

Islington Local Plan

# Strategic and Development Management Policies

September 2023



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# 1 What is the role of the Local Plan?

## Introduction

- 1.1 The Council is the key agent responsible for shaping Islington's future. Everything the Council does contributes to making Islington fairer, creating a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life. The Local Plan is integral to achieving these aims. It sets out a range of planning policies to steer development in the borough over the next fifteen years – this includes:
  - spatial policies covering specific areas in the borough;
  - strategic policies which outline the key priorities across a number of policy areas;
  - detailed criteria-based policies, which stem from strategic requirements and are the main basis on which planning decisions are made; and
  - specific site allocations which provide fine-grain detail on a number of planned and potential development sites across Islington.
- 1.2 The Local Plan provides a clear, bold framework for planning decisions which set out what we expect from development. The Local Plan covers the period 2020/21 to 2036/37 ("the plan period"). Islington is a borough with significant constraints, and it is not hyperbole to state that each and every development must make the most of every site and development opportunity, in order to ensure that opportunities for using increasingly scarce resources, including a lack of developable land, are not wasted.
- 1.3 We can only succeed by working with key public and private sector partners such as the police, health service, and local universities as well as with local communities. The Local Plan has been prepared in co-operation with these stakeholders and many others, including adjacent boroughs in line with the Duty to Co-operate. This co-operation does not stop once the Local Plan is adopted; it is a continuous process, which enables policies to remain effective throughout the lifetime of the plan.
- 1.4 The Local Plan is informed by an extensive evidence base, both technical and non-technical. In preparing the document, this evidence has provided the basis for our approach. Policy requirements at the national and regional level also have direct implications on what the Council can and cannot do. Where possible, we have sought to reflect the full range of opinion – from stakeholders, evidence and policy requirements – but it is never possible to identify a single approach with which everyone will agree and which would be found 'sound' and compliant with various statutory requirements set out in planning legislation.

## The planning framework

- 1.5 The Local Plan is developed within a complex planning framework, at the heart of which is primary legislation which sets out the basic legal parameters within which the Local Plan should be prepared and subsequently operate. The Planning and Compulsory Purchase Act 2004 ("The PCPA") provides the fundamental basis on which the plan-led system functions. It sets out the definition of Local Development

Documents, a suite of documents which must (taken as a whole) set out the authority's policies (however expressed) relating to the development and use of land in their area. This includes documents which have Development Plan status as well as those which do not, such as Supplementary Planning Documents (SPDs) and the Statement of Community Involvement (SCI).

- 1.6 The Development Plan is the key set of documents which inform decisions on planning applications. In Islington, the Development Plan consists of any locally adopted Development Plan Documents (such as the Local Plan) and the London Plan (the Spatial Development Strategy prepared by the Mayor of London). Any 'made' neighbourhood plans – those which have been successful at examination and referendum – also form part of the Development Plan.
- 1.7 The PCPA specifies that planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise. What does and does not constitute a material consideration is determined on a case-by-case basis, as is the weight to be given to any such considerations.
- 1.8 Secondary legislation provides further detail on the operation of primary legislation. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out the process for preparing and adopting a Local Plan. It also requires Local Planning Authorities (LPAs) to review Local Development Documents – such as the Local Plan – every five years from the date of adoption. A review does not mean that policies will definitely need to change – it merely requires an objective assessment of policies to determine whether they need updating. Where the review concludes that updates are not necessary, the LPAs must publish the reasons why.
- 1.9 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they should be applied. It provides a framework within which locally-prepared plans addressing housing needs and other economic, social and environmental priorities can be produced. The NPPF must be taken into account in preparing the development plan; it is also a material consideration in planning decisions, although the weight attributed to the NPPF will depend on the details of each application. Planning Practice Guidance (PPG) provides further detail on policies in the NPPF.
- 1.10 The London Plan is the Spatial Development Strategy for Greater London. It is a strategic plan for London which sets out a policy framework covering a variety of economic, social and environmental issues. It is part of the Development Plan, meaning it must be taken into account in the determination of planning applications. For plan-making, the London Plan provides the strategic, London-wide policy context for all borough Local Development Documents; all such documents including the Local Plan have to be 'in general conformity' with the London Plan.
- 1.11 This iteration of Islington's Local Plan is made up of four Development Plan Documents:
  - Local Plan: Strategic and Development Management policies – the principal document in the Local Plan, which sets out strategic policies to identify where and how change will happen in Islington; and detailed policies to manage development.
  - Site Allocations – this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
  - Bunhill and Clerkenwell Area Action Plan (AAP) – a plan for the south of the borough where significant change is expected to occur. The plan sets out spatial

policies covering different parts of the area with further policies to manage development.

- North London Waste Plan – a joint waste plan together with six other boroughs within the North London Waste Authority area (Camden, Haringey, Hackney, Barnet, Enfield and Waltham Forest). The Waste Plan will identify a range of suitable sites for the management of all North London’s waste and will include policies and guidelines for determining planning applications for waste developments.

1.12 There are a number of SPDs which provide further guidance on Local Plan policies. The Policies Map visualises the various designations identified in the Local Plan. Implementation of the Local Plan will be monitored through the Authorities Monitoring Report.

**Figure 1.1: Islington Planning Framework**



## Strategic and non-strategic policies

1.13 Section 19 (1B-E) of the PCPA requires LPAs to identify the strategic priorities for the development and use of land in the authority’s area<sup>1</sup>. Policies to address those priorities must be set out in the LPAs development plan documents (taken as a whole). The NPPF elaborates on the legislative requirement, making clear that Local Plans should identify strategic policies, clearly distinguishing from other policies which are considered non-strategic.

<sup>1</sup> As noted in paragraph 1.10, the London Plan forms part of Islington’s Development Plan. Where LPAs are satisfied that policies to address the area’s strategic priorities are set out in the London Plan, policies to address these priorities do not need to be set out in local DPDs. For avoidance of doubt, the Local Plan is considered to set out the full suite of policies to address Islington’s strategic priorities. Some DPD policies do refer to relevant London Plan policies but none of the strategic priorities of the plan is entirely reliant on the London Plan.



1.14 Strategic policies should set out an overall strategy for the pattern, scale and quality of development including housing and employment uses. Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development. For avoidance of doubt, all policies have full statutory Development Plan weight.

1.15 Table 1.1 sets out the strategic and non-strategic policies of the Strategic and Development Management Policies DPD.

**Table 1.1: List of strategic and non-strategic policies**

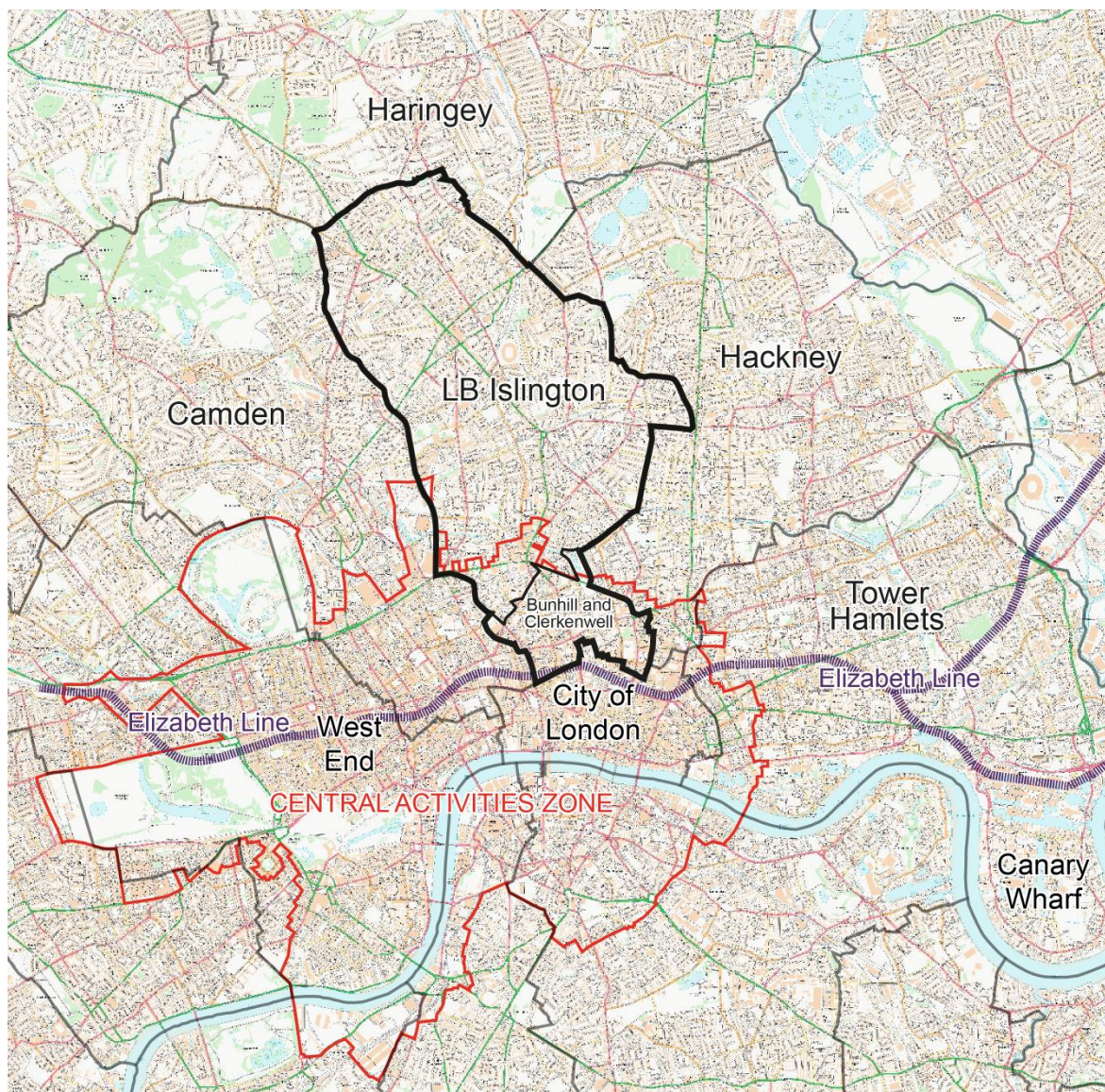
<b>Strategic and development management policies</b>	
<b>Strategic policies</b>	<b>Non-strategic policies</b>
Policy PLAN1: Site appraisal, design principles and process	Policy H6: Purpose-built Student Accommodation
Policy SP1: Bunhill and Clerkenwell	Policy H7: Meeting the needs of vulnerable older people
Policy SP2: King's Cross and Pentonville Road	Policy H8: Self-build and Custom Housebuilding
Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site	Policy H9: Supported Housing
Policy SP4: Angel and Upper Street	Policy H10: Houses in Multiple Occupation (HMOs)
Policy SP5: Nag's Head and Holloway	Policy H11: Purpose Built Private Rented Sector development
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Policy H1: Thriving communities	Policy R5: Dispersed retail and leisure uses
Policy H2: New and existing conventional housing	Policy R6: Maintaining and enhancing Islington's unique retail character
Policy H3: Genuinely affordable housing	Policy R7: Markets and specialist shopping areas
Policy H4: Delivering high quality housing	Policy R8: Location and Concentration of Uses
Policy H5: Private outdoor space	Policy R9: Meanwhile/temporary uses
Policy H12: Gypsy and Traveller Accommodation	Policy R10: Culture and the Night-Time Economy
Policy SC1: Social and Community Infrastructure	Policy R11: Public Houses
Policy B1: Delivering business floorspace	

Policy B2: New business floorspace	Policy R12: Visitor accommodation
Policy B3: Existing business floorspace	Policy G5: Green roofs and vertical greening
Policy B4: Affordable workspace	Policy S2: Sustainable Design and Construction
Policy R1: Retail, leisure and services, culture and visitor accommodation	Policy S6: Managing heat risk
Policy R2: Primary Shopping Areas	Policy S8: Flood Risk Management
Policy R3: Islington's Town Centres	Policy S9: Integrated Water Management and Sustainable Drainage
Policy R4: Local Shopping Areas	Policy S10: Circular Economy and Adaptive Design
Policy G1: Green infrastructure	Policy T2: Sustainable Transport Choices
Policy G2: Protecting open space	Policy T4: Public realm
Policy G3: New public open space	Policy T5: Delivery, servicing and construction
Policy G4: Biodiversity, landscape design and trees	Policy DH2: Heritage assets
Policy S1: Delivering Sustainable Design	Policy DH4: Basement development
Policy S3: Sustainable Design Standards	Policy DH5: Agent-of-change, noise and vibration
Policy S4: Minimising greenhouse gas emissions	Policy DH6: Advertisements
Policy S5: Energy Infrastructure	Policy DH7: Shopfronts
Policy S7: Improving Air Quality	Policy DH8: Public art
Policy T1: Enhancing the public realm and sustainable transport	Policy ST3: Telecommunications, communications and utilities equipment
Policy T3: Car-free development	Policy ST4: Water and wastewater infrastructure
Policy DH1: Fostering innovation and conserving and enhancing the historic environment	
Policy DH3: Building heights	
Policy ST1: Infrastructure Planning and Smarter City Approach	
Policy ST2: Waste	

## Islington in context

1.16 Islington is affected – directly and indirectly – by changes at the London level, and beyond. Islington is part of Inner London; it borders the Inner London boroughs of the City of London, Camden, Hackney to the south, west and east respectively, and the Outer London borough of Haringey to the north. It is both a gateway to the commercial heart of the city and to the suburbs, and the varied character of the borough reflects this.

**Figure 1.2: Islington in context**



1.17 Islington as a place is both small and incredibly diverse. The borough is less than six square miles in size, making it one of the smallest local authorities in the country (by area). There have been significant population increases in recent years, with projections showing further steep increases.

- 1.18 Islington's diversity is reflected in its people. We have a broad multi-ethnic population from a variety of backgrounds, a variety of faith communities, a significant proportion of disabled people, as well as one of the most concentrated LGBTQI+ populations in the U.K. Islington is an inclusive place for all where diversity is celebrated, and ensuring that this continues is one of the key objectives of the Local Plan.
- 1.19 The challenges facing the borough are considerable. Fundamental to almost all of them is the degree of contrast within an area which contains both some of the country's most deprived neighbourhoods in close proximity to areas of very considerable wealth; the borough registers as the thirteenth most deprived in the country. This contrast, and particularly the effects of poverty and lack of affordable housing, are crucial issues for the borough.
- 1.20 Islington is easily accessible via a number of transport modes. Direct rail links connect Islington with Inner and Outer London as well as the wider South East, with Crossrail and (potentially) Crossrail 2 poised to open up additional capacity to alleviate pressure on the existing transport network.
- 1.21 Many people commute through the borough travelling between central and outer London. In terms of Islington residents, over 70% work in Islington, the City of London, Westminster or Camden. Islington has a low proportion of car-owning households but suffers from a number of heavily trafficked through-routes, particularly the A1 (Goswell Road, Upper Street, Holloway Road) and A503 (York Way, Caledonian Road and Pentonville Road/City Road).
- 1.22 Islington is an important employment centre, evidenced by the significant positive net inflow of employees, the fourth highest of all Inner London boroughs. As manufacturing has shrunk dramatically over recent years, office-based businesses including financial and business services and, more recently, technology and creative industries, have all grown rapidly, mirroring the structural shift towards a service-based economy seen across the UK. At present, employment sectors are diverse although most employment space and jobs are concentrated in the south of the borough.
- 1.23 The borough is a popular place to live and visit and is valued for its built environment. Islington's mix of shopping, restaurants, culture and night-time economy, rich architecture and walkable environment draws visitors wishing to explore beyond the standard tourist attractions of central London.
- 1.24 Islington comprised a number of villages before it became a suburb of Victorian London and continues to have its own character. The borough has significant Georgian and Victorian heritage, and important features which predate this heritage, for example the shape and space of Clerkenwell Green and Islington Green. It is also home to some fine examples of contemporary architecture.
- 1.25 Major growth and change has occurred on Islington's doorstep. The Olympics have transformed Stratford to the east, with significant development to the west at King's Cross. The south of the borough is located within the Central Activities Zone (CAZ), the main commercial centre of the city where employment uses, particularly business floorspace is prioritised.
- 1.26 Islington, by contrast, has little by way of major new development sites at present, certainly sites of regional significance. This is in part due to the character of the borough, shortage of developable land and the historic pattern of development. The development strategy advocated in recent years, by the Mayor of London and by Government, was to focus new development in Inner London, on brownfield sites.

Islington has made a significant contribution to delivery of new housing and employment space over the past two decades, in line with this overarching development strategy; our small size has not prevented the borough taking a bold and expansive approach to new development. However, we have now reached a critical point; given the densely developed nature of Islington and its small size, development opportunities to facilitate further growth are decreasing significantly.

- 1.27 The challenge we face is to build on the distinctiveness of Islington – the people and places within the borough that make it unique – while ensuring that the borough grows in an inclusive and sustainable way as part of one of the largest and most populous cities in the world.
- 1.28 The new London Plan recognises this challenge explicitly. It advocates a multi-faceted spatial approach to development, recognising that if London is to meet the challenges of the future, all parts of London will need to embrace and manage change. This is not necessarily transformative change – in many places, the London Plan envisages that change will occur incrementally, and recognises that there needs to be a strong focus on sustainable and inclusive regeneration, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment.
- 1.29 In terms of housing growth, the London Plan seeks to meet the vast majority of London’s housing need. Opportunity Areas have the potential to deliver a substantial amount of new homes (as well as employment growth) and are expected to do a lot of the heavy lifting in terms of meeting overall needs. However, the London Plan also emphasises the importance of small sites to meet housing need, with a focus on incremental, appropriate suburban intensification, and the introduction of a presumption in favour of small housing development.

## Vision and objectives

- 1.30 The Islington Local Plan is underpinned by a clear vision:

**To make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.**

- 1.31 Islington has a thriving economy and its location in close proximity to central London means it is well placed to continue to develop successfully. This success must feed through into all elements of our communities. This is fundamental to creating and maintaining a fairer borough and delivering sustainable development.
- 1.32 To ensure that the vision becomes reality, the Local Plan sets out seven clear objectives, which are the basis for the policies set out in the rest of the document, and which, if delivered, will create and sustain a fairer Islington. These objectives are not drafted to sit idle in the Local Plan introduction; they must be actively considered from the very first stage of a development proposal. Each and every development in the borough, from small roof extensions and street furniture to major mixed use housing and employment sites, should contribute to the delivery of the Council’s objectives.

Any development proposal which does not proactively engage with and address these objectives will not be acceptable.

### **Objective 1: Homes – Delivering decent and genuinely affordable homes for all**

- 1.33 There is a pressing need to reduce inequality and the negative consequences of relative poverty in Islington, so that every person has the same opportunity to reach their potential. Islington is a very polarised place of rising inequality and high levels of poverty, where wealthy and deprived areas are in close proximity throughout the borough. Those who are poorest are most likely to experience poor physical and mental health, have lower educational attainment, and be engaged in or be a victim of crime.
- 1.34 Maximising the delivery of genuinely affordable housing of a high quality is a key aspect of the Local Plan, which will help tackle inequality in the borough and improve quality of life for residents.
- 1.35 Evidence suggests a significant need for genuinely affordable housing, which means homes that people can live in without spending very high proportions of their incomes on housing costs.

### **Objective 2: Jobs and money – Delivering an inclusive economy, supporting people into work and helping them with the cost of living**

- 1.36 The Council strives to make Islington somewhere where everyone, regardless of skills, experience or background, can truly and meaningfully share in and shape the success of an area. To deliver this, an economy needs to be inclusive and must work for everyone, working from the bottom up rather than 'trickle down' from the top, providing new employment opportunities for all sections of the borough's residents.
- 1.37 The Council is currently developing its overarching strategy for delivering an inclusive economy. An inclusive economy is not just beneficial to the borough's disadvantaged residents on an individual level. By reducing social inequality, it enables more cohesive and resilient local communities. A diverse local economy that contains a broad range and mix of sectors and businesses at varying scales is more resilient than an economy dominated by a few sectors. It is also better able to withstand an economic downturn. Economic diversity adds to the character of the borough making it a more attractive and interesting place to live and work. A diverse ecosystem of small locally owned businesses can rapidly respond to consumer need while offering experiences that cannot be replicated through e-commerce.
- 1.38 Provision of affordable workspace and suitable space for a range of businesses, including Small and Medium Enterprises (SMEs), is key to delivering an inclusive economy, as this is a tangible mechanism to open up the local economy to those who would otherwise find it difficult or impossible to access.

### **Objective 3: Safety – Creating a safe and cohesive borough for all**

- 1.39 Islington is a vibrant place for people to live, work, visit or pass through. Safety and the feeling/perception of safety can be a key determinant for how vibrant and successful a place is. The Council wants people to be safe and feel secure on its streets and within its open spaces. Safety relates to crime and anti-social behaviour, but also other considerations such as use of transport infrastructure and the public realm. The creation and maintenance of mixed and balanced communities will be a key part of ensuring safety; this depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities.

- 1.40 The benefits of designing for community safety should not be underestimated, particularly for more vulnerable people, including children, young people, older and disabled residents. It is therefore expected that the design of proposals seeks to achieve an appropriate spatial balance between pedestrians, cyclists and vehicles using the space, and that measures to bring together design and management to modify user behaviour for the better are introduced. Designs should encourage more users onto the street to promote natural surveillance.
- 1.41 Designing out crime is a key planning principle, which incorporates a number of design techniques to limit incidences of crime; this includes increases in natural surveillance and designing space so it is conducive to positive behaviour.
- 1.42 Risks of physical harm, for example, from perceived danger in the public realm where pedestrians, cyclist and vehicles all operate in close proximity to one another. Without clear delineation of routes for different modes of transport, the risk of accidents and collisions increases. The Mayor of London has a long-term vision (so-called 'Vision Zero') for no deaths or serious injuries to occur on London's streets, via street design and management that accommodates human error and ensures impact levels are not sufficient to cause fatal or serious injury.
- 1.43 In any event, designers should take into account the experience of local community safety groups and other relevant expertise in weighing the risks and benefits associated with a proposal. It is not always necessary to eliminate all risks; in pedestrianised areas or residential locations (with less traffic) for instance, it might be possible to encourage children and young people to play in the street. And, where risks are unavoidable they can very often be offset.

#### **Objective 4: Children and Young People – Making Islington the best place for all young people to grow up**

- 1.44 The Local Plan aims to deliver development that is adaptable and usable for people of all ages. The importance of ensuring that children and young people have access to the right facilities as they grow cannot be overstated. Ensuring a child friendly environment for children and young people ensures that they get the best start in life, and will enable them to achieve their full potential.
- 1.45 The Fair Futures Commission project explored what is needed to improve the futures of children, young people and their families in Islington, with the aim to make Islington a great place to grow up in. The Commission was an independent body made up of people from a range of backgrounds and lived experiences.
- 1.46 Planning is an important tool to facilitate the recommendations of the Commission to deliver child-friendly places, whether through protection and provision of social infrastructure such as schools, libraries and community centres; protection of a range of spaces of all shapes and sizes, both soft and hard landscaped, where play and activity can occur; or by ensuring good quality housing with enough space for children and young people to lead healthy lives.

#### **Objective 5: Place and environment – Making Islington a welcoming and attractive borough and creating a healthier environment for all**

- 1.47 The quality of Islington's places and spaces support the borough's diverse communities and its commercial, cultural and social life. The success of any development depends largely on how it relates and contributes to its context. There are no sites within the borough that are so large or so detached from their surroundings that the context can be ignored. It must also be recognised that a site's

context is dynamic, constantly evolving with time and use and any new development must be sufficiently resilient to, and capable of flexing with, that change. All planning applications must take into account the wider physical, social, economic, cultural, historic and green infrastructure; identifying the opportunities and challenges each presents.

- 1.48 This is not just individual buildings but the wider neighbourhood, public realm, transport and associated social infrastructure. An inclusive place should facilitate social cohesion and community stability, avoiding the need for unwanted or premature moves. It should also support the local economy, enabling service providers to benefit from the patronage of the whole community.
- 1.49 The creation and maintenance of mixed and balanced communities depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities. The way in which a site connects with and 'stitches into' its surroundings, and how it might be developed to improve those, or create new, connections is a vital part of the assessment of new development. Those connections might be for pedestrians, bikes, wildlife, visual links, way-finding, sunlight and or drainage; improving the site's amenity and its contribution to the amenity of the area. Each should be carefully considered to deliver safe, inclusive, functional and efficient routes. The delivery of more well designed places within the public realm, which provide the opportunity and a reason for people to dwell, will also facilitate the personal connections that underpin wider social/community cohesion.
- 1.50 An inclusive place features socially inclusive neighbourhoods without barriers, which enables a range of users to access spaces and interact within them. For example, developments should increase rather than reduce permeability; residential and commercial developments should not be gated. This will enhance the dignity of individuals, supporting their use and enjoyment of facilities on their own terms. To that end design proposals that separate users and deliver an inferior experience, on the basis of a person's age, disability, race, gender, wealth, or any other characteristic, will be resisted.
- 1.51 Places and spaces must be designed with diversity in mind, so that they are convenient and enjoyable for all to use. The provision of accessible, essential and appropriate services to support a development will allow independent use and contribute to the cohesion and sustainability of the community.
- 1.52 Attention should also be given to the quality of spaces around or between buildings; determining their social, environmental, historical, cultural and aesthetic value, whilst connecting, reflecting and enhancing the structures and spaces they link.
- 1.53 Islington's historic environment is one of the borough's defining characteristics, including a variety of heritage assets. Conservation of this historic environment will help to deliver wider social, cultural, economic and environmental benefits. Opportunities to enhance the historic environment should be sought wherever possible.
- 1.54 Islington has the second lowest proportion of green space (as a proportion of overall land), and the second lowest amount of open space, of any local authority in the country. As a small but densely populated borough, green and open space is highly valued but under continued pressure in light of housing, population and employment growth. Planning has a key role in balancing the pressures of development with the need to provide a high quality green infrastructure to meet the needs of Islington's communities.



- 1.55 Provision of green and open space provides multiple benefits. It is extremely important for residents' health and wellbeing. It provides space for recreation and play, supporting the development of a child-friendly borough. It can also act as a space for mental relief and a place to escape; parts of the borough experience issues with overcrowded housing, therefore the availability of green and open spaces – however small – can be an important resource for these residents. In addition, it protects and enhances biodiversity, lessens flood risk, improves air quality and helps with mitigating the impact of climate change.
- 1.56 Development should continue to make efficient use of land and fully integrate with, and relate positively to, its immediate neighbours and locality. This principle ensures that regard is had to the historic environment whilst enabling sensible evolution of character and facilitating new development.
- 1.57 Planning has a significant role to play in minimising the borough's contribution to climate change and ensuring that the impacts of climate change can be effectively mitigated. Climate change impacts are increasingly affecting the day-to-day lives of people who live in, work in and visit Islington. From the 'urban heat island effect' to extreme winter temperatures, this threatens the health and wellbeing of these people and also the physical fabric of the borough which makes it a place where people want to be. In June 2019, the Council declared an environment and climate emergency and has pledged to work towards making Islington net zero carbon by 2030.
- 1.58 The approach to tackling climate change is multi-faceted, including provision of more green infrastructure, ensuring buildings are designed sustainably and promoting less polluting modes of transport, in particular walking, cycling and public transport.

### **Objective 6: Health and independence – Ensuring our residents can lead healthy and independent lives**

- 1.59 Spatial planning can positively influence the wider determinants of health by shaping a healthier environment for people of all ages, abilities and backgrounds across the borough, from ensuring every child has the best start in life to creating healthy, inclusive environments for older and disabled people.
- 1.60 This includes facilitating active healthy lifestyles and reducing inactivity through the pattern of development, good urban design, good access to local services and facilities (including sports facilities); increased urban greening and open space; provision of safe places for active play and food growing; improved accessibility by walking, cycling and public transport.
- 1.61 Tackling inequality and poverty can also have a significant impact on health and wellbeing. Islington has wealthy and deprived areas located cheek by jowl throughout the borough. Those who are poorest are also most likely to experience poor physical and mental health, lower educational attainment, and be engaged in or be a victim of crime. Islington residents experience poorer physical and mental health that results in early deaths from cancer and circulatory disease, caused in large part due to deprivation across all Islington wards coupled with unhealthy lifestyle choices and poor access to the right services at the right time. Deprivation is the main risk factor for early death and poor health in Islington.
- 1.62 At the same time, life expectancy is increasing overall. Some people are living longer while experiencing long-term physical and mental health conditions, for example, there has been an increase in the number of people living with dementia. This requires the creation of a healthy environment that contributes to the prevention of ill-health, but

also one supports people who do experience ill-health to live independently, for longer, in their community. Planning can help to create social, civic spaces which increases interaction of people from all walks of life. This can help address issues of loneliness and social isolation which affect certain residents, and which can have a detrimental impact on health and wellbeing, particularly mental health.

**Objective 7: Well run Council – Continuing to be a well-run Council and making a difference despite reduced resources**

- 1.63 Planning delivers holistic benefits and considers issues over the long-term. Proper planning can help to identify and mitigate issues, thereby saving money and resources in future, building resilience. The examples of this are numerous, whether requiring energy efficiency measures to address fuel poverty, which saves families £100s and may lessen chances of them requiring support services in future; or by ensuring that hot food takeaways are not opened up near schools, contributing to reduced levels of childhood obesity which has knock on benefits for health spending amongst other things.
- 1.64 To be truly proactive and contribute fully to ensuring efficiency of resources will require further improvements in those policy areas where we are already doing well and developing effective solutions for policy areas which are currently not delivering as they should be.

## Delivering the Local Plan vision and objectives

- 1.65 Islington aspires to the highest standards of architectural and urban design in London, to be at the forefront of sustainability and to preserve and enhance the borough's historic environment, its heritage assets and their settings. Good design is indivisible from good planning, and innovation and tradition need to be complementary for successful physical regeneration and the creation of high quality public spaces and places.

### Policy PLAN1: Site appraisal, design principles and process

- A. All forms of development are required to be of a high quality and make a positive contribution to local character, legibility and distinctiveness, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. Any development which does not take the opportunities available for improving the character and quality of an area and the way it functions will be refused.
- B. To ensure that the vision and objectives of the Local Plan are realised, all development in Islington must, from the very first iteration of the proposal, comply with four key design principles:
- (i) Contextual – all development must make efficient use of sites/buildings, by responding to and enhancing the existing site context (which could extend beyond the site itself); not undermining the quality of existing development and streetscape; and ensuring that the development capacity of site is fully realised. A good level of amenity must be provided, including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution (such as air, light and noise), fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook<sup>2</sup>.
  - (ii) Connected – development must improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings. All opportunities to repair fragmented urban form should be taken. Proposals must improve safety and promote positive social contact, behaviours and community cohesion, including through creation or enhancement of effective places to dwell, and through increased natural surveillance. Development must sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan. No proposal should unduly prejudice the satisfactory development or operation of adjoining land and/or the development of the surrounding area as a whole.
  - (iii) Inclusive – development must be adaptable, functional and resilient, and able to respond to the spatial, social and economic needs of the borough's increasingly diverse communities and their different and evolving demands. This includes sustaining and reinforcing a variety and mix of uses in line with any relevant land use priorities of the Local Plan.
  - (iv) Sustainable – development must be durable and adaptable, and contribute to the creation of a vibrant, liveable, enduring city. All development must consider

<sup>2</sup> This is not an exhaustive list and there may be other relevant amenity impacts which should be considered on a case-by-case basis.

social, environmental and economic elements jointly and simultaneously, guiding development towards sustainable solutions.

