

Appendix 3

Evidence to support the making of an Article 4 Direction to remove the Class MA permitted development right in Fonthill Road and Camden Passage Specialist Shopping Areas.

Introduction

1. Islington has two Specialist Shopping Areas (SSAs) in two of its four town centres. These SSAs constitute small areas predominantly along the singular streets they are named after. Both Camden Passage and Fonthill Road SSAs provide unique offers within Angel Town Centre and Finsbury Park Town Centre respectively and both sit within Primary Shopping Areas (PSA). The spatial extent of PSAs are required to be defined as per NPPF paragraph 86. PSAs are where retail uses are concentrated in town centres and Islington's PSAs have been drawn to reflect this.
2. This appendix sets out the range of evidence that demonstrates Class MA would result in wholly unacceptable impacts to the SSAs themselves and the town centres they are part of. National, London and Local Plan policy relevant to the SSAs will also be expanded on, demonstrating the policy basis for protection of Camden Passage and Fonthill Road SSAs. The following will illuminate that in Islington's context, Class MA would have the opposite effect to a central aim of the permitted development right – 'revitalising high streets'.

SSAs in the retail hierarchy

3. In terms of the retail hierarchy, Islington has four town centres which are located along historic transport routes. Islington's 40 Local Shopping Areas (LSAs), second in the retail hierarchy, support the offer of town centres and provide for the day to day needs of the borough's residents. Town Centres and LSAs serve the different communities and workers across the borough. Having a comprehensive spread of town centres and LSAs is important in terms of providing a range of access to goods and services across the borough, and supports a sustainable pattern of development, reducing the need to travel by car which contributes to tackling climate change and congestion.
4. Primary Shopping Areas (PSAs) have been redrawn as part of the Local Plan review, since the move away from Primary and Secondary Frontages in the 2018 NPPF. Islington's PSAs are accessible by multi-mode public transport, have a conducive public realm to shopping and leisure uses, and most importantly a concentration of retail and supporting uses. If these centres lose a critical mass of town centre uses, people will be forced to travel further for goods and services. The economic output of these centres and attractiveness as a business environment will be greatly reduced. SSAs are crucial assets of Angel and Finsbury Park Town Centres and support their overall viability and vitality.
5. Camden Passage and Fonthill Road SSAs are introduced here. However, the appendix starting at '**Retail Mix**' below and the text thereafter will discuss the SSAs together, focusing on elements including '**Unit Size Breakdown**'; '**Vacancy**'; '**Social Value**'; '**Supporting Evidence**'; '**Wholly unacceptable adverse impacts of Class MA**'; and '**Policy**'. The Area Assessments at the end of Appendix 3 will focus on specific evidence and conclusions for the SSAs separately.

Camden Passage SSA context

6. Camden Passage Specialist Shopping Area – is partly within the CAZ. The northern part of the Camden Passage Specialist Shopping Area, equating to around two thirds of the SSA is however outside the CAZ. It is proposed this is included in the Article 4 Direction, due to this SSA working as a coherent entity. The SSA makes up a very small proportion of Angel Town Centre and to disaggregate part of it would jeopardise the retail offer and critical mass of retail uses that is required to retain the area as a destination and supporting feature for the viability of Angel Town Centre as a whole.
7. Camden Passage is an established SSA and features as number one in Visit London Official Visitor Guide for 'best independent shopping in London'¹.

Fonthill Road SSA context

8. Fonthill Road Specialist Shopping Area is unique to Islington and also constitutes a very small proportion of Finsbury Park Town Centre. An Article 4 Direction here is necessary due to the densely developed series of retail units providing significant character that supports Finsbury Park Town Centre's viability, the opportunities for local economic betterment and the patronage of local residents in need of good quality, affordable clothing.
9. A 2015 survey of retail operators commissioned by Islington Council, found that the two largest retail groups in the Finsbury Park were fashion retailers (36%) and food/drink retailers (24%), both occupying Class E and at risk of being lost because of high residential land values and short-term economic shocks.

Retail mix

10. Islington Council's Retail and Leisure Study 2017 identified Fonthill Road as the best performing retail area within the Finsbury Park Town Centre. Retail survey data 2022 shows that Fonthill Road SSA has approximately **81%** of its total units in retail use. The Council is working to enhance Fonthill Road, supporting the clothing businesses to become more self-sufficient and attract new customers. It is therefore warranted that a 75% threshold would accommodate supporting service and leisure uses to further animate Fonthill Road without compromising its core retail function.
11. Camden Passage SSA has approximately **64%** of its total units in E(a) retail use. The minimum target level of 75% retail for both SSAs is appropriate because this threshold works to address the unique needs of both SSAs. Conversely Camden Passage, with an E(a) retail mix below 75% would benefit from an aspirational 75% minimum threshold target as Camden Passage itself and the surrounding area has strong competition from leisure food and drink offers, making the preservation of the retail function paramount in sustaining Angel's unique selling proposition.

Unit size breakdown

12. Analysis of unit sizes using the London Town Centre Health Check Analysis Report² demonstrates significant vulnerability to the Class MA PDR in both Camden Passage

¹ [Best independent shopping in London - Shopping - visitlondon.com](https://www.visitlondon.com/en-gb/whats-on/what-to-do/where-to-go/shopping/best-independent-shopping-in-london)

² [London Town Centre Health Check Analysis Report - London Datastore](https://data.london.gov.uk/dataset/london-town-centre-health-check-analysis-report)

and Fonthill Road SSAs, due to the relatively small unit size character of Islington's town centres. The data has been interrogated and although this cannot provide exact individual unit sizes for different uses within the SSAs, the average unit size has been calculated by dividing the total quantum of floorspace in the town centre for different uses by the number of units within that use, giving a reflection of the level of vulnerability to the MA PD right. The data corresponds with the findings in the Retail and Leisure Study³ which notes the retail units in Camden Passage 'are small and mainly occupied by independent retailers'⁴ and in Fonthill Road are characterised by 'independent fashion boutiques'⁵.

13. Figure 1 below⁶ shows the average Class E use unit size within Angel Town Centre is **250sqm (excluding offices) and 469sqm (including offices)**. This figure is even less for Camden Passage SSA where it can be observed that the units are demonstrably smaller and occupy a distinct historic townscape, characterised by narrow street widths, a dense shopfront repetition and cobbled streets. It is this distinct character of a bustling retail concentration that contributes to the unique selling proposition Camden Passage provides for Angel Town Centre. The intrusion of residential use at ground floor would compromise this retail agglomeration and erode the unique contribution this makes to Angel Town Centre's economy and character.

³ Islington Retail and Leisure Study (2017)

⁴ Islington Retail and Leisure Study (2017), paragraph 6.6

⁵ Islington Retail and Leisure Study (2017), paragraph 9.21

⁶ GLA, London Town Centre Health Check Analysis Report (2017)

<https://data.london.gov.uk/dataset/london-town-centre-health-check-analysis-report>

