision of genuinely affordable housing and affordable workspace.</p>								Correction	Minor	
BC-M17	65	Site Allocation BC5	<p><i>Current/previous use, amend text as follows:</i></p> <p>Further education <del>(D1)</del></p>								To reflect introduction of Class E	Minor	
BC-M18	69	Site Allocation BC8	<p><i>How was the site identified and relevant planning history, amend text as follows:</i></p>								Update planning details.	Minor	

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			2013 Site Allocation (BC24) TfL are undertaking a comprehensive highway and public realm improvements to the area to improve the public realm, conditions for walking and cycling, and the station environment. The works involve the closure of the north-western arm of the roundabout, creating a two-way road system, with the roundabout becoming a peninsula. Much of the work is being undertaken under TfL's permitted development rights. Two planning permissions were required: P2015/5222/FUL for new a station entrance to the south-east at Cowper Street (approved 2016) and P2019/0528/FUL for construction of a new station entrance to provide access to St. Agnes Well and Old Street Station (approved 2019).		
BC-M19	77	Site Allocation BC12	Current/previous use, amend text as follows:  University teaching facilities <del>(D1)</del>	To reflect introduction of Class E	Minor
BC-M20	81	Site Allocation BC13, Allocation and Justification	Amend the text as follows:  The site has planning permission for the development of a 61- bedroom hotel, 35 residential units, 1,954sqm office (B1) floorspace, 80sqm retail (A1) floorspace, 1,536sqm restaurant (A3) floorspace and 263sqm leisure (D2) floorspace.  Should the site be subject to further amendments or new applications, the Council will seek <del>redevelopment to provide an office development including affordable workspace and small scale business uses</del> redevelopment to provide a mixed use development which includes a significant amount of office floorspace including affordable workspace and small scale business uses. Additional residential use may be acceptable.	To recognise that residential use may be acceptable as part of a development which provides a significant amount of office floorspace.	Main
BC-M21	82	Site Allocation BC15	How was the site identified and relevant planning history, amend text as follows:  <del>2013 Site Allocation (BC34) and planning application P2017/2961/FUL (granted subject to legal agreement, March 2018)</del> 2013 Site Allocation (BC34) and planning permission P2017/2961/FUL (permission granted and construction started in 2018)	To update planning application implementation status	Minor
BC-M22	85	Site Allocation BC17	How was the site identified and relevant planning history, amend text as follows:  2013 Site Allocation (BC36) and planning permission P120484. <b>Construction started. A S73 application was approved in March 2020 for minor material amendments (P2019/2991/S73).</b>	To update planning application implementation status	Minor
BC-M23	86	Site Allocation BC18	How the site was identified and relevant planning history, amend text as follows:  2013 Site Allocation (BC37) and pPlanning permission P121162	Clarification.	Minor
BC-M24	88	Site Allocation BC19	Current/previous use, amend text as follows:  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M25	90	Site Allocation BC20	Current/previous use, amend text as follows:  Current/previous use: Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M26	91	Site Allocation BC21	Current/previous use, amend text as follows:  Current/previous use: Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M27	91	Site Allocation BC21	How the site was identified and relevant planning history, amend as follows:	Updated details	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			Planning permission P112478 ( <del>now lapsed</del> ) <b>Planning permission P2016/3353/FUL to provide a 6-storey building accommodating 1,307sqm office 243sqm retail at ground level, granted 2018, under construction.</b>		
BC-M28	93	Site Allocation BC23	<i>Current/previous use, amend text as follows:</i>  Offices ( <del>B1</del> )	To reflect introduction of Class E	Minor
BC-M29	100	Site Allocation BC27	<i>Amend allocation and justification as follows:</i>  Healthcare and community uses ( <del>D1</del> )	To reflect introduction of Class E	Minor
BC-M20	102	Site Allocation BC28	<i>Current/previous use, amend text as follows:</i>  Offices ( <del>B1</del> )	To reflect introduction of Class E	Minor
BC-M31	102	Site Allocation BC29	<i>Current/previous use, amend text as follows:</i>  Tribunal hearing centre ( <del>D1</del> )	To reflect introduction of Class E	Minor
BC-M32	102	Site Allocation BC29	<i>Allocation and justification, amend text as follows: :</i>  Redevelopment for office use, subject to justifying the loss of social infrastructure in line with relevant Local Plan policies. Mixed-use office/ <del>D1</del> <b>social or community use</b> development may also be acceptable where retention of social infrastructure is required on site.	To reflect introduction of Class E	Minor