- C. The process of developing and designing a proposal which addresses the four key design principles will only be effective where it is informed by a comprehensive site appraisal. All development proposals must submit a site appraisal comprising the information below, commensurate with the scale, location and potential impact of the proposal; major developments and smaller developments on sites in prominent or sensitive locations will likely be required to address many, if not all, of the criteria. Information must be demonstrated/evidenced through provision of detailed clear and accurate drawings and relevant written statements<sup>3</sup>:
- (i) architectural and design quality and detailing, such as colour, type, source and texture of detailing and materials used. Construction detailing must be unified, visually attractive, robust and maintenance free; poorly-detailed and undeliverable built forms are not appropriate;
  - (ii) details of historic context, such as distinctive local built form, significance and character of any designated and non-designated heritage assets, scale and details that contribute to its character as a place;
  - (iii) an assessment of the urban form, such as building lines, frontages, plot sizes and patterns, building heights, storey heights and massing;
  - (iv) movement and spatial patterns, such as definition, scale, use, detailing and surface treatment of routes and spaces;
  - (v) considerations of the local landscape and natural features, such as topography, trees, boundary treatments, planting and biodiversity; this must be informed by appropriate information including, where relevant, a tree survey and analysis of the local ecology and green links;
  - (vi) visual context, particularly strategic, local and other site specific views (e.g. local landmarks), skylines and silhouettes, and scale and form of townscape set pieces or urban compositions;
  - (vii) daylight and sunlight levels, based on relevant best practice/guidance;
  - (viii) surface water flows and opportunities to capture them;
  - (ix) existing features and patterns of use including housing, entertainment, commercial, community and play activities;
  - (x) details of infrastructure provision, including existing and planned infrastructure, and any impacts that the proposed development will have on this existing and/or planned provision;
  - (xi) the accessibility (physical, social, and economic) of the street in context; including technical survey information and feedback on user experience of the street;
  - (xii) safety in design, including consideration of access, materials and site management strategies;
  - (xiii) plan(s) showing the location of utilities above and below ground, and, where proposals may impact on ongoing operation of utilities, evidence of engagement with relevant utilities providers;

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<sup>3</sup> In conjunction with additional information requirements set out in various Local Plan policies.

(xiv) traffic, including pedestrian flows at different times of the day and week, and an analysis of what modal shift might be possible; and

(xv) assessment of route and place qualities.

- D. All elements of proposed building designs must be demonstrably deliverable. Any proposals which are considered likely to employ 'value engineering' approaches, which dilute the design quality of approved schemes and often make schemes difficult to maintain, will be resisted.

1.66 The four key design principles are an essential part of delivering the vision and objectives of the Local Plan, and are the starting point for designing a development proposal. All development in the borough must seek to deliver holistic benefits in line with these principles, which will ensure that each and every scheme maximises its contribution to the overarching aims of the Local Plan, thereby making the best use of land in the borough.

1.67 The policy ensures that the site and its context have been sufficiently analysed and understood during the design process and that this knowledge has been used in the proposed design of the development. For development to be considered acceptable, it must be:

- Contextual – development proposals must respond to and enhance the existing site context. Consideration of various potential amenity impacts is a key aspect of this design principle; this includes:
  - ensuring a minimum distance of 18 metres between windows of habitable rooms, to protect privacy for residential developments and existing residential properties. This does not apply across the public highway, as overlooking across a public highway does not constitute an unacceptable loss of privacy.
  - assessment of daylight and sunlight to ensure that there is sufficient levels of sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing. Further guidance is provided in the Building Research Establishment (BRE) publication 'Site Layout Planning for Daylight and Sunlight: a guide to good practice'.
  - consideration of rooftop plant and enclosures which can often have a negative impact on the roofline of both existing and proposed buildings. Plant enclosures must therefore not be visible from the public realm and should instead be incorporated within the main body of the building.
- Connected - good places are well connected, and it is essential to look beyond the red line of the site boundary and consider how new development will connect with its surroundings and integrate with the urban context and natural environment. Development which unduly prejudices the satisfactory development or operation of adjoining land and/or the development of the surrounding area as a whole will be resisted. This will be assessed on a case-by-case basis but could include impacts on renewable or low carbon energy supply, i.e. where new development caused detrimental overshadowing of solar panels. Where negative impacts are identified, the design must be modified where possible, to avoid adverse impacts.
- Inclusive – an inclusive development places people at the heart of the design process, creating places/environments which:

- are convenient and enjoyable for everyone to use. Development must be designed with diversity in mind; addressing the specific physical, sensory, cognitive and social needs of people protected by current equalities legislation. This will ensure that barriers are designed out and flexibility built in. The provision of accessible, essential and appropriate services to support a development will also provide for and will enhance independence and contribute to the cohesion and sustainability of the community.
  - ensure 'ease of use' and versatility in use. 'Ease of use' means that access to, and enjoyment of, an environment should require minimal strength, stress and effort and should be achievable in comfort; independently and/or with assistance delivered on the users' terms. "Versatility" suggests a lack of prescription in a design and, as a result, flexibility in use. Versatile solutions take into account diverse and evolving needs, whilst minimising the need for structural adaptation.
  - are safe, legible and logical. Logical layouts and clear sightlines enable spaces and places to be understood without recourse to excessive text based signage. They inspire a sense of security and promote confidence, minimising the need for active surveillance and/or personal support.
  - have integrated the design and management of development from the outset and over its lifetime and therefore minimising the need for awkward, costly and unsightly alteration in the future. The success of an Inclusive Design will often be affected as much by its management as by its physical form. Shortcomings in the latter frequently place unreasonable and unsustainable demands on the former, and vice versa. Implications for the management of spaces and places, particularly when considering diverse and changing needs, must be considered and resolved at the earliest design stages.
  - uphold the 'dignity' of all users and avoid the separation or special treatment of any individual; this includes safe and dignified emergency evacuation for all building users in a manner that does not limit the number of particular users permitted in any part of the building.
- Sustainable – the concept of sustainable development underpins the entire planning system. Development proposals must ensure that social, environmental and economic benefits, as sought by the full suite of Local Plan policies, are delivered holistically.

1.68 Policy PLAN1 applies to all new developments including alterations and extensions to existing buildings. With regard to the information required by Part C, the scale and nature of a development will determine the relevance of particular elements. In order to deliver high quality design and demonstrate that all design policy requirements have been considered from the very first stage of a proposal, applicants/developers will be expected to demonstrate a rigorous design process that, inter alia:

- is multidisciplinary, bringing together functional, technical and aesthetic considerations;
- employs relevant specialist expertise;
- engages with the planning authority from the earliest stages;
- places people at the heart of the process;
- brings together the design and management of the built environment; and

- is regularly monitored and evaluated.
- 1.69 The design process does not end once an application is permitted. All elements of proposed building designs must be demonstrably deliverable. In the realisation of buildings from plans to build-out, their design quality can often be compromised by poorly-considered detailing and inappropriate materials. Such 'value engineering' approaches, which dilute the design quality of approved schemes and often make schemes difficult to maintain, will be resisted. Where relevant, guarantees on design quality will be secured through conditions and/or legal agreement.
- 1.70 Further details on design requirements in Islington are set out in supplementary guidance including the Islington Urban Design Guide, Streetbook and Inclusive Design SPDs. Islington's Design Review Panel can provide constructive feedback on certain design proposals<sup>4</sup>.

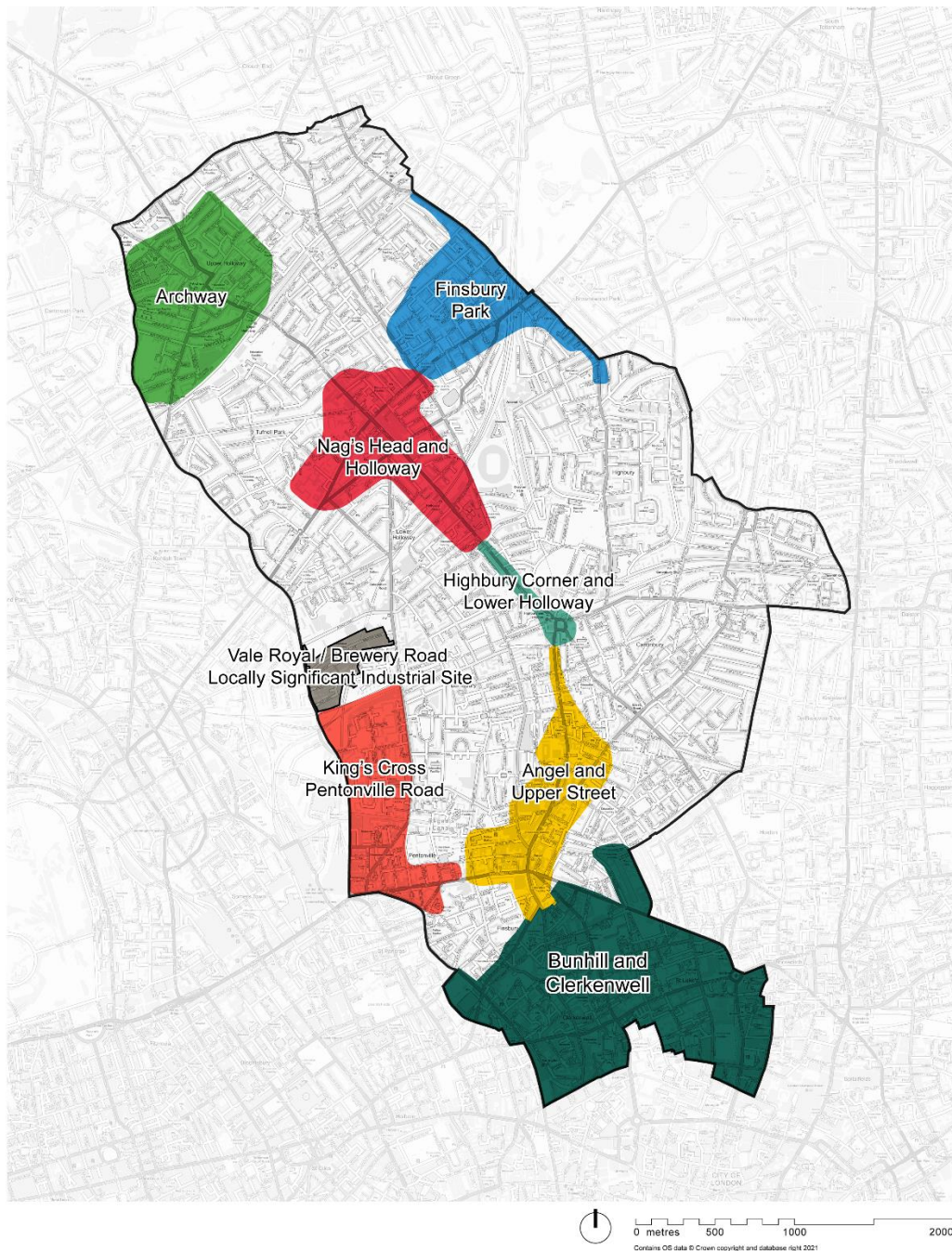
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<sup>4</sup> See paragraph 8.11.

# 2 Area Spatial Strategies

2.1 This section sets out a number of policies for various parts of the borough where growth and change is expected to occur within the plan period. These areas are shown on the key diagram (Figure 2.1) below:

**Figure 2.1: Key diagram - Islington Spatial Strategy areas**





- 2.2 Each Spatial Strategy policy (SP1 to SP8) sets out the key priorities and requirements for the respective areas, with a detailed Spatial Strategy map visualising these. All development proposals within the Spatial Strategy areas must be actively consider how they will address the Local Plan objectives, from the very first stage of the proposal through to any eventual permission.
- 2.3 The parts of Islington not covered by a Spatial Strategy area will still experience development and change over the plan period, but it is not expected to be at the same scale as the defined areas. Relevant Local Plan policies in chapters 3 to 9 will apply where proposals come forward in these parts of the borough.
- 2.4 Some parts of Islington, particularly those areas adjacent to the borough boundary, may experience change by virtue of significant development in other boroughs. Islington is committed to working with other boroughs and relevant stakeholders to deliver such development while preventing/mitigating impacts for Islington residents and businesses. Of particular relevance is joint working with the London Boroughs of Hackney (with regard to Dalston Town Centre, Finsbury Park Town Centre and the City Fringe/Shoreditch area), Camden (with regard to King's Cross) and Haringey (with regard to Finsbury Park Town Centre).

## Spatial Strategy

### Policy SP1: Bunhill and Clerkenwell

- A. The Bunhill and Clerkenwell area is made up of the following six Spatial Strategy areas (shown on Figure 2.2):
- City Fringe Opportunity Area
  - City Road
  - Farringdon
  - Mount Pleasant and Exmouth Market
  - Central Finsbury
  - Historic Clerkenwell
- B. The Bunhill and Clerkenwell Area Action Plan (AAP) has policies for each Spatial Strategy area, which set out the key strategic considerations for these areas. These areas have been defined by their scope for development opportunities to meet key needs (in particular office use) and distinctive characteristics that must be maintained and enhanced.
- C. The AAP also sets out area-wide policies focused on prioritising and supporting the office function of the area, as well as consolidating and enhancing the area's cultural, retail and leisure role.
- D. Site Allocations within the Spatial Policy Area are expected to deliver 1,260 homes and 216,900sqm of office space over the plan period.

2.5 Bunhill and Clerkenwell is the area in the borough expected to see the most significant levels of growth, particularly business floorspace. This growth must be managed, to secure a high quality and sustainable urban environment, to promote economic growth and employment, and also to address the deep challenges including deprivation, social mobility and environmental problems.

2.6 The Bunhill and Clerkenwell Area Action Plan (AAP) sets out area-specific policy for the majority of the Bunhill and Clerkenwell wards of Islington. The plan area lies within the CAZ and comprises almost all of Islington's portion of this area; Figure 2.2 shows the location of the AAP area in relation the rest of the borough. The AAP identifies a number of site allocations where new development is expected to come forward. The AAP operates in conjunction with the Local Plan: Strategic and Development Management Policies document.

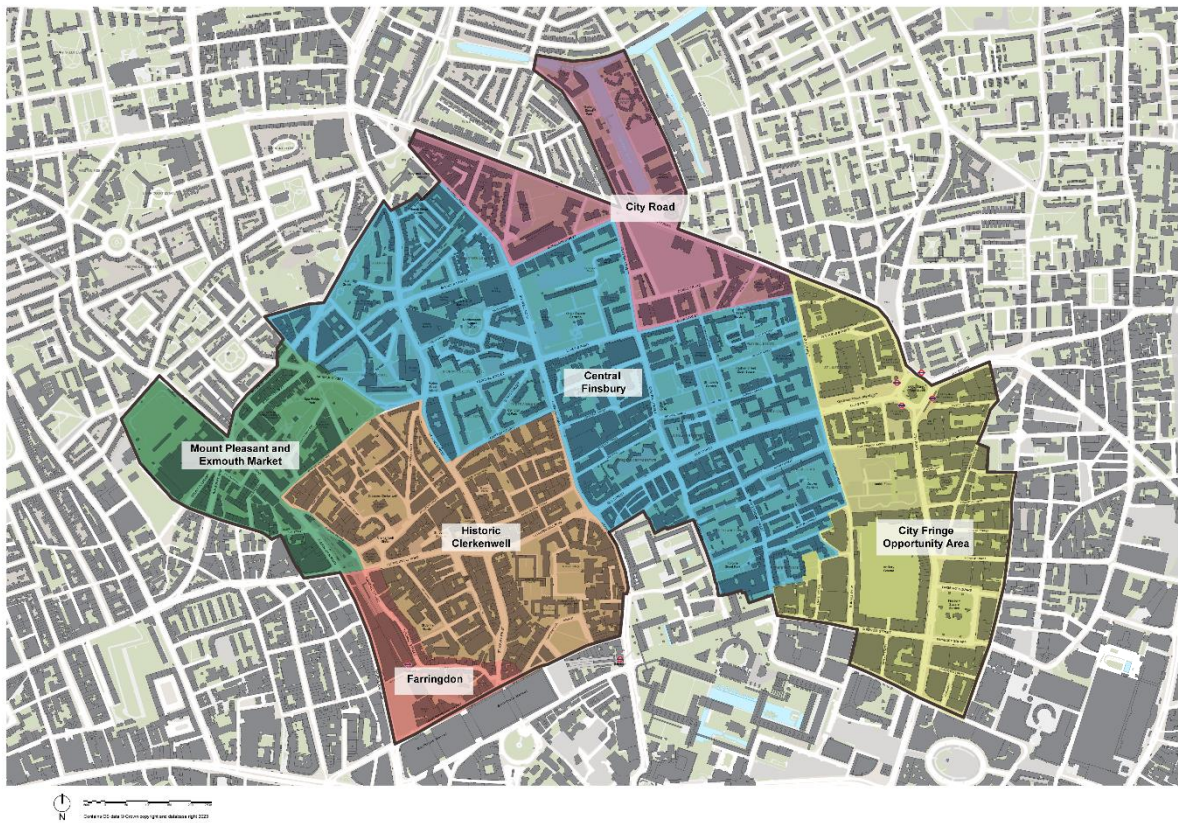
2.7 The area is the most significant location for commercial growth in Islington, particularly office floorspace. Bunhill and Clerkenwell has a large and successful economy and is home to 70% of Islington's jobs, the majority of which are office-based. Local and regional evidence is clear that the CAZ is the location with the most demand for office space and this will be the priority land use within the AAP area.

2.8 The area also has a rich variety of cultural, entertainment and leisure uses. These uses are integral to supporting the predominant office-led employment function of the

area, but they also contribute to a significant night-time economy and the creation of a dynamic and attractive place in their own right.

- 2.9 Bunhill and Clerkenwell is also home to a variety of education and medical uses and has a significant residential population, including a number of housing estates across the area. The area is very well connected to London and this has been further improved following the opening of the Elizabeth Line.

**Figure 2.2: Bunhill and Clerkenwell AAP area boundary and Spatial Strategy areas**



## Policy SP2: King's Cross and Pentonville Road

- A. The King's Cross Spatial Strategy area is partly covered by the CAZ, while the remaining part is a CAZ fringe location, including the King's Cross Priority Employment Location (PEL). Within these locations existing business uses will be safeguarded and proposals for the intensification, renewal and modernisation of existing business floorspace is encouraged. Proposals for new business floorspace are required to maximise the provision of business floorspace.
- B. A broad range of business floorspace typologies are suitable within the Spatial Strategy area, including Grade A offices, hybrid space, and co-working space.
- C. The Local Shopping Areas (LSAs) of Kings Cross, Caledonian Road (Copenhagen Street) and Caledonian Road (Central) are located in the Spatial Strategy area. The existing retail and service function of these areas will be maintained and enhanced in line with Policy R4. These shopping areas function together collectively to form a 'high street' along Caledonian Road, which should continue to provide important services for local communities, particularly retail and leisure.
- D. Opportunities to repair, improve and unify existing frontages on Caledonian Road are encouraged, in particular the stretch between the junctions of Twyford Street and Copenhagen Street.
- E. The Council aims to improve the pedestrian, cyclist and bus network and will seek to reduce traffic access on some residential roads. Improvements to public transport capacity are supported. General improvements to the public realm, specifically along York Way and Caledonian Road, will create a safer and better-quality environment for pedestrians and cyclists. Measures to improve bus journey time and bus priority (especially over private vehicles) are supported.
- F. The Council will seek to improve connectivity and permeability for pedestrians and cyclists, within and across the Kings Cross area and nearby neighbourhoods, particularly east-west access. Removing barriers to movement and integrating the urban fabric are key priorities for the whole area, but particularly between the area east of York Way and King's Cross Central. All new development proposals, transport and other public realm schemes must contribute towards achieving these priorities.
- G. Regent's Canal will continue to be an important multifunctional space, primarily as a wildlife corridor but also as a recreational space for pedestrians and cyclists. Access to the canal should be improved, although increased access must not cause detrimental impacts, particularly for biodiversity.
- H. Proposals for boater facilities and residential moorings, including those which meet an identified housing need for boat dwellers, will be permitted where:
  - (i) public access to and along the towpath is not impeded;
  - (ii) they do not hinder navigation along the waterway;
  - (iii) there is no adverse impact on leisure provision that cannot be mitigated;

- (iv) there is no detrimental impact on air quality, nature conservation and biodiversity value and the character and amenity of the waterway corridor including its function as public open space; and
- (v) they respect the amenity of neighbouring residential properties.

I. In addition to Part H above:

- (i) To meet the identified need for 7 additional permanent moorings for boat dwellers by 2025 the council will work with the Canal and River Trust to identify opportunities for and convert where appropriate, existing leisure moorings in the area as well as exploring other opportunities for moorings through a waterspace strategy.
- (ii) If the measures in (i) do not result in the delivery of 7 permanent moorings by the end of 2024, the Council will undertake an early focused review of Policy SP2.
- (iii) Development of boater facilities will only be acceptable where there is an identified need, which will include being identified in the London Mooring Strategy.
- (iv) 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.

J. King's Cross has a distinct character, and the area contains a number of heritage assets, including the Regent's Canal and a number of listed buildings. The area's character will be protected and enhanced, with high quality design encouraged to respect the local context of King's Cross and its surroundings.

K. Four sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.

L. Housing development will come forward on sites allocated for housing as well as windfall sites in the area over the plan period.

M. Site Allocations within the Spatial Policy Area are expected to deliver 270 homes and 20,500sqm of office space over the plan period.

2.10 Kings Cross is continuing to develop as a key commercial destination and important transport hub. High-density development delivering office, retail and leisure space, as well as housing, has taken place on both sides of the Camden/Islington boundary. The area's central London location, and excellent local, national and international transport links, has enabled high quality regeneration which has successfully attracted high profile commercial tenants.

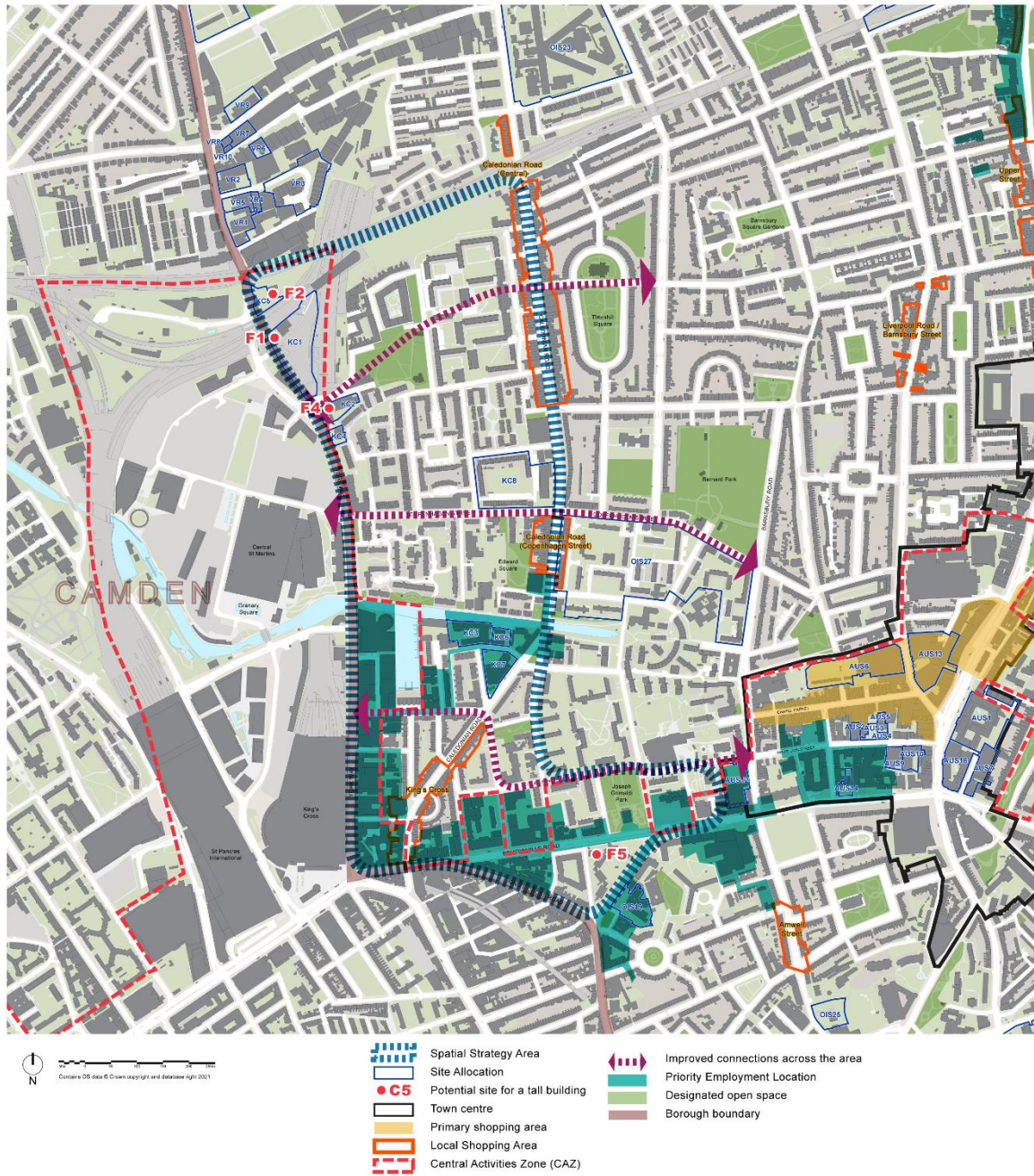
2.11 As the development of the King's Cross Central site adjacent to the railway tracks continues into the plan period, it will bring further change to the character of the area. The development is already producing a noticeable 'halo' effect, with office buildings that pre-date the development observed to be busy and fully occupied. It is considered that this effect will only intensify as the King's Cross Central development matures.

- 2.12 There is an opportunity for the King's Cross area to help meet Islington's significant projected jobs growth and support the economic growth of the borough over the plan period, through protection of existing commercial floorspace across the area, including in the PELs covering York Road, Regent's Wharf, Wharfdale Road and Regent's Quarter; and through the intensification of business uses across the area. Proposals for new business floorspace are required to maximise the provision of business floorspace in these locations and proposals which are not considered to maximise business floorspace will not be allowed.
- 2.13 The remainder of the Spatial Strategy area – outside of the PELs – may also be appropriate for the development of business floorspace as the 'halo effect' from the King's Cross central development continues. North of the canal it is recognised that there is a predominantly residential character where the development of business uses will be considered in line with relevant policies including B2 and H2.
- 2.14 Many important academic and cultural institutions are based within the King's Cross area, including the British Library and the Francis Crick Institute in Camden and Kings Place and the Institute of Physics in Islington. To promote collaboration and forge closer links to the community, a growing number of local organisations have come together under the umbrella of the 'Knowledge Quarter'. The Knowledge Quarter aims to market the commercial potential of the area as an incubator of innovation, given its excellent transport links and access to local universities and other institutions carrying out important research work.
- 2.15 Aside from being an important business location, the King's Cross area also has a retail function. Three LSAs are located within the area – King's Cross, Caledonian Road (Copenhagen Street) and Caledonian Road (Central). These areas, whilst small in scale compared to Islington's Town Centres, serve an important role for local residents and workers, and should be maintained and enhanced.
- 2.16 As the regeneration of King's Cross continues, it is likely that this will impact surrounding areas, such as 'the Cally' – a commercial section of Caledonian Road between Regent's Canal north and Pentonville Prison. The Council believes that local people and businesses in this area should benefit from the regeneration of King's Cross. There are also opportunities for improving existing frontages on Caledonian Road, particularly between the junction of Twyford Street and Copenhagen Street, and improving connectivity and the urban fabric in this area. The Cally Plan SPD provides further guidance.
- 2.17 Kings Cross will continue to be a nationally and internationally significant transport hub. The expansion of the area presents several opportunities for improving the road network and public realm. This may include improvements to the pedestrian, cyclist and bus networks and measures to reduce traffic on some residential roads. The Council also encourages general walking and cycling improvements in the area, including the creation of east-west cycle routes.
- 2.18 There is a long term Council aspiration to see the former Maiden Lane station (immediately over the borough boundary in Camden) re-opened, which could provide additional transport capacity for the area.
- 2.19 Much of the area is covered by Conservation Areas and there are several listed and locally listed buildings located here. The historic character of the area should be enhanced and maintained and any development must have regard to any listed or locally listed buildings located nearby.

- 2.20 The Islington Tall Buildings study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Buildings study (2018) and must be read alongside this Spatial Strategy policy. The Spatial Strategy diagram (Figure 2.3) identifies the following four sites where tall buildings (30 metres and above) may be appropriate in the King's Cross Spatial Strategy area:
- Railway land and substation on York Way, opposite student housing tower (site F1 from the study).
  - Railway land between Overground and HS1 tracks, east of York Way (site F2 from the study).
  - 176-178 York Way, car wash site (site F4 from the study).
  - Penton Rise Estate, corner of Weston Rise with Pentonville Road (site F5 from the study).
- 2.21 Any proposal for tall buildings on these sites must be fully consistent with DH3 and all other relevant policies and Site Allocations.
- 2.22 Site F5 is not allocated within the Site Allocations DPD. The study identifies site F5 as suitable, in principle, for a local landmark building of up to 37m (12 storeys). This would only be suitable as part of comprehensive redevelopment of the estate, which must be developed through engagement with local residents and stakeholders. There would be an opportunity to mark this street corner with a local landmark, to help terminate the view northwards from Kings Cross Road. Redeveloping the site could re-introduce a more street based development and establish a sense of place. Commercial floorspace should be promoted along the ground and lower floors along Pentonville Road.
- 2.23 Residential Moorings including those which meet an identified housing need for boat dwellers. In order to meet the identified need for 7 additional permanent moorings for boat dwellers during the plan period the Council will work with the Canal and River Trust to identify opportunities for and convert existing leisure moorings in the area where possible. Alongside this the Council will explore the potential for the conversion of other types of moorings as well as opportunities for new moorings through the development of a waterspace strategy for the borough. Should the waterspace strategy not identify sufficient moorings by the end of 2024, it will be necessary to undertake an early focused review of Policy SP2.
- 2.24 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 open spaces including the canal corridor.
- 2.25 Housing development will come forward on sites allocated for housing. It is recognised that smaller windfall housing development, including through the utilisation of permitted development rights, will also come forward in the area over the plan period.