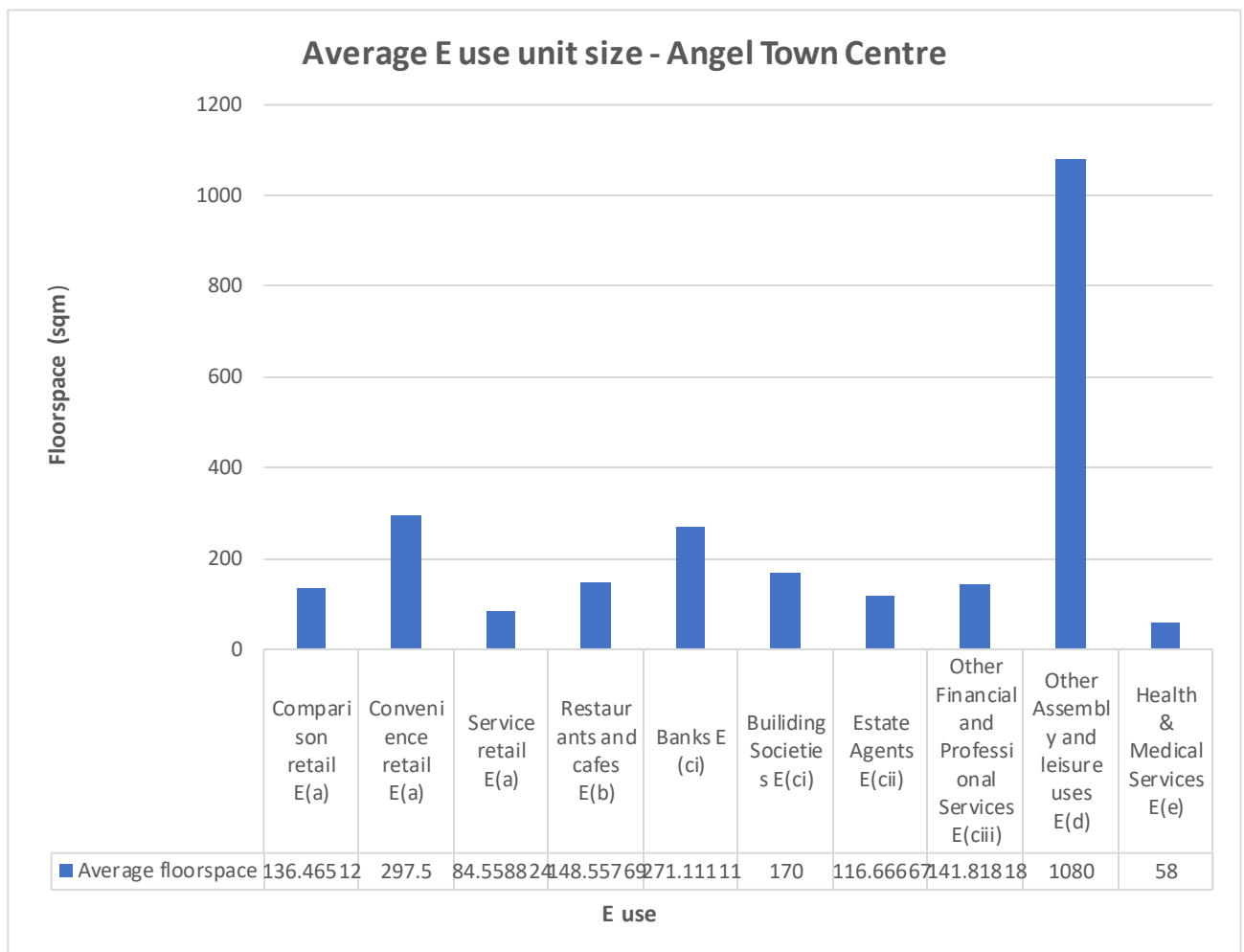


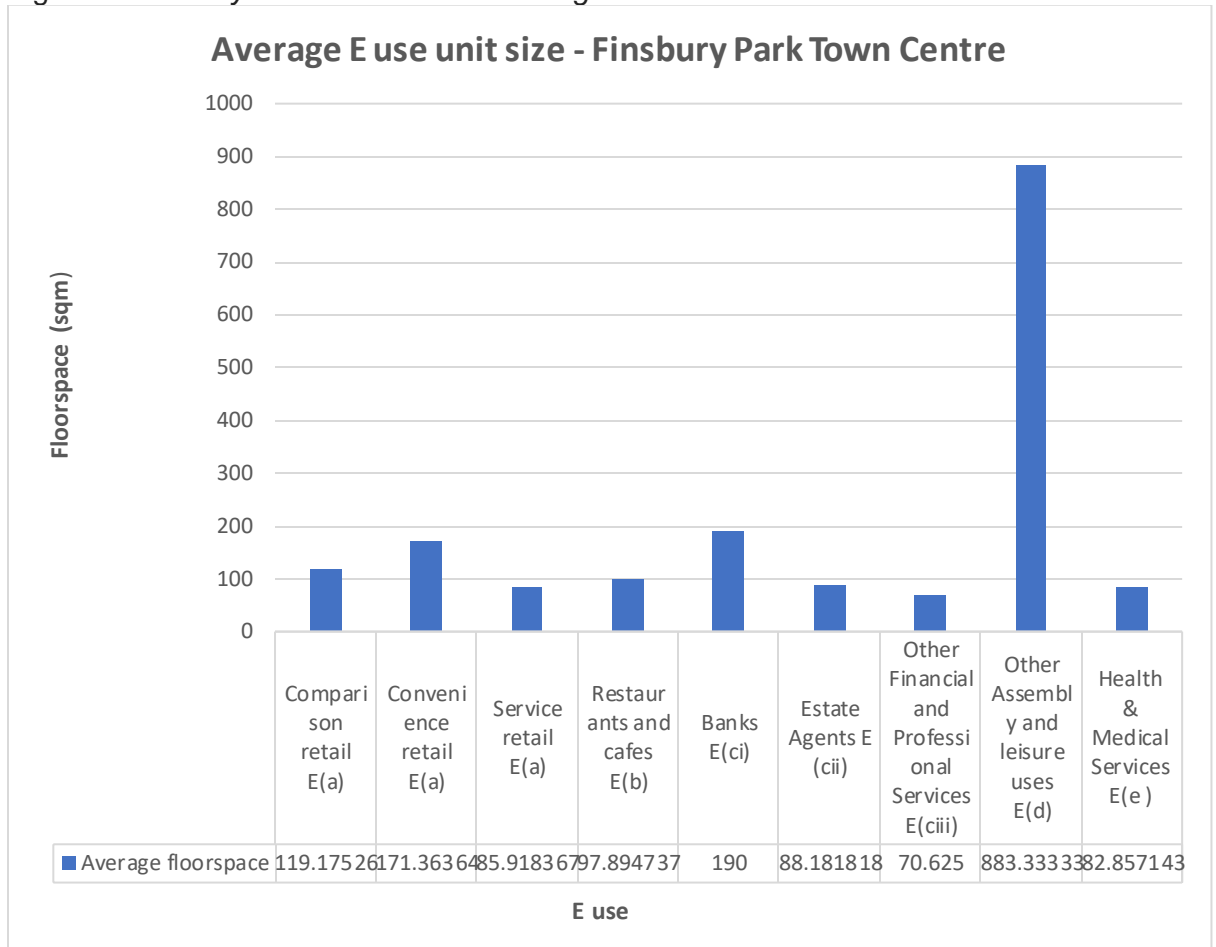
Figure 1. Angel Town Centre average Class E unit sizes.

14. Figure 2 below⁷ shows the average Class E unit size within Finsbury Park Town Centre is **198sqm (excluding offices), 188sqm (including offices)**. There are around 100 businesses on Fonthill Road which cover only a c.255m stretch of Fonthill Road demonstrating the small unit sizes here. The configuration of the retail units on Fonthill Road often span basement, ground floor and upper ground floor levels. The Council's Inclusive Economy Team have been working closely with the Planning Policy Team to help realise the Local Plan's policies and strategies around the Fonthill Road specialist fashion cluster, affordable workspace and local employment opportunities. The planning and economic growth strategies seek to enhance a vibrant and unique area of Islington, which would be severely put at risk by the MA PD right.

⁷ GLA, London Town Centre Health Check Analysis Report (2017)

<https://data.london.gov.uk/dataset/london-town-centre-health-check-analysis-report>

Figure 2. *Finsbury Park Town Centre average Class E unit sizes*



Vacancy

15. The context of Islington's town centres is one of relative prosperity and low vacancy rates, unlike some more struggling town centres such as Blackpool, Grimsby and Hull where vacancy levels are closer to 20-25%⁸. The arguments for increased residential use in these cities to support commercial viability is understandable. However, in Islington this could have the opposite effect as the London Assembly highlight in their Covid-19 and high streets report⁹ that 'the increase of residential premises on the high street could threaten the viability of existing businesses if local authorities do not retain sufficient oversight of planning.'
16. Fig. 3 below shows the historic vacancy data for the Camden Passage and Fonthill Road Specialist Shopping Areas. Both SSAs have consistently performed well with the vacancy rate consistently at or below 8% (apart from Camden Passage in 2005), which is widely considered to indicate the market is in balance and allows for needed market churn of businesses.