BC-M33	105	Site Allocation BC31	<i>Allocation and justification, amend text as follows:</i>  Intensification of business use, particularly industrial uses such as <del>B1(e)</del> <b>light industrial</b> . Proposals must ensure at least no net loss of existing industrial use.	To reflect introduction of Class E	Minor
BC-M34	105	Site Allocation BC31	<i>Amend allocation and justification as follows:</i>  Intensification of business use, particularly industrial uses such as <del>B1(e)</del> light industrial. Proposals must ensure at least no net loss of existing industrial use.	To reflect introduction of Class E	Minor
BC-M35	106	Site Allocation BC32	<i>Current/previous use, amend text as follows:</i>  Offices ( <del>B1</del> )	To reflect introduction of Class E	Minor
BC-M36	107	Site Allocation BC33	<i>Current/previous use, amend text as follows:</i>  Offices ( <del>B1</del> )	To reflect introduction of Class E	Minor
BC-M37	108	Site Allocation BC34	<i>How the site was identified and relevant planning history, amend as follows:</i>  Planning <del>application</del> <b>permission</b> P2017/3103/FUL ( <b>granted 2018</b> )	Updated details	Minor
BC-M38	108	Site Allocation BC34	<i>Current/previous use, amend text as follows:</i>  Offices ( <del>B1</del> ) and financial and professional services ( <del>A2</del> )	To reflect introduction of Class E	Minor
BC-M39	109	Site Allocation BC35	<i>Current/previous use, amend text as follows:</i>  Offices ( <del>B1</del> )	To reflect introduction of Class E	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
BC-M40	111	Site Allocation BC36	<i>Current/previous use, amend text as follows:</i> Office and light industrial <del>(B1)</del> . Part of the site is used for the London Metropolitan Archives.	To reflect introduction of Class E	Minor
BC-M41	114	Site Allocation BC38	<i>Amend allocation and justification as follows:</i>  ...This site is, therefore, required to deliver a very substantial quantum of <del>B1</del> office floorspace, a large proportion of which is expected to be Grade A office space. A range of unit types and sizes, including a significant proportion of small units, particularly those suitable for SMEs, must be provided.  Active <b>shops, cafes and restaurants, or drinking establishment A1, A3 and/or A4</b> uses will be sought on the ground floor as part of any future development proposal.  A substantial amount of affordable workspace at peppercorn rent must be delivered as part of the <del>B1</del> office floorspace, as well as a proportion of affordable retail units.	To reflect introduction of Class E	Minor
BC-M42	117	Site Allocation BC39	<i>How the site was identified and relevant planning history, amend as follows:</i>  Planning <del>applications</del> <b>permissions</b> P2017/1103/FUL (refused) and P2018/1578/FUL (granted March 2019)	Updated details	Minor
BC-M43	119	Site Allocation BC41	<i>Current/previous use, amend as follows:</i>  <del>D1</del> education use	To reflect introduction of Class E	Minor
BC-M44	120	Site Allocation BC42	<i>How the site was identified and relevant planning history, amend as follows:</i>  London Borough of Islington's Call for Sites/planning <del>permission application</del> P2017/3389/FUL (granted subject to completion of legal agreement, February 2018)	Error	Minor
BC-M45	122	Site Allocation BC44	<i>Current/previous use, amend text as follows:</i>  <del>(B1)</del> <b>Offices</b>	To reflect introduction of Class E	Minor
BC-M46	124	Site Allocation BC46	<i>Current/previous use, amend text as follows:</i>  University teaching facilities <del>(D1)</del> and ancillary uses	To reflect introduction of Class E	Minor
BC-M47	124	Site Allocation BC46	<i>How the site was identified and relevant planning history, add text as follows:</i>  <b>P2019/1124/FUL extension to library, granted 2019.</b>	Updated planning history.	Minor
BC-M48	127	Site Allocation BC49	<i>Amend allocation and justification as follows:</i>  Intensification for business use, particularly <del>B1(e)</del> <b>light</b> industrial uses.	To reflect introduction of Class E	Minor
BC-M49	128	Site Allocation BC50	<i>Amend allocation and justification as follows:</i> Higher education and medical and research uses, alongside improvements to increase permeability through the site. Development on the site may include some <del>B1(a)</del> office space and <del>B1(b)</del> research space linked to overarching higher education, medical, and/or research uses. The Council will resist development of additional student accommodation on the site; however, development which rearranges the existing quantum of provision of student accommodation may be acceptable.	To reflect introduction of Class E	Minor
BC-M50	130	Site Allocation BC51	<i>Current/previous use, amend text as follows:</i>  <del>D1</del> <b>Education</b>	To reflect introduction of Class E	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification																