Figure 2.3: King's Cross and Pentonville Road Spatial Strategy diagram



### **Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site**

- A The Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS) will be retained and strengthened as the borough's most significant industrial location. The principal objective in this area is to retain industrial land and intensify light industrial, B2 general industry and B8 storage and distribution uses, including Sui Generis uses akin to these industrial uses. Light industrial use is now part of Class E and continues to be sought in the LSIS. For proposals involving light industrial floorspace, the Council will use conditions to limit Class E for this specific purpose (consistent with Policy B2: New business floorspace, Part C) and to protect the primary industrial function of the LSIS. To ensure an adequate supply of industrial land and floorspace in Islington industrial uses in the area will be protected in accordance with Policy B3. The encroachment of some non-industrial uses could jeopardise the long term sustainability, economic function and future economic growth of the LSIS as an industrial area and will not be allowed.
- B The provision of 'hybrid workspace', which may incorporate a mix of the industrial-related uses, is encouraged. Such proposals (including those for refurbishment) should provide a variety of spaces that can accommodate a range of industrial uses, including spaces which are suitable for SMEs.
- C The LSIS is a successful industrial location which accommodates a wide range of operators, including some existing office use. Proposals for the co-location of industrial use with office and/or research development use will be permitted, where there would be an intensification of industrial use on the site (either through new floorspace or the redevelopment/modernisation of existing floorspace) and it can be demonstrated that the continued industrial function of the LSIS would remain.
- D The Council recognises the contribution of businesses related to the music and entertainment industry in the area, including Tileyard Studios, and seeks to support this successful economic cluster, including through allocation VR3: Tileyard Studios, Tileyard Road, of the Site Allocations DPD.
- E The LSIS is currently inward facing. Where possible, development should avoid blank frontages and create active frontages towards open spaces, such as Market Road Gardens and the sport pitches on Market Road. The creation of active frontages may also be appropriate along York Way and Caledonian Road, where consistent with the land use policies set out above.
- F Development proposals in the LSIS should, where possible, improve pedestrian and vehicle connections throughout the LSIS and have regard to proposed routes set out on the Spatial Strategy diagram.
- G All development proposals in the LSIS must (individually and cumulatively) consider the layout, orientation, access, servicing and delivery arrangements in order to minimise conflict and to avoid potential negative impacts on highways safety and amenity. Proposals for B8 space should consider the potential provision of yard space.

H Site Allocations within the Spatial Policy Area are expected to deliver 4,800sqm of office space over the plan period.

- 2.26 The Vale Royal/Brewery Road LSIS is located on the western periphery of the borough on the border with the London Borough of Camden, near Kings Cross. It is located in close proximity to Central London and the CAZ. The area is relatively well connected by road and public transport; Caledonian Road underground and Caledonian Road and Barnsbury overground stations are located nearby.
- 2.27 The LSIS is the borough's largest concentration of industrial uses. It accommodates a wide range of businesses, including film/TV production, catering, building, plumbing and heating trade suppliers, self-storage, photographic studios, props hire, car rental and repair, and charity/social enterprises. The LSIS is significant in terms of scale, as well as in terms of its contribution to the local and Central London economies.
- 2.28 The LSIS has two distinct business clusters. The first provides services to the music and entertainment industries and includes Tileyard Studios which comprises around 10,000sqm of studio, writing and office space dedicated to the music industry. The second cluster comprises a number of catering operations which are located throughout the LSIS.
- 2.29 The LSIS is an important, vibrant industrial location. It is well occupied and vacancy rates are considerably lower than the optimum 8% frictional vacancy rate. Evidence suggests there is high demand and a lack of supply for such industrial space in Islington. This is typical of inner London boroughs where large scale industrial areas are generally scarce, particularly within densely populated boroughs such as Islington. This reinforces the need to safeguard the existing functions of the LSIS.
- 2.30 Islington has lost a significant amount of industrial space in recent years – between 2005 and 2015 approximately 125,000sqm of B2 and B8 floorspace was granted permission to convert to other uses. This means that the Council must strengthen its policies to avoid further losses to its limited industrial land stock.
- 2.31 The retention and intensification of industrial uses in the Vale Royal/Brewery Road LSIS is a key priority. The Council considers industrial uses to be those which fall within light industrial, B2 general industry and B8 storage and distribution, as well as certain Sui Generis uses with a clear industrial function. The LSIS must be protected and nurtured for a range of industrial uses, including the provision of hybrid workspace, which is particularly supported. The Council's evidence also suggests that the LSIS is an appropriate location for providing space for start-up companies and SMEs, in particular older, lower value stock which remains perfectly functional.
- 2.32 Maintaining and intensifying the current functions of the LSIS will also ensure that businesses can continue to benefit from being located in close proximity to one another. These 'agglomeration benefits' can include increased productivity levels, having access to a pool of labour, and enabling businesses to attract and retain skilled labour. Other benefits include fostering collaboration and the transfer of knowledge, innovation and technology between businesses and sectors. Aside from these benefits, there may be potential synergies between the music and entertainment businesses and catering businesses within the LSIS. Evidence produced by the Council also states that the area provides space that is crucial in accommodating businesses who service both the wider borough and Central London economy. These important functions and industrial uses will be safeguarded and promoted.

- 2.33 Islington's economic success relies on the diversity of its business clusters and the Brewery Road/Vale Royal LSIS is an example of this. In recent years, there has been an increase in "clean" industrial activities driven by market demand. Light industrial activities, particularly in the LSIS, have an important function in complementing and supporting general industrial and storage and distribution uses in the area. The LSIS has also an important role in supporting Central London's economy due to its proximity to the CAZ. The Council recognises the important economic function that the LSIS has and the need to safeguard existing and deliver new industrial floorspace in the borough. Existing B2 general industrial and B8 storage and distribution will continue to be protected from change of use to non-industrial. New light industrial floorspace will be secured through the use of conditions to avoid further losses of industrial floorspace to other Class E uses.
- 2.34 Office space is sought elsewhere in the borough – particularly in the CAZ and other designated employment areas – due to its contribution to jobs growth and employment floorspace. However, in the LSIS specifically, other forms of industrial business floorspace are prioritised. Office and research and development floorspace will only be considered if they are included as part of a scheme where it can be clearly demonstrated that there would be an intensification of industrial floorspace and the continued industrial function of the LSIS would remain. Non-industrial floorspace as part of any proposals will be required to provide affordable workspace in line with Policy B4, Part B. Other non-industrial uses which are not considered ancillary to the development could jeopardise the long term sustainability, economic function and future economic growth of the LSIS as an industrial area and will not be allowed.
- 2.35 Development proposals in the Vale Royal/Brewery Road LSIS must, as a minimum, not result in a net loss of industrial land or floorspace. Proposals involving the loss of industrial land or floorspace must consider the requirements set out in Policy B3 and demonstrate there is no demand for the use of the floorspace, unit, building and/or land, for a use appropriate to the primary industrial function.
- 2.36 The extent of potential additional industrial development will vary depending on the current use and occupancy of existing sites. Some sites in the LSIS may have potential for substantial, additional industrial development given they are low rise and/or underused. It is these sites that present the greatest opportunities for the delivery of typical industrial space.
- 2.37 All development proposals in the LSIS must maximise the provision of industrial uses, including the delivery of hybrid workspace in the LSIS. Where new industrial uses are provided, conditions will be attached to the permission to remove any applicable permitted development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that specific industrial use(s) are retained and that any future loss is assessed against Local Plan policies via a planning application. By maximising these appropriate industrial uses, the LSIS can be developed without harming the delicate balance of existing industrial uses (including lower value uses) that are vital in sustaining economic diversity in the borough, and in supporting the wider economy.
- 2.38 The LSIS's industrial function has been maintained for a number of years – this is recognisable in some of the remaining historic buildings and in the layout and scale of the streets. Refurbishment, conversion and extension of existing older buildings is preferred to demolition and redevelopment schemes. New development should respond sensitively to existing historic buildings; this could include stepping down building heights to avoid domination of the street scene.

- 2.39 The LSIS is characterised by narrow streets. Private forecourts and the limited height of industrial units currently alleviate the impact on the scale of the street. To avoid an overbearing scale of the street – a canyon effect – and allow light penetration, new development should ensure that the width to height ratio of street does not exceed 1:1.35 and optimally stays below 1:1. This can be achieved by the stepping back of development above a certain height on the building line or by sufficiently pulling the building line back from the street. Any development in the western edge of the LSIS, along York Way, will need to be clearly sub-ordinate in height as, due to the narrow street profile, there is a risk of creating an adverse canyon effect. This can be avoided through appropriate scaling and setting back development in relation to the streetscape.
- 2.40 Due to the nature of its uses, the LSIS is inward looking and frequently presents the back of development to surrounding open spaces, such as the Market Road Gardens and the sports pitches on Market Road. Where possible new development should create strong active frontages toward these open spaces, so that they can provide overlooking and animation and enhance the perception of the area. Where possible, backs should become fronts with the provision of new access routes along open spaces (mindful of policy requirements to maintain and enhance open space provision and function). The same principle applies to those building-street interfaces which are characterised by inactive fronts and blank walls. Where consistent with priority land uses in the LSIS, new development along York Way and Caledonian Road should seek to create active street frontages that define, animate and overlook the street space. In this context, the term active frontages does not refer to the introduction of non-industrial uses; rather, development is expected to explore the potential of introducing active frontages whilst maintaining an industrial use, for example windows which allow views in and out of the building. It is recognised that industrial uses do not traditionally create active frontages so the policy should not be considered a barrier to development – the creation of industrial uses takes precedence over the creation of active frontages.
- 2.41 The LSIS is poor in terms of transport movement and connectivity, particularly internally within the LSIS. York Way and Caledonian Road are the primary access points to the LSIS. Most of the internal roads are narrower secondary roads which can cause issues for traffic movement. Whilst many sites in the LSIS incorporate parking spaces or yards for larger vehicles, street widths are often inadequate to facilitate turning of vehicles in and out of plots – this is exacerbated where there is a high concentration of on-street parking. The narrowness of the internal road network also causes pinch points at the junctions of York Way, Brandon Road and Vale Royal. These adjoining streets are less than 10m wide which impedes the flow of vehicles in and out of the LSIS. All development in the LSIS is required to demonstrate how delivery and servicing can be adequately provided and potential impacts on highways safety and amenity can be prevented. On-street delivery and servicing will generally not be acceptable for uses which require more frequent and significant vehicle movements, such as B8 uses.
- 2.42 The railway line along the southern border of the LSIS is a major barrier to pedestrian and cycle movement to the wider area. There are no existing north-south pedestrian or vehicular routes between Brewery Road and Blundell /Brandon Road, or between Tileyard Road and Blundell Street. There is an existing pedestrian connection between Brewery Road and Market Road – this frames the view towards the Clock Tower and should be improved where possible. To improve movement within the LSIS, the Council will seek to create new north-south routes. Where appropriate, development proposals should consider opportunities to create new north-south pedestrian routes to improve permeability throughout the LSIS, in line with Figure 2.4. Where provision of

new routes would involve loss of industrial space or would mean that industrial space cannot be maximised, the wider strategic benefits of the greater connectivity may outweigh loss of space or lack of maximisation on a specific scheme (although weighting of issues is a case-specific consideration).



## Policy SP4: Angel and Upper Street

- A The Angel Spatial Strategy area is partly covered by the CAZ, while the remaining part is a CAZ fringe location.
- B Angel Town Centre covers the majority of the Spatial Strategy area. It has a strong retail, service and leisure offer with a large number of small and independent units. Further retail, leisure and service uses are considered suitable across Angel Town Centre to support and enhance this offer and to meet the limited need for new floorspace over the plan period. Retail uses should be directed to the Town Centre in the first instance, particularly to the Primary Shopping Area, then the Upper Street LSA, in line with the sequential approach.
- C The Sainsbury's site (Site Allocation reference AUS6) offers an opportunity to develop a significant amount of retail and business uses and contribute to the strategic aims for retail and office uses.
- D Chapel Market will be strongly protected. Any development proposals must ensure that the character and function of the street market is not adversely impacted, and opportunities for improvement must be sought where appropriate, particularly with regard to the public realm to help improve the management of the market and the shops, and to make this area more accessible for pedestrians.
- E Camden Passage is 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.
- F Angel Town Centre is a designated Cultural Quarter where existing cultural uses will be protected and new cultural uses are promoted. All development proposals within the Town Centre must enhance and protect this cultural role and ensure its continued effective operation.
- G Night-time economy uses must be directed to the Town Centre, and demonstrate that there is no significant adverse effect on local amenity.
- H The Upper Street LSA should be the focus for smaller retail, leisure and service provision consistent with the existing character and function of the area.
- I Consistent with the CAZ/CAZ fringe location, business use is a priority land use in Angel Town Centre, and on upper floors in the rest of the Spatial Strategy area. Existing office, research and development and light industrial use will be protected and proposals for new business floorspace must maximise the provision of business floorspace, particularly in White Lion Street, Pentonville Road and upper floor locations across the Town Centre. The Sainsbury's site is a key strategic site which could deliver a significant amount of new business floorspace.
- J A broad range of office floorspace typologies is considered suitable within the Town Centre, including Grade A space, 'hybrid' space and co-working space. All proposals involving new and/or re-provided business floorspace must provide suitable space for SMEs.



- K Development in the Angel and Upper Street area must contribute to the creation of a high quality environment that is accessible to all residents, employees and visitors, including through improvement of public transport capacity and experience. New development should provide good connectivity for pedestrians and cyclists, and good permeability within and through sites.
- L The Council supports the development of Crossrail 2 with a station at Angel. There are several site allocations in the Angel and Upper Street area which are TfL Crossrail 2 2015 Consultation work sites and/or within the Crossrail 2 Safeguarding Limits (March 2015).
- M The Angel Crossrail 2 station should achieve an exemplary design quality with specific focus on ensuring improved permeability through, and in the vicinity of, the site. This should include the creation of a new 24-hour level access public route between City Road and Islington High Street, via Torrens Street.
- N Opportunities for public realm improvements must be prioritised as part of the Crossrail 2 project and associated development. Public spaces and street infrastructure such as pavements, cycling facilities and pedestrian crossings should adapt to accommodate any increase in activity and changes to how people move through the Town Centre.
- O Improvements to reduce the dominance of through traffic are sought around Angel station and the main junction of Islington High Street with City Road, Goswell Road and St. John Street. In particular, pedestrian and cycling routes should be promoted to improve the linkages along the City Road/Pentonville Road commercial corridor. Measures to improve bus journey time and bus priority (especially over private vehicles) are supported.
- P The historic character of the area should be protected and enhanced through high quality design. New development should respect the local context of the Angel and Upper Street area, particularly in relation to conservation areas and local landmarks. Islington Tunnel runs underneath the Spatial Strategy area. The structural integrity and heritage value of the tunnel should be protected from any adverse impacts.
- Q Housing will come forward on sites allocated for housing, on upper floors within the town centre (outside of the Specialist Shopping Area) as well as windfall sites within the wider area.
- R Site Allocations within the Spatial Policy Area are expected to deliver 80 homes and 24,600sqm of office space over the plan period.

2.43 Angel is the most significant, distinctive and vibrant Town Centre in Islington. The Centre has an important role as Islington's largest Town Centre – one of Islington's two Major Town Centres – and one of the most important areas for employment and economic growth in Islington. A significant part of Angel falls within the CAZ. The Council will respond to the challenges and opportunities associated with the future developments to ensure that Angel Town Centre is a place for everyone, offering a unique mix of shops, services, cultural activities, and other Town Centre uses alongside employment opportunities and an accessible and pedestrian-friendly environment.

- 2.44 Angel Town Centre serves both local communities and also attracts people from further afield, due to its vibrant shopping offer featuring a range of specialist shops and services. It is a key part of Islington's and London's night-time offer and is a sub-regional cultural and visitor destination.
- 2.45 In 2007, Angel Town Centre became a Business Improvement District (BID) – known as 'Angel.London' – to deliver improvements to the trading and commercial environment in the centre. The BID boundary covers a large proportion of the Town Centre boundary.
- 2.46 The Angel and Upper Street area has a strong comparison and convenience retail offer. It accommodates a number of large supermarkets alongside independent retail shops and range of market stalls. This offer is further strengthened by Chapel Market – a traditional street market – and the specialist shopping area in Camden Passage, well known for its antique, curio and vintage stores. Both these areas contribute significantly to the character, vibrancy and vitality of the area.
- 2.47 The Sainsbury's site on Liverpool Road is the most significant development opportunity in the area. The site offers an opportunity for the development of a significant amount of retail and business floorspace, to complement and enhance the existing character and function of the area, and contribute towards the identified need for new office floorspace in the borough.
- 2.48 Angel Town Centre is a designated Cultural Quarter and successful night-time economy destination. Angel's entertainment and cultural offer is a major draw for visitors to the area, which makes a significant contribution to the economic success of the area and helps to maintain its unique character and vibrancy. This offer includes theatres such as the Almeida Theatre and Sadler's Wells and a number of theatre pubs and music venues – such as the King's Head Theatre and the Lexington – cinemas and arts centres. Maintaining and enhancing these unique assets is important whilst protecting the amenity of residents and other uses.
- 2.49 There are a number of pubs located in the Angel and Upper Street area, many with historic and social value. They are an important part of the night-time economy of the area and will be protected.
- 2.50 Upper Street LSA is located to the north of the Town Centre and extends up to Highbury and Islington station. It is a popular location for eating, drinking and includes a number of independent retailers.
- 2.51 The provision of new business floorspace is encouraged in Angel Town Centre, specifically on Pentonville Road, White Lion Street and upper floor locations across the Town Centre. The aforementioned Sainsbury's site in particular offers a significant opportunity for the development of new business floorspace.
- 2.52 Angel should continue to be a welcoming, inclusive, accessible and pedestrian friendly environment. New development in Angel and the spaces around it should create a high quality environment that is accessible to all residents, employees and visitors. Improvements to pedestrian access within and across the centre should be prioritised, specifically around Pentonville Road/City Road crossroads which hinders pedestrian access from St. John Street to the rest of the centre. Cycling routes which improve access to and through the area are encouraged.
- 2.53 Crossrail 2 is a proposed South-West – North East rail link across London, with a station planned at Angel. Following the TfL funding settlement in November 2020 the

project is ready to be restarted when the time is right. Crossrail 2 will still be needed in the future to support London's growth and TfL has demonstrated the case for the scheme. Any associated development must be in-keeping with the character and function of the area and must prioritise public realm improvements in order to positively improve the experience of the centre. A number of sites within Angel Town Centre are safeguarded to protect land needed to build and operate Crossrail 2, including land for the Crossrail 2 station itself<sup>5</sup>. These sites are allocated in the Site Allocations DPD<sup>6</sup>. Crossrail 2 should improve pedestrian permeability in the area and create a 24-hour pedestrian access between Islington High Street and Torrens Street through RBS building (site allocation AUS1).

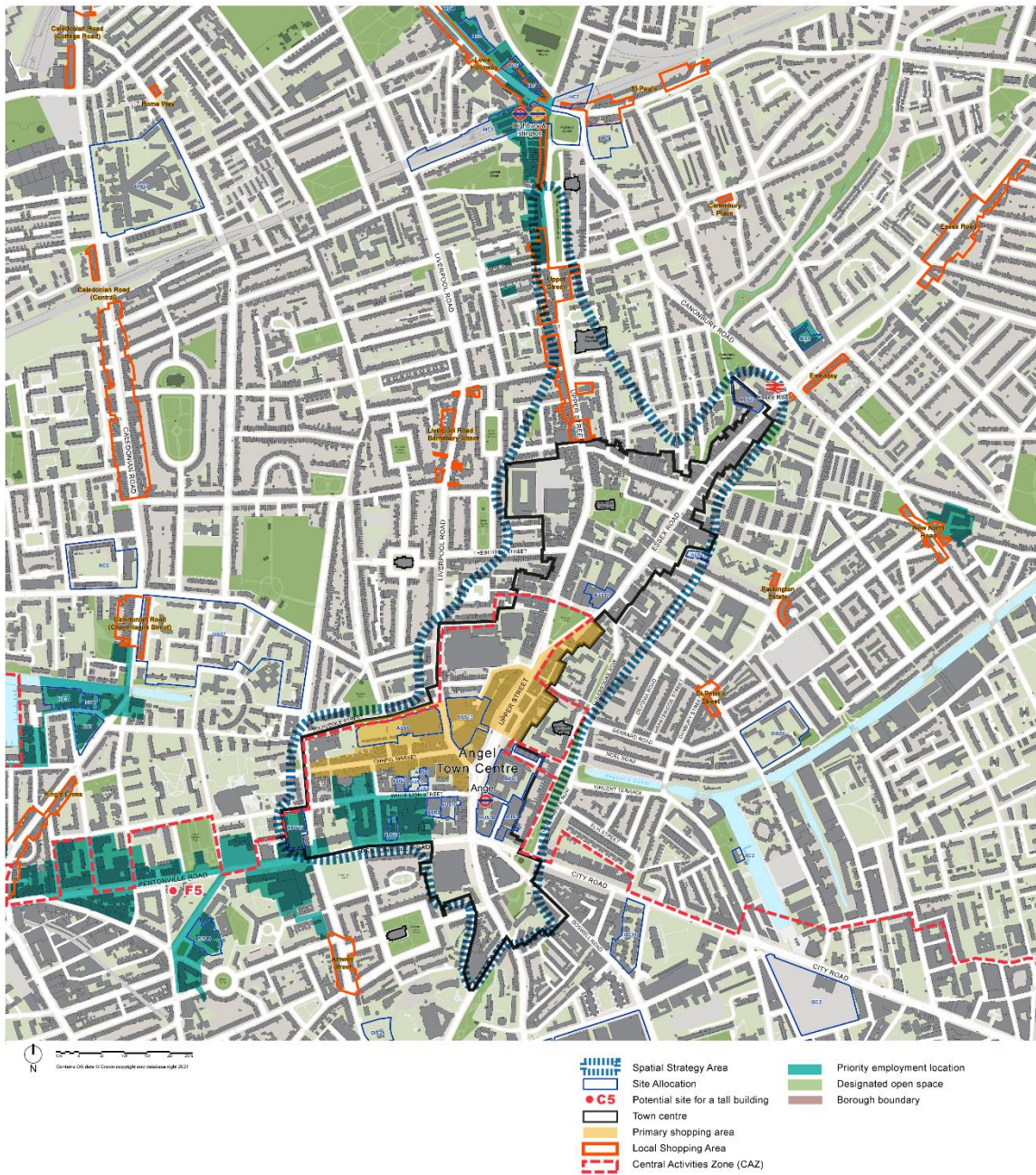
- 2.54 Angel Town Centre has a high number of listed buildings and is covered by eight Conservation Areas. The historic character of the area should be protected and enhanced in line with relevant policy and guidance.

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<sup>5</sup> A map showing these sites is available on the [Crossrail 2 website](#)

<sup>6</sup> Site references AUS1-5, AUS7, AUS9-10, AUS12, AUS14 and AUS16

Figure 2.5: Angel and Upper Street Spatial Strategy diagram



## Policy SP5: Nag's Head and Holloway

- A. Nag's Head Town Centre is an important retail area. Retail uses will be maintained and enhanced within the Town Centre, particularly within the Primary Shopping Area.
- B. Increased night-time economy and leisure uses are encouraged in the Town Centre, particularly outside the Primary Shopping Area and also as part of new development.
- C. Smaller scale retail provision may be acceptable in the three LSAs that fall within the Spatial Strategy boundary – Cardwell Terrace, Hillmarton Terrace and part of Lower Holloway.
- D. Seven Sisters Road has some of the highest concentrations of betting shops/takeaways in the borough. Further uses which add to this overconcentration will be resisted.
- E. The Holloway Prison site is the key local housing site which will help to meet identified housing need in the borough. The site will provide, inter alia, high levels of genuinely affordable housing, community uses including a women's building/centre and publicly accessible green open space.
- F. Morrison's supermarket and its adjacent car park is the key opportunity site for the retention and enhancement of retail provision in the Town Centre in the longer term, as well as for the delivery of a significant amount of residential and office floorspace on the upper floors, subject to amenity issues being addressed in line with the agent-of-change principle. Other Town Centre uses may be appropriate as part of redevelopment of the site, including night-time economy uses such as restaurants. Existing site permeability through to Seven Sisters Road and the Nag's Head market must be maintained and retail user amenity should be improved. Enhancements to the covered market are encouraged where they fit with the wider function of the area and do not lead to adverse amenity impacts. Public open space should be provided to act as a focal point for the Town Centre.
- G. Markets are encouraged within the Spatial Strategy area, such as the weekly market on the Grafton Primary School site.
- H. New office floorspace will be encouraged to support diversity in the local economy. Conversion of upper floors above retail units to office floorspace will be considered appropriate where there are no adverse impacts on the ongoing operation of ground floor retail and safe, secure access is provided.
- I. The London Metropolitan University will continue to play an important role in contributing to the local economy. Space for learning should be consolidated and improved within the university campus. Additional accommodation for students will only be allowed where consistent with Policy H6.
- J. Public realm and environmental improvements throughout the Town Centre will be strongly encouraged.

- K. The Seven Sisters Road, Isledon Road/Tollington Road gyratory system will be removed if feasible in the long term. Removal of the gyratory system will need to consider and mitigate any significant adverse impacts on existing residents and businesses. A cycle route linking Camden and Tottenham Hale along Seven Sisters Road will be supported. A junction improvement incorporating a cycle route link between Sussex Way to Hornsey Road will be progressed. Junction improvements to Seven Sisters Road/Holloway Road, Hornsey Road/Seven Sisters Road and Holloway Road/Tollington Road/Camden Road will be prioritised.
- L. The heritage assets of the area will be protected and enhanced where specific proposals come forward. The key listed buildings are the Holloway Odeon cinema and 458-462 Holloway Road. Other notable buildings include the former Jones Brothers tower and 67-83 Seven Sisters Road.
- M. Five sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.
- N. Housing will come forward on sites allocated for housing, on upper floors within the town centre as well as windfall sites within the wider area.
- O. Site Allocations within the Spatial Policy Area are expected to deliver 1530 homes and 22,000sqm of office space over the plan period.

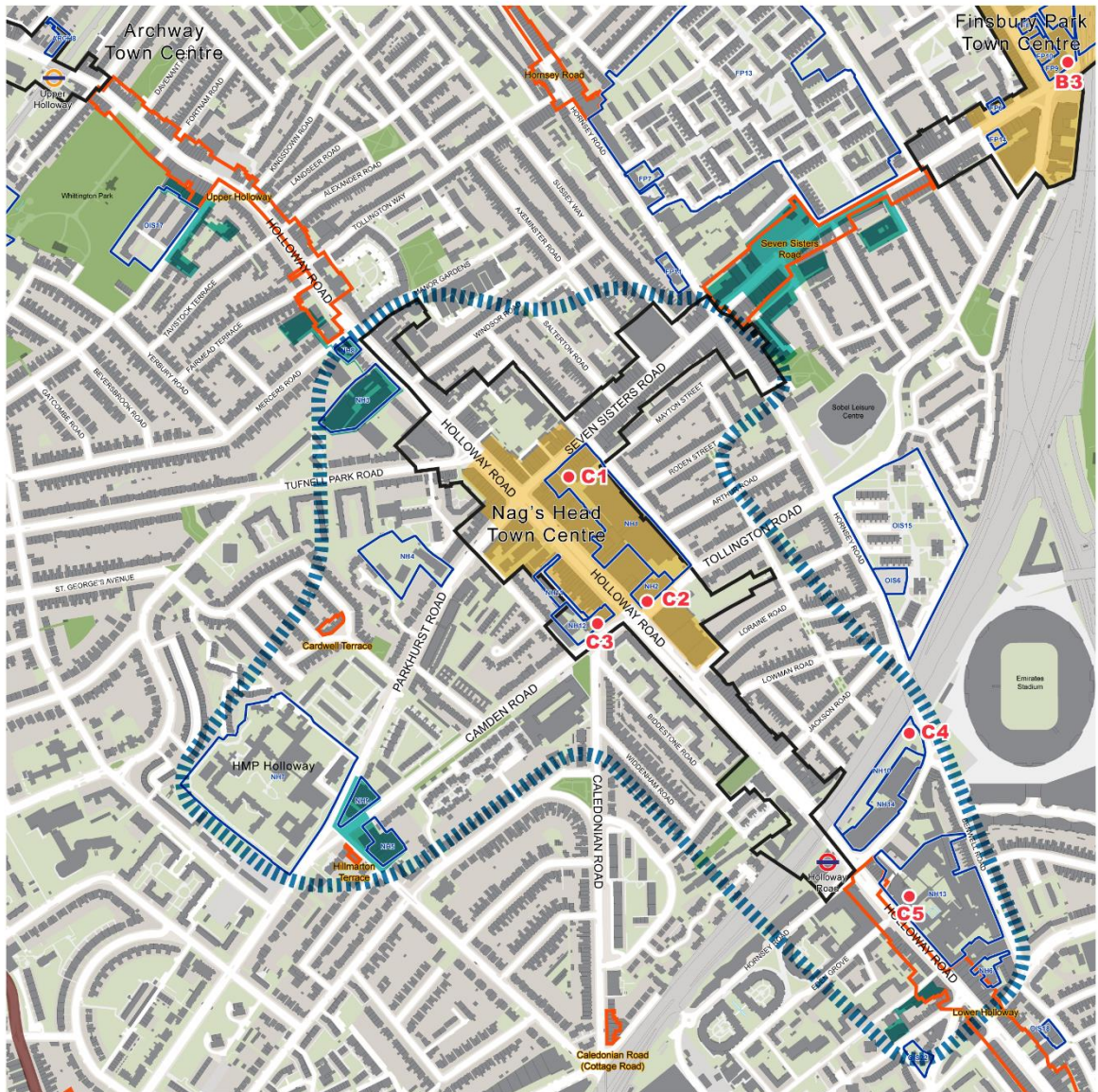
- 2.55 Nag's Head is a busy and vibrant Major Town Centre offering a range of both independent and national retailers. The Town Centre has a strong convenience (daily goods) retail offer, which meets both local residents and wider needs. It includes an indoor market and also offers a good range of comparison shops including Selby's, an independent department store. The centre specialises in fresh produce with a number of butchers, fishmongers, grocers and bakeries. There are various specialist shops, particularly outside the Primary Shopping Area, which further enriches the retail experience. The focus of retail use will be in the Primary Shopping Area.
- 2.56 Local evidence suggests that there is potential for improving the Town Centre's food and beverage offer. This could significantly increase the attraction of both daytime and night-time economies for different customers and support the wider Town Centre retail function, for example taking greater advantage of people visiting the Emirates Stadium for football matches and other events; Additional restaurants will be supported, particularly outside the Primary Shopping Area and as part of any Nag's Head Shopping Centre redevelopment.
- 2.57 The Nag's Head Shopping Centre is at the heart of the Town Centre and is occupied principally by Morrison's supermarket alongside a number of smaller retail units. The western part of the site fronting Seven Sisters Road includes the Nag's Head covered market, which contains a variety of retail, café and takeaway uses and adds vibrancy to the Town Centres retail and leisure offer. The shopping centre is a key development opportunity in the longer term, which could contribute towards improved retail provision in the Town Centre alongside significant residential and office floorspace, pending consistency with relevant Local Plan policies including agent-of-change. The existing centre could be improved; with reconfiguration to provide a better use of space with additional planting, pop-up stalls and events. The opportunity to create a significant public open space fronting Holloway Road should also be explored.