⁸ EB7 Retail and Leisure Study (2017), paragraph 3.32

⁹ London Assembly Economic Committee, High hopes: Supporting London's high streets in the economic recovery from COVID-19, (March 2021), page 12 - https://www.london.gov.uk/sites/default/files/economy_committee_high_streets_report_-_final_for_publication.pdf

Figure 3. Historic SSA vacancy levels



17. To provide some perspective, in 2019 the average London shop vacancy rate was 9%, which is more than three percentage points lower than the rate for Britain (12.1%). The average vacancy rates for town centres and high streets was 8.5 per cent in London and 9.4 per cent nationally which translates to 3.6 and 2.7 percentage points lower (respectively) than the average vacancy rate for Britain¹⁰. This demonstrates that Camden Passage and Fonthill Road are performing better than both the London and national average.

18. Recent data from the Local Data Company suggests that average shop vacancy rates in London increased from 9 per cent in the first half of 2020 to 10 per cent in the second half of 2020 - largely attributed to the pandemic and associated lockdowns - but these vacancy rates for London remain well below the national average (which was over 13 per cent in the second half of 2020) and lower than in any other region of the UK.

19. Recent retail surveys conducted in spring of 2022 found the SSA vacancy rates to still be very healthy and still performing better than London and national vacancy averages.

- **Camden Passage: 8% of units vacant**
- **Fonthill Road: 4.7% of units vacant**

20. Vacancy rates in both Camden Passage and Fonthill Road SSAs have remained stable during and since the Covid-19 pandemic, demonstrating the resilience of these local economies. Even with this resilience, the SSAs are still vulnerable to the MA PD right

¹⁰ GLA, Strategic evidence to support London borough Article 4 Directions (commercial to residential), paragraph 5.3.10 ([Strategic evidence to support commercial to residential Article 4s in London July 2021](#))

and can experience short bouts of vacancy in line with macro-economic downturns. The performance of Islington's vacancy rates of main town centre uses including E uses have been incredibly resilient and the application of the adopted Local Plan policies have demonstrated they have worked effectively in retaining and enhancing the important retail, leisure, and office function of town centres. Even with the significant impacts of the pandemic, Islington sits within a context where significant flows of residents, workers, domestic and international tourists visit and pass through regularly, making its town centres and SSAs desirable locations for businesses to establish.

Social value

21. Both SSAs provide significant value to local amenity and the well-being of the area and population. Camden Passage significantly enhances Angel Town Centres USP and acts as a tourist draw from domestic and international visitors. Angel Town Centre is an example of a successful town centre that performs multiple functions- retail, leisure, culture, office as well as residential. The Angel.London Business Improvement District (<https://www.angel.london/>) is active and effective in the sustained improvements to the town centre and SSA. The special character of Camden Passage can be demonstrated by it being the location for the Angel Day Festival. The expertise afforded by the shopkeepers of Camden Passage, not only provide access to rare and historic goods but the knowledge attributed to these goods. In this sense, Camden Passage exemplifies the shift needed to experience based leisure activities through the medium of retail.
22. The whole of Fonthill Road SSA is an established and improving retail cluster, being complemented by surrounding public realm improvements, the implementation of affordable workspace linked to the fashion industry and heightened protection through emerging Local Plan planning policy. Accessibility has been enhanced by the public realm and access improvements from the adjacent City North development. The Council is carrying out the following wider work in the area:
 - The Council's Inclusive Economy Team are working to create a fairer Finsbury Park – a sustainable, socially just, and locally-rooted economy, where wealth is fairly shared; people are supported into, and progress in well-paid, secure jobs; and assets and resources within the local economy create prosperity and opportunity for all.
 - **Fonthill Road Retail Space – FC Designer Collective at 113-115 Fonthill Road, N4 3HH:** The Council secured affordable retail unit showcases products from trainees, tenant businesses and local makers. Fashion Enter offers training on visual merchandising, product development, pricing, and all other related issues in the commercialisation of products. It is anticipated that the Provider could also utilise the retail unit to provide training in retail skills. The Provider is required to engage local traders, support sustainable practices, and enhance the vibrancy of the Fonthill Fashion Village cluster, offering practical support such as local shopper initiatives, and merchandising uplifts.
 - **FC Designer Workspace and incubation at 9 Durham Road N7 7FB:** is located 0.3 miles from Fonthill Road (not included in the Article 4 Direction) on the Andover Estate but is fostering links with businesses on Fonthill Road. The workspace approach is designed to support local young businesses through the early testing and growth stages– nurturing businesses from idea generation to start-up companies. This will have positive consequences for local job creation, innovation, economic growth and social inclusion in Islington. The workspaces are now fully occupied with the majority of start-ups run by women from the BME community.

- **Fonthill Road Fashion Village – Markets:** Fonthill Road Fashion Village was part of a rebranding initiative to reinvigorate the area and increase footfall. Independent local designers and makers were recruited to participate in a Festive Market to coincide with the brand launch. There has been strong support to host a regular market that would bring new designers to the village and promote the garment-making activities taking place in the area.
23. Fonthill Road has a particular important benefit to the local Finsbury Park community which contains LSOAs within the top 10% most deprived LSOAs in the country¹¹. It provides good quality clothing at affordable prices for a range of ages and sizes. This constitutes an essential service to local residents, especially in a cost of living crisis and provides dignity to those seeking clothing for occasions such as weddings and funerals, religious/cultural festivals, job interviews, and employment that requires business attire as well as everyday casual wear.
24. As demonstrated, both SSAs provide specific and valuable economic vitality and viability to the wider town centre as well as being sources of specialist skills, inherent for sustainable economic and social wellbeing of the people who work in the retail sector and the customers that use it.

Supporting evidence

25. The following cites various reports and studies that explain why SSAs are crucial to sustaining the vitality and viability of town centres.

Retail and Leisure Study (RLS) 2017

26. The RLS¹² formed part of the evidence base for the Local Plan Review. It highlights the importance of both SSAs in contributing significantly to the Town Centres offer and character. The alleyways and cobbled streets of Camden Passage create a unique shopping environment that enhances Angel Town Centre and its comparison goods offer. The RLS recognises the value of the variety of small independent shops that provide a specialist art and antique offer that attracts visitors from outside the borough. The markets hosted in Camden Passage also work to support the bricks and mortar uses, making the need for a conducive public realm, commercial character and non-sensitive uses important here.
27. Fonthill Road is identified in the RLS as one of Finsbury Park Town Centres key streets and assets. All units in the SSA are independent and draw visitors from outside the borough, especially for its fashion boutiques and occasion dresses. Like Camden Passage, Fonthill Road has the ability to host a street market which is being explored by Inclusive Economy officers. This would further animate an already commercial street and support the circular economy here together with garment manufacturing on upper floors.

¹¹ Index of Multiple Deprivation (2019)

¹² Retail and Leisure Study (2017),

[20191001biretailandleisurestudyaugust2017withoutnems.pdf](https://www.islington.gov.uk/media/2019/10/01/biretailandleisurestudyaugust2017withoutnems.pdf) (islington.gov.uk)

SSAs contribution in a London and Islington context

28. The London Plan promotes town centres as strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community and social infrastructure and appropriately planned residential uses¹³.
29. Islington's town centres which include the two SSAs have competing land uses in a context of very limited land supply. For town centres to continue to thrive they will need to evolve and diversify their commercial, cultural and community functions in response to current and future economic trends, technological advances, consumer behaviours, and the development of the 24-hour city¹⁴. For this to be achieved, a varied number of unit sizes and configurations is needed; the commercial rhythm and character of town centre streets needs to be retained; and the development of residential uses needs to be carefully considered, utilising London Plan and Local Plan policies such as the 'agent of change' principle to ensure commercial uses used by a wide range of people are not jeopardised by the amenity considerations of singular dwellings.
30. The importance of London's high streets is one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange¹⁵. Camden Passage and Fonthill Road both provide particularly unique roles in Islington.
31. Their contribution is still relevant as can be shown by the retail goods output growing at a faster rate in London (by 3.7 per cent a year between 2010 and 2018) than it is nationally (2.2 per cent per annum). Around a third (34 per cent) of consumer expenditure by Londoners is on commodities which correspond broadly to the retail sector and almost a quarter (23 per cent) is on leisure activities¹⁶.
32. Prior to the pandemic approximately 20 per cent of spend on comparison goods retail in London was from international tourists, domestic tourists and day-time commuters from outside London and all of these sources of spend are projected to grow strongly (around 4 per cent per annum for international tourist spend, 3 per cent per annum for domestic tourist spend and 2 per cent per annum for commuter spend)¹⁷. Both SSAs have proved to be resilient even as tourism has taken a hit during the pandemic. Fonthill Road provides a key source of good quality affordable clothing to local residents, helping those financially struggling. Camden Passage provides a niche offer for antique/curio goods. Shopping in person for such goods is a leisure activity in itself and an area of retail that is hard to replicate on the internet. In addition, the knowledge of workers in this retail sector provides consumers with confidence.