BC-M451	130	Site Allocation BC51	<p><i>Amend allocation and justification as follows:</i></p> <p>Retention of <b>D4 social and community</b> infrastructure use unless the loss of <b>social and community infrastructure D4</b> use can be robustly justified, in which case office development would be required in this location.</p>	To reflect introduction of Class E	Minor																
BC-M52	131	Site Allocation Monitoring	<p><i>New section to be added after paragraph 5.2:</i></p> <p><b>5.3 The list of indicators to be used for monitoring of the Local Plan is set out in Section 10 of the Strategic and Development Management Policies document. This list includes indicators to monitor implementation of the Bunhill and Clerkenwell Area Action Plan, also set out in Table 10.1 below.</b></p> <p><b>Table 10.1 Bunhill and Clerkenwell AAP Monitoring Indicators</b></p> <table border="1"> <thead> <tr> <th>Policy Reference</th> <th>Proposed indicator(s) if applicable</th> <th>Target/milestone/success factor (if applicable)</th> <th>Source of data</th> </tr> </thead> <tbody> <tr> <td><b>BC1 Prioritising office use</b></td> <td><b>Office floorspace as a proportion of total floorspace completed in major developments in the City Fringe Opportunity Area and across rest of Bunhill and Clerkenwell AAP area.</b></td> <td><b>90% office in the City Fringe Opportunity Area and 80% elsewhere in the Bunhill and Clerkenwell AAP area.</b></td> <td><b>London Planning Datahub, Islington Development Management</b></td> </tr> <tr> <td><b>BC2 Culture, retail and leisure uses</b></td> <td><b>New major cultural floorspace completed in the cultural quarter.  New major retail and leisure floorspace completed in the Local Shopping Areas.</b></td> <td><b>New cultural uses located in the Cultural Quarter unless sites are not available or appropriate.  New retail and leisure uses located in the Local Shopping Areas.</b></td> <td><b>London Planning Datahub, Islington Development Management</b></td> </tr> <tr> <td><b>BC1 Prioritising office use and</b></td> <td><b>Sqm of floorspace completed against site</b></td> <td><b>Percentage of floorspace completed from each site capacity assumption</b></td> <td><b>London Planning Datahub, Islington</b></td> </tr> </tbody> </table>	Policy Reference	Proposed indicator(s) if applicable	Target/milestone/success factor (if applicable)	Source of data	<b>BC1 Prioritising office use</b>	<b>Office floorspace as a proportion of total floorspace completed in major developments in the City Fringe Opportunity Area and across rest of Bunhill and Clerkenwell AAP area.</b>	<b>90% office in the City Fringe Opportunity Area and 80% elsewhere in the Bunhill and Clerkenwell AAP area.</b>	<b>London Planning Datahub, Islington Development Management</b>	<b>BC2 Culture, retail and leisure uses</b>	<b>New major cultural floorspace completed in the cultural quarter.  New major retail and leisure floorspace completed in the Local Shopping Areas.</b>	<b>New cultural uses located in the Cultural Quarter unless sites are not available or appropriate.  New retail and leisure uses located in the Local Shopping Areas.</b>	<b>London Planning Datahub, Islington Development Management</b>	<b>BC1 Prioritising office use and</b>	<b>Sqm of floorspace completed against site</b>	<b>Percentage of floorspace completed from each site capacity assumption</b>	<b>London Planning Datahub, Islington</b>	To update monitoring indicators in light of Class E policy modifications	Main
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			Site Allocations	capacity assumptions set out in the Local Plan	Percentage of 400,000sqm B1a floorspace provided during plan period	Development Management		
BC-M53	136	Appendix 1, Scheduled Monuments	<p><i>Change to update Scheduled Monuments information. St John's Gate was de-scheduled from being a scheduled monument, but remains a Grade I listed building. Changes are set out below and reflected in policies map changes. Amend text as follows:</i></p> <p><del>"1. St. John's Gate (St. John's Square no. 25)</del>  <del>2. Nunnery of St. Mary de Fonte (Clerkenwell Close nos. 35-42, 44, 46-48, 53-55, St. James' Church and Garden, bollards; Clerkenwell Green nos. 43-47; St. James' Walk nos. 1 and 3; Sans Walk no. 3; Newcastle Row; Scotswood Street)</del>  <b>Benedictine nunnery of St Mary, Clerkenwell.</b>  <b>Extent marked on the Policies Map and map available on the Historic England website. Site reference 1002003."</b></p>				In response to Historic England Regulation 19 comments, and to update the BCAAP to reflect current heritage status of sites.	Main
BC-M54	141	Glossary and Abbreviations  Term: Business floorspace/buildings/development/uses	<p><i>Amend text as follows:</i></p> <p><b>Office, research and development and light industrial aActivities as well as industrial uses B2 general industrial and B8 storage and distribution, and Sui Generis industrial uses.</b> <del>or uses that fall within the B-use class.</del> Sui <del>generis</del> Generis uses which are akin to business floorspace, such as depots or builders merchants, can be classed as business floorspace for the purposes of the Local Plan.</p>				To reflect introduction of Class E	Main