- 2.58 The Holloway Prison site is the largest development site in the borough. The site must deliver a significant amount of new housing, with a high proportion of genuinely affordable housing. Other uses, including a women's building/centre, must also be provided. Further detail is set out in Site Allocation NH7 and in the Holloway Prison Site SPD.
- 2.59 The pedestrian link from Holloway Road through to Morrison's into the market and onto Seven Sisters Road should be improved; it would need careful design to create an attractive and safe space for future users. The market itself should be retained with frontages improved on both the Seven Sisters Road and Hertslet Road.
- 2.60 The Islington Tall Buildings study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Buildings study (2018) and must be read alongside this Spatial Strategy policy. The Spatial Strategy diagram (Figure 2.6) identifies the following five sites where tall buildings (30 metres and above) may be appropriate in the Nag's Head Spatial Strategy area:
- 8-32 Seven Sisters Road and backland of Hertslet Road (site C1 from the study).
  - 372-376 Holloway Road (Argos and adjoining shops) (site C2 from the study).
  - 379-391 Camden Road/341-345 Holloway Road (site C3 from the study).
  - 45 Hornsey Road (site C4 from the study).
  - Metropolitan University Tower on Holloway Road (site C5 from the study).
- 2.61 Any proposal for tall buildings on these sites must be fully consistent with Policy DH3 and all other relevant policies and Site Allocations.
- 2.62 The adult amusement centre on the corner of Holloway Road and Seven Sisters Road in the locally listed former Nag's Head pub provides a prominent and less desirable leisure use. The unit is symbolic of the challenges faced in Nag's Head with a concentration of pawnbrokers, betting shops and money lenders. The Council supports the re-use of the prominent former pub site for a more suitable Town Centre use.
- 2.63 The nearby Emirates stadium is an important cultural and leisure attraction which helps support the wider Town Centre economy. The Emirates also features the Arsenal hub community facility and Arsenal museum.
- 2.64 The A1 Holloway Road is a heavily trafficked route which creates a major barrier dividing the Town Centre. The amount and speed of traffic creates an unsafe environment for pedestrians. The new signalled pedestrian crossing on Holloway Road and other improvements to crossing has improved the pedestrian environment, but the road remains a barrier. In the long term, removing the gyratory may provide the opportunity to revise the road layout. Three other junctions afford opportunity for design improvements to improve safety for pedestrian crossings and improved cycling routes. These are the junction between Seven Sisters Road and Hornsey Road, the junction between Seven Sisters Road and Holloway Road and the junction between Tollington Road and Holloway Road. More generally, public realm improvements could include reducing street furniture clutter, co-ordination of cycle parking and further street planting along Seven Sisters Road. Public realm interventions, including public art and signage, which reinforce the distinctiveness and unique features of Nag's Head will be supported in line with relevant policies which safeguard amenity and accessibility.

2.65 The Town Centre has a number of architecturally and historically interesting buildings including a variety of styles from Victorian, through to the post-war period. Conservation areas run along and adjacent to Holloway Road, encompassing the Grade II listed Odeon Cinema, with small incursions into the edge of the Town Centre. Investment in the Odeon cinema and its frontage along Holloway Road is planned.












Figure 2.6: Nag's Head and Holloway Spatial Strategy diagram





  
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- |   |                                    |   |                              |
|---|------------------------------------|---|------------------------------|
|  | Spatial Strategy Area              |  | Priority Employment Location |
|  | Site Allocation                    |  | Designated open space        |
|  | Potential site for a tall building |  | Borough boundary             |
|  | Town centre                        |   |                              |
|  | Primary Shopping Area              |   |                              |
|  | Local Shopping Area                |   |                              |

## Policy SP6: Finsbury Park

- A. Finsbury Park is a District Town Centre with a Primary Shopping Area covering parts of Fonthill Road and parts of Stroud Green Road, Blackstock Road and Seven Sisters Road. A diverse range of shops within the area should be maintained, so that the overall retail offer can cater for the needs of different sections of the community.
- B. Development in the Town Centre must maintain the predominant commercial role of the area, with specific focus on retail and services on ground floors. These uses must be directed to the Town Centre in the first instance, then the Seven Sisters Road LSA.
- C. The Specialist Shopping Area at Fonthill Road is a unique agglomeration of specialist clothing stores which adds significant value to the character and vitality of the Town Centre and wider area. This specialist shopping role must be strongly protected and enhanced. In line with protecting this function retail use, including at upper floors, will be strongly protected consistent with Policy R7.
- D. Finsbury Park has potential to develop as an important location for additional business uses to supplement the provision in the CAZ, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In order to realise this potential, diminution of office, research and development, light industrial, B2 and/or B8 uses will be resisted and further intensification of these uses, particularly units suitable for SME occupation and light industrial 'maker space', will be strongly encouraged.
- E. Housing will come forward on sites allocated for housing, on upper floors within the town centre (outside of the Specialist Shopping Area) as well as windfall sites within the wider area.
- F. Development of a street market will be supported, particularly on Fonthill Road, where it can be demonstrated that such expansion will enhance the vitality and viability of the area.
- G. Finsbury Park has a rich offer of community uses and cultural spaces, which reflect its diverse and vibrant community. Development within Finsbury Park should seek to protect and enhance this community-based cultural and entertainment offer.
- H. Leisure and night-time economy uses are a strong feature of the area, with a particularly distinct food scene. Strengthening the role of the area as a food destination is supported. Additional leisure and night-time economy uses must be directed to the Town Centre. Development proposals must ensure that adverse amenity impacts are prevented/mitigated.
- I. Music venues are synonymous with the character of the area. Existing venues will be strongly protected and development of new music venues is supported.
- J. Finsbury Park is one of the busiest transport interchanges in London outside Zone 1. New tunnels will connect the Thameslink service from Finsbury Park to London St. Pancras and provide increased connectivity to the wider South East of England. In order to absorb this increased rail capacity, the Council will work with relevant

stakeholders – including Transport for London (TfL) – to identify further improvements to make the station fit for purpose; this should include fully step-free access. Options for enhancement/redevelopment of the station should explore options for intensification of development above the station.

- K. Development must contribute to the creation of a high quality environment that is accessible to all residents, employees and visitors. New development should provide good connectivity for pedestrians and cyclists and should improve permeability and legibility within and across the Town Centre. In particular, access to retail areas such as Fonthill Road and to Finsbury Park itself should be improved.
- L. Joint working with TfL will be undertaken to improve the pedestrian environment along Seven Sisters Road. There will be improved walking and cycling routes through the Finsbury Park area to Highbury Corner linking with wider routes into central London, to encourage walking and cycling for local residents, London Metropolitan University students and visitors to the Emirates Stadium.
- M. The area's key heritage assets include the Grade II\* listed former Rainbow Theatre and the Grade II listed Church of St. Mark with St. Anne, which contribute significantly to Finsbury Park's character and townscape and will be protected and enhanced. Development proposals must also conserve or enhance heritage assets including those in neighbouring boroughs where impacted.
- N. Four sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.
- O. Site Allocations within the Spatial Policy Area are expected to deliver 290 homes and 20,200sqm of office space over the plan period.

2.66 Finsbury Park is a busy, multi-cultural area with cafes and shops that reflect this diversity. The wider area falls within the administrative boundaries of the London Boroughs of Islington, Haringey and Hackney and the Council will work jointly with these boroughs to deliver a co-ordinated approach to planning for the future of the area. Development in this area should contribute towards creating more inclusive local economy, which supports small and independent business, and increases job opportunities for its diverse local community wherever possible.

2.67 Finsbury Park is a District Town Centre and its predominant commercial role must be maintained. A diverse range of shops within the area is essential, so that the overall retail offer can cater for the needs of different sections of the community, including the least well off residents in the area. The Primary Shopping Area seeks to secure a vibrant and viable retailing core. However, the overarching commercial role of the area is changing from traditional retailing to more leisure and experience-based retailing.

2.68 New commercial development must be directed to the Town Centre. The Seven Sisters Road LSA joins Nag's Head and Finsbury Park Town Centres; the retail offer in this part of the area is less concentrated than the designated Town Centres, but opportunities for enhancing commercial activity should be explored in line with the sequential approach.

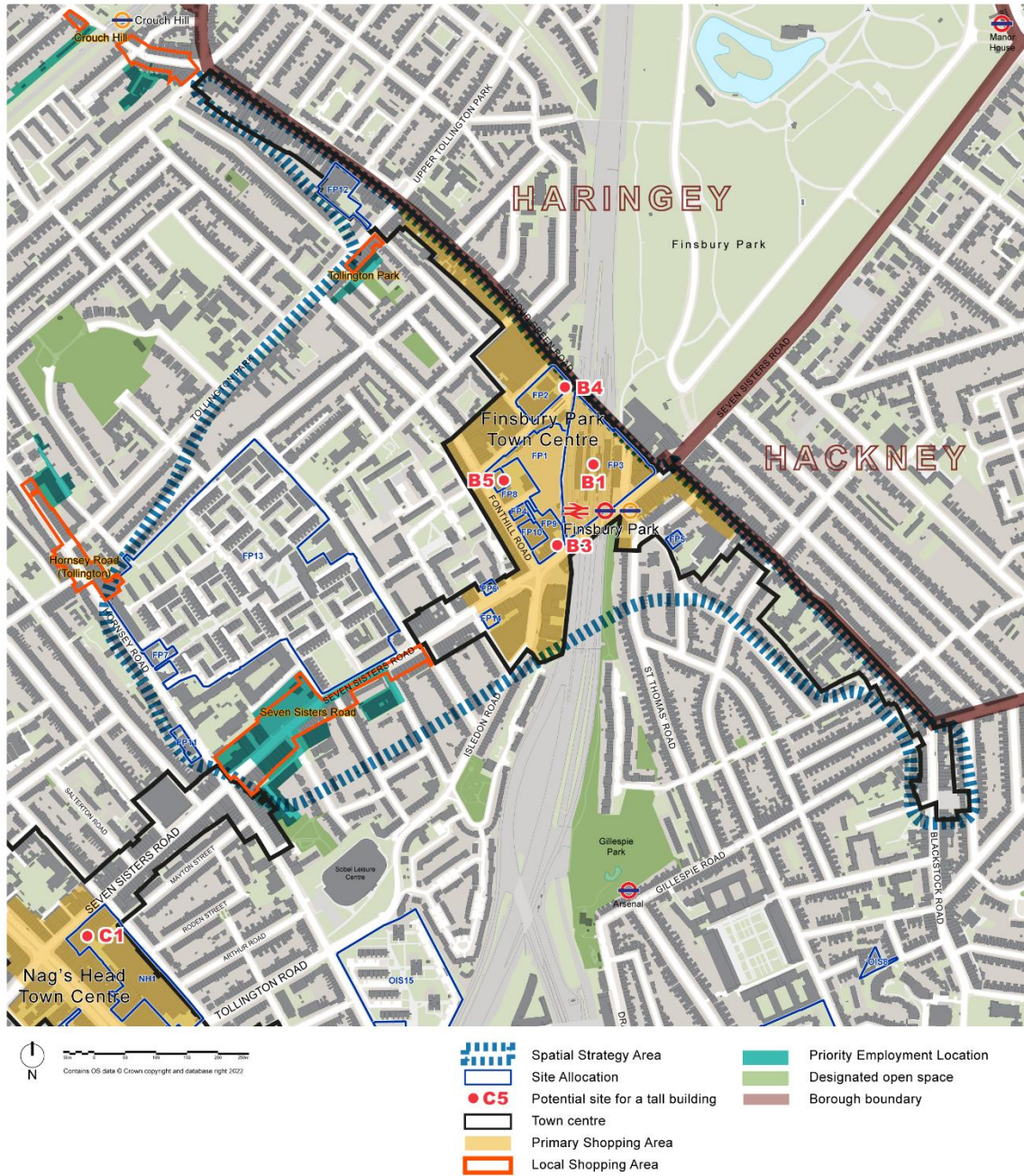
2.69 Nag's Head is the closest Town Centre to Finsbury Park and is designated above Finsbury Park in the retail hierarchy as a Major Town Centre. Despite their proximity and high inter-accessibility, evidence shows that they are distinct centres with different

characters and opportunities for future development and functions, as well attracting different catchments of shoppers. However, establishing strong commercial identities in both Finsbury Park and Nag's Head Town Centres with commercial activity between them may bring mutual benefits such as additional footfall.

- 2.70 Fonthill Road is designated as a Specialist Shopping Area due to its important and widely recognised fashion cluster, which contributes significantly to Finsbury Park's character and vitality. All development in this area must contribute or complement the specialist function of Fonthill Road, in line with Policy R7. Fonthill Road used to be a successful garment manufacturing hub although the manufacturing element has fallen into decline over the past thirty years. The Council will work with traders and partners to reinvigorate manufacturing and workshop functions on Fonthill Road to enhance its uniqueness and create a sustainable commercial environment that allows traders here to continue running viable businesses. This may include provision of business floorspace above shops.
- 2.71 Finsbury Park has significant potential to develop as an important location for additional business uses to supplement the provision in the CAZ, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In developing this potential location, the focus should be on promoting and enhancing the nascent fashion, tech and creative industries through provision of units suitable for SME occupation and light industrial space, particular 'maker space', as well as affordable workspace where appropriate. Ensuring adequate provision of such spaces in Finsbury Park will enable opportunities for the establishment of a mix of dynamic, sustainable local businesses.
- 2.72 Residential development will generally be resisted in the Town Centre on ground floors in order to retain the predominant retail function of the Town Centre. Residential uses on upper floors in the Town Centre may be acceptable, except for Fonthill Road SSA where because of the unique function and character, proposals for the change of use from main town centre uses to residential of any part of the premises, including upper floors or ancillary space, will be strongly protected in line with Policy R7. Other impacts, including the impact on the amenity of adjacent occupiers, will also be considered in line with relevant policies.
- 2.73 Finsbury Park has a rich community cultural offer with third sector organisations such as Muslim Welfare House, Outlandish, the Jones Art Building and Park Theatre. Development should seek to contribute to and complement the existing community cultural infrastructure.
- 2.74 Leisure uses such as bars, pubs and theatres are synonymous with the cultural fabric of an area and provide formal and informal spaces to collaborate and share cultures. The Council will support proposals for cultural and leisure uses in the Town Centre which reflect the culturally diverse local identities. A particular feature of the area is its distinct food scene, including a wealth of restaurants catering for North African and East African cuisine. Expanding this food offer and strengthening Finsbury Park's role as a food destination is supported.
- 2.75 The night-time-economy has potential to be improved in Finsbury Park. The London Plan identifies Finsbury Park as an area where the night-time economy is more than locally significant. Additional night-time economy uses must be directed to the Town Centre. Development proposals must ensure that adverse amenity impacts are prevented and/or mitigated.

- 2.76 Music venues cater to different demographics, foster social interaction and support established and fledgling musicians. Finsbury Park currently has a limited number of music venues, but has a rich heritage of past venues such as the Rainbow Theatre and site of the former George Robey Pub. Increased provision of music venues is supported, including through the introduction of a live music offer at existing venues such as pubs that may not currently have a music offer. An increase in music venue provision will help Finsbury Park enhance a positive identity that will increase the vibrancy and appeal for residents and visitors alike.
- 2.77 Finsbury Park station is one of the busiest transport interchanges in London outside Zone 1, providing links to central and north-east London on the Piccadilly and Victoria underground lines, and train services to King's Cross/St Pancras and the City southwards, and to Cambridge and Stevenage northwards. Improved connectivity via the Thameslink service now also links Finsbury Park to the wider South East of England.
- 2.78 To manage the intensification of services at Finsbury Park station and the associated increase in passengers, improvements to capacity, the introduction of step-free access and a larger station entrance from Wells Terrace are all underway. The Council envisage the need for complete redevelopment of the station in the future to truly be a 21<sup>st</sup> century station that can cope with increasing capacity demands. The Council will liaise with partners including TfL and the Greater London Authority (GLA) to identify further potential improvements.
- 2.79 The station and the area around it can be congested at peak times and are restricted by the railway bridges and road layout. Access to existing commercial areas, such as Fonthill Road, can be difficult because of this. The Council will, through its continued working with stakeholders and the adjoining boroughs of Hackney and Haringey, seek extensive redevelopment in the area immediately surrounding Finsbury Park station to improve the station's permeability and legibility, and make access to these facilities safer and more inclusive, including for people with disabilities.
- 2.80 The Islington Tall Buildings study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Buildings study (2018) and must be read alongside this Spatial Strategy policy. The Spatial Strategy diagram (Figure 2.7) identifies the following four sites where tall buildings (30 metres and above) may be appropriate in the Finsbury Park Spatial Strategy area:
- Finsbury Park Station (site B1 from the study).
  - 221-233 Seven Sisters Road, corner with Fonthill Road (site B3 from the study).
  - Wells Terrace East, Morris Place East, Yellow Car Wash site (site B4 from the study).
  - 113-119 Fonthill Road and land to rear (site B5 from the study).
- 2.81 Any proposal for tall buildings on these sites must be fully consistent with Policy DH3 and all other relevant policies and Site Allocations.

Figure 2.7: Finsbury Park Spatial Strategy diagram



## Policy SP7: Archway

- A. Development in Archway must support the commercial function of the area, particularly the retail function of the Town Centre. Junction Road and Holloway Road act as the 'high street' within the Town Centre and further development of retail uses here, including essential services, is encouraged. Development on the central site bound by Junction Road, Vorley Road, MacDonald Road, Highgate Hill and Navigator Square must provide new office and retail floorspace. Development of other uses will only be acceptable where consistent with relevant Local Plan policies and site allocations.
- B. The continued operation of Archway market is supported. Expansion of the market (in terms of size or frequency of its operation) will be supported where it can be demonstrated that such expansion will enhance the vitality and viability of the Spatial Strategy area, particularly the Town Centre; and where there will be no adverse impacts on Navigator Square.
- C. Archway Tavern is a historic feature and a focal point of the Town Centre. The Council supports the continued lawful public house use and will resist any change of use.
- D. Night-time economy uses must be directed to the Town Centre. Such uses will only be supported where adverse amenity impacts are prevented/mitigated, particularly in relation to uses which intend to serve alcohol.
- E. Existing business floorspace will be protected and proposals that result in a net loss of business floorspace in the Town Centre will be resisted. Development proposals for new business floorspace, particularly SMEs and/or light industrial floorspace which supports the areas cultural offer or other local institutions such as the Whittington Hospital, will be encouraged.
- F. Improvements to Archway station are supported, including entrance level accessibility improvements and provision of active frontages. New retail units should be provided as part of station entrance improvements and, where appropriate, active frontages should be provided on Junction Road and Navigator Square.
- G. The Upper Holloway and Highgate Hill LSAs complement the Town Centre, providing accessible local services for residents in the mainly residential areas surrounding the Town Centre. Smaller-scale retail development is encouraged within these LSAs.
- H. Housing will come forward on sites allocated for housing, on upper floors within the town centre as well as windfall sites within the wider area.
- I. It is anticipated that St. Pancras Mental Health Hospital (which is currently located in King's Cross) will be moving to part of the site currently occupied by the ancillary buildings of Whittington Hospital. This will provide an important social infrastructure use in the Archway Spatial Strategy Area and in the borough as a whole.
- J. The Council will promote and support the use of Navigator Square for public events where there are no adverse impacts on its key open space function.

- K. Public realm and road safety improvements along Junction Road will be encouraged. Development must contribute to the creation of a high quality environment that is accessible to all residents, employees and visitors, including through improvement of public transport capacity and experience. New development should provide good connectivity for pedestrians and cyclists, and good permeability through sites (where relevant).
- L. Three sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.
- M. Site Allocations within the Spatial Policy Area are expected to deliver 580 homes and 8,300sqm of office space over the plan period.

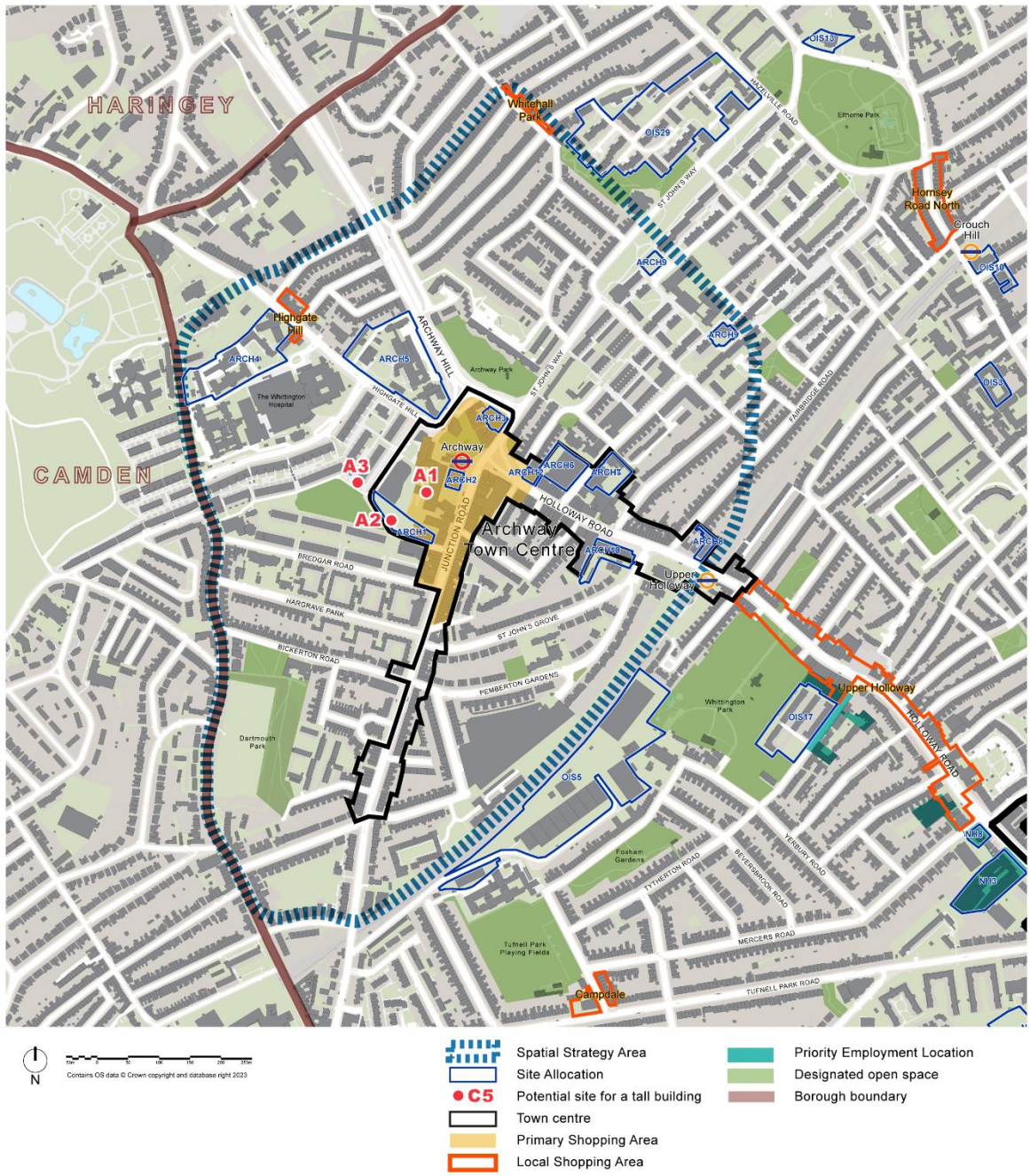
- 2.82 Archway is a District Town Centre located in the north west of the borough at the intersection of five roads: Holloway Road, Highgate Hill, Junction Road, Archway Road and St. John's Way. The heart of the centre is focused around Archway Underground Station and Navigator Square, a new public open space created in 2017 following the removal of the Archway gyratory. The centre is dominated by a modernist complex of three high-rise towers. Residential areas lie to the north and east. The area benefits from two green spaces; Girdlestone Park and Archway Park.
- 2.83 The area includes a variety of uses of different scales including large social infrastructure uses at Whittington Hospital and Archway Campus; a significant retail and leisure offer within the Town Centre, complemented by LSAs; and other commercial uses, particularly offices and workspaces.
- 2.84 Archway accommodates a number of quality independent retailers which concentrate along Junction Road and Holloway Road. The area's retail function must be maintained and enhanced, utilising the opportunities for increased footfall derived from the recent public realm improvements as part of the gyratory removal scheme.
- 2.85 The Primary Shopping Area will remain the focus of retail use with a range of other uses promoted elsewhere in the Town Centre. Archway is identified as a night-time economy of more than local significance in the London Plan; the area has potential for expansion of night-time economy uses, dependent on mitigation of any adverse impacts, particularly noise and disturbance for residents and businesses.
- 2.86 Archway Market could have an expanded role in order to diversify and extend the Town Centre's offer and attract new visitors to the area. In this regard, the market could benefit from more frequent operation, although such expansion would need to demonstrate that impacts on Navigator Square are prevented or mitigated.
- 2.87 Proposals for business floorspace, particularly where it supports the areas cultural offer or other local institutions, should be directed to suitable locations within the Spatial Strategy area, including the designated PEL and within the Town Centre (directed to upper floors). Proposals resulting in the net loss of business floorspace will be resisted in line with relevant Local Plan policies.
- 2.88 Archway Town Centre should be a welcoming, inclusive, accessible and pedestrian friendly environment. Development proposals are expected to be of a high quality and improve the public realm in and around the centre. The gyratory removal project has delivered a new public space in the heart of the Town Centre, including a new two-way traffic system and improved pedestrian and cycling facilities. The replacement of the



gyratory with a new public space, Navigator Square has removed barriers to movement which previously severed the Town Centre, enabling far better pedestrian access to shops and services.

- 2.89 The quality of the environment around and between the three central towers is generally poor, particularly Archway Mall. The Council will encourage further improvements to this part of the Town Centre and work with the landowners to carry out beneficial redevelopment.
- 2.90 The Islington Tall Buildings study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Buildings study (2018) and must be read alongside this Spatial Strategy policy. The Spatial Strategy diagram (Figure 2.8) identifies the following three sites where tall buildings (30 metres and above) may be appropriate in the Archway Spatial Strategy area:
- Hill House (site A1 from the study).
  - Vorley Road Bus Station (site A2 from the study).
  - Southern end of Macdonald Road, opposite Archway Leisure Centre (site A3 from the study).
- 2.91 Any proposal for tall buildings on these sites must be fully consistent with Policy DH3 and all other relevant policies and Site Allocations.
- 2.92 Sites A1 and A3 are not allocated within the Site Allocations DPD.
- 2.93 The study identifies the potential for an increase in height on site A1 up to 52m (17 storeys). Increasing the height of Hill House could help to enhance its visual qualities and slenderness and strengthen the cluster on the skyline. Any increase in height should be linked to more comprehensive development in the area, including public realm improvements and increased permeability. Hill House should remain subservient in height to the Archway Tower.
- 2.94 The study identifies site A3 as suitable, in principle, for a local landmark building of up to 37m (12 storeys) opposite Archway Leisure Centre to form part of the Archway cluster. This would only be suitable in the context of a potential renewal and significant enhancement to the Salisbury Walk Estate, for example when the estate comes to the end of its natural life; any proposals must be developed through engagement with local residents and stakeholders. Any building should landmark Archway Centre on an approaching route from the west (Dartmouth Park Hill and Salisbury Walk) and from the north (linking with the entrance to the Whittington Hospital); and should provide surveillance of the adjacent open space.

Figure 2.8: Archway Spatial Strategy diagram



## Policy SP8: Highbury Corner and Lower Holloway

- A. Highbury Corner is a key transport node in Islington. Significant transport improvements are being delivered to improve the pedestrian, cyclist and road networks in the area, particularly around the station. The Council will continue to work with TfL to make Highbury Corner safe and accessible for all users, primarily through the delivery of an ongoing transformation project at Highbury Corner Roundabout which includes:
- (i) closing the western arm of the roundabout to create a new public space, which includes Highbury & Islington Station forecourt and part of the arboretum (with the remainder of the arboretum to remain closed off);
  - (ii) improving pedestrian crossings, which will allow pedestrians to move around the area more safely and directly, and will improve access and permeability to the surrounding area, including Highbury Fields; and
  - (iii) introducing a dedicated, segregated cycle lane associated with the new public space, to help reduce the risk of conflicts and to make cycling safer.
- B. There may be an opportunity to improve/redevelop the current station, with the potential to deck over the existing railway lines and build above the tracks. Any redevelopment would need to integrate seamlessly with the newly created public space, which will be safeguarded from redevelopment. Mixed-use development would be appropriate and active ground floor uses encouraged on those parts of the site fronting onto Highbury Corner and Holloway Road. Office use is also encouraged above the station. Opportunities to improve accessibility to the station should be explored, either as part of redevelopment or through other proposals such as reopening the old Highbury Station entrance (see site allocation HC1).
- C. The LSAs of Lower Holloway Road, St. Paul's and Upper Street are the main retail centres within the Spatial Strategy area. The existing retail and service function of the area must be maintained and enhanced.
- D. Existing business uses will be protected, and the development of new business floorspace encouraged, particularly within PELs. Space which meets the diverse needs of the SME economy, including studios and co-working space, is supported.
- E. Cultural and night-time economy uses will be protected. The Garage and the Union Chapel are of more than local significance, and retention of these uses is a key priority.
- F. The historic character of the Highbury Corner and Lower Holloway area will be protected and enhanced, with high quality design encouraged so that it respects the local context. Views of the Grade I listed Union Chapel – a key heritage asset and designated local landmark – will be protected.
- G. Highbury Fields – which lies just outside the Spatial Strategy area - is the largest open space in the borough, and one of only two designated pieces of Metropolitan Open Land. The function of Highbury Fields will be strongly protected. Development in close proximity to Highbury Fields must preserve or enhance this unique asset, including views to and from the open space.