¹³ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021, paragraph 5.2.1](#)

¹⁴ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021](#)

¹⁵ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021, paragraph 5.2.2](#)

¹⁶ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021, paragraph 5.3.5](#)

¹⁷ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021, paragraph 5.3.6](#)

33. The High Streets for All mission set out a clear intent to work with London's diverse communities to establish new, innovative and experimental uses across London's high streets and public spaces. The programme seeks to create thriving, inclusive and resilient high streets and town centres, within easy reach of all Londoners. It aims to bring vacant and underused buildings into productive use, promoting local employment and near home working¹⁸. Islington's Local Plan Policy R9 is supportive of this mission, seeking to support meanwhile uses, that support local employment and business incubation. Both SSAs constitute key assets for such future town centre improvement works.
34. The introduction of piecemeal residential development on the ground floor in thriving areas such as the SSAs could lead to sterile and incoherent high street frontages, impacting on their sense of place, natural surveillance and weakening their function, resilience, and attractiveness as places to visit, work and interact. The piecemeal loss of commercial units will reduce overall footfall, depriving other businesses and potentially driving the loss of a far more significant number of premises than those who chose to convert commercial to residential¹⁹.
35. Once conversions to residential occur the inherent flexibility of high street premises in commercial and community uses is lost, undermining the ability of the high street to adapt to future circumstances.
36. Too much erosion of commercial and community services via PDR in town centres and high streets could also create dormitory areas where residents must travel further afield to get to shops and places of work, undermining efforts to support walking and cycling and the creation of a more sustainable city²⁰.

Avoiding the blight of 'clone towns'

37. There is a growing acknowledgement that town centres must offer a unique experience, the right retail mix and good reasons to spend time and money²¹ for town centres to be successful. The Institute of Place Management highlight in their High Street UK 2020 report²² that within the top 25 priorities for successful town centres the following were cited:
 - Diversity of a centre's retail
 - Attractiveness of the centre. What pulls people to the centre from further afield?

¹⁸ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021 , paragraph 5.4.3](#)

¹⁹ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021 , paragraph 5.5.3](#)

²⁰ GLA, [Strategic evidence to support commercial to residential Article 4s in London July 2021 , paragraph 5.5.5](#)

²¹ Hart, Cathryn A., Grazyna B. Stachow, Mohammed Rafiq, and Angus Laing. 2019. "The Customer Experience of Town Centres". [14-Hart-et-al-2014-ESRC-Town-Centre-Customer-Experience.pdf \(bettertowns.co.uk\)](#)

²² Parker, C., Ntounis, N. and Quin, S. (n.d.). Additional factors that affect High Street performance: as identified by HSUK2020 partners. <https://v1.placemanagement.org/media/20711/additional-factors-that-affect-high-street-performance-with-mendeley-references-sq.pdf>.

- A healthy amount of independent stores.

38. Fonthill Road and Camden Passage are key in meeting these priorities. The SSAs offer protect against the blight of 'clone towns' as the New Economics Foundation acknowledges how distinctiveness, historic character and local primacy work to sustain a town centres unique offer, resulting in visitation by a wider group of local and non-local visitors.²³. The imposition of unplanned residential development erodes the spaces in which fine grain independent, specialist shops can establish and prosper – risking a transition to 'clone-townification'. Protected specialist shopping areas where the prevailing unit size is small, amalgamation is resisted and residential use is carefully considered works to retain maximum consumer choice and prevents the materialisation of clone towns which have detrimental effects on the sustainable viability of the whole town centre.
39. The SSAs, as well as providing specialised goods should be understood in the context that physical shopping is more than the transactional process of acquiring goods. It's a social experience and a leisure pursuit.
40. British Independent Retailers Association chief executive Andrew Goodacre told the *Retail Gazette* that retailers have learnt bricks-and-mortar will be about becoming smaller and smarter as large chains vacate premises and focus online²⁴. Furthermore, "large footprint stores are being shunned in favour of localised experiences that run in tandem with digital channels," says Andrew Howell, global marketing director for K3, a technology firm specialised in queue-beating solutions²⁵. Independent retailers have quickly adapted and in many cases thrived. This is because they are smaller and therefore more flexible to responding to sudden and unexpected change²⁶. The two SSAs are therefore well positioned to continue to thrive

Residential is not the answer to the future prosperity of Islington's town centres

41. An independent study of Angel Town Centre during the pandemic by the Crossriver Partnership focused on evidence and ideas for recovery from the pandemic²⁷. The report cited 'the mix of one-off, independent boutiques with family favourite stores continues to offer a unique and enjoyable shopping experience' as a key opportunity. Camden Passage is specifically cited as contributing to a healthy retail mix. Recommendations made for improvement was better lighting of the public realm and an increase in new workspaces that suit the needs of remote workers, such as a focus on social interaction spaces. An increase in residential uses was not identified as a needed approach to sustain the viability of Angel Town Centre or Camden Passage SSA.

²³ New Economics Foundation [Clone Town Britain \(neweconomics.org\)](https://www.neweconomics.org/clone-town-britain)

²⁴ <https://www.retailgazette.co.uk/blog/2021/03/the-state-of-uk-retail-one-year-after-the-first-lockdown/>

²⁵ <https://www.lexology.com/library/detail.aspx?g=92e7b1db-919e-4f92-b8d8-5cc8e5a4f157>

²⁶ <https://www.lexology.com/library/detail.aspx?g=92e7b1db-919e-4f92-b8d8-5cc8e5a4f157>

²⁷ Crossriver Partnership, Evidence and ideas for recovery (March 2021) [Centre-for-London_Town-Centre-Futures_HQ.pdf \(crossriverpartnership.org\)](https://www.crossriverpartnership.org/Centre-for-London-Town-Centre-Futures_HQ.pdf)

Wholly unacceptable adverse impacts of Class MA

42. Wholly unacceptable adverse impacts of Class MA have been identified for both Camden Passage and Fonthill Road SSAs. The specific impacts for each SSA are expanded upon in the 'How is it necessary to avoid wholly unacceptable adverse impacts?' section of the Area Assessments below. There are however overarching impacts that have been identified for both SSAs, summarised as follows:

- SSAs provide a crucial unique selling proposition for the viability of Angel and Finsbury Park Town Centres, contributing significantly to their character;
- the SSAs provide an important comparison goods service to local residents as well as destination shopping for domestic and international tourists.
- The SSAs foster local employment opportunities and business creation, with particular emphasis on independent SMEs.
- The SSAs provide a range of goods and service that internet shopping cannot replicate to the same quality;

43. *An Article 4 Direction is appropriate given –*

- the low and healthy level of vacancy;
- the vast majority of Class E uses being well below the 1,500sqm threshold and a context that would see the introduction of residential use through the PD right, at ground floor especially, achieve the inverse a key objective of the PD right, to revitalise high streets after the pandemic.

Why is this the smallest possible area

44. Both Camden Passage and Fonthill Road make up a very small amount of the respective town centres they lie within and a small proportion of the Primary Shopping Area. Given these SSAs are the most unique retail assets in the borough, their protection is warranted due to their wide ranging economic and social benefits.

Policy

45. Adopted Local Plan Policy DM4.9 seeks to protect and promote the role of specialist shopping areas. Emerging Local Plan Policy R7, builds on this policy to provide more clarity around proposals within the SSAs, so that they continue to thrive. Further explanation of the NPPF, London Plan and Local Plan policy is provided in this policy section.