BC-M55	144	Glossary and Abbreviations  Term: Entertainment uses	<p><i>Amend text as follows:</i></p> <p><del>Entertainment uses generally fall within the A3, A4 and A5 uses; live music and dance venues (D2 use); and nightclubs, casinos and amusement arcades (Sui Generis uses), as defined under the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments. Depending on their impact, other uses may also be considered to fall within this definition, such as private members' clubs, restaurants and casinos in hotels, and premises that contain a mix of retail and entertainment (Sui Generis uses).</del>  <b>Entertainment uses include restaurants and cafes, pubs and bars, hot food take aways, live music and dance venues, nightclubs, casinos, and amusement arcades. Depending on their impact other uses may also be considered to fall within this definition, such as private members' clubs, restaurants and casinos in hotels, and premises that contain a mix of retail and entertainment.</b></p>				To reflect introduction of Class E	Main
BC-M56	144	Glossary and Abbreviations  Term: Function	<p><i>Update text as follows:</i></p> <p>In relation to a specific area, function is defined as that areas predominant role, although some areas can have supporting functions. For example, Islington's town centres all have an overtly <del>A1</del> retail function but some also have a distinct cultural or night-time economy element. The introduction of certain uses can undermine the function of an area and cause harmful impacts either individually or cumulatively.</p>				To reflect introduction of Class E	Minor
BC-M57	147	Glossary and Abbreviations  Term: Hybrid space	<p><i>Update text as follows:</i></p> <p>The main feature of hybrid space is that it straddles different <del>B-use classes</del> <b>business floorspace uses</b>. It is often created in older industrial building stock which has been repurposed for more modern industrial uses, but can also be provided in newly developed space. Hybrid space is space suitable for industrial activities/occupiers that 'serve the services', meaning that they provide services which support the expanding central London business market, and the wider London economy. Hybrid space must have a</p>				To reflect introduction of Class E	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			predominantly industrial function, which could combine features of light industrial, studio and production space, as well as storage and logistics; however, it can include supporting/complementary elements of office provided they are ancillary. As such, hybrid space is likely to be considered a Sui Generis use. Fundamentally, hybrid space must be conducive to occupation by a range of industrial and light industrial users due to its flexible design.		
BC-M58	148	Glossary and Abbreviations  Term: Industrial floorspace/buildings/development/uses/land	<i>Amend text as follows:</i>  Activities or uses that fall within light industrial ( <del>B1e</del> ), general industry (B2) and storage and distribution (B8) uses, <b>Sui Generis industrial uses</b> , and some <del>Ssui G</del> generis akin to industrial uses such as depots and builder's merchants.	To reflect introduction of Class E	Main
BC-M59	150	Glossary and Abbreviations  Term: Office-led development	<i>Amend text as follows:</i>  Development where the majority of floorspace/uses is offices <del>s within use class B1(a)</del>	To reflect introduction of Class E	Minor
BC-M60	152	Glossary and Abbreviations  Term: Retail floorspace/buildings/development/uses,	<i>Amend text as follows:</i> <del>Activities or uses that fall within the A1 use class.</del> <b>Uses for the display or retail sale of goods, other than hot food, principally to visiting members of the public - as defined in Class E(A). This includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes.</b>	To reflect introduction of Class E	Main
BC-M61	153	Glossary and Abbreviations  Term: Social and community infrastructure	<i>Amend text as follows:</i> Infrastructure that is available to, and serves the needs of, local communities and others, which is often funded in some way by a grant or investment from a government department, public body and/or the voluntary sector. Social and community facilities comprises a wide variety of facilities/buildings including those which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres; education and training facilities including early years providers, nurseries, schools, colleges and universities; children and young peoples' play facilities; health facilities; youth centres; libraries; community meeting facilities; community halls; places of worship; sport, leisure and recreation facilities; and policing facilities. Social and community infrastructure generally falls within Use Classes <del>G2, D1 or D2</del> , <b>E, F.1 or F.2</b> and possibly some Sui Generis uses. This list is not intended to be exhaustive and other facilities can be included as social and community infrastructure.	To reflect introduction of Class E	Minor