- H. Housing will come forward on sites allocated for housing as well as windfall sites within the Spatial Strategy Area.
- I. Site Allocations within the Spatial Policy Area are expected to deliver 50 homes and 4,200sqm of office space over the plan period.

- 2.95 Highbury and Islington station is the focal point of the Highbury Corner and Lower Holloway Spatial Strategy area. The station is a busy transport hub served by London Underground, London Overground and National Rail lines. Key bus routes also operate through the area. It is in close proximity to Highbury Fields to the north and Upper Street to the south. The area has historically been dominated by a busy one-way traffic system, and there is often significant congestion along the A1, which connects Angel to Holloway Road and beyond.
- 2.96 It has been a long term aspiration of the Council to improve the pedestrian, cyclist and road networks at Highbury Corner. The environment around Highbury Corner has generally been of a poor quality. Vehicular domination of the public realm, congested footways and unsafe cycle routes have led to a consistently poor pedestrian experience over a number of years. Significant work to improve this area is underway. Proposed improvements include removing of the current one-way system, partially opening the arboretum as part of a new pedestrianised public open space, and introducing a two-way traffic system, as well as various pedestrian crossing and cycle improvements.
- 2.97 There is redevelopment potential at Highbury and Islington station. The site is allocated for redevelopment of existing buildings, with potential to deck over the existing railway lines and build over the tracks. The station must be retained and any redevelopment must safeguard the newly created public square and include ground floor retail uses onto the square, Highbury Corner and Holloway Road. Offices uses should be provided above the station.
- 2.98 Aside from being a key transport hub, the area has a number of other functions. It accommodates the LSAs of Lower Holloway and St. Paul's Road, and part of Upper Street LSA. The area also includes several PELs. To sustain the commercial function of the area, loss of retail and office floorspace will be resisted, and new retail/office space will be encouraged.
- 2.99 The function and role of existing cultural uses must not be diminished or put at risk by any proposed development. The Spatial Strategy area features several significant cultural destinations, such as the Hen and Chickens Theatre Bar, the Garage and Union Chapel.
- 2.100 The Garage live music venue is a significant cultural destination. Where the Garage forms part of a redevelopment proposal, it must be re-provided and continuity of operation must be ensured, i.e. the re-provided venue must be operational before the Garage cease to occupy their existing site. The Union Chapel, which is a working church and also a performance space which provides a diverse programme of arts experiences, will also be safeguarded through this policy.
- 2.101 Highbury Corner has retained much of its historical character and is covered by a number of conservation areas, listed buildings and heritage assets, including the Union Chapel. This historic character must be preserved or enhanced and local views towards Union Chapel must be maintained.

Figure 2.9: Highbury Corner and Lower Holloway Spatial Strategy diagram



# 3 Thriving Communities

## Policy H1: Thriving communities

- A. Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities which are economically, environmentally and socially healthy and resilient. All new housing development must be fully integrated within, and relate positively to, its immediate neighbours and locality. Gated development is not suitable, as it isolates and compartmentalises communities.
- B. All new housing must contribute to the delivery of the Local Plan vision and objectives, making the borough a fairer place through the delivery of the right type of housing that meets identified needs.
- C. Islington support high density housing development. Proposals which include housing must make the most efficient use of land to ensure that the optimal amount of housing is delivered, while having regard to other Development Plan policies and the specific site context. Proposed developments which result in the reduction of land supply which could reasonably be expected to be suitable for conventional housing, and would therefore threaten the ability to meet housing targets, will be refused. Further detail on this policy approach is set out in Policy H2.
- D. High quality new homes are integral to achieving the aim of making the most efficient use of land and improving quality of life of residents. Homes should be designed as a place of retreat and as such must contribute to improving the health and wellbeing (both physical and mental health) of residents. New homes must be designed to be adaptable over their lifetime to accommodate changing needs. Further detail on this policy approach is set out in Policy H4.
- E. Delivery of genuinely affordable housing is a key priority of the Local Plan. The overarching strategic target over the plan period is for 50% of all new housing to be genuinely affordable. Further detail on this policy approach is set out in Policy H3.
- F. The affordable housing tenure split on all schemes must prioritise forms of affordable housing which is genuinely affordable for those in need, particularly social rented housing. Further detail on this policy approach is set out in Policy H3.
- G. Islington will seek affordable housing contributions from small sites (less than 10 net additional units) to fund the development of affordable housing in the borough, including Council-led housing developments. Further detail on this policy approach is set out in Policy H3.
- H. Islington is committed to meeting and exceeding the boroughs minimum housing delivery target as set out in the London Plan. Further detail on this policy approach is set out in Policy H2.

- I. The Council will maintain a supply of housing land to meet housing targets over the plan period, with a particular focus on demonstrating a five year supply of land. The Council will produce a housing trajectory, which will be published annually as part of the monitoring framework. Further detail on this policy approach is set out in Policy H2.
- J. The size mix of new housing must reflect local need, with priority for units suitable for families. Further detail on this policy approach is set out in Policy H2.
- K. Conventional residential accommodation must be designed to meet a variety of needs throughout its lifetime. Various forms of specialist housing may be necessary to provide support to specific groups of vulnerable people and those at risk. Further detail on this policy approach is set out in Policy H9.
- L. Housing needs for older people will predominantly be met through conventional housing. Where there is an identified need, specialist accommodation for vulnerable older people may be required. Further detail on this policy approach is set out in Policy H7.
- M. The provision of additional student accommodation will be restricted to allocated sites or sites in existing use as purpose built student accommodation or where there is a wider master-planned approach to consolidate and reconfigure educational floorspace on a university campus. Any proposals for student accommodation will be expected to provide affordable student accommodation. Further detail on this policy approach is set out in Policy H6.
- N. Purpose Built Private Rented Sector development will need to provide affordable housing in line with Policy H3 and meet the criteria set out in Policy H11.
- O. Self-build and Custom build housing will be supported on suitable sites, where compliant with other relevant policies. Further detail on this policy approach is set out in Policy H8.
- P. The Council will support the provision of new supported housing where there is an identified need, and will resist the loss of existing supported housing. Further detail on this policy approach is set out in Policy H9.
- Q. Existing good quality Houses in Multiple Occupation (HMO) will be protected. Large-scale HMOs – such as co-living schemes – are not considered to make the best use of land and deliver the priorities of the Local Plan. Proposals for large scale HMOs will be assessed against the criteria set out in Policy H10.
- R. The Council will seek to meet an identified need for Gypsy and Traveller accommodation. Further detail on this policy approach is set out in Policy H12.
- S. Islington will support the retention and development of social and community infrastructure necessary to support the borough's residents, workers and visitors. This infrastructure must be designed to be high quality, appropriate to specific needs and requirements of the use and users; and located in places that are accessible, safe and convenient for people of all ages that use them. Further detail on this policy approach is set out in Policy SC1.
- T. Existing play space will be protected and new play space will be sought as part of development. This should meet the needs of children and young people of all ages and abilities. Provision of incidental play space and the creation of playable

environments, as part of building/public realm design, adds a further important element of play. Further detail on this policy approach is set out in Policy SC2.

- U. The health of communities is a very important consideration as part of new development. Health Impact Assessments will be required in order to assess how new development will affect the health of local communities. Further detail on this policy approach is set out in Policy SC3.

- 3.1 Islington's residential population is expected to increase significantly over the plan period. The challenges associated with housing additional residents are significant; not only do we have to contend with constraints on land availability, in the most densely populated and third smallest (by land area) English local authority area, we also face acute affordability issues.
- 3.2 The London-wide Strategic Housing Market Assessment (SHMA) 2017 sets out an overall housing need figure for London, some 66,000 additional homes per annum. The Islington SHMA identifies a borough-level housing need of 23,000 dwellings over the period 2015 to 2035, or 1,150 dwellings per annum; the majority of this need is for genuinely affordable housing.
- 3.3 In areas covered by spatial development strategies (such as London) the NPPF and PPG allow for the elected Mayor to distribute the total housing need figure across the plan area, in this case the strategic need figure for the entirety of Greater London. In London, the distribution of strategic housing need is done through the Strategic Housing Land Availability Assessment (SHLAA).
- 3.4 A housing need figure is not in itself a housing target. Through the SHLAA process, boroughs establish available housing capacity, which then informs actual local level housing targets. The SHLAA process has highlighted that there is dwindling capacity for new residential development in Islington, insufficient to meet local housing need.
- 3.5 In order to meet our housing targets, and because of the aforementioned issues with new capacity for housing, it is important that existing housing is protected, and that land which could reasonably be expected to be suitable for new housing is not developed for other uses; this includes reduction of housing units from extant permissions not yet built out.
- 3.6 The London SHMA figure relates to overall housing need. However, Islington consider that provision of genuinely affordable housing is the single most effective measure that could help to truly address housing need in Islington. Islington's local SHMA 2016 identifies that over half of projected housing need in Islington is for affordable housing at or below social rents.
- 3.7 In addition, the Islington SHMA highlights a need to provide a range of affordable housing products, particularly intermediate rented products, to address the current imbalance in the Islington housing market, whereby only a small percentage of households can afford market rent based on a sensible gross income affordability benchmark (30% of gross income on housing costs).
- 3.8 However, housing policies, particularly affordable housing requirements, must have regard to development viability. The viability study underpinning the Local Plan shows that 50% of affordable housing can viably be delivered in the plan period.



- 3.9 New housing across all tenures must be of the highest quality, in accordance with the Local Plan objectives and detailed design policies. Meeting housing need through the provision of sub-standard housing would be a pyrrhic victory and would be at odds with the idea of planning for sustainable development. It would create further substantial problems that would need to be addressed by future plans and strategies and would not be good planning. This Local Plan seeks to deliver new housing to meet local housing need, but this must not be at the expense of housing quality.
- 3.10 The need for new housing in the borough is significant, particularly the need for genuinely affordable housing as demonstrated by local evidence. The Islington SHMA identifies a minimum need of 12,300 affordable dwellings between 2015 and 2035, but this does not factor in households spending large proportions of their income on rent who may also need more affordable dwellings. The most telling statistic in the Islington SHMA is that only 15% of households can afford market rent based on spending 30% of their income on housing costs; the remaining 85% of households will therefore need some form of rent subsidy/assistance in order to meet their housing costs.
- 3.11 However, it is important to note that the ultimate delivery of housing is something that is largely outside the Council's control, notably on private development sites, as there are limited powers to force build-out once planning permission is granted.
- 3.12 At the macro-economic level, the financialisation of housing and the idea of a home as a commodity, coupled with Government focus on demand-side economic interventions, has played a much greater role in exacerbating the 'housing crisis' than a simple lack of building enough homes. In Inner London, and Islington in particular, where land availability for development is scarce, demand-side measures have played a large role in increasing unaffordability. Only when these macro issues are resolved, and where proper focused supply-side measures (such as freeing up Councils to build housing, and focusing grant funding on delivery of housing tenures which meet defined need not aspirations) are put in place can a true picture of the housing market be ascertained. This is beyond the power of Islington Council, but it is important to understand these issues when planning for the future of Islington, to ensure that some realism is factored into planning for housing in particular and ensure that other development needs are not overlooked.
- 3.13 Housing is not just a place for individuals and families to live; it can also deliver a specialist function (e.g. through design) to meet specific local housing needs. Islington's Housing Strategy aims to increase support and choice for vulnerable older people around housing options; increase levels of independence for people in need through improved housing opportunities and conditions and provide a better quality of life for some of the boroughs most vulnerable residents.
- 3.14 Islington faces an extreme set of circumstances when it comes to need and land supply. Land supply in Islington is constrained, and the borough is small and densely populated. Local evidence demonstrates that the need for new housing in the borough is significant, particularly the need for genuinely affordable housing. The borough faces an acute affordability issue which means that a simple 'supply and demand' model of housing delivery will not address the needs of our growing population. In this context land supply for conventional housing and genuinely affordable housing are considered the top priority because they are the most sustainable use of land in Islington, as they meet a broad range of housing needs.
- 3.15 Given the shortage of land, certain specialist forms of housing, including purpose-built student accommodation and large scale HMOs, are not considered the most appropriate use of the land that is available in terms of maximising uses which deliver

the objectives of the Local Plan, including meeting housing needs, and will generally be resisted.

- 3.16 Conventional residential development is by far the most sustainable form of residential development as it meets the broadest spectrum of housing need. Many people can live in conventional residential units (even where units require adaptation), whereas specialist forms of housing cater to specific groups. The future need for such specialist forms is untested as they are relatively new products, unlike conventional residential units which are a tried and tested method of meeting a broad spectrum of need over decades.
- 3.17 Supported housing can take many forms and helps to meet the needs of those people unable to live independently or those who are at risk or vulnerable. Provision of new supported housing which meets such needs will be considered favourably.
- 3.18 The adaptation of conventional housing can provide for the vast majority of housing needs, reducing the need to move homes and the need for specialist accommodation. Specialist housing for older people – such as extra care housing – will not usually be supported by the Council. This form of specialist housing often has excessive communal space which adds to the cost of the provision, leading to reduced affordable housing and less than optimal use of land. However, specialist affordable housing for vulnerable older people with significant care needs may be appropriate in certain circumstances.
- 3.19 The Council is supportive of self-build and custom housebuilding in principle, but acknowledge that the highly urbanised context, the constrained land supply and high land costs in the borough, combined with a need for efficient use of sites, make delivery challenging.
- 3.20 Social and community infrastructure uses, such as hospitals, doctors' surgeries, nurseries, schools, leisure centres and sports facilities, libraries, community centres and recreational and play spaces are vital for the creation and maintenance of strong, vibrant and healthy communities. Ensuring new development is supported by a suitable level of social and community infrastructure is important not only for the quality of life of residents in new developments, but also for the existing population who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in Islington through the redevelopment of existing facilities.
- 3.21 New development will be required to contribute to the borough's sense of social, mental and physical wellbeing by supporting social and community infrastructure provision. This may involve financial contributions secured through CIL or on-site provision at larger developments secured through planning obligations. Further information on infrastructure and financial contributions secured through CIL or planning obligations is provided in the strategic infrastructure section and the Planning Obligations (Section 106) SPD.

## **Policy H2: New and existing conventional housing**

- A. Islington aims to meet and exceed the housing target of 7,750 units by 2028/29, which equates to an annualised target of 775 per annum. The overall housing target for the plan period from 2020/21 to 2036/37 is a minimum of 13,175 homes.
- B. Development proposals involving new housing – regardless of site size – must demonstrate that use of the building/site is optimised. Particular consideration must be given to:
- (i) the contribution to meeting need for particular types of housing;
  - (ii) the contribution to meeting the borough’s housing targets;
  - (iii) the level of housing density;
  - (iv) social and strategic infrastructure requirements and impacts on existing and/or planned infrastructure; and
  - (v) interaction with other policy priorities, including the provision of new business floorspace to meet projected jobs growth and sustainable and inclusive design measures.
- C. Loss of Existing housing

The following applies to proposals resulting in the loss of existing housing:

- (i) The loss of existing self-contained housing will be permitted where the housing is replaced by at least equivalent floorspace and does not involve the net loss of more than one unit.
  - (ii) The loss of existing affordable housing units will only be permitted in exceptional circumstances where there is no net loss of affordable housing floorspace overall and in terms of social rented floorspace.
  - (iii) Conversion of two or more units into a single dwelling is considered material and would require planning permission.
- D. All development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2.
- E. Concentrations of one-bedroom units – overall and as part of constituent market and affordable elements of a proposal – will not be acceptable.
- F. Studio and bedsit units will be permitted where all of the following exceptional circumstances are demonstrated:
- (i) Studios/bedsits would constitute a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable elements;
  - (ii) The delivery of additional higher priority unit sizes and/or proposed higher priority units of an increased size is not possible; and
  - (iii) Provision of studios/bedsits would result in a high quality dwelling in accordance with Policy H4 and other relevant design policies.
- G. To maintain a supply of family homes, the conversion of a residential unit into a larger number of self-contained units will only be permitted where:

- (i) The total floor area of the existing dwelling is in excess of 125sqm GIA;
- (ii) The total number of new homes resulting from the conversion is optimised in line with the housing size mix priorities; and
- (iii) The dwelling mix does not contain any studio/bedsit units or more than one one-bedroom unit.

3.22 Working in conjunction with the GLA and other London boroughs through the London SHLAA process, Islington have derived capacity for 7,750 additional new homes by 2028/29<sup>7</sup>. This gives an annual minimum housing target of 775 new homes per annum. These figures are identified in the London Plan.

3.23 The housing target is made up of a large sites and small sites component<sup>8</sup> (shown in Table 3.1 below) but the aim of the policy is achievement of the overall target, rather than meeting each constituent part.

**Table 3.1: London Plan housing target**

	Annual target	Total target 2019/20 to 2028/29 (10 years)
Small sites benchmark	484	4,840
Large sites benchmark	291	2,910
Total housing target	775	7,750

3.24 To meet the overall housing target, the Local Plan sets out a number of allocations on sites where new housing development is expected to come forward over the plan period. The majority of allocations will address the large sites benchmark. It is important that housing is delivered where allocated; in line with the strategic policy, proposed developments which result in the reduction of land supply which could reasonably be expected to be suitable for conventional housing (such as an allocated site) will be refused.

3.25 Almost two thirds of Islington’s housing target is derived from small sites of less than 0.25 hectares. The Local Plan supports delivery of housing on small sites, which is a continuation of broad support for such development evident in previous years. This support is not carte blanche; small site housing delivery must address relevant policy requirements set out elsewhere in the Local Plan.

<sup>7</sup> It is expected that the housing target will be revised prior to 2028/29, either through a review of the Local Plan or London Plan, but for avoidance of doubt, the annual target of 775 units will be rolled over after 2028/29 if no revision has taken place. The Islington housing trajectory (produced at least annually) will assume an annual target of 775 for years after 2028/29.

<sup>8</sup> For purposes of the SHLAA and the derivation of a housing target, a small site is a site with an area of less than 0.25 hectares; and a large site is a site with an area of 0.25 hectares or greater. The London Plan Policy H2 defines a small site as a development which provides between one and 25 homes.

- 3.26 Progress toward meeting the borough’s housing target will be set out in the housing trajectory. An up-to-date housing trajectory will be published at least annually.
- 3.27 Proposals of any size which include housing must optimise housing delivery. The overarching Local Plan objectives are the starting point for developing all proposals involving the development of housing, to ensure that new housing provision contributes to the fundamental aims of the Local Plan. In addition, any proposals involving the development of housing must optimise the amount of housing delivered, having regard to the following issues:
- The potential level of housing for which there is a defined need, particularly social rented housing and other types of genuinely affordable housing.
  - The contribution that a particular site makes toward meeting housing targets.
  - The impact on existing or planned infrastructure resulting from new occupants.
  - The effect that a given level of housing delivery would have on other policies of the Local Plan, in particular mixed-use proposals involving housing where housing may constrain the amount of business floorspace that could come forward to meet other development needs such as affordable workspace.
- 3.28 The loss of conventional housing will directly affect the ability of the Council to meet housing targets. Existing housing should be retained, except where housing will be re-provided on the site with at least equivalent floorspace and where no more than one unit is lost (net), although any cumulative impact of small net losses from other similar proposals across the borough may be taken into account, which may mean that the net loss of single units is unacceptable on specific proposals. For the purposes of this policy, the conversion of two or more dwellings into a single dwelling is considered to be material for the purpose of section 55(1) of the Town and Country Planning Act 1990 (as amended), and would require planning permission.
- 3.29 Where redevelopment of affordable housing is proposed, any net loss of affordable housing units may be acceptable, where replacement affordable dwellings are of high quality in line with the requirements of Policy H4 and the replacement units are addressing a specific need in terms of unit size, to be agreed with the Council’s Planning and Housing departments.
- 3.30 All development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2, as follows:

**Table 3.2: Housing size mix priorities for each housing tenure**

Tenure	Studio/bedsit	1-bed	2-bed	3-bed	4-bed
Social rented	None	Low/Medium	High	Medium	Low
Intermediate rent – at London Living Rent levels (or rents akin to social rent)	None	Medium	High	Medium	Low
Intermediate rent – other Discounted Market Rent products	None	High	Medium	None	None

Intermediate – shared ownership	None	High	Medium	None	None
Market	None	Low	High	Medium	Low

- 3.31 The housing size mix priorities have been derived from local evidence and engagement with the Council's housing team. The priorities reflect a snapshot in time, and are sensitive to issues outside the Council's control, including changes to the benefits regime. Affordable housing in particular may require a different mix to address short term changes in need/demand as a result of specific interventions (for example, efforts to reduce under-occupation).
- 3.32 The housing size mix of the wheelchair accessible units built to M4(3) 'Wheelchair user dwellings' standard may be informed by data supplied by the Council's housing allocations team. Further Council evidence/research on affordable housing size mix that suggests different priorities may be relevant to justify deviation from the proposed housing size mix on a case-by-case basis.
- 3.33 Units of two-bedrooms or more are considered to be family homes for the purposes of Policy H2. One-bedroom units should not be the predominant sized unit across a development proposal overall, or as part of the individual market and affordable proportions of a scheme; however, within certain intermediate tenures where they are a high priority housing size mix as set out in Table 3.2, one-bedroom units may be the predominant unit size (provided they are not the predominant size mix for affordable housing overall, factoring in social rented provision).
- 3.34 Studio and bedsit units are not a priority housing size mix across any affordable or market tenures, and they will only be permitted where specific exceptional circumstances are demonstrated, including demonstrating that studio/bedsit units form a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable element. This is considered to be no more than 5% of units, as a percentage of units overall and as a percentage of each of the affordable and market elements of a proposal. Applicants will also need to provide evidence clearly showing why higher priority housing sizes cannot be accommodated; this includes either additional higher priority unit sizes; or increased floorspace for higher priority units already proposed, which will be particularly important where such units are at the margins in terms of meeting space standards. Regarding the latter, additional space should not result in a unit/units being over-sized, as this would not be considered to be optimal use of a site/land in line with Part B of the Policy.
- 3.35 Policy H2 covers Use Class C3 and C4 housing only. Relevant policies covering other types of residential accommodation are provided elsewhere in the Local Plan.

### **Policy H3: Genuinely affordable housing**

- A. A minimum of 50% of the total net additional conventional housing built in the borough over the plan period must be genuinely affordable. Affordable housing tenures which are not considered to be genuinely affordable will be resisted and will

not be counted towards the level of affordable housing provision on individual schemes.

- B. All sites (except for those which are currently or have been in full or partial public sector ownership) which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more must:
- (i) provide 45% on-site affordable housing (by net additional unit) without public subsidy; and
  - (ii) demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing to reach 50% (by net additional unit) have been utilised.
- C. Where a site triggers Part B, and proposes a level of on-site affordable housing above 45% but less than 50% (regardless of whether public subsidy is provided or not), the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including a late stage review mechanism. Any sites which trigger Part B and provide 50% on-site affordable housing (by net additional unit) will not be subject to a review mechanism.
- D. All sites which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more, and which are currently or have been in public sector ownership (either part or full public ownership) must:
- (i) provide 50% on-site affordable housing (by net additional unit) without public subsidy; and
  - (ii) demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% (by net additional unit) have been utilised, and demonstrate additionality delivered using any and all forms of public subsidy.
- E. Where a site triggers Part D, and additional on-site affordable housing does not demonstrate 'additionality' above 50% to the Council's satisfaction, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including a late stage review mechanism.
- F. Where a proposal seeks to apply the portfolio approach in line with London Plan Policy H5 the following will need to be demonstrated:
- At least 35% affordable housing is provided on-site (without subsidy);
  - Confirmation of the Mayor's agreement to use of the portfolio approach and robust evidence to demonstrate the delivery of 50% affordable housing (without subsidy) across the portfolio and the timescales associated with achieving this; and
  - All reasonable steps have been undertaken to maximise delivery of on-site affordable housing through public subsidy to deliver additionality above the level provided on-site under the portfolio approach.

The Council will employ the use of early stage review mechanisms, as set out in paragraph 3.49, if substantial implementation is not achieved within two years. Where there are future changes to a proposal that result in a reduction of affordable housing provision agreed for the site under the portfolio approach, the proposal will be required to follow the viability tested route as set out in this policy.

If a site falls outside of the portfolio approach due to a change in circumstances then the proposals will be required to comply with H3 parts B, C, D or E as relevant.

G. Any proposal which does not provide the minimum required level of affordable housing set out in Part B or D will be refused unless the Council accepts Part H can be applied.

H. Site-specific viability information will only be accepted in exceptional cases. This could include circumstances:

(a) where a significant shift in macro-economic conditions has occurred which has a demonstrable negative impact on the delivery of development.

(b) where a development is proposed which is of a wholly different type and is therefore not reflected by any of the typologies used in the viability assessment that informed the Local Plan.

(c) where a development is proposed which demonstrates a very close alignment to a typology shown to be unviable at full policy compliance in the viability assessment that informed the Local Plan.

(d) where the development in question is an Estate re-development scheme which involves the demolition and replacement of affordable housing.

Where it is accepted that a site-specific financial viability assessment should be considered as part of an application, the Council will determine the weight to be given to the viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms. For schemes where a site-specific financial viability assessment is accepted, the site specific targets set out in Parts B or D must remain the starting point. Site-specific viability assessments will be tested rigorously and undertaken in line with the Council's Development Viability SPD and the maximum viable amount of affordable housing must be delivered. Such proposals will be subject to detailed review mechanisms throughout the period up to full completion of the development, including a late stage review mechanism.

I. For schemes which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace, in genuinely exceptional circumstances affordable housing may be provided off-site or as a cash in lieu contribution. Cash in lieu contributions will be calculated based on the financial equivalent to on-site provision including an appropriate amount to take into account the value of the land.

J. Where affordable housing is provided on-site, the Council will require an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should be London Living Rent, and regard will be given to the priorities set out in the Council's Housing Strategy and other agreed evidence of housing need.

K. Sites delivering fewer than 10 residential units (gross) and/or which propose less than 1,000sqm (GIA) residential floorspace are required to provide a financial contribution to fund the development of affordable housing off-site. The level of contribution required will be £50,000 per net additional unit, except for the area south of Pentonville Road/City Road where the contribution required will be £60,000 per net additional unit.



- L. For proposals which trigger affordable housing requirements in Islington (either on-site or through financial contributions), exceptional reasons will be required to justify application of the Vacant Building Credit and all of the following criteria must be met:
- (i) It has been demonstrated that the proposal has been considered under Policy H3, Part H and the criteria for pursuing the viability tested route are not satisfied.
  - (ii) All buildings within the site boundary must be vacant at the time the application is submitted and it should be demonstrated that the buildings have been vacant for 3 years or more (this must meet the requirements set out in appendix 1).
  - (iii) There are no extant or recently expired permissions on the site, for any proposed use class.
  - (iv) It is clearly demonstrated that the site would otherwise not come forward for any form of redevelopment and the building has not been made vacant for the sole purpose of redevelopment. This should be evidenced by provision of marketing evidence for a continuous period of 24 months (up to the point of submission of an application). Such evidence must meet the marketing requirements set out in Appendix 1. Evidence should also be provided setting out any site specific issues which form a barrier to the redevelopment of the site.

- 3.36 The majority of housing need in Islington is for affordable housing, particularly social rented accommodation which local evidence suggests is the affordable tenure which best meets housing need. Islington aspire to fully meeting this need, with a particular aim of delivering as many genuinely affordable homes as possible from private sites and from the Council's own sites.
- 3.37 In the context of the Local Plan, genuinely affordable housing is primarily considered to be social rented accommodation. Intermediate housing which is demonstrably affordable to those on low to moderate incomes, such as key workers in the borough, could fall within the definition of 'genuinely affordable'; this particularly includes London Living Rent<sup>9</sup>. Shared ownership housing is, in the majority of circumstances, not affordable to those on low to moderate incomes and therefore in most cases would not constitute 'genuinely affordable housing'; however, it may be classed as an acceptable 'genuinely affordable' intermediate tenure on a case-by-case basis, depending on the size of units and location within the borough, and where the total monthly costs including the rental element are demonstrably affordable. In such circumstances, the rental element must be secured at an affordable level through legal agreement. Paragraph 3.55 sets out specific tenures which meet the NPPF definition of affordable housing that are not considered 'genuinely affordable housing' as per Islington's definition.
- 3.38 Local Plan viability testing shows that 45% of affordable housing can be provided on a site-by-site basis, from development value alone, without constraining the viability of schemes. Indeed, in many cases, 50% affordable housing is viable without public subsidy.
- 3.39 In light of this, the Local Plan has a minimum strategic target for 50% of all housing delivered over the plan period to be affordable. Given that sites of less than 10 units and/or 1,000sqm are not required to deliver on-site affordable housing, this

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<sup>9</sup> This also applies to any replacement product which sets rents at a low proportion of the prevailing market rate, and which is therefore affordable for those on low to moderate incomes whose needs it is intended to meet.

necessitates a strong requirement for affordable housing from schemes above this threshold to achieve 50% affordable housing. In addition, to balance out non-delivery from small sites, very high levels of affordable housing are expected to be delivered through the Council's own housing schemes and those brought forward by Registered Providers. By implementing this package of measures, the Council considers that 50% affordable housing, delivered across the plan period, is a deliverable and achievable objective.

- 3.40 Sites which are currently or have been in public ownership must provide at least 50% affordable housing on-site, without public subsidy (such as grant funding); this applies to sites owned or in use by a public sector organisation, or company or organisation in public ownership; or land that has been released from public ownership, having previously been owned or in use (at any point in the past) by a public sector organisation, or company or organisation in public ownership. Public sector sites are (or have been) public assets and therefore there is a reasonable expectation that such sites should prioritise affordable housing which helps address housing needs.
- 3.41 The Holloway Prison site is the largest potential development site in Islington. Viability testing has demonstrated that this public sector site can deliver at least 50% genuinely affordable housing, including the entire intermediate component as London Living Rent. The Council considers this site to be the benchmark for all public sector sites in the borough. Further information on the site is provided in the Site Allocations document and the Holloway Prison Site SPD.
- 3.42 The London Plan advocates a 'portfolio approach' to delivering affordable housing, whereby public sector landowners must deliver 50% affordable housing in total across a number of sites (which can be in multiple boroughs); individual sites within the portfolio can deliver less than 50% so long as the overall amount is at least 50%. Where the portfolio approach is used it is important that opportunities for affordable housing are still maximised given the levels of affordable housing need in the borough, this should include exploring opportunities for public subsidy, taking account of the London Plan and borough-wide strategic 50% affordable housing target. It will also be important that evidence is provided about the wider portfolio approach, including agreements with the Mayor to demonstrate affordable housing delivery will meet the London Plan strategic 50% target and timescales for this. Portfolio approach sites will be subject to Fast Track Route early viability review mechanisms as set out in London Plan Policy H5 if substantial implementation is not achieved within two years. It is recognised that there may be changes to individual schemes that form part of a portfolio approach. Where there is a proposed reduction in the level of affordable housing the proposal will be required to follow the viability tested route as set out in Policy H3; a site specific financial viability assessment should be undertaken in line with the Council's Development Viability SPD. If a scheme no longer meets portfolio approach requirements it will be required to comply with Parts B, C D or E of Policy H3 as relevant.
- 3.43 On all sites (both public sector and non-public sector), in addition to the respective minimum affordable housing requirements to be funded from development value alone, all potential options to secure public subsidy to provide further affordable units (i.e. additionality) must be fully utilised. This should include proactive engagement with Registered Providers at the earliest possible opportunity, ideally at pre-application stage. Public subsidy includes, but is not limited to, any form of grant and loan from a public body, land received at zero or discounted value, and other funding sources available to Registered Providers such as rent receipts, receipts from sale of land, sale of shared ownership properties or similar products, and other funding a Registered Provider may provide. Proposals must make clear the level of affordable housing

provision with and without subsidy as part of the application process. On non-public sector sites which are required to provide 45% affordable housing from development value alone, where the level of affordable housing does not meet 50% following any investigation of potential further options, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including a late stage review mechanism.