National Policy

46. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out that significant weight should be placed on the need to support economic growth and productivity, taking into account both local businesses needs and wider opportunity for development. With the approach to each area building on its strengths, countering any weaknesses and addressing the challenges of the future, with this being particularly important in areas where Britain can be a global leader in driving innovation and in

areas with high levels of productivity. Paragraph 81 requires planning policies to do the following:

- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.
 - Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.
47. NPPF paragraph 83 requires planning policies to recognise and address the specific locational requirements of different sectors.
48. The PPG requires local planning authorities to assess economic development needs within their areas to ascertain the levels of quantitative and qualitative predicted employment need. Islington has done this for the existing adopted Local Plan policies and an Employment Land Study and a Retail and Leisure needs assessment have informed the draft new Local Plan.
49. The NPPF states that planning policies should allow Town Centres to grow and diversify in a way that reflects their distinctive characters.
50. The National Planning Policy Framework 2021 states that in regard to ensuring the vitality of town centres, planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation

London Plan

51. London Plan Policy SD6 encourages town centres to be promoted and enhanced as hubs for a diverse range of uses which act as the primary commercial locations outside of the CAZ.
52. London Plan Policy SD7 classifies all town centres based on their function and size. Major town centres should be the focus for the majority of higher order comparison goods retailing and secure opportunities for higher density employment, leisure and residential development. District centres should focus on consolidating a range of retailing, leisure and employment uses.
53. London Plan Policy SD9 encourages town centre strategies to be produced (which have been created through the spatial strategy area policies in the emerging Local Plan). Town Centre health checks should be undertaken to inform strategic and local policy implementation. Consideration of Article 4 Directions and partnership based approaches for land assembly should also be made.
54. London Plan Policy E9 directs development plans to identify future requirements and locations for new retail development, and set out policies to secure an appropriate mix of shops and other commercial units of different sizes.

55. Plans should also provide a framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping.

Local Plan

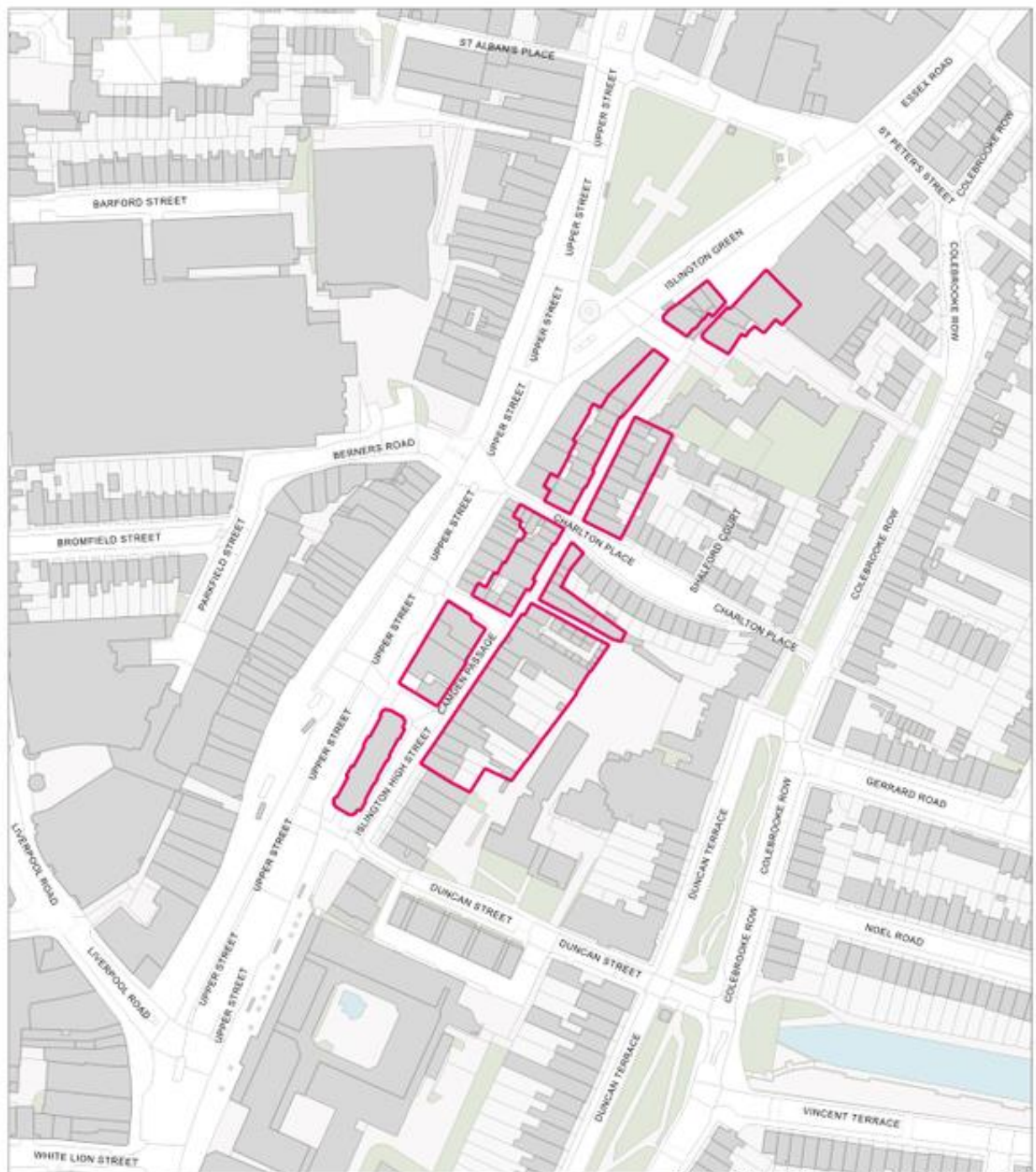
56. Adopted Core Strategy policy CS14 identifies that these areas will be actively promoted and considered when assessing future retail proposals. Development Management Policy DM4.9 sets out that the council will continue to protect and promote the role of the specialist shopping areas. These specific policies are also read alongside other policies which apply to retail and town centres more generally but understanding the symbiotic economic reliance of different parts of the town centre, as well as the Spatial Policy for Finsbury Park and the Spatial Policy for Angel. The Local Plan identifies the town centre boundary for Finsbury Park and Angel Town Centres, together with primary and secondary retail frontages, with all of Fonthill Road and Camden Passage SSAs falling within the primary frontage in recognition of their importance to the retail offer of the town centre.
57. Draft Local Plan policy R7 builds upon Policy DM4.9 in protecting the SSAs and identifies an optimum threshold for retail units in Specialist Shopping Areas. This has been introduced in the new Local Plan to give additional opportunity for protection of these uniquely important areas. As identified in the Strategic and Development Management Policies document, Specialist Shopping Areas provide a significant benefit to their local areas, with the ability to draw shoppers from outside the borough due to the more bespoke nature of the goods on offer, as well as adding significant value to the character and vitality of their respective areas. Specialist Shopping Areas in Islington –the antique/curio shops at Camden Passage in Angel and the clothing shops at Fonthill Road in Finsbury Park – have a high level of units in retail use and provide a major contribution toward a healthy retail offer in these centres. The retention of at least 75% retail use in these areas will maintain the specialist character and function of these areas.
58. The Specialist Shopping Areas at Fonthill Road and Camden Passage both fall within a Primary Shopping Area for their respective town centres, as identified in the NPPF – these are defined areas where retail development is concentrated. Policy R2 also seeks to protect the retail function of these areas. The SSA supports the viability of the PSA, whilst the PSA is crucial in supporting the SSAs and wider town centre viability. There are other policies which seek to protect and enhance Islington's Town Centres – for example policy R3.
59. Draft Local Plan spatial strategy policy SP6 for Finsbury Park, part C is specific to Fonthill Road and its shopping function, recognising the unique agglomeration of specialist clothing stores and the significant value this adds to the character, vitality and viability of the Town Centre and wider area. It is emphasised that the specialist shopping role must be strongly protected and enhanced.
60. Draft Local Plan policy B2 promotes new business floorspace in town centres on upper floors especially. This is particularly relevant to Fonthill Road and the ambitions for light industrial uses on the upper floors. Policy B3 protects existing business floorspace in town centres. This is necessary to deliver the 443,000sqm of additional office floorspace needed by 2036.

