

Appendx 2 – consultation responses

| Ref | Consultee type | Summary of representation | Support/object | Council response |
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| 1 | Individual | <p>To extend this unnecessary control on the flexible use of existing buildings will reduce the supply of needed housing.</p> <p>LBI should reverse its imposition on areas of the Borough and encourage flexible uses of existing buildings.</p> | Object | <p>The Article 4 Direction does not preclude the flexible use of buildings but requires proposals to be assessed against the Local Plan through the planning application process. Islington's Local Plan seeks to balance the provision of much needed housing with provision for retail and office needs and has identified sufficient housing supply to meet and exceed the boroughs housing target. Furthermore the proposed approach to Article 4 Directions is not a blanket approach meaning that the permitted development rights continue to apply outside of these areas. In many cases the conversion of buildings to residential leads to less efficient use of the site than redevelopment leading to less housing overall. The proposed article 4 areas are based on detailed and robust evidence and are considered to be justified.</p> |
| 2 | Individual | <p>Support LBI withdrawal of PD rights from these areas. Areas like Brecknock Road/ Camden Rd with independent shops and</p> | Support | <p>The Council notes the support for the Article 4 Direction. Streets outside of the CAZ such as Brecknock Road/ Camden Road will be assessed as part of tranche 2 of the Article 4 Direction.</p> |

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| | | businesses are also valuable especially with the cost-of-living crisis. | | |
| 3 | Individual | <p>The office blocks identified are not comprehensive enough. A4D should include developments where planning approval for office space has been granted, even if building work is not complete.</p> <p>The deadline for coming into force of August 2023 is too distant. This gives every office block time to apply for residential use before the order becomes effective.</p> <p>Suspect that the Council will get a deluge of change of use applications in the next few months, as the economic climate worsens and demand for office space declines.</p> | Object | <p>The Council has powers to add conditions to decision notices to retain Class E as approved. NPPF and PPG state that A4Ds should be limited to situations where they are necessary to avoid wholly unacceptable adverse impacts, or to protect local amenity and / or the wellbeing of the area. The NPPF/ PPG also state that Directions should cover the smallest possible geographic area.</p> <p>The reason for the Article 4 Directions coming into force in August 2023 is that the council needs to follow a 'non-immediate procedure' under legislation to avoid being liable to pay compensation if prior approval is refused – this requires a years notice to be given.</p> |
| 4 | Business - Mortgage Advisor | <p>Why there are some buildings with red lines in “southwest CAZ” and some not? My block (B1 office) isn't identified for protection. Does that mean its exempt?</p> <p>Am I allowed to convert the office to residential before 31/8/23? Is your</p> | Neither | <p>Blocks outside the red line will not be included in the Direction Areas, should they be confirmed. Certain sites may be ineligible for Class MA due to listing, floor area etc.</p> <p>The Secretary of State has powers to amend the direction after it is confirmed by the Council.</p> |

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| | | <p>decision final? What if secretary of state overrules?</p> <p>I have had no tenant since October 2020 as pandemic has driven office workers out of London and We-work model means normal office rentals hard to fill.</p> | | |
| 5 | Property Owner (Angel Gate) | <p>Concerns that evidence (ELS 2016, Employee Jobs by Lower Super Output Area 2020), not up to date and skewed due to Covid-19 pandemic/ lockdowns. Commercial agency should have undertaken report as evidence base for proposed A4D.</p> <p>Home working, hybrid working, flexible office workspace and caution among office occupiers reducing demand for average office space in secondary locations.</p> <p>Introducing residential to area with existing residential would not result in 'wholly unacceptable adverse impact'. Partial use of Angel Gate for residential would have little or no impact on amenity or well-being of area. An element of residential could make efficient use of vacant offices and help respond to the housing crisis. As an accessible location there would be minimal carbon footprint.</p> | Object | <p>The Council's evidence is based on a range of sources and is not solely based on those cited. It includes Local Plan research, census data, GLA studies, research published by planning consultants, a study on the potential impact of Class MA on the Borough prepared by UCL and a thorough site-by-site mapping exercise.</p> <p>This detailed, up-to-date and extensive evidence is listed in Appendix 1 and the signed Delegated Report.</p> <p>Sites and blocks are only included in the A4D where this is justified by robust evidence and meets the strict NPPF and PPG tests.</p> <p>The PPG advises that an A4D removing PD rights where prior approval powers are available to control permitted development should have particularly strong justification. In</p> |

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| | | <p>Long-term comprehensive redevelopment potential of the site would be prejudiced if in the A4D area. All commercial uses (Class E) surrounding the site (e.g. on Wakeley Street and former NCB site) should also be included to ensure they're not converted to residential and thereby create amenity expectation.</p> | | <p>the case of buildings on nearby streets, prior approval applications in these locations would need to comply with the qualifying criteria and the prior approval conditions. For example some of the properties on Wakley Street are in Duncan Terrace/ Colebrook Row Conservation Area so the prior approval conditions provide an element of protection.</p> |
| 6 | Natural England | No comment | Neither | Noted. |
| 7 | GLA | <p>A4D will support recovery and safeguard future sustainability of CAZ and its nationally significant offices, retail, cultural and leisure activities. Will support its contribution to London economy and employment, and prosperity of UK as a whole. The Mayor strongly supports these targeted A4Ds which will help its vibrant mix of business clusters to flourish, including those in CAZ, town centres, specialist shopping and industrial areas and sustain their</p> | Support | The Council notes support for the Article 4 Direction. |

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| | | contribution to national, London and local economies. | | |
| 8 | Theatres Trust | Concerned about potentially negative impact of this PD right on theatres, cultural and performance facilities if neighbouring buildings converted. Essential these venues are supported and the strategically important strength and diversity of London's cultural offer is not undermined. Also important the cultural needs of local people are met. Therefore, we welcome these A4Ds. | Support | The Council notes the support for the Article 4 Direction. |
| 9 | Islington Society | <p>Wholeheartedly support for these A4Ds. Our interest is encapsulated in Section 8, Para 8.5 of the report. "The broad range of Class E uses and social opportunities contributes to the amenity and quality of life of residents".</p> <p>Welcome the intention to apply for a 2nd tranche of Class MA A4Ds (para 8.11). Local shops, restaurants, businesses and cultural uses are essential to the well-being and amenity of residents, we would wish to see them protected. In response to Local Plan consultations, we stressed the need to retain and provide workspaces locally to provide local</p> | Support | The Council notes support for the Article 4 Direction. The value different f Class E uses for quality of life of residents is recognised. |

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| | | <p>employment for residents. We wish to encourage a 'walk-to-work' approach, with workplaces within walking/ cycling distance of where people live.</p> <p>Local workplaces as a 'dispersed use' provide a valuable service to local communities. Retention of local pockets of Class E benefits community and stimulates local economic activity.</p> | | |
| 10 | Angel.London | <p>In principle we support Council's plans to remove the Class MA Permitted Development Rights (PDR). Retaining and promoting the rich mix of retail, employment, dining and night-time uses supporting the vibrant business ecosystem aligns with the remit of the Angel BID.</p> <p>Map should include 31 - 47 Camden Passage to conform to the Camden Passage SSA designation map (Map 1) ensure its survival as a whole to maintain the integrity of the SSA.</p> | Support | <p>The Council notes support for the Article 4 Direction. Numbers 31-45 are listed so are ineligible for Class MA. No.47 is in the setting of listed buildings and also in Angel Conservation Area, so has an element of protection from Class MA.</p> |