- 3.44 PPG<sup>10</sup> states that review mechanisms are not a tool to protect a return to the developer, but to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project. Review mechanisms are an important tool to bolster affordable housing provision on each and every housing scheme, and thereby assist in meeting the Council's key priority of delivering genuinely affordable housing. Further detail on review mechanisms is set out in paragraphs 3.49 and 3.50.
- 3.45 For avoidance of doubt, any site which is not in public sector ownership which triggers Part B of Policy H3 which achieves 50% affordable housing on-site (by net additional unit), without public subsidy, will not be subject to a review mechanism.
- 3.46 Any proposal which does not provide the minimum required amount of affordable housing – in line with relevant policy requirements – will be refused. These levels of affordable housing have been informed by detailed viability evidence which demonstrates that these levels are viable and will not preclude development from coming forward. On a limited number of sites, there may be genuine exceptional circumstances which necessitate provision of site-specific viability information; the Council will consider this on a case-by-case basis. The expectation is that such circumstances would usually only include those set out in Part H of Policy H3, but in rare cases could include other factors and it would be for the applicant to demonstrate such exceptional circumstances. The amount paid for land is not considered to be an exceptional reason to justify provision of site-specific viability, in line with Government guidance<sup>11</sup>. The Council will not entertain a viability assessment if it is considered that there are no exceptional circumstances which justify doing so.
- 3.47 Generally, viability information should not normally be required at application stage in order to inform future review mechanisms, and therefore this will generally not be considered appropriate except in exceptional circumstances. Values and costs will be assessed in the future, at the point of the viability review, informed by the Council's Development Viability SPD and, where relevant, the use of indices, to assess the change in values and build costs since permission was granted. However, there may be some cases – determined by the Council – where limited site-specific viability information is necessary to enable future review mechanisms to operate effectively.
- 3.48 Where viability evidence is provided to justify the level of affordable housing, this must be in accordance with Islington's Development Viability SPD and relevant guidance published by the Mayor of London. This includes (but is not limited to) requirements for development proposals to:
- provide relevant viability information at the earliest possible stage of the planning process, and clearly demonstrate that the requirement to provide the maximum level of affordable housing has been integrated in the scheme from the outset;
  - ensure that all viability information is submitted at the validation stage of an application, and that revised information is provided as necessary to reflect changes to the scheme and/or wider market conditions;

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<sup>10</sup> [National Planning Practice Guidance - Viability](#), paragraph 009, reference ID: 10-009-20180724.

<sup>11</sup> Ibid

- approach the assessment of viability in a transparent manner and make all documentation related to the viability assessment of a proposal publicly available;
- ensure that the Council's costs associated with assessing any viability assessment (including independent assessment as deemed necessary by the Council), and any associated costs, are paid for in advance; and
- provide statutory declarations to verify the accuracy of any viability information submitted; to confirm that the company producing the viability assessment are not instructed on the basis of performance related pay or other incentives according to outcome of the viability process; and to confirm the deliverability of any scheme proposed;

3.49 In line with Part C, Part E and Part H, the Council will employ the use of the following viability review mechanisms:

- a) Early Stage review mechanism which will be triggered in the event that a planning permission has not been substantially implemented within 24 months of the planning permission being granted.
- b) Mid-term review mechanisms on large phased schemes which will be triggered prior to the implementation of phases.
- c) Late Stage review mechanisms which will be triggered at the point that 75 per cent of homes are sold, or at a point agreed by the Council.

3.50 Advanced stage review mechanism will be applied to schemes delivering less than 50% affordable housing, to ensure that viability is accurately assessed at the point at which actual values are realised. This ensures that the requirement to maximise affordable housing is built in to the development, even development that can initially – at the point of application through any accepted site-specific viability – demonstrate that a higher proportion of affordable housing is not viable.

3.51 Given the acute affordable housing need in the borough and the limited availability of developable land it is essential that major housing developments provide affordable housing on-site. Experience over the past 10 years has shown that this can be achieved even on small/constrained sites. Consistent with the London Plan, affordable housing should be delivered on site. However, it is recognised that in some genuinely exceptional circumstances, this may not be possible and where this is the case off-site provision will be prioritised. Cash in lieu payments should be used in even more limited circumstances where there is detailed evidence that on-site delivery is not practical and off-site options have been explored but are not acceptable.

3.52 Some specialist housing, including supported housing provided in line with Policy H9, may in some circumstances (agreed with the Council) contribute towards affordable housing requirements because they meet an important need, and can be discounted from the overall site-specific requirement.

3.53 The tenure of affordable housing must be genuinely affordable and address the needs identified in local evidence, which suggests that the majority of Islington's housing need is for rented accommodation at or below social rents. One of the key statistics from this local evidence is that almost half of Islington households cannot afford target rent<sup>12</sup>. A quarter of households can afford target rent based on this income/rent ratio, and only approximately a fifth of households can afford 80% of market rent or market

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<sup>12</sup> Modelled on assumption that 30% of gross income of households in rented accommodation is spent on rent.

rent. Therefore, maximising the delivery of social rented homes is the Council's absolute priority.

3.54 Part H sets out the required 70% social rented /30% intermediate tenure split for any proposed affordable housing. This proposed split will help address the identified housing need in the borough. It is also consistent with paragraph 64 of the NPPF which requires major development involving the provision of housing to include at least 10% of homes for affordable home ownership; this 10% provision can be accommodated within Islington's 70/30 tenure split, as tenure split permits genuinely affordable intermediate products which would constitute affordable home ownership – paragraph 3.37 defines genuinely affordable housing for the purposes of Policy H3.

3.55 There are a number of other forms of affordable housing (as defined by the NPPF) which will not be acceptable in Islington, as they would simply be unaffordable to those whose needs they are intended to meet<sup>13</sup>:

- Discounted Market Sales (DMS) – DMS is an intermediate home ownership product that must be sold at a discount of at least 20% below local market value. DMS should be affordable to households which meet a specified household income cap<sup>14</sup>. DMS should remain available at a discount for future eligible households. Given the high average house prices in Islington and the required income multipliers that would be required even for an 80% mortgage, it is highly unlikely that DMS would meet defined housing needs in Islington. This would be the case even with substantially higher rates of discount, e.g. 50%+.
- Starter Homes – Starter Homes are similar to DMS, although they have various statutory requirements attached, including an income cap (£90,000 in Greater London), price cap (£450,000 in Greater London, which includes the minimum 20% discount) and age restrictions (Starter Homes can only be purchased by qualifying first time buyers aged between 23 and 40, although limited exceptions apply). Also, Starter Homes have a set period during which the home needs to be sold at a set discount, although this discount is not recycled following the end of the discount period. Like DMS, Starter Homes are unlikely to meet defined housing needs in Islington.
- Affordable Private Rent (APR) – APR is intermediate rented housing provided within Purpose Built Private Rented Sector development – so-called 'Build to Rent' development. Policy H11 details Islington's approach to 'Build to Rent' and includes, inter alia, a requirement to provide genuinely affordable housing. APR at high percentages of market rent will not be acceptable as part of any 'Build to Rent' development, as they would not contribute toward meeting identified housing need and would validate the perception that 'Build to Rent' is a wasted opportunity to provide more priority affordable tenures such as social rent.

3.56 Proposals involving fewer than 10 residential units (gross) and/or which propose less than 1,000sqm (GIA) residential floorspace are required to provide a financial contribution to fund the development of affordable housing off-site. The level of contribution is set out in Policy H3<sup>15</sup> and is determined by the number of net additional

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<sup>13</sup> Any other new forms of affordable housing which materialise during the plan period, which the Council consider is not genuinely affordable and therefore will not meet identified needs, will also be deemed unacceptable.

<sup>14</sup> The current income cap for Intermediate Ownership is £90,000, as set out in the London Plan Annual Monitoring Report. Any updated income caps in future London Plan AMRs, or any initial income caps set at a local level, will be relevant for the purposes of assessing intermediate ownership proposals.

<sup>15</sup> The standard level of contribution may be updated via a SPD in future, where updated evidence suggests a different standard amount is viable.

units provided and the location of a proposal. For avoidance of doubt the required contribution applies to new build units, conversions of existing buildings resulting in the creation of new units, and subdivision of existing residential properties resulting in net additional units. The contribution applies to residential units within the C3 and C4 Use Classes. Affordable housing requirements for non-C3/C4 housing are covered in policies H6 and H10.

- 3.57 In cases where an applicant is seeking to demonstrate – through a viability assessment – that a full contribution is unlikely to be viable, they will be required to provide this assessment when the planning application is submitted; the Council will not accept viability assessments submitted during the application process. The Council reserves the right to have any viability assessment independently assessed, the cost of which must be borne by the applicant.
- 3.58 Proposals which include on-site provision of social rented housing will not be required to make a financial contribution, unless the unit(s) proposed on-site are worth less than the full financial contribution that would be required for the scheme. In such cases, the Council will require the difference in value to be provided as a top-up financial contribution.
- 3.59 Contributions for off-site affordable housing for small sites – whether for the full amount or a lesser amount in line with the findings of agreed viability evidence – and the trigger point for payment of the contribution will be secured through a unilateral undertaking (Section 106, Town and Country Planning Act, 1990) which site owners, including mortgagees, will be required to enter into before the planning permission is issued. In line with Part H of Policy there may be exceptional circumstances where viability evidence is necessary for small sites in particular where a proposal demonstrates a very close alignment to a typology shown to be unviable in the Small Sites Viability Study. The contribution will be payable on commencement of the development, although in exceptional cases the Council may accept alternative payment triggers, such as:
- Payment on practical completion for very small developments (i.e. subdivision of an existing home to create one additional unit).
  - Payment on future sale where an additional self-contained unit is being created for a family member (or in similar circumstances) and there will be no immediate sale of the unit.
- 3.60 The Vacant Building Credit (VBC) is a material consideration in relevant planning determinations. The aim of the VBC is to incentivise development on brownfield sites, however all of Islington's land supply is brownfield land and Islington has some of the highest development values in the country. In Islington, in situations where a site is vacant and particularly where it possesses a low Existing Use Value (EUUV), there is an inherent incentive to redevelop the site. This means that even where there have been occasions, where one developer has not been able to bring vacant sites forward for housing because they were unable to deliver it in line with the development plan policies, they have been able to sell the site to another developer who could. Where a site is marketed – this should be for the existing use and other suitable alternative uses, including residential use. Applicants looking to justify application of the VBC will need to demonstrate exceptional circumstances and ensure that they meet the criteria in H3, Part L.
- 3.61 Where an applicant meets the criteria and VBC is applied, the affordable housing policy will be applied to the uplift in the floorspace.

3.62 It should be noted that if a scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy (CIL) relief through the vacancy test.

#### **Policy H4: Delivering high quality housing**

- A. All new C3 and C4 housing developments (including conversions and changes of use) and specialist housing identified in policies H7 to H9 and H11 must be designed and built to a high quality for the duration of its lifetime. A high quality dwelling is one which meets the criteria set out in this policy and accords with the Local Plan objectives and other relevant Local Plan policies. Sufficient information, such as detailed dwelling plans showing internal layout, must be provided at the earliest possible stage of an application, to allow for proper assessment of proposals.
- B. Residential development must be functional, useable and comfortable space that has good amenity for occupiers of all ages. Regard must be had to the surrounding local context as part of the holistic consideration of inclusive design. Housing must be built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development, and must provide 90% of dwellings to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Islington Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations.
- C. The Council may, in limited circumstances, accept a S106 contribution in lieu of Category M4(3) units on site, where there is definitive local evidence (produced by the Council) of a supply/demand imbalance for wheelchair accessible units. This contribution will be used to finance the development of new and adapted wheelchair accessible units elsewhere in the borough where demand is more acute. Any units where the Council accepts a contribution in lieu must be designed to Category M4(2) standard, instead of M4(3). The process for securing this contribution, and the amount required, will be set out in a revised Inclusive Design SPD.
- D. Residential development must meet or exceed the minimum space standards, and address other requirements for private internal space, as set out in the London Plan and relevant Supplementary Planning Guidance (SPG). Appropriate consideration must also be given to:
  - (i) providing sufficient space for the general and specific storage needs of residents (including those with disabilities) living within dense urban development, where options for storing possessions are often very limited;
  - (ii) how recycling and waste arising from the occupation of the development will be stored, collected and managed, particularly for flatted residential development; and
  - (iii) provision of rooms which are designed to function comfortably and efficiently for their intended purpose.

- E. Good circulation space must be provided within each residential unit. Multi-storey dwellings must provide space for provision of a stair lift, and a suitably identified space for a through-the-floor lift from the entrance level.
- F. In new housing development, all habitable rooms, kitchens and bathrooms are required to have a minimum floor to ceiling height of 2.6 metres (between finished floor level and finished ceiling level). In residential conversions, including extensions, where the original ceiling height is maintained, a lower ceiling height may be acceptable where it can be demonstrated that overall a good standard of daylight, natural ventilation and useable floorspace can be provided.
- G. Layout and design must accord strictly with tenure blind principles to maximise opportunities for social interaction. Development must be designed from the outset to ensure shared building access for both market and affordable units. Where applicants have demonstrated that this is not possible and/or where shared building access would demonstrably impact the level of affordable housing on site, building access for affordable units must:
- (i) be accessible and located on main frontages or as close as possible to main frontages, unless location away from main frontages results in improved residential amenity;
  - (ii) ensure that the location of building access will not affect safety and security of residents or lead to negative perceptions of safety and security; and
  - (iii) maintain the dignity of residents of affordable units and avoid locating building access for these units adjacent to waste/refuse areas and/or other building services.
- H. Residential development, particularly flatted development and proposals involving the conversion of residential unit(s) into a larger number of units must consider the effect on the amenity of adjacent properties, and put in place measures to address any adverse effects raised. This consideration should include (but is not limited to):
- (i) internal layout, including the relationship of rooms on different floors within the scheme, and the position of entrances, extensions and fire escapes;
  - (ii) consideration of any overlooking or overshadowing impacts;
  - (iii) the impact on existing delivery and servicing provision; and
  - (iv) noise and vibration impacts (see also Part J of this policy).
- I. All new residential units should be dual aspect, unless provision of dual aspect is demonstrated to be impossible or unfavourable. Where such circumstances are demonstrated, all single aspect units must:
- (i) provide a good level of daylight for each habitable room, and optimise opportunity for direct sunlight;
  - (ii) ensure that the aspect is not predominantly north-facing and does not face onto main roads or other significant sources of air pollution and/or noise and vibration, which would preclude opening windows;



- (iii) provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and
  - (iv) ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking.
- J. The design of all residential development is required to maximise natural light into the room (subject to passive heating and cooling considerations). The glazing to all habitable rooms must be generous and should aim to be not less than 20% of the internal floor area of the room. All dwellings should provide for direct sunlight to enter the main habitable rooms for a reasonable period of the day.
- K. All development proposals which include residential units must fully assess noise and vibration impacts on and between dwellings, in line with Policy DH5. Proposals should:
- (i) ensure residential units are sited away from sources of noise and vibration, to prevent impacts occurring; or
  - (ii) Where this is not possible, provide a detailed assessment of noise and vibration impacts. Where noise and/or vibration effects are identified suitable mitigation measures must be put in place to reduce these effects, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. Effects will need to be suitably mitigated for planning permission to be granted.
- L. All development proposals which include residential units must ensure that the overall approach to all entrances is logical, legible and level or gently sloping. The distance from parking spaces/drop-off points to the main entrance to the residential building must be no more than 50m. The total distance between a parking space/drop-off point and an individual dwelling entrance must be no more than 75m.
- M. In all new residential development, the number of dwellings accessed from a single core must not be more than eight on each floor, although a smaller number is preferable. The following criteria must be addressed in relation to shared circulation space:
- (i) Common/shared entrances should lead to a hall large enough for people to manoeuvre with shopping and/or baby buggies and/or wheelchairs with ease.
  - (ii) All dwellings should be provided with step-free or lift access.
  - (iii) Communal circulation corridors should ideally be 1,500mm wide, but no less than 1,200mm wide. Where they have an unobstructed width of less than 1,500mm, communal corridors should have wheelchair turning spaces at reasonable intervals.
  - (iv) Access cores must provide an access control system, with entry phones in all dwellings linked to a main front door with remote electronic lock release.

3.63 High quality housing is housing which accords with the Local Plan objectives, and which meets the full breadth of design requirements set out in Policy H4, as well as other Development Plan policies including those focused on sustainability and

amenity. A home should be a place of retreat, where people can feel comfortable and safe. Collectively, the design of new homes can provide the foundation for mixed and balanced communities to develop and thrive. The Local Plan objectives are the starting point for the design of new homes, particularly via compliance with Policy PLAN1.

- 3.64 Design policy must be people-focused to ensure that the needs of individuals and families are at the heart of housing that is developed in Islington. Collectively, this focus on high quality housing will contribute to the development of mixed and balanced communities. Ensuring that affordable housing is integrated within development is one specific way that such communities can develop. In order to facilitate this, all development must adhere to tenure-blind principles to ensure that the affordable and private housing elements are indistinguishable from one another, which assists with limiting the stigma often attached to affordable housing development.
- 3.65 Access to the building should be shared, unless this is demonstrably not possible and/or where shared building access would demonstrably impact the level of affordable housing on site. In these circumstances, separate entrances must be accessible, safe, secure and not sited adjacent to waste/refuse areas and/or other building services.
- 3.66 All applications involving new housing must be accompanied by sufficient information to allow for full assessment against Policy H4 criteria. Information must be provided as early as possible in the planning application process, ideally at pre-application stage where relevant. Applicants are required to provide details of proposed overall floorspace and a breakdown of dwelling and room sizes, including occupancy. Dwelling plans are required to demonstrate how dwellings will accommodate standard-sized furniture, access and activity space needs related to the declared level of occupancy, including internal space where children can play; and standards for adaptable and/or wheelchair accessible homes. Plans should also show how separate storage (within suitable containers) of food waste, mixed dry recycling and any non-recyclable waste can be accommodated within the home. Those details not evident on the dwelling plan are required to be detailed in the Design and Access Statement and relevant schedule of accommodation (for example, details such as level entry showers and the route for ceiling mounted hoists).
- 3.67 Larger units of 3 bedrooms or more should normally provide a separate living room and kitchen/dining rooms. Where separation is not possible, a demountable partition should be provided (or provision made for its installation) between kitchen/dining rooms and living rooms, ensuring adequate circulation and activity space within each discrete area.
- 3.68 Homes that are built to be adaptable to changing needs have the potential to enable individuals to stay put longer, which contributes towards meeting various policy objectives, including the creation of mixed and balanced communities and the move towards a circular economy (by reducing the need for significant and costly retrofitting and/or redevelopment in the future). Importantly, it reduces the need for certain types of specialist housing, particularly older persons housing, by allowing people to maintain independence and minimising unwanted moves to residential care.
- 3.69 Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion and/or change of use. Housing delivery through conversion and/or change of use could be significant over the plan period, given the densely developed characteristics of the borough, therefore it is vital that all new dwellings created embed the principles of inclusive design, having regard to the overarching objectives of the

Local Plan. Islington will seek to secure the greatest degree of 'visitability' and 'adaptability' that is reasonably achievable within an existing structure.

- 3.70 Approved Document M of the Building Regulations sets out standards for 'Accessible and Adaptable' – known as Category M4(2) – and 'Wheelchair user dwellings' – known as Category M4(3). Category M4(3) consists of two sub-categories; 'Wheelchair Adaptable' Category M4(3)(2)(a) - which requires the dwelling to be constructed with the potential to be adapted for occupation by a wheelchair user - and 'Wheelchair Accessible' Category M4(3)(2)(b) - which requires the dwelling to be suitable for immediate occupation by a wheelchair user.
- 3.71 Category M4(2) dwellings are considered suitable for older people, some disabled people including some wheelchair users, and also for non-disabled people, including families with children. Building to this standard will ensure that London's housing stock becomes progressively more capable of responding to the needs of a range of households as they live independently for longer and their circumstances and levels of mobility change over time. It ensures that households who need to accommodate a disabled family member from birth, or through accident, injury or illness or old age are able to make effective adaptations to their homes without incurring substantial cost, and therefore precluding the need to move property.
- 3.72 London Plan Policy D4 sets out minimum internal space standards (in GIA) for new residential development, inclusive of space for storage, as well as other specifications for private internal space including bedroom sizes; these standards reflect the Nationally Described Space Standard. All new residential development in Islington, including conversions, changes of use and relevant specialist housing identified in policies H6 to H11, must meet these minimum space standards and specifications (except ceiling heights, which has a separate locally specific policy). The Council will resist configurations which do not have identified minimum space standards and specifications, as these are not considered to be conducive to high quality design and would not provide a good standard of amenity.
- 3.73 Units which significantly exceed the minimum space standards will not be considered to be making optimal use of a site/land, and would therefore not be consistent with Local Plan Policy H2. Provision of studies is also considered to be sub-optimal, and should not be used as a means to circumvent space standards by subsequently utilising them as additional bedrooms.
- 3.74 Rooms within dwellings, particularly habitable rooms, must be designed to function comfortably and efficiently for their intended purpose, having regard to aspect, outlook, noise, ventilation, privacy and light. Regard should be had to the ability to adapt dwellings to meet changing needs and circumstances in the future, although accommodating flexibility does not outweigh the need to meet standards and design requirements.
- 3.75 Management of recycling and waste is an important strategic issue. Effective segregation of recyclable materials by residents and high recycling rates are dependent on the provision of convenient, well designed facilities both within the home and in common areas. In order to implement an effective system of waste management in Islington, it is essential that new development enables effective recycling and waste segregation and collection. All residential developments (particularly major developments) must provide appropriate information which clearly demonstrates how recycling and waste arising from the occupation of the development can be adequately segregated, stored, collected and managed, whilst ensuring that impacts on amenity are mitigated/prevented; this should include a specific Recycling

and Waste Management Strategy where necessary. Applicants must have regard to Council guidance on Recycling and Refuse Storage Requirements, which includes guidance on the level of information that should be provided as part of applications. Other relevant best practice guidance should be referred to where relevant.

- 3.76 Recycling and waste storage facilities should be integrated into new developments, both within the home and in communal locations that are accessible to all. Both in-home and communal storage should allow for separate storage of recyclable materials. On-site treatment of waste should be investigated for larger developments, including consideration of adequate contingency measures in case of any mechanical breakdowns.
- 3.77 With regard to ceiling heights, Islington require a minimum floor to ceiling height of at least 2.6 metres (between finished floor level and finished ceiling level), for at least 75% of the GIA of each dwelling. Providing appropriate ceiling heights is an integral part of achieving high quality housing, as it is one of the most tangible design elements that enables a home to become a comfortable place of retreat. Many modern homes in high density housing developments have relatively low ceiling heights of 2.3 metres to 2.4 metres to maximise the number of floors built at a given building height. The low level of public open space and the high-density of built form in Islington means that private outdoor space and internal space in the home are even more important to quality of life (including mental health) than in less densely populated areas. Higher ceiling heights provide a greater sense of space and help keep rooms cool in summer months. They can also improve the amount and quality of natural light and ventilation and may also allow for future adaptability to convert properties to adjust to occupants' changing needs over time, for instance through the installation of ceiling mounted hoists.
- 3.78 In residential conversions (including extensions), there may be some flexibility with the minimum ceiling heights requirement where the original ceiling height is being maintained. In such circumstances, applicants must still ensure that a good standard of daylight, natural ventilation and useable floorspace can be provided, in line with other design requirements.
- 3.79 Amenity is an important consideration when determining the quality of housing. The design of housing is intrinsically linked to amenity; poor design often means a poor standard of amenity for future occupiers. Amenity can be affected by various factors, either individual factors or a combination of factors, including noise, levels of daylight and sunlight and the general level of comfort. Policy PLAN1 and the agent-of-change principle set out in Policy DH5 enable full consideration of various potential impacts on amenity, where new development is proposed in close proximity to existing residential units.
- 3.80 Noise and vibration impacts can make dwellings uninhabitable. It is therefore vitally important that noise and vibration impacts are robustly assessed for all planning applications involving residential use, at the earliest possible stage of the development. Further information is provided in Policy DH5.
- 3.81 In the first instance, proposals should be sited away from potential sources of noise and vibration, although given the boroughs densely developed nature, this may not always be possible. In such cases, noise and vibration impacts should be assessed in line with Policy DH5. Good acoustic design in and around new residential development should be a key consideration from the earliest possible stage of development proposals.

- 3.82 Where impacts are identified, they should be mitigated through proposed layout and design of a scheme, and through use of appropriate and effective materials (for example, in walls and floors) which dampen noise and vibration between and within dwellings, and between dwellings and public and/or communal areas. Layout in particular can be effective in mitigating impacts arising from mixed-use developments. The layout of adjacent dwellings and the location of lifts and circulation spaces is required to limit the transmission of sound to noise sensitive rooms within dwellings. Applications which cannot demonstrate effective mitigation for all proposed residential units will be refused. Residential conversions in particular can commonly lead to adverse amenity impacts including from noise and vibration; proactive consideration of layouts and other issues can help mitigate or prevent these impacts.
- 3.83 Applications which cannot demonstrate effective mitigation of noise and vibration for all proposed residential units will be refused.
- 3.84 Dual aspect dwellings have multiple ‘comfort’ benefits, particularly by maximising levels of natural light and enabling cross ventilation (and therefore reducing necessity for mechanical ventilation). All residential dwellings should be dual aspect. There may be legitimate circumstances where dual aspect is impossible or unfavourable, but this must be clearly demonstrated in line with the policy requirements. Provision of a greater quantum of residential units is not considered adequate justification for provision of single aspect units. An example of where a dual aspect unit maybe impossible is a highly constrained site where there are issues of unacceptable overlooking/loss of privacy.
- 3.85 Levels of daylight and sunlight within new residential development, particularly within habitable rooms, can be integral to the enjoyment and comfort of a home, and are therefore a key factor in what constitutes a high quality home.

### **Policy H5: Private outdoor space**

- A. All new residential development and conversions will be required to provide private outdoor space, in the form of gardens (for houses and ground floor maisonettes) or balconies (for upper floor dwellings). Any provision must be of a good quality which is designed – in terms of its shape, position and location within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
- B. Glazed ventilated winter gardens may be considered an acceptable form of private outdoor open space where:
- (i) gardens or balconies would lead to issues of overlooking, either for future occupiers of the proposed residential unit or for existing adjacent residential units; or
  - (ii) gardens or balconies would be likely to experience noise in excess of relevant standard set out in Appendix 2.

- C. Where winter gardens are acceptable in line with Part B, they must have a drained floor and be thermally separated from the interior; and must be of a good quality in line with considerations set out in Part A.
- D. The minimum requirement for private outdoor space is 5sqm on upper floors and 15sqm on ground floors, for 1-2 person dwellings. For each additional occupant, an extra 1sqm is required on upper floors and an extra 5sqm on ground floors.
- E. Balconies and other private external spaces must have a depth and width of not less than 1.5 metres.
- F. Communal provision of private outdoor space, in lieu of private outdoor space for each individual residential unit, will only be acceptable for non-family units, where:
  - (i) provision of individual private outdoor space is considered likely to cause significant adverse impacts related to overlooking and noise, both within and external to the development;
  - (ii) the provision of communal outdoor space would lead to a higher quality scheme overall;
  - (iii) the level of communal space provided is commensurate with the type and size of the accommodation and the households it is intended to serve; and
  - (iv) access to communal space is not restricted, particularly on the basis of the tenure of residential units.
- G. Where roofs are utilised to provide private and/or communal outdoor space, proposals must demonstrate that:
  - (i) there are no adverse impacts relating to noise, overlooking and privacy of future residential occupiers as well as existing residents adjacent to the site;
  - (ii) the space is designed to prevent crime and to ensure that security of residents is not compromised; and
  - (iii) use of roofs for amenity purposes is balanced with the use for green roofs and renewable energy equipment in line with relevant Local Plan policies, through careful design which prioritises and integrates the benefits for biodiversity, carbon reduction and amenity.
- H. All new build residential developments and, where practicable, residential conversions, must provide step-free access and a level threshold from homes to private outdoor space.
- I. Any basement and/or ground floor unit must have a defensible space not less than 1.5 metres in depth in front of any window to a bedroom or habitable room.

3.86 Given the high density built form and low level of open space in Islington, private outdoor space is an important factor in providing good quality housing within the borough. Islington has one of the lowest amounts of open space of any local authority in the country. Many recent new buildings and converted houses do not have access to a garden or any other private outdoor space such as a balcony or terrace. This is

not satisfactory as it does not provide space for future occupants to be outdoors in a private setting.