61. Draft Local Plan spatial strategy policy SP4 for Angel and Upper Street, part E refers to Camden Passage as a specialist shopping area with a significant concentration of antique, curio and vintage stores. The unique function of this area will be strongly protected. In line with protecting this function retail use, including at upper floors, will be strongly protected consistent with policy R7.

Area Assessments

62. The Area Assessments below set out the different economic and employment characteristics as well as heritage, social value and Class MA considerations for each SSA. NPPF considerations and specific analysis of the wholly unacceptable impacts of the MA PD right are importantly expanded upon and demonstrate the need for an Article 4 Direction. The Area Assessments have been used as a tool in the evidence gathering process by identifying and ordering the uses, unit sizes, specific businesses, listed buildings and conservation areas that have contributed to the extent of the Article 4 Direction.

Camden Passage area assessment



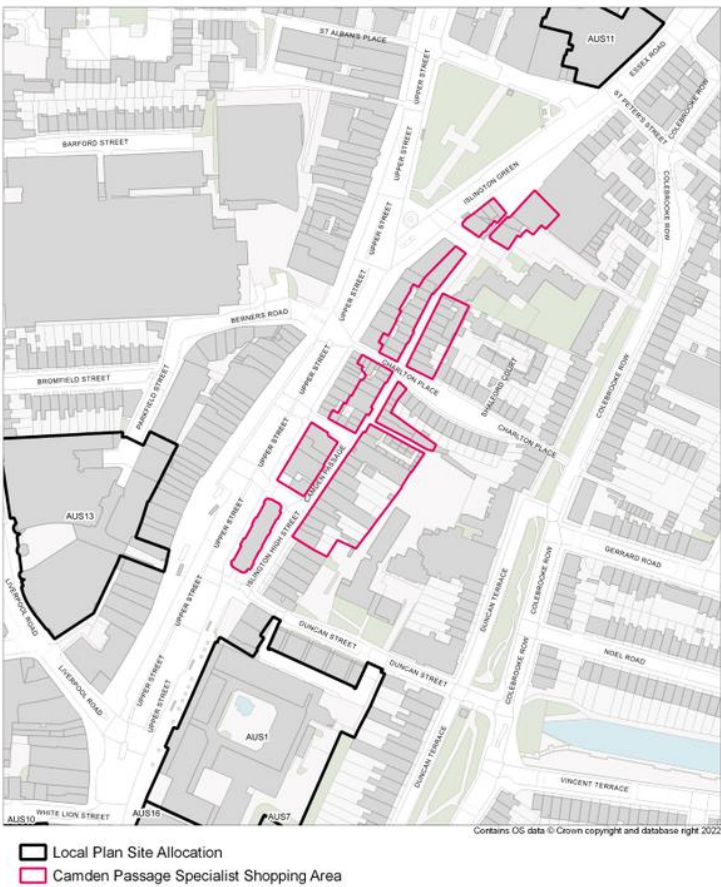
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 Camden Passage Specialist Shopping Area

Map 1: Heritage Map

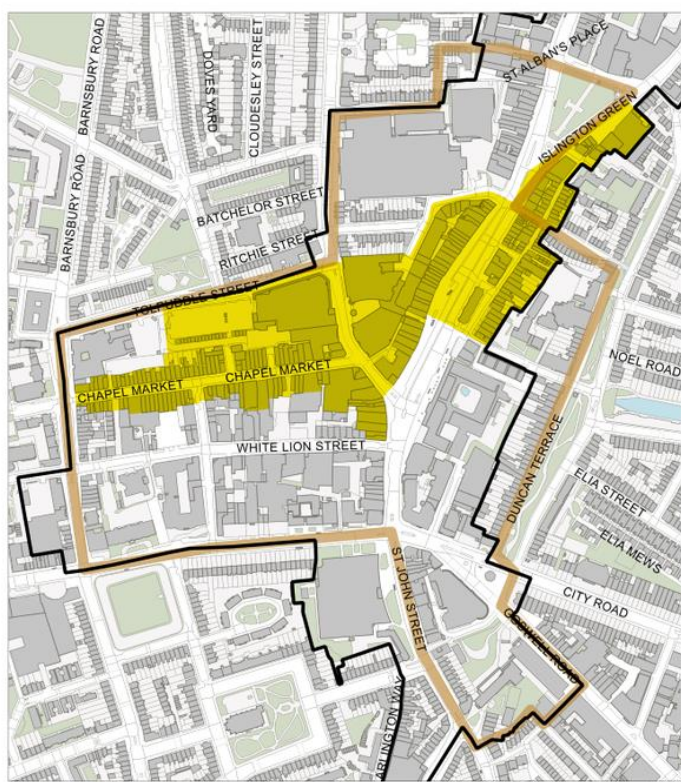


Map 2: Site allocations



Map 3: Camden Passage within Angel Town Centre context

Map 4: Proposed Article 4 Direction map



- Town Centre
- Primary Shopping Areas
- Character Areas

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Article 4 Direction Class MA (Class E to residential) - Camden Passage Specialist Shopping Area



- Article 4 Direction Class MA (Class E to residential)
- Camden Passage Specialist Shopping Area

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Description

Camden Passage is located towards the eastern edge of Angel Town Centre. Since the 1950's Camden Passage has ranked alongside Portobello, Kensington Church Street and Spitalfields as one of London's leading antique locations. It is a well-known visitor attraction and is still renowned for its antique, curio and vintage shops, making a significant contribution toward a healthy and diverse retail offer in Angel Town Centre. The units are demonstrably smaller than elsewhere in the town centre and occupy a distinct historic townscape, characterised by narrow street widths, a dense shopfront repetition and cobbled streets. All of Camden Passage sits within the Primary Shopping Area and the southern third falls within the CAZ boundary.

Employment Characteristics

- The Employment Land Study²⁸ identifies Camden Passage as a destination for specialist shopping.
- The Retail and Leisure Study acknowledges:
 - Camden Passage attracts many visitors from within and outside of the borough to Angel, bolstering the contribution to the Angel and Islington economy.
 - There is a strong independent offer particularly concentrated along Camden Passage,

²⁸ Employment Land Study (2016), [Company \(islington.gov.uk\)](http://Company(islington.gov.uk))

	<p>characterised by small units which supports local businesses and traders.</p> <ul style="list-style-type: none"> - Three markets are supported in Camden Passage, which each have a unique specialism: Pierrepont Arcade Market (books and antiques); Charlton Place Market (rare antiques and collectibles); Camden Passage Market (vintage clothing, vintage luggage, collectables and bric-a-brac). - The environmental quality is particularly high in Camden Passage, offering a unique shopping environment. <ul style="list-style-type: none"> • 64% of units are in retail use. • 8% of units are vacant. This represents a very healthy vacancy rate where 8% is considered healthy. • Specialist clusters: <ul style="list-style-type: none"> - <u>Antiques</u>: significant cluster of specialist shops around Camden Passage, Charlton Place, Camden Walk and Pierrepont Arcade Market - stalls with a range of vintage clothes, homewares, books and antiques. Vintage clothing stores (Annie's; Four & Twenty Blackbirds; Dreamtime; Hearts & Daggers Miltiaria). Antiques and home accessories (Argosy Antiques, Caroline Carrier, David Griffith Antiques, Modern Times Vintage). Vintage art and furniture (James Freeman Gallery; Japanese Gallery; Kevin Page Oriental Art; Style Gallery; Chris Tapsell Oriental Antiques. • Main types of Class E uses in area: <ul style="list-style-type: none"> • E(a) - Retail (comparison; specialist antique shops; health and beauty shops and services; occasion wear, specialist food shops) • E(b) - Food and drink (cafes; restaurants; delis) • Other uses in the area: Residential (C3); Public Houses (Sui Generis); Beauticians (Sui Generis).
Retail and Other Town Centre Uses	<ul style="list-style-type: none"> • The dense nature of Camden Passage's urban form adds to its character. The commercial character allows it to host three markets complementing the 'bricks and mortar' uses, and outdoor drinking and dining, • Average size of a Class E unit (excluding office uses) in Angel Town Centre is 250sqm. The

	<p>average unit size in Camden Passage is even smaller.</p> <ul style="list-style-type: none"> • High quality cafes and restaurants support the retail function here and encourage extended dwell times, which maximise consumer expenditure. • Camden Passage is a designated Specialist Shopping Area in the adopted and emerging Local Plan (Policy SP4 and R7) with concentrations of antique and vintage stores. Many of the units in the SSA are compact and utilise basement and upper floors for storage, back office functions or additional operational trading floorspace;
Key Sites and Allocations	<p>Location is partly in the CAZ. Camden Passage is a designated Specialist Shopping Area in adopted and emerging Local Plan and sits within the Angel Town Centre Primary Shopping Area.</p> <p>There are no emerging site allocations in Camden Passage. The quality of buildings is high and there is no prolonged vacancy.</p>
Heritage Designations	<ul style="list-style-type: none"> • Conservation Areas: Camden Passage is within The Angel Conservation Area and immediately borders the Duncan Terrace/ Colebrook Row Conservation Area to the east; • Clusters of Grade II listed buildings in the SSA. Concentration around Camden Passage including: 31-45 Camden Passage. All listed buildings have been removed from the Article 4 Direction. <p>Some of the potential impacts on future occupiers can be considered under Prior Approval process, however numerous sites have premises that could be converted to residential with no external alterations required. Although Camden Passage is included in The Angel Conservation Area, this consideration is not sufficient enough to prevent wholly unacceptable impacts of the MA PD right in the context of Camden Passage. The SSA is characterised by two and three storey terraced buildings. An Article 4 Direction is necessary to protect the upper floors from conversion to residential as such conversion would not always 'detrimentally impact the conservation area'. However, commercial upper floors are required for the effective operation (including storage) of many ground floor uses. The dense urban form of Camden Passage also heightens the amenity impacts felt by residential uses, further justifying the need for an Article 4 Direction to protect the commercial function of the SSA.</p>

Social Value Considerations	<ul style="list-style-type: none"> • Provides specialist town centre retail and services to local and wider communities and tourists. • Camden Passage has been used to host Angel.London BIDs Angel Day Festival. • Provides employment and spaces for micro businesses to establish and benefit from agglomeration of other similar and complementary businesses, especially retail. • Camden Passage contributes significantly to Angel's USP and complements the cultural function Angel also offers through theatre and art.
Class MA Considerations	<ul style="list-style-type: none"> • Cumulative floorspace of all Class E units are well-below the Class MA threshold of 1,500 square metres and even smaller than the average Class E unit size of 469sqm in the rest of Angel Town Centre. When office uses are discounted the average Class E unit size is even smaller at 250sqm. Due to the dense, historic form of Camden Passage most units are smaller than 250sqm. This is within the size range that would be at risk for change of the whole premises to residential use(s). • All units are small ground floor retail units with either operational, storage or back office floorspace in the basement and upper floors; or residential use on a few upper floors. There is a risk of conversion under Class MA which would result in loss of retail and hospitality-based employment and harm to the strategic retail cluster; • Class MA (1)(1)(d) prevents the use of permitted development rights for listed buildings. Listed buildings have been removed from the proposed Article 4 Direction. However, in Camden Passage there are a significant number of locally listed buildings in Class E use. Whilst not formally listed, these buildings are still important historic assets that contribute to the character of the area. • Class MA(2)(2)(d) - Impacts of noise from commercial development on residential occupiers – this would be part of Prior Approval Assessment.
NPPF Considerations	<p>All buildings outside Class E have been identified and excluded.</p> <p>All listed buildings have been identified and excluded.</p> <p>The Direction Area has been reduced to the smallest geographical area possible in accordance with NPPF paragraph 53.</p>

<p>How is it necessary to avoid wholly unacceptable adverse impacts?</p>	<p>The Class MA conditions are insufficient to ensure a wholly unacceptable loss of specific economic activity in one of Islington's major town centres. Camden Passage SSA is a unique location in the borough and contributes significantly to Angel Town Centre's unique selling proposition. The concentration of retail uses here is specifically protected, where 75% of all units is sought to be in Class E(a) use. The imposition of residential uses on ground or upper floors would lead to the breakup of the agglomeration of retail and supporting E uses and the active frontage that is vital to retaining the character of the SSA.</p> <p>Camden Passage is a unique asset and a mature retail destination. It has a particularly high quality historic public realm with a dense commercial character. As well as the specialist shops, a range of specialist markets are held here. Residential uses here would cumulatively limit these functions due to the inescapable impact on any residential amenity.</p> <p>The narrow streets are occupied by outdoor seating used by a range of cafes and restaurants that support the retail offer and animate the street. Sensitive uses such as residential use would constrict the operation and expansion of these commercial activities and result in negative impacts on the viability of E(a) and E(b) uses.</p> <p>Camden Passage is made up of small unit sizes and predominantly two storey terraces. This form is at risk of PD change of use via Class MA. Many of the small shops require ancillary space for storage as antique and art goods do not have a high stock turnover. This makes even part of buildings converted to residential a risk for future commercial viability.</p> <p>Angel experiences particularly high land values out of Islington's four town centres. Camden Passage SSA is located near to Angel Underground Station, exacerbating the land values for residential development.</p> <p>Camden Passage SSA is an important part of Angel Town Centres Primary Shopping Area and has been identified as key to supporting the PSA function as the retail core. The NPPF acknowledges the importance of the retail core (PSA) and an example of reasonable exception from the PD right.</p>
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Fonthill Road Area Assessment



Fonthill Road Specialist Shopping Area

Map 1: Site allocations



Local Plan Site Allocation
 Fonthill Road Specialist Shopping Area

Map 2: Proposed Article 4 Direction area map

Article 4 Direction Class MA (Class E to residential) - Fonthill Road Specialist Shopping Area



Article 4 Direction Class MA (Class E to residential)
 Fonthill Road Specialist Shopping Area

Description:

Fonthill Road is situated on the western boundary of Finsbury Park Town Centre. It has a rich history of fashion manufacturing and wholesale commerce. A specialist shopping area for clothing, the area functions extremely well as a shopping area and is a major draw for people from surrounding areas and beyond. The SSA is a key factor in Finsbury Park Town Centre's unique selling proposition and provides local employment and skills opportunities as well as providing clothing particularly popular with the areas ethnically diverse population. There are just under 100 fashion businesses on Fonthill Road which cover only a c.255m stretch of Fonthill Road demonstrating the small unit sizes here. The configuration of the retail units on Fonthill Road often span basement, ground floor and upper ground floor levels.

Employment characteristics

- The Employment Land Study²⁹ recognises Fonthill Road is an important and widely recognised clothing fashion cluster, which is visibly successful, and this cluster should not be put in jeopardy. There is a case for building on its "brand" and giving it a more formal identity.
- Fonthill Road is considered to have the strongest identity of all the shopping streets within Finsbury Park Town Centre. The street provides a specialist clothing retail offer including a large number of party and bridal dress shops. All units along the street are occupied by independent retailers. Unlike the rest of the centre, provision here is mainly retail, with very few service or leisure occupiers.