- 3.87 Policy H5 requires provision of private outdoor space proportionate to the level of occupation of proposed dwellings. In a densely built up borough such as Islington, ground floor units offer the greatest scope to increase provision and ensure that family accommodation benefits from a good level of amenity which enables secure and safe play by children; therefore, the Council considers that higher standards should be required for ground floor dwellings, which, for the avoidance of doubt, includes units fully or partly within basements.
- 3.88 Houses and ground floor flats maisonettes should have private gardens. Dwellings on upper floors should all have access to a private balcony, terrace, or (where considered acceptable) glazed ventilated winter garden. The standards for upper floor dwellings provide sufficient space for either a meal around a small table, clothes drying, or for a family to sit outside with visitors.
- 3.89 It is acknowledged that the provision of individual private outdoor space can be challenging on some sites and that accessible, well maintained and managed communal provision can provide a workable solution where it would not be practical to provide individual areas for each unit of accommodation. However, even the best designed communal spaces do not provide residents with their own private outdoor space accessible directly from their home. Communal spaces in lieu of private outdoor space will only be considered acceptable for non-family units, in line with Policy H2 (i.e. one-bed units), and where other policy criteria is addressed, including addressing any issues regarding overlooking and noise. Where it is acceptable to provide outdoor space communally, the total space requirement must provide a level of communal outdoor space commensurate with the type and size of the accommodation and the households it is intended to serve.
- 3.90 Access to communal space in mixed tenure blocks (i.e. featuring market and affordable housing) must not be restricted on the basis of tenure, unless there are demonstrable issues regarding maintenance of communal space which could affect the overall provision of affordable housing on a scheme.
- 3.91 Roof terraces/gardens can provide outdoor space (either private space, or communal where acceptable) where balconies are not achievable. Larger buildings can have the ability to provide both private balconies and communal roof terraces. Using roofs for amenity space can reduce run-off of rainwater by using plants and soft landscaping to capture and store water but there can be a potential conflict in the use of roofs between the need for amenity space and the need to create biodiversity-rich green roofs and provide space for renewable energy generation. High quality design should aim to resolve any potential conflicts between creating green roofs, providing renewable energy and supplying amenity space on roofs for residents.
- 3.92 In assessing the quality of private outdoor space provision in development proposals, whether individual or communal areas, the shape and position and how they have regard to such matters as daylight and sunlight, noise, enclosure and privacy will be considered.
- 3.93 Issues of overlooking and noise can be a significant concern with roof terraces and balconies, which can also detract from the character of surroundings; careful design can reduce this impact. Impact of noise from external noise sources on the quality of proposed private outdoor space will be a particular consideration.

## Policy H6: Purpose-built Student Accommodation

- A. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will only be permitted on:
- (i) sites allocated for purpose-built student accommodation; or
  - (ii) sites with existing purpose-built existing student accommodation, subject to consistency with other Local Plan policies and additional impacts of development being acceptable; or
  - (iii) a university campus where reconfiguration of the educational floorspace as part of a wider master-planned approach to the higher education providers' plans for change result in a consolidation of social infrastructure floorspace that complies with Policy SC1, Part D (iii)
- B. All proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation must ensure a high standard of amenity for future occupiers of the development and residents in the surrounding area and must meet all the following criteria:
- (i) Provide high quality accommodation in line with the relevant policy requirements set out in Policy H4, including the provision of good-sized rooms and communal space. General needs units must be designed to be 'visitable' and shared facilities must be accessible. A high level of amenity must be provided, including limiting noise impacts and providing good levels of daylight and sunlight, and natural ventilation;
  - (ii) Ensure that 5% of bedspaces, their associated bathrooms and all common parts are easily adaptable for occupation by wheelchair users;
  - (iii) Ensure that the development is subject to an appropriate site management and maintenance plan;
  - (iv) Demonstrate, through a binding nomination agreement, that the accommodation will only be occupied by students of one or more higher education provider(s). Priority must be given to higher education providers in close proximity to the proposed accommodation in the first instance, then those located elsewhere within the borough;
  - (v) Temporary use of student accommodation for ancillary uses will be secured via legal agreements/conditions to ensure the potential impacts on the safety, security and privacy of both resident students and wider amenity impacts are managed. The potential cumulative impact on housing supply will be considered and any proposal for temporary use which cannot be demonstrated to be ancillary will be resisted; and
  - (vi) Provide at least 35% affordable student accommodation in line with London Plan Policy H15.
  - (vii) Demonstrates that the development contributes to a mixed and inclusive neighbourhood.



- 3.94 Islington has consistently had the highest rates of student housing delivery in London over the past 10-15 years. Due to this substantial amount of delivery, as well the need to prioritise conventional housing and employment growth in a borough with severe constraints on land, the development of purpose-built student accommodation is limited to specific locations, either allocated sites, or, in certain circumstances, intensification of existing student accommodation. It is recognised that higher education providers' estate and expansion plans can change. As university campus plans emerge surplus land may become available which may provide opportunities for other land uses to be considered including an element of purpose built student accommodation. The scale of this opportunity should be determined through a master-planned approach that demonstrates a clear strategy for the wider higher education providers' campus and estate. A piecemeal approach to campus and estate rationalisation will not be supported. Any loss of social infrastructure would also need to comply with Policy SC1.
- 3.95 The delivery of student accommodation contributes to overall housing delivery based on the amount of general housing that is (theoretically) freed up from students residing in other forms of accommodation. Previously permitted student accommodation was counted towards the housing target on a 1:1 basis, meaning that one bedspace counted as one housing unit for monitoring purposes. Any student accommodation permitted following the adoption of the Local Plan should be monitored on a 2.5:1 basis (in line with the London Plan), meaning every two and a half bedspaces will equate to one unit of housing.
- 3.96 It is important that student accommodation is high quality, in line with Local Plan policies which look to secure high quality housing. The following parts of Policy H4 are relevant; Part C (ii) and (iii) in relation to provision of recycling and waste facilities and provision of functional rooms for their intended purpose, Part G in relation to intensification of existing PBSA and consideration of impacts (i) to (iv), Part J for noise and vibration and Part K in relation to the approach to building entrances. Bedrooms and separate communal/amenity areas should consider HMO guidance as a starting point to considering good sized rooms. Kitchen, washing and utility facilities should meet environmental health requirements.
- 3.97 To ensure purpose-built student accommodation follows inclusive design principles, general needs bedrooms must be 'visitable' while shared facilities must be accessible. A wheelchair accessible toilet must be provided on every floor. Buildings must also be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. Further guidance is provided in the Inclusive Design SPD.
- 3.98 Site management and maintenance is considered key to successful student accommodation and will be secured by legal agreement. This must cover matters such as provision of on-site wardens, use of communal facilities, elimination of potential noise nuisance, recycling facilities, the approach to security and safety for students and the management of anti-social behaviour. To better inform determination of proposals for purpose-built student accommodation, a site management and maintenance plan must be submitted at the earliest possible stage, ideally at pre-application stage. A condition will be imposed on all student accommodation permissions requiring adherence to the management plan.
- 3.99 All purpose built student accommodation must be accompanied by a nomination agreement, which will be secured by legal agreement. A nomination agreement ensures that accommodation will only be occupied by students of one or more higher education provider(s). Priority must be given to higher education providers in close

proximity to the proposed accommodation in the first instance, then those located elsewhere within the borough, then those outside the borough. The agreement must apply for as long as the student accommodation is in use.

- 3.100 Restrictions will be imposed to ensure that the whole scheme is retained as an individual unit of student accommodation. The use of student accommodation for ancillary uses including providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses may be acceptable where they can be demonstrated to be ancillary. Any ancillary use should be outside term time and should not disrupt the accommodation of resident students during their academic year. The potential impact on local housing supply by removing units from the housing market for certain periods will be considered. There are also potential amenity issues for longer-term student occupants, particularly related to noise, safety and security issues. The ancillary use must not disrupt the accommodation of the longer-term resident students, either during or outside their academic year. Any suggested ancillary use of a scale which is likely to cause such disruption would constitute a material change and therefore would not be classed as ancillary and require planning permission.

## **Policy H7: Meeting the needs of vulnerable older people**

- A. The need for accommodation for older people will be met primarily through delivery of conventional residential accommodation designed to be adaptable to changing needs over time. Different levels of care may be delivered in conventional accommodation which means there is likely to be a lesser need for certain specialist forms of older persons housing, in particular market extra care housing.
- B. There is some local need for affordable one and two-bed extra-care units. This specific type of specialist older persons accommodation may be acceptable on certain schemes, but only where the Council's Adult Social Care service consider that the proposed accommodation would meet a defined need.
- C. Specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:
  - (i) there is evidence of local unmet need for specialist older people accommodation, or it would contribute to meeting the London Plan benchmark figure of 900 dwellings over the plan period;
  - (ii) affordable housing is provided in line with Policy H3;
  - (iii) it has adequately considered and addressed all design issues in Part D or Part E to ensure the accommodation is suitable for the intended occupiers;
  - (iv) it provides the necessary level of supervision, management and care/support, which is secured in a legal agreement;
  - (v) it is easily accessible to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and

- (vi) it constitutes a suitable use for the site considering the surrounding neighbourhood, potential for development of other priority land uses and its contribution to mixed and balanced communities.
- D. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- (i) The proposal is for provision of self-contained units (or at least en-suite private rooms which meet or exceed minimum space standards) which addresses other requirements for private internal space;
  - (ii) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - (iii) Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
  - (iv) Appropriate wheelchair accessibility is provided in line with Policy H4;
  - (v) Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
  - (vi) Servicing access and a safe drop off point is within 50m of the main entrance in line with H4; and
  - (vii) Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings.
- E. Care homes must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- (i) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
  - (ii) 100% of all habitable rooms are wheelchair accessible;
  - (iii) Accommodation is provided in line with relevant design guidance and best practice standards;
  - (iv) Servicing access and a safe drop off point is provided within 50m of the main entrance. This must be appropriate for ambulance/mini bus drop-off; and
  - (v) Provision of accessible communal outdoor space for use by residents, staff and visitors of a good quality and which is designed – in terms of its shape, position and location within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
- F. The Council will resist development which involves the loss of floorspace in specialist older peoples accommodation unless:
- (i) adequate replacement on-site accommodation will be provided that satisfies Part D or Part E; or
  - (ii) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part D or Part E; or

(iii) the applicant can robustly demonstrate that there is a surplus over a long-term of this housing type in Islington; and it can be demonstrated that the existing accommodation is unsatisfactory for modern standards and/or not fit for purpose.

- 3.101 Islington is expected to experience growth in its older population as part of the long term trend in population growth<sup>16</sup>. However, the proportion of older people in Islington is currently below the London and UK average; this is not projected to change substantially and it will likely remain below the London average for the foreseeable future. Older people's needs vary with the majority expected to remain housed in existing housing stock, with some demand for down-sizing in response to changing lifestyle. Demand for various types of accommodation for vulnerable older people exists and new specialist accommodation may be appropriate in certain circumstances. Market extra care accommodation is not considered a priority due to its cost, which is often inflated due to provision of 'luxury' communal facilities that are not a necessary component of care.
- 3.102 Accommodation for older people will be met through conventional housing designed to be adaptable/wheelchair accessible, in line with Policy H4. More specialist accommodation (with varying elements of care) may also contribute to meeting some vulnerable older peoples' need where it is affordable. The future accommodation needs for older people are considered in the SHMA which demonstrates varying levels of need depending on the base data. The London Plan contains a benchmark which is intended to help inform a local level assessment. The preferred local solution is to meet most of this need through conventional housing with some exceptions for affordable extra care units to meet defined local need (the quantum of which will be informed by relevant up-to-date evidence produced by the Council). Where affordable extra care units are deemed acceptable (only through engagement with the Council's Adult Social Care service), provision will be offset against affordable housing requirements of a scheme.
- 3.103 The London Borough of Islington Housing Strategy sets out the intention that the borough will increase levels of independence both for older people and various other groups of dependent people. For older people this includes both physical adaptations and improvements within the home in combination with other social measures of support such as care services, in order to sustain people in their own homes for as long as possible. More general levels of accessibility in the wider public realm is also an issue and can also help enable people to remain in their homes for longer; policies which make streets more liveable can help to remedy this. Islington has a strong record in delivering accessible development.
- 3.104 The range of specialist housing designed for older people can be referred to under various terms including sheltered housing/accommodation, extra care housing/accommodation, and residential/nursing care homes. Supported housing for other vulnerable groups is covered under Policy H9 below. Islington will consider which Use Class a proposal falls into on a case-by-case basis, although extra care facilities will generally be considered to be C3 use unless they include a significant element of care. Regardless of whether extra care facilities are determined to be a C2 or C3 use (or Sui Generis use which could also be justified in principle), relevant policy

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<sup>16</sup> An older person in Islington (for the purposes of Policy H7) is defined as 75 or over.

requirements including affordable housing will apply. Development proposals must provide details of:

- care aspects, including qualifying age, entry criteria, minimum expected numbers of care hours per week and the proportion of residents expected to need different levels of care; and
- how the facilities are to be funded and managed.

3.105 The Council will consider the use of Section 106 agreements to secure:

- the involvement of a registered Care Quality Commission care provider in the delivery of care;
- the availability of 24-hour care services for residents to receive/purchase from an on-site team according to their needs;
- the receipt of a minimum package of care services as a requirement for occupation; and
- a minimum age of occupants.

3.106 To ensure high quality accommodation is provided the design of specialist residential accommodation for older people (including new build, conversions and extensions) must demonstrate it has considered and addressed a number of key design aspects. To ensure appropriate privacy for residents, elements of a building should be ranked on a scale of ascending privacy, with the most public spaces close to either main entrances or centrally located, and the private dwellings the farthest away from the main entrance. There should be separation between areas just for residents, staff and visitors with a distinction between shared spaces. Provision of communal spaces must be proportionate to the scale of the accommodation and not excessive, optimising the accommodation for residents whilst maintaining the usability of the communal spaces.

3.107 Suitable bathrooms, storage space for equipment and appropriate rooms for activities must be provided. Providing and retaining storage space is important for mobility scooters, hoists and other equipment both in existing accommodation and new provision. In particular, extra care should provide sufficient charging points for scooters, equivalent to 25% of dwellings. Likewise, conversions involving loss of activity rooms/amenity rooms would also need to be justified.

3.108 When determining applications for specialist forms of older people's accommodation, the Council may take account of detailed standards and design guidance including (but not limited to) the following documents or any appropriate successor documents:

- The design and build of successful extra care housing – Housing LIN<sup>17</sup>
- Building better care homes for adults – Care Inspectorate<sup>18</sup>; and
- Extra Care Housing Development planning, control and management – RTPi Good Practice Note 8<sup>19</sup>

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<sup>17</sup> [Design and build of successful extra care housing guidance – Housing LIN](#) :

<sup>18</sup> [Building better care homes for adults guidance – Care Inspectorate](#):

<sup>19</sup> [Extra Care Housing Development planning, control and management – RTPi Good Practice Note 8](#)

## Policy H8: Self-build and Custom Housebuilding

- A. Proposals including Self-build and Custom build unit(s) must:
- (i) meet an identified need for self-build or custom housebuilding as identified on the Islington self-build and custom housebuilding register;
  - (ii) make the most efficient use of land, optimising the number of residential unit(s) and level of density that would be expected given the site size, context and layout;
  - (iii) provide high quality homes in line with Policy H4;
  - (iv) provide affordable housing in line with Policy H3 (either on-site or off-site contribution depending on proposed number of net additional homes); and
  - (v) comply with other relevant policies including sustainable design policies.

3.109 Islington has a duty to keep a register of demand for self-build and custom housebuilding, and have regard to that register when undertaking planning, housing, regeneration or land disposal functions. To be eligible for the register, individuals and associations must demonstrate that they meet certain eligibility conditions. Islington's self-build and custom housebuilding register is divided into two parts:

- Part 1 keeps track of local demand for self-build and custom housebuilding which must be met via the grant of sufficient development permissions for serviced plots of land.
- Part 2 keeps track of general demand for self-build and custom build, with no requirement to grant sufficient development permissions for serviced plots of land to meet this demand.

3.110 Self-build generally refers to homes built by an individual to their own specification. Custom-build generally refers to bespoke homes built by a third party for occupation by specific individuals or an association of people.

3.111 LPAs should use their registers as evidence of demand when developing their Local Plan and associated documents. The Islington SHMA considered the demand for self-build and identified that whilst there is some interest, it is only a very limited number of people and a very small proportion of the overall housing need identified for the borough. Therefore, whilst the Council is supportive of self-build and custom build in principle, it does not consider that it will make a significant contribution to meeting housing need in the borough. Given the highly urbanised context, with a constrained supply of land, high land costs and the need to make efficient use of sites, the potential for people to acquire sites to build their own homes – which is the fundamental goal of the legislation – is likely to be very limited.

## Policy H9: Supported Housing

- A. The Council will support the provision of new supported housing where:
- (i) it meets an identified need, including larger-than-local need;
  - (ii) it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence, and provides the necessary level of supervision, management and care/support. Regard must be had to Policy H4 and any best practice standards that the Council considers relevant and which are related to the specific type of accommodation and the people/groups it is targeted to; and
  - (iii) there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers.
- B. The Council will resist the loss of supported housing unless:
- (i) adequate replacement accommodation of the same quality and quantity will be provided for the particular group;
  - (ii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported housing; or
  - (iii) it can be demonstrated that the accommodation is not fit for purpose for its current use or other relevant types of supported housing.

3.112 The purpose of supported housing is to enable people with specific needs to live as independently as possible within their community, with a real focus on social inclusion. Provision of a wide range of supported housing types is likely to be necessary over the plan period, including permanent, long term and shorter term accommodation which meets temporary need. This can include foyer accommodation for young people, refuges, and long-term accommodation for people with ongoing support needs. The wide range of supported housing types may also include accommodation referred to as hostels (which may or may not have an element of care, but are distinct from visitor accommodation hostels). In planning use class terms, supported housing may be considered Sui Generis, C2 or C3 and would usually be considered exempt from (or be provided instead of) affordable housing requirements.

3.113 Supported housing may be acceptable as part of a mixed-use development, although where a proposal involves more sensitive types of supported housing, this may not be appropriate.

3.114 Islington will consider supported housing to be any housing scheme where housing, support and (where relevant) care services are provided (or are capable of being provided) as an integrated package. Some schemes are long-term, designed for people who need ongoing support to live independently. Other, semi-independent living options are designed to help people develop the emotional and practical skills needed to move into more mainstream housing and provide varying levels of support. Support can include help with health needs, including mental health, drug and alcohol use, managing benefits and debt, developing daily living skills and accessing

education, training and employment. Supported housing provision may be necessary for a range of people/groups<sup>20</sup> including:

- people with Mental Health Problems
- people with Learning Disabilities
- people with a Physical or Sensory Disability
- single Homeless people with Support Needs
- people with Alcohol Problems
- people with Drug Problems
- offenders or People at risk of Offending
- mentally Disordered Offenders
- young People at Risk
- young People leaving Care
- women at Risk of Domestic Violence
- people with HIV/AIDS
- homeless Families with Support Needs
- refugees
- teenage Parents
- rough Sleepers

3.115 Existing supported housing will be protected where need exists and the accommodation remains suitable, unless it is adequately replaced. Adequate replacement can occur on-site or off-site and will be considered in terms of both the quality and quantity of accommodation replaced, in line with relevant best practice standards and the ability/need to provide continuation of a service. Off-site replacement may be acceptable but will depend on the quality of new replacement location and its accessibility.

3.116 There will be a need for proposals to demonstrate where accommodation is no longer needed for particular groups. This should be considered at both a local and a sub-regional level to ensure that varying changes in provision at a wider scale are considered. Changes in service delivery can render accommodation outdated and no longer fit for purpose. Where loss of such accommodation is proposed, this must be evidenced including information which shows that refurbishment is not possible. Accommodation must be proven to be not fit for purpose for the existing specific supported housing and for other relevant types of supported housing which could reasonably occupy the accommodation. In some cases, a replacement development may provide units meeting different supported housing needs which fall within different use classes.

3.117 Proposals involving the loss of existing supported housing must take every opportunity to meet unmet need(s) for other relevant types of supported housing. There are a range of supported housing need(s) which will need to be considered, with differing design considerations which need to be taken into account to assess the feasibility of utilising existing provision. Consultation with the Councils Housing department, Adult Social Care department and/or Children's Services department must occur as part of evidencing meeting unmet need.

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<sup>20</sup> The relevant policy for accommodation related to older people, which may include housing which could be referred to as supported housing, is Policy H7.



## Policy H10: Houses in Multiple Occupation (HMOs)

- A. The Council will support the provision of new small-scale HMOs where they:
  - (i) do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood; and
  - (ii) provide a good quality of accommodation within non-self-contained units, in line with the relevant requirements set out in HMO best practice standards.
- B. Proposals involving the loss of good quality HMOs will be resisted, unless the replacement use meets an acute need identified by Islington Council's housing department, particularly genuinely affordable housing.
- C. Proposals for large-scale HMOs are not considered the best approach to meeting housing needs in the borough. On sites where the Council considers that large-scale HMOs may be an acceptable form of housing in principle, proposals must:
  - (i) prevent any significant adverse amenity impact(s) on the surrounding neighbourhood. Sufficient evidence – including a detailed management plan – must be provided;
  - (ii) be consistent with all relevant parts of Policy H2 and H4. With regard to minimum space standards, living space and communal space must be comfortable and functional for the needs of tenants and must include adequate space for storage;
  - (iii) Ensure that 5% of bedspaces, their associated bathrooms and all common parts (including a unisex WC on every floor) are easily adaptable for occupation by wheelchair users;
  - (iv) provide 35% (or 50% where on public sector land) on-site affordable housing and provide tenures in line with Policy H3. Cash in lieu payments will be acceptable where it can be demonstrated that it is not possible to deliver the affordable housing on-site in accordance with London Plan Policy H16; and
  - (v) provide appropriate and accessible communal facilities and services.

3.118 There are various definitions associated with the term 'House in Multiple Occupation' (HMO). Within Islington, an HMO is defined as residential property that takes the form of shared houses, flats and non-self-contained units/housing let to three or more unrelated tenants who form two or more households and share a kitchen, bathroom or toilet. Households are families, including single persons and co-habiting couples. In terms of planning use class, there are two scales of HMO. A small-scale HMO (Use Class C4) is where between 3 and 6 unrelated people share basic amenities such as a kitchen or bathroom. All other HMO are considered large-scale HMO and are classed as a sui generis use. Large scale HMO are sometimes called co-living or shared living.

3.119 There is a permitted development right to allow change of use between conventional self-contained housing in Use Class C3 and small-scale HMO in Use Class C4. If it becomes apparent that this permitted development right is impacting the mix and

balance of uses in an area, and/or is causing significant amenity impacts for local residents then the Council will consider removing this permitted development right.

- 3.120 In accordance with housing legislation, the Council's Environmental Health team licences some HMOs. Agreed minimum standards<sup>21</sup> for room sizes and the provision of kitchens and bathrooms are used to determine the maximum number of occupiers and households for an HMO licence. These were designed as minimum standards to protect the health of occupants in existing property by ensuring adequate facilities and space for the number of people a HMO is licensed for. In the case of new development, the Council considers that higher space standards are eminently deliverable. For planning purposes, the minimum standards will be a relevant consideration for all HMOs, not just HMOs which trigger the licensing requirements.
- 3.121 The loss of good quality HMOs will be resisted. Good quality HMOs are those that provide sufficient internal space, provide occupants with a reasonable standard of amenity, and do not give rise to significant adverse amenity impacts to the adjacent and/or surrounding residential neighbourhood. The Council will exercise a general presumption in favour of protecting HMOs that could be improved to meet standards without conversion. The Council's Environmental Health team will be consulted on a case-by-case basis, to assist with determining what constitutes 'good quality'.
- 3.122 London Plan Policy H16 'Large-scale purpose built shared living' is relevant to Policy H10. Given the extent of the overall housing need and the shortage of land, large-scale HMOs are not capable of meeting the range of housing needs in the borough and priority for family housing. Large-scale HMOs will need to demonstrate to the Council that genuinely affordable housing can be secured; and that they are not constraining the delivery of conventional residential uses. Evidence must also be provided to demonstrate that there is actual demand for what is currently a niche style of accommodation.
- 3.123 Where large-scale HMOs meet initial policy requirements and are acceptable in principle, proposals will need to address specific criteria, including provision of genuinely affordable housing. The large-scale HMO format would in such cases be the format for the private/market element of housing; the affordable provision must be conventional self-contained units in line with tenures/mix set out in Policy H3. Due to the style and operation of large-scale HMO accommodation, pepper-potting of affordable provision with HMO units will not be appropriate. Affordable housing must therefore be separate to the HMO units, including separate access. Tenure blind principles must be adhered to, alongside other relevant Local Plan policies including Policy H4. Sites which cannot provide separate affordable housing (e.g. due to constraints with site size, inability to provide multiple cores) may provide cash in lieu payments.
- 3.124 For avoidance of doubt, large-scale HMOs cannot be seen as affordable accommodation. Comparisons between the rental cost for an HMO bedspace and conventional housing (Use Class C3) should not be made on the basis of units, given that the space and living quality of HMOs can be drastically different. Comparisons are only relevant on a per square metre basis, which means that disparity of size is factored in. Where non-standard communal facilities are provided, these must be discounted from any comparisons with conventional housing costs.

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<sup>21</sup> [Islington Council Paper: Standards for houses in multiple occupation Housing Act 2004](#) or any subsequent update.

- 3.125 Living space and communal space must be comfortable and functional for the needs of tenants and must include adequate space for storage. What constitutes comfortable and functional will be determined on a case-by-case basis, but relevant Environmental Health standards and private internal space standards set out in the London Plan will be used as a reference point. Relevant parts of Policy H4 will also apply when assessing the standard of proposed applications. The following parts of Policy H4 are relevant; Part C (ii) and (iii) in relation to provision of recycling and waste facilities and provision of functional rooms for their intended purpose, Part G and consideration of impacts (i) to (iv), Part J for noise and vibration and Part K in relation to approach to building entrances. The Inclusive Design SPD and BS8300:2018 (Part 2) will also be important considerations, alongside other guidance and/or best practice which the Council considers is relevant.
- 3.126 The achievement of mixed and balanced communities is a key objective of the Local Plan; it is important for maintaining community cohesion, diversity and character. New housing development can have a significant impact on the achievement of mixed and balanced communities, and relatively high cost tenures like large-scale HMOs can potentially lead to residential enclaves shut off from the community at large; co-living/shared living is often advocated as a way of facilitating communal interaction, but this should apply to the wider community not just those living within the development. Proposals for large-scale HMOs must contribute positively to the mix and balance of uses in an area and demonstrate that any adverse amenity impacts on the surrounding neighbourhoods and communities are prevented.
- 3.127 A detailed management plan is essential, to prevent adverse amenity impacts on the surrounding area and also to ensure that the development is properly managed. A management plan must be submitted as early as possible, ideally at pre-application stage. All large-scale HMOs must be managed by a single company/organisation with minimum six-month tenancy lengths; shorter tenancies risk damaging any sense of community through constant turnover of residents. They also blur the lines between short-term let accommodation, turning large-scale HMOs into de facto hostels/visitor accommodation which would further undermine the ability to genuinely meet housing need.
- 3.128 The management plan must set out how the HMO element of the development will interact with on-site genuinely affordable housing, in addition to details on how all other facets of the development will operate, from move-in and move-out arrangements and maintenance of communal areas, to staffing and security arrangements and responsibilities. The exact scope of a management plan must be agreed with the Council on a case-by-case basis. Where applications for large-scale HMOs are permitted, adherence to the provisions set out in the management plan will be secured through S106 agreement.
- 3.129 Kitchens, amenity space (internal and external) and laundry facilities are considered appropriate, essential communal facilities for large-scale HMOs. Provision of non-standard 'luxury' communal facilities – such as swimming pools, cinemas, gyms – which inflate development costs will not be considered an acceptable reason for any policy non-compliance with regard to any other aspect of the development, particularly affordable housing.

## Policy H11: Purpose Built Private Rented Sector development

- A. Proposals for purpose built (PRS) development will be permitted where they comply with all of the following criteria:
- (i) There will be no adverse impacts on local amenity;
  - (ii) Affordable housing is provided in line with Policy H3;
  - (iii) High quality housing is provided in line with Policy H4. All units must be self-contained and let separately;
  - (iv) The PRS units are held under a covenant for the lifetime of the building, generally no less than 15 years. The covenant will be strictly enforced and must not allow any provision for general market sale of any units (either individually or as a group of units), for the length of the covenant period;
  - (v) A clawback mechanism is put in place to ensure that the maximum amount of affordable housing is provided on-site where the covenant is broken (notwithstanding criterion iv);
  - (vi) Unified management and unified ownership, including partnerships, of the development is guaranteed throughout the covenant period;
  - (vii) Longer tenancies (three years or more) are available to all tenants. The tenancy process should give security to the renter, with appropriate break clauses and transparency on rent increases enshrined in the tenancy agreement. The tenant should be able to end the tenancy with a month's notice any time after the first six months. Upfront fees during the letting process must not be charged, except for security deposits and upfront rent payments.

3.130 For the purposes of Policy H11, Purpose Built Private Rented Sector development (commonly known as 'Build to Rent') relates to a specific business model where non-owner-occupied self-contained dwellings are built with the intention of being rented out (rather than sold) from the outset<sup>22</sup>. These developments often claim to have 'distinct economics' due to the fact that they are rented not sold, which in turn is used as an argument for a more flexible approach to policy requirements including provision of affordable housing.

3.131 The schemes are intended for institutional investors as a means to increase housing supply through varying the housing product mix and stimulating a faster delivery rate. Both the Government and Mayor have supported provision of more private rented homes and a more positive approach in enabling purpose-built PRS to contribute to the achievement of housing targets.

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<sup>22</sup> Policy H11 does not aim to restrict market housing being rented privately; it aims to prevent a specific business model (purpose built PRS) being used to undermine affordable housing and other policy requirements. To clarify, the Council has no issue with the market element of a scheme being rented privately, and are not seeking to restrict this.

- 3.132 As set out in Policy H3, APR at high percentages of market rent will also not be acceptable as part of any 'Build to Rent' development, as they would not contribute toward meeting identified housing need and would validate the perception that 'Build to Rent' is a wasted opportunity for conventional housing which could provide more priority affordable tenures such as social rent.
- 3.133 Purpose built PRS must provide genuinely affordable housing in line with Policy H3, including the required tenure mix which prioritises social rented accommodation. The purpose built PRS business model is not an acceptable excuse for not meeting these policy requirements; for example, PRS schemes can be designed with separate cores to allow for delivery of social rented accommodation. Purpose built PRS developments which do not provide the required proportion and tenure split of affordable housing will be refused. Unified management and unified ownership of the development can include partnerships; these should be guaranteed throughout the covenant period.
- 3.134 In addition, developers must enter into a covenant to ensure that PRS schemes commit to provide rental accommodation for the lifetime of the building, during which period no sales out of the covenant will be allowed. Where it is agreed that sale out of the covenant can take place, this will only be suitable where it involves sale of all PRS units. Such a break in the covenant will trigger a clawback mechanism requiring the maximum reasonable amount of affordable housing, in line with the Local Plan affordable housing requirements. In the event that the covenant is broken in order to enable the level of clawback to be calculated a valuation of the market and affordable units must be included within the S106 agreement. The clawback must provide for provision on-site by identifying specific units that will be converted to genuinely affordable housing, which reflects the tenure split set out in Policy H3, particularly social rented housing. Provision of clawback through financial contributions is generally not acceptable.
- 3.135 Section 106 agreements and covenants should be carefully worded in order that the construction of the units would be VAT zero-rated; affordable housing units will not be subject to a minimum covenant period and will always be secured in perpetuity.
- 3.136 Ensuring housing quality is just as important for PRS development as for conventional market housing. All requirements set out in Policy H4, including minimum space standards, will need to be complied with along with other policies in the Local Plan such as those requiring car-free development and cycle parking.