²⁹ Employment Land Study (2016) [Company\(islington.gov.uk\)](http://Company(islington.gov.uk))

	<ul style="list-style-type: none">Fonthill Road is being enhanced by the Council to promote and support local people into employment. This includes the Council securing a retail unit for incubator space for start-up businesses to allow the showcasing of local designers and makers (see paragraph 22).Many shops provide local employment on a part time basis. This is taken up by mostly working mothers in the week and teenagers at the weekend. This supports individuals and families incomes.The range of independent shops share resources such as changing rooms and storage. This inter-connectedness of businesses in this area of dense urban form would not be possible if the SSA was broken up through residential development. This would have wholly unacceptable impacts on the viability of the SSA.Fonthill Road SSA had an 4.7% vacancy rate in 2022, representing a low rate of vacancy.Accessibility has been enhanced by the public realm and access improvements from the adjacent City North development. This has resulted in a more conducive and appealing commercial environment.Specialist clusters:The whole of Fonthill Road SSA is an established and improving retail cluster, being complemented by surrounding public realm improvements, the implementation of affordable workspace linked to the fashion industry and heightened protection through emerging Local Plan planning policy. <p>Types of class E in the Fonthill Road SSA:</p> <ul style="list-style-type: none">E(a) Sale of Goods: this includes predominantly clothing retailersE(b) sale of food and drink on the premises: a small number of supporting café uses are present.E(g)(i): Offices;E(g)(iii): Industrial processes: this includes light industrial processes mainly on upper floors related to the garment industry on Fonthill Road. <p>Main building types:</p> <ul style="list-style-type: none">Fonthill Road is mainly comprised of three storey 20th century terraces, with floorspace well under 1500sqm.There are also some early 21st century buildings such as the London Fashion Centre designed to host a range of retail units.								
Retail and other town centre uses	<ul style="list-style-type: none">Fonthill Road has a make-up of 81% retail (E(a) units at ground floor (Retail Survey 2022). <p>The table addresses the land uses and size of premises assessed. GLA Town Centre Healthcheck (2017) data finds the average Class E unit size in Finsbury Park is 188sqm. Finsbury Park Town Centre is characterised by small units occupying terraced buildings. This is the case on Fonthill Road where the ground floor is likely to be even smaller than the town centre average.</p> <table><tr><th>Address</th><th>Land use</th><th>size</th><th>A4D?</th></tr><tr><td>All addresses</td><td>81% of units in</td><td>Mostly under 1500sqm</td><td>yes</td></tr></table>	Address	Land use	size	A4D?	All addresses	81% of units in	Mostly under 1500sqm	yes
Address	Land use	size	A4D?						
All addresses	81% of units in	Mostly under 1500sqm	yes						

	in Fonthill Road SSA	retail E(a) use			
	217 Seven Sisters Road	Barbers E(a)	Well under 1500sqm	Yes. Units are outside the SSA but form the gateway to the SSA. Residential use here would detract from the commercial character the SSA is trying to promote.	
	219 Seven Sisters Road	Food deli E(a)	Well under 1500sqm		
Key sites and Allocations	13 sites in emerging Site Allocations within the Finsbury Park Spatial Strategy Area. Fonthill Road contains two site allocations: <ul style="list-style-type: none">• (FP4) 129-131 and 133 Fonthill Road and 13 Goodwin Street. Allocated for retail led mixed use development. Ground floor retail, upper floor office and workshop floorspace related to the ground floor retail function. An element of residential use may be acceptable.• (FP8) 113-119 Fonthill Road. Allocated for retention of retail floorspace with provision of a significant amount of business floorspace on the upper floors				
Heritage Designations	<ul style="list-style-type: none">• The Tollington Park Conservation Area is to the north of the Fonthill Road SSA. The SSA is not included in the conservation area.• In close proximity to Grade II* listed Rainbow Theatre, 232-238 Seven Sisters Road				
Social Value Considerations	<ul style="list-style-type: none">• Fonthill Road SSA provides clothing which caters for a wide range of ages, ethnicities and sizes at affordable prices and good quality. The five social housing estates around Fonthill Road have a particularly high patronage.• Suits, dresses and formal wear is provided at low prices. This supports people and especially young people into employment where such attire is required.• The Council’s Inclusive Economy Team are working to create a fairer Finsbury Park – a sustainable, socially just, and locally-rooted economy, where wealth is fairly shared; people are supported into, and progress in well-paid, secure jobs; and assets and resources within the local economy create prosperity and opportunity for all. This includes the securing of affordable retail units and workspace as expanded on in paragraph 22 above.• It is imperative that the premises on Fonthill Road are kept in Class E use and the environment in which they sit is commercial in character. The option of residential uses would limit commercial growth; not be compatible with light industrial processes; limit the benefits of agglomeration; and reduce the ability to run a successful street market.				

Class MA Considerations	<ul style="list-style-type: none"> • Class MA(1)(1)(c) - Cumulative floorspace of the vast majority of buildings is below 1,500 square metres. The three storey terraced form of the buildings pose a risk, that one of the three floors at least has potential to be separated off and converted to residential via Class MA. • The street has retained a garment function since the 1960s, surviving multiple recessions and most recently the Covid-19 pandemic. Short term vacancy is inevitable and is necessary for a healthy churn of businesses and supporting new businesses entering the market. <p><u>Conclusion</u> – some of the potential impacts on future occupiers can be considered under the Prior Approval process, however numerous sites have premises that could be converted to residential use with no external alterations required, due in part to individual access to each unit. Fonthill Road SSA does not include any conservation areas or listed buildings.</p>
NPPF considerations:	<p>How is this the smallest geographical area possible?</p> <p>All buildings within the Fonthill Road Specialist Shopping Area are included, in addition to two buildings at the main gateway to Fonthill Road at the junction with Seven Sisters Road. All of these premises are within the Finsbury Park Town Centre's Primary Shopping Area and constitute a small and unique area within the PSA. This is in line with NPPF paragraph 53.</p> <p>All buildings have at least an element of commercial use and are within Class E, predominantly Class E(a). Furthermore, the upper floors of many premises are in light industrial E(giii) and office E(gi) use, with actions being taken by the Council to reinvigorate the industrial processes linked to the garment trade. Any conversion of commercial to residential use would cause wholly unacceptable harm to the economic nature and functioning of the SSA as well as the benefits to the community of this agglomeration of specialist retailing.</p> <p>Assessment of the area has been conducted at a granular level by assessing every site. Every site apart from The London Fashion Centre (89-93 Fonthill Road) is cumulatively below 1500sqm. However, there is risk that the upper floors of the Fashion Centre could be converted to residential use. The London Fashion Centre offers a dense shopping centre format which also hosts the Council's procured affordable retail unit. The current use of the site in retail use makes efficient use of land and contributes significantly to the specialist retail function and character.</p> <p>The Direction Area has been reduced to the smallest geographical area possible in accordance with NPPF paragraph 53. The resultant loss of class E uses especially retail uses would negatively impact on jobs and economic activity that would result in wholly unacceptable impacts on the important specialist retail function and the businesses and residents that depend on them.</p>
How is it necessary to avoid wholly unacceptable adverse impacts?	<p>As set out above, the Class MA conditions are insufficient to ensure a wholly unacceptable loss of jobs and economic activity, with the resultant harm to the cluster and the communities that depend on them.</p>

The imposition of residential uses on ground or upper floors in the Fonthill Road SSA would be wholly unacceptable due to the breakage of commercial frontages at ground floor, resulting in the dismantling of the cluster of retail uses (specifically clothing retail), and the reduction in upper floor space to meet economic objectives of revitalised garment manufacturing. This would not just affect the function of the SSA but would have wholly unacceptable adverse impacts on Finsbury Park PSA and the town centre as a whole. Fonthill Road SSA significantly enhances the character of the town centre and provides a unique asset that widens Finsbury Park appeal for local residents and customers from further afield.

The loss of retail floorspace in a mature retail location that benefits highly from agglomeration of retail uses would jeopardise the independent businesses that are currently supported here. These businesses provide employment for a range of people but most notably part time work for teenagers and mothers.

The MA PD right would restrict local economic initiatives focused around boosting garment manufacturing on upper floors. This strategic vision has multiple benefits including: increasing local employment and skills within an area of high levels of deprivation; promotes a circular economy; supports local supply chains, which have become more necessary after the impacts of the pandemic as well as being more environmentally friendly.

The retail businesses work in a cooperative way, sharing changing rooms and storage. This economic relationship would not be possible if these spaces were eroded through conversion to residential.

The small size of units and the terraced form of much of the SSA is at high risk of PD change to residential via Class MA and is situated very near to Finsbury Park Station, making it a competitive location. Significant commercial and residential development is allocated in the PSA over the next 5-15 years. This coupled with high land values makes the SSA at high risk of being negatively impacted from the MA PD right.

Fonthill Road SSA is an important part of Finsbury Park's Primary Shopping Area and has been identified as key to supporting the PSA function as the retail core. The NPPF acknowledges the importance of the retail core and an example of reasonable exception from the PD right.

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