## **Policy H12: Gypsy and Traveller Accommodation**

- A. To meet the identified need for 10 Gypsy and Traveller pitches, the Council will undertake an immediate focused review of this policy following its adoption. If the focused review is not submitted to the SoS for examination within 24 months from the date of adoption of the SDMP, this policy will be considered out-of-date for the purposes of the NPPF.
- B. In the absence of a particular site allocation(s) to meet defined need, the following criteria will apply to any windfall sites which come forward before the immediate review is completed. Any site proposed in order to meet an identified need must:

- (i) have suitable access for the type of vehicles that could reasonably be expected to use the site;
- (ii) be able to provide basic amenities, including water and sewerage;
- (iii) provide a good level of residential amenity and high quality housing, in line with relevant policy requirements set out in Policy H4;
- (iv) not have any relevant pre-existing policy designations that restrict the use of the site, including green infrastructure such as Metropolitan Open Land; and
- (v) the site is not allocated for other uses, e.g. conventional housing, offices.

3.137 The Council's Gypsy and Traveller Accommodation Assessment (2019) (GTAA) considered the need for such provision against several different definitions. Following the judgement *Smith v Secretary of State for Levelling Up, Housing and Communities* [2022] EWCA Civ 1391, it is considered the need identified under the 'ethnic' definition in the GTAA should be selected. This results in a need for 10 Gypsy and Traveller pitches over the plan period. The Council has not been able to identify any sound site allocations to meet the identified need as part of plan preparation or during the examination of the plans. It will therefore undertake an immediate focused review of Policy H12 following the adoption of the SDMP. This will include a review of the need for Gypsy and Traveller accommodation as well as positively meeting the identified need. This must be submitted for examination to the SoS no later than 24 months following the adoption of the SDMP. If this does not occur, then Policy H12 will be considered out-of-date in accordance with Paragraph 11 d) of the NPPF.

3.138 The policy also sets out assessment criteria for any windfall applications for Gypsy and Traveller accommodation, which would apply to future applications for sites on council owned or privately owned land, until the focused review is completed. The relevant aspects of Policy H4 in relation to amenity includes ensuring a good level of privacy and aspects in relation to high quality housing relate to ensuring provision meets accessibility standards in terms of access to amenity blocks for example. Other aspects of Policy H4 may also be relevant.

3.139 The 2019 assessment also considered the accommodation needs of Travelling Showpeople and boat dwellers. It concluded that there is no need for Travelling Showpeople plots within Islington, but found that there is a need for some accommodation for boat dwellers. The Council is committed to ongoing engagement with the Canal and River Trust to meet this need. The Regent's Canal crosses two Spatial Strategy areas – King's Cross and Pentonville Road (covered by Policy SP2), and City Road (covered by Policy BC4 of the Bunhill and Clerkenwell AAP). Policies SP2 and BC4 both set out criteria to assess residential moorings.

## Policy SC1: Social and Community Infrastructure

- A. The Council will support proposals to provide new and/or extended social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment of need by the Council and against all relevant Local Plan policies.
- B. Social and community infrastructure will be funded through the CIL and/or section 106 planning obligations (as appropriate). In addition, new and/or extended on-site provision of social and community infrastructure may be required as part of the supporting infrastructure for significant new housing and mixed-use development proposals, in order to mitigate the impacts of the development on local services and meet the needs of occupiers.
- C. Where a proposed social and community infrastructure use/facility is deemed necessary to mitigate the impacts of existing or proposed development (e.g. a health centre to serve the residents of a large housing scheme), that specific use will be secured at planning stage.
- D. Where new and/or extended social and community infrastructure is provided on-site it must be designed in line with criteria in Part H.
- E. The Council will not permit any loss of social and community infrastructure uses unless:
  - (i) a replacement facility is provided on-site. Any facility must be of at least equivalent quality, quantity and accessibility to that of the existing facility, and must be consistent with Part G. It must, in the Council's view, ensure that the needs of the local population will continue to be met to at least the same level as the existing use; or
  - (ii) the existing use or another social and community infrastructure use is not required on site, demonstrated through:
    - a. provision of marketing and vacancy evidence to assess continued demand for the existing use and all other suitable social and community infrastructure uses that could be accommodated on site. Evidence must be provided for a period of at least 12 months, in line with Appendix 1; and
    - b. provision of a Community Needs Assessment detailing why the site cannot support social and community infrastructure uses and why the existing use is no longer required on-site as well as demonstrating that the needs of service users have been considered before making recommendations/submitting proposals involving replacement or relocation or consolidation of services; or
  - (iii) The proposal involves the loss/reduction/relocation of social and community infrastructure uses as part of a rationalisation of a recognised public sector body's estates programme. The applicant will be required to provide a Community Needs Assessment demonstrating details of rationalisation,

including that they have considered the needs of service users as part of any rationalisation strategy.

- F. Where, in the Council's view, there is an ongoing need for the service/facility currently operating from the site and it cannot be re-provided as part of the proposed development, its loss will not be permitted unless the applicant has secured provision of at least equivalent quality, quantity and accessibility which meets criteria set out in Part G. The Community Needs Assessment must demonstrate that they have considered the needs of service users before making recommendations/submitting proposals involving the loss, relocation or consolidation of services.
- G. Development resulting in the provision of new social and community infrastructure that is not generally accessible to the public, such as school sports facilities, will be required to enter into Community Use Agreements to allow and promote access to the facility by local communities.
- H. New social and community infrastructure and, where applicable, extensions to existing infrastructure must:
  - (i) be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport;
  - (ii) provide buildings that are inclusive, accessible, flexible, sustainable and which provide design and space standards which meet the needs of intended occupants;
  - (iii) provide appropriate drop-off/pick-up facilities for disabled people;
  - (iv) be sited to maximise shared use of the facility, particularly for sports, recreational and community uses; and
  - (v) complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.
- I. Proposals involving new/redeveloped social and community infrastructure should provide free, publicly available provision of accessible toilet, baby change and drinking water facilities. 'Changing Places' toilets will be required in appropriate social and community facilities in building types as specified within Approved Document M, Volume 2. Changing Places toilets will be especially encouraged in town centres, and other areas with high footfall.

3.140 Islington's social and community infrastructure comprises a wide range of facilities and services, such as hospitals, doctors' surgeries, childcare facilities (such as nurseries), schools (including post-16 education), leisure centres and sports facilities, libraries, community centres and recreational and play spaces (including green space such as playing pitches). The Council strongly supports the retention of this infrastructure, which makes a crucial contribution to the mental and physical wellbeing, learning and education, and sense of place and community of Islington's residents.

3.141 With regards to proposals for new or extended social and community infrastructure facilities that sit within Class E, such as health centres, nurseries and day centres, the Council will use conditions to secure the specific proposed use (e.g. a GP surgery or a nursery) through the planning process where it is deemed necessary to mitigate the



impacts of development and/or meet the needs of the community. Applications involving social and community infrastructure uses will be fully assessed against the requirements of Policy SC1 and other relevant Local Plan policies.

- 3.142 Social and community infrastructure contributes to sustainable communities by providing venues for a wide range of activities and services, including accommodation for Islington's active voluntary and community sector, meetings and events, which add to its diversity and interest. There is a need for a range of facilities in the borough to support community needs. To maintain sustainable communities, provision of new social infrastructure will be expected as part of significant new development proposals. New social infrastructure must be designed with consideration for all users from the outset.
- 3.143 Evidence of social and community infrastructure facilities in Islington is provided as part of the update to the Infrastructure Delivery Plan which has considered the changing infrastructure needs and requirements in response to the development and growth seen in Islington in recent years, and the growth projected in future, as well as the objectives and priorities for both the Council and its partners. The Council has also prepared updated sports facilities evidence which supports the continued protection of existing sports facilities in the borough, with no surplus provision identified for the range of sports assessed by the study. This evidence should be used to inform supporting information such as the Community Needs Assessment.
- 3.144 Proposals involving the loss of social and community infrastructure will be resisted and all reasonable efforts must be made to preserve existing facilities in community use and/or re-provide facilities on-site, including active marketing for a range of other suitable social infrastructure uses. There may be some instances where proposals involve loss/reduction/relocation of social and community infrastructure in response to changing community needs or services. Any proposals involving loss of social and community infrastructure must demonstrate, through provision of a Community Needs Assessment, that the facility in its current form is no longer needed or able to meet community needs.
- 3.145 The scope and content of the Community Needs Assessment will be judged in proportion to the scale and significance of the change in provision being proposed. The scope of the Community Needs Assessment will need to be agreed with the Council at the earliest possible stage of the planning process, ideally pre-application stage. The following will be expected to be covered by all Community Needs Assessments as a minimum; additional evidence may be necessary depending on the change of community use proposed. Where borough-level assessments of need/provision have already been prepared, by the Council or other relevant bodies, these assessments may also inform determinations:
- Engagement with all relevant bodies/organisations involved in provision of services, which may not be solely the service providers, e.g., NHS Islington Clinical Commissioning Group and the relevant NHS Health Trust, where proposal involves primary or secondary health care premises.
  - Evidence which demonstrates understanding of service users and expected users and former users where needs have declined;
  - Explanation of the change in service, and how the service will be better provided elsewhere;
  - Details of why the facility no longer meets specific needs because of physical constraints of the site/facility or changing user requirements; and
  - Evidence of consultation with existing/former users of the social and community infrastructure in relation to the proposed changes.

3.146 Proposals involving the loss or reduction of the public sector body's estate as part of a recognised asset/estates rationalisation programme may be acceptable, where details are provided to demonstrate how rationalisation is addressing the existing and future community needs. A recognised public sector body's estates programme can include those produced for:

- hospital trusts and other health organisations;
- the emergency services (Metropolitan Police Service, London Fire Brigade, London Ambulance Service);
- public sector organisations who maintain a portfolio of community premises; and
- higher education institutions.

3.147 To ensure high quality social and community infrastructure is provided, the design of facilities must demonstrate it has addressed a number of key design aspects, including the need for infrastructure to be inclusive, accessible, flexible and sustainable.

3.148 Ensuring convenient access to buildings is important to ensure that a range of people can readily access services. Building/site entrances must be clearly identifiable with level access. Ensuring safe vehicle drop off within 50m of the entrance is important to meet needs of disabled people. The internal design of buildings will be expected to demonstrate that they meet the needs of a range of users considering for example, entrance lobbies, waiting areas, circulation space, access between floors and emergency egress and evacuation. Further guidance is contained in Inclusive Design SPD.

3.149 Social and community infrastructure must be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes; such as on major thoroughfares and locations in close proximity to bus stops, although there may be flexibility depending on the type of infrastructure being provided. Facilities must integrate with the surrounding area and create or enhance places where people using facilities feel welcome. Co-location of services by different providers is strongly encouraged subject to complying with all other policy requirements.

3.150 Where new community spaces are proposed as part of new development, the Council's Voluntary and Community Sector team must be consulted, to gauge the necessity for such space, taking into account existing provision in the area. Provision of unnecessary space may result in opportunities for other development being lost.

3.151 Sport and recreation facilities must adopt inclusive design standards to ensure that everyone has the opportunity to take part in sporting activity, in line with relevant best practice and guidance issued by Sport England and other relevant bodies/organisations.

3.152 Where specified within Approved Document M, Volume 2 and in other appropriate locations, social and community infrastructure should incorporate Changing Places WCs; this is a toilet for people with profound and multiple learning disabilities which has enough space for disabled people and their carers; and the right equipment, including a height adjustable changing bench and a hoist. Depending on the scale of a proposal, the following infrastructure may be considered appropriate for Changing Places WCs, in addition to those proposals specified within Approved Document M, Volume 2:

- sport and leisure facilities.
- cultural centres, such as museums, concert halls and art galleries.

- stadia and large auditoria.
- town halls, civic centres and main public libraries.
- educational establishments.
- health facilities, such as hospitals, health centres and community practices.

## Policy SC2: Play space

- A. The Council will strongly resist the loss of existing play spaces across the borough unless replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Any replacement space must be provided on-site or in the immediate vicinity, and access must be unrestricted which will be secured by S106 agreement.
- B. The Council will protect all twelve of the borough's adventure playgrounds designated on the Policies Map and listed in Appendix 6.
- C. All major residential development must make appropriate on-site provision for free-to-use publicly accessible play space, which is suitable for children and young people of all ages and abilities. Provision must be proportionate to the anticipated increase in child population as a result of development proposals. All proposed provision of new play space within development sites must be designed in partnership with Islington Council, in line with any relevant best practice standards. Where on-site publicly accessible play space is provided details of ongoing management and maintenance will be secured by condition.
- D. All developments (including large-scale public realm schemes) must provide playable public space where possible, in addition to any formal play space provision. This play space should encourage children and young people to move around freely and safely through streets and footpath networks that connect to more formal play provision, green spaces and parks.

3.153 Play provision must be inclusive and suitable for children and young people of all abilities, employing the principles of inclusive play. Increased physical activity contributes to healthy growth and development in children and young people, as well as improved psychological wellbeing and social interaction. In order to facilitate greater physical activity, it is important that children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision.

3.154 Major housing developments are expected to make appropriate provision of play space. In determining the amount of play space required the Council will consider the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development. The Council will take into consideration the London Plan benchmark for 10sqm of play space to be provided per child as a starting point, but it is recognised that in Islington's context, delivery at this level may not always be feasible.

- 3.155 Play space can include communal outdoor space, private outdoor space, and gardens suitable for play. Communal gardens and other outdoor spaces suitable for play, including communal amenity space, may be considered to contribute towards play space provision where they have distinct playable elements; however, developments must provide publicly accessible play space where possible, rather than provision being entirely from private space. Where formal play space is provided it must be free, accessible, and integrated into any wider networks of open space. Where possible, minor developments are also required to provide informal play space.
- 3.156 Such proposals must be accompanied by detailed plans which include a detailed design for play provision. Reference should be made to best practice standards and any relevant guidance or strategies, in particular any Islington specific play strategy. Proposals must also include information detailing proposed future management and maintenance arrangements for any play space secured. This management plan will be conditioned by the Council as part of any permission.
- 3.157 Play and informal recreation areas must incorporate trees and greenery wherever possible and form an integral part of a child friendly built environment. This involves making the whole of the public realm safe, welcoming and enjoyable for children and young people. Streets, pavements, walkways and various forms of public open space have the potential to be treated as incidental spaces for play. Appropriate inclusive play provision must be included for different age groups on site.
- 3.158 Play provision should encourage an element of positive risk taking and incorporate provision for natural play, which may be provided in formal play space, informal play space, and throughout the landscaping and open spaces of developments.
- 3.159 The Council supports the concept of playable public space. Playable space involves alterations to spaces outside of playgrounds which make them more usable for children's active play. A playable space is one where children and young people's active play is a legitimate use of the space. Playable space can be provided in a range of places including on local streets and parks, or on the public realm of private developments, and can allow children to safely move around neighbourhoods more independently; this involves reducing traffic volumes and speed. Such spaces should present physical and sensory challenges whilst managing appropriate risks, meeting the needs of different people at the same time.
- 3.160 Playable spaces often feature engaging elements that signal and welcome use by children and young people, such as landscaped mounds, decks, climbing elements boulders, logs, planting, undulating landscapes, water features. These features must be orchestrated in a way that is easily navigated, without the use of formal signage. The use of additional scented or tactile clues can enhance legibility for all users. Some quiet areas that have gentle sensory experiences benefit children, enriching their play experience at different paces.

### **Policy SC3: Health Impact Assessment**

- A. The Council will require all major developments, and developments where potential health issues are likely to arise, to complete a screening assessment as early as

possible in the development process, to determine whether a full Health Impact Assessment (HIA) is required.

- B. Where the screening assessment identifies that a full HIA is required, this must be prepared as early as possible in the development process so that potential health gains can be maximised and any negative impacts can be mitigated. HIAs, where required, should be submitted at the planning application stage and must be proportionate to the scale of the development.
- C. The scope of any HIA must be agreed with the Council's Public Health department, and must be informed by relevant Council guidance.
- D. Where a HIA is carried out and specific measures are identified to mitigate health impact or enhance health benefits, they will be secured through a legal agreement and/or condition as appropriate.

3.161 Improving health and reducing inequalities are key considerations that the Council assesses through the planning system. Healthy lifestyles are encouraged through good urban design, good quality accessible open space, access to active travel such as walking, cycling and public transport, clean air, access to good quality employment opportunities and access to good quality affordable housing.

3.162 The HIA process is an integral part of the assessment of specific planning applications. It ensures that relevant schemes enhance health benefits and mitigate any identified impacts on the wider determinants of health, i.e. social determinants of health, wellbeing and inequalities.

3.163 All major developments, and developments where potential health issues are likely to arise, must complete a screening assessment (as a minimum) as early as possible in the development process, to determine whether a full HIA is required; pre-applications must also have regard to the HIA requirements and submission of draft screening assessments is strongly encouraged at this stage. Developments where potential health issues are likely to arise may include hot food takeaways and betting shops.

3.164 Sensitive locations in proximity to the development must be considered in screening and any subsequent HIA. Sensitive uses include (but are not limited to) schools, child care centres, hospitals, and older persons' facilities.

3.165 The Council have produced guidance on the HIA process – Islington HIA Guidance. All relevant proposals must have regard to this guidance when screening for HIA or subsequently preparing an HIA. The scope of any HIA must be agreed with the Council's Public Health department. The HIA must be proportionate to the size of the development and must look at the issue of health in the round, not just focus on access to health services.

# 4 Inclusive Economy

- 4.1 The Council is currently developing its overarching strategy for delivering an inclusive economy. An inclusive economy works better for local people and benefits the community as a whole. It is an economy where:
- inequality is declining rather than increasing;
  - people are able to participate fully in community and economic activity, with a greater say over their future;
  - secure and well-paid work opportunities – with increasing incomes – are available for a wide range of people, especially for poor and excluded communities;
  - individuals, households, communities and businesses are secure enough to invest in their future and sustain a level of wealth and wellbeing to enable a stress-free cost of living;
  - there is greater diversity of businesses, with a range of smaller businesses; worker co-operatives and social enterprises, rather than being dominated by a small number of larger firms;
  - more money generated in the local economy stays in the local economy; and
  - growth is balanced against consideration and mitigation of environmental impacts.
- 4.2 This inclusive economy model can deliver wider social, economic and environmental benefits in a more holistic manner than more conventional economic models, which heavily prioritise growth above other considerations with limited (if any) subsequent direct or indirect benefits for local economies (e.g. trickle-down).
- 4.3 The Council's Inclusive Economy Strategy will expand on the concept of an inclusive economy, and provide clarity on what an inclusive economy in Islington looks like. The strategy will include a number of objectives to deliver an inclusive economy in the borough.
- 4.4 Planning is an integral part of this delivery, particularly maximising opportunities for the growth of micro and small businesses, e.g. by providing affordable workspaces; and ensuring that the borough's Town Centres, high streets, and street markets continue to be successful places for local businesses to trade and thrive. Chapter 4 of the Local Plan outlines a range of planning policies which will enable delivery of these key elements of an inclusive economy.

## Business floorspace

### Policy B1: Delivering business floorspace

- A. In line with the Local Plan objectives, in particular the aim to deliver an inclusive economy, the Council will seek to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types and unit sizes, which are affordable for a range of occupiers, including established and emerging enterprises, and SMEs.
- B. New business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ fringe Spatial Strategy areas of Angel and Upper Street and Kings Cross and Pentonville Road, PELs and Locally Significant Industrial Sites. Proposals in these areas must make efficient use of land by providing new business floorspace; proposals which do not will be considered to be an inefficient use of a site and will be refused.
- C. For Islington, evidence estimates that there is an office need of 443,000sqm for the plan period. The Council is committed to ensuring there is an adequate supply of business space in line with job growth projections and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, at least, no net loss of business floorspace as per Policy B3, and through the making of Article 4 Directions, where appropriate.
- D. The Council will aim to secure space that fosters the development and expansion of businesses, particularly space suitable for start-ups and small businesses. This includes the delivery of affordable workspace as required in Policy B4; and the provision of small units suitable for SMEs.
- E. Islington's Locally Significant Industrial Sites are the focus for new industrial uses, namely light industrial, B2 general industrial and B8 storage and distribution uses, and Sui Generis uses which are akin to industrial uses. Existing industrial land and floorspace will be safeguarded and any future proposals will be considered in line with Policy B2: New business floorspace, Policy B3: Existing business floorspace and Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site as relevant to the proposals. The renewal, modernisation and intensification of industrial uses will be encouraged.
- F. Development in the borough must provide jobs and training opportunities/support.

4.5 The Council aims to create an economy where the benefits of economic success are shared across the different sections of society. An inclusive economy cannot be achieved through planning alone, but requires joint working between developers, economic agents and the various parts of the Council. From a planning perspective, achieving an inclusive economy can be done through:

- ensuring a sufficient supply of business land and floorspace to facilitate future job growth;
- ensuring that business space meets the needs of businesses; and

- securing jobs and training opportunities from new development.
- 4.6 Business floorspace in this chapter is considered to be activities or uses that fall within offices, research and development, industry, or warehousing and some Sui Generis uses which are akin to business uses, such as building merchants and depots. Employment floorspace is a broader term which refers to activities or uses that generate employment, including offices, industry, warehousing, showrooms, hotels, retail, entertainment, educational, health and leisure uses (regardless of whether the end occupier is private, public or charity sector). Policy B1 works alongside other policies in providing the framework for other employment uses. This includes sui generis uses akin to industrial use in SP3, and B3, other spatial policies such as those covering the town centres alongside policies such as R3: Islington's Town Centres and R4: Local Shopping Areas and site allocations which also form part of this framework. In the Bunhill and Clerkenwell Area, policies BC1: Prioritising office use and BC2: Culture, retail and leisure uses provide a clear framework for non-business employment floorspace in that part of the borough.
- 4.7 Islington has a strong and prosperous economy. It has grown significantly in recent years and is set to grow even further. Evidence produced by the Council demonstrates an unprecedented high need for additional office floorspace – 443,000sqm up to 2036. Land supply in Islington is highly constrained; the borough is the most densely populated and third smallest (by land area) English local authority. This extremely limited land supply coupled with exceptionally high need for new space to accommodate projected jobs growth means that the Council must do more to protect existing business floorspace and encourage the delivery of new business floorspace.
- 4.8 The Council recognises that although it is unlikely that this need will be fully met, given the significant land constraints in the borough as well as competing needs for development of other uses, policies and their implementation must go as far as possible to meet this need. This means that an efficient use of land for delivery of business floorspace is an absolute priority, in addition to housing, whereas the delivery of uses, including other types of commercial floorspace, can be considered as secondary. In achieving an efficient use of land which prioritises business floorspace, a longer term view of viability must be taken, i.e. where there are short term dips in the market, this does not necessarily negatively impact the delivery of business floorspace in the future.
- 4.9 The success of Islington's economy can be attributed to a number of factors, including being located in the CAZ, which accommodates 70% of the borough's jobs, and several unique economic clusters which are of sub-regional or national significance. These clusters include Tech City around Old Street; the Clerkenwell Design Cluster; the Kings Cross-Moorfields Eye Hospital corridor which links the Kings Cross life sciences cluster/Knowledge Quarter with Old Street; and the Vale Royal/Brewery Road industrial cluster. There are also a number of smaller scale clusters of business uses and industrial areas which are located across the borough. Given the concentration of jobs in the CAZ, even a small proportional decrease in office floorspace would have a significant impact on the borough's economy. Equally business clusters in other locations can be undermined by gradual losses of business floorspace, including to other Class E uses, which could have wider negative impacts on the agglomeration benefits that can be created in these areas with the concentration of business floorspace.
- 4.10 Islington's economy is made up of a wide range of businesses and organisations, the majority of which are micro and small enterprises. Whilst these businesses make up the vast majority of the borough's enterprises, the majority of jobs come from a few



larger businesses, as well as the borough's universities, hospitals, and the Council itself.

- 4.11 By 2036, 50,500 additional jobs are expected in the borough, with the majority of this increase within sectors that will require office accommodation. Much of this office growth will be concentrated in the CAZ, Bunhill and Clerkenwell AAP area and the CAZ fringe Spatial Strategy areas of Angel and Upper Street and King's Cross and Pentonville Road. These areas are crucial in providing a pipeline of office land capable of meeting the projected floorspace demand. To realise this growth, a range of workspaces that meet the existing and future needs of businesses must be provided. The loss or reduction of existing business floorspace anywhere across the borough will not be allowed. In line with job growth projections, the Council will take a rigorous approach to ensuring the maximisation of business floorspace in locations which are identified as the focus for business use. The maximisation of floorspace in this instance, will be where the maximum amount of business floorspace is provided, subject to design constraints or viability. The assessment of maximisation is not prescribed, but may include a requirement for scenario testing of alternate schemes, particularly where proposals involve a mix of uses including non-business uses.
- 4.12 This approach aligns with the London Plan, including Table A1.1 which identifies office guidelines for various areas in Islington.
- 4.13 Small and micro businesses rely on smaller spaces, often in secondary locations, underscoring the need to ensure a sufficient supply at affordable rates. Development proposals for business floorspace will be expected to provide a range of units in terms of type and size, and major development proposals in specific locations must provide an element of affordable workspace.
- 4.14 LSISs are the focus for light industrial, B2 general industrial and B8 storage and distribution uses. Existing industrial land will be safeguarded, and its renewal and modernisation will be encouraged. Non-industrial uses will not be allowed in LSISs. It is recognised, however, that some of the existing premises in the LSISs will be able to utilise the flexibility of the new Class E. Vale Royal/Brewery Road LSIS is the largest concentration of industrial uses in the borough. The area is an established cluster of industrial uses. In addition to the more conventional industrial uses expected in an inner London industrial area, the area is also home to a small cluster of creative industries and specialist event companies/music orientated businesses. The unique function of this LSIS must be protected and nurtured to allow for an intensification of industrial uses – see Policy SP3 for further detail.
- 4.15 Despite the prosperous economic environment, Islington experiences a higher than average rate of economic inactivity, meaning that although the number of jobs is increasing, residents in the borough are not necessarily able to access them. The Council will seek to ensure that Islington residents benefit from new development and will expect jobs and training opportunities to be provided from major development for local residents.

## **Policy B2: New business floorspace**

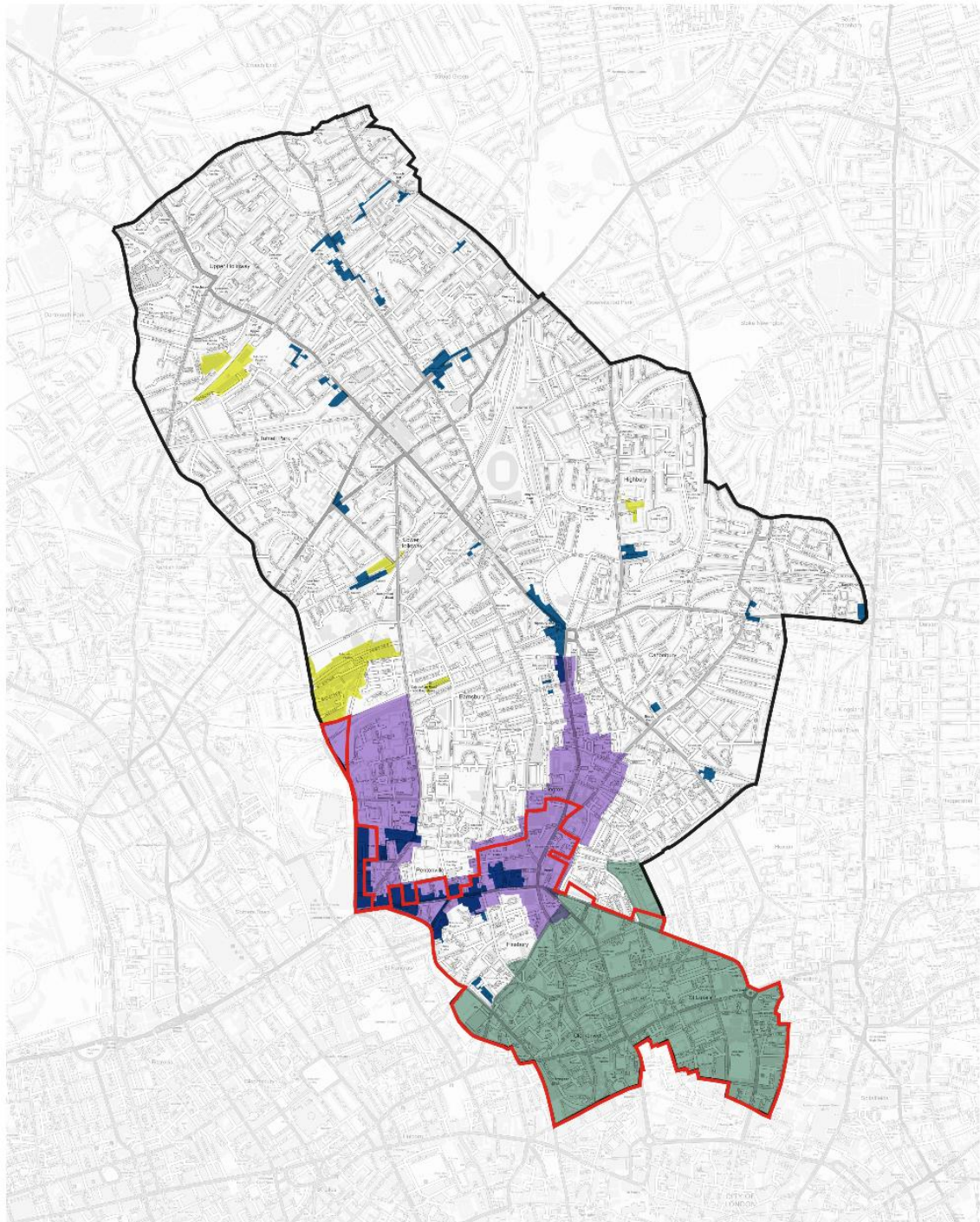
- A. New business floorspace will be directed to the locations identified in (i) to (iii) below (and shown on Figure 4.1) to support the specific role and function of each of the locations. The Council will use conditions on future proposals to ensure that specific uses such as new office, research and development and light industrial floorspace are secured in these locations. Proposals must maximise the provision of business floorspace in line with the priorities for each location. Proposals involving existing business floorspace must prioritise the intensification, renewal and modernisation of this business floorspace throughout the borough and particularly in the locations set out below.
- (i) **CAZ and Bunhill and Clerkenwell AAP area:** office uses are the clear priority in this area, in order to support London's strategic business role. The primary economic function of the CAZ and AAP area depends on maintaining and enhancing office uses. A range of workspace typologies are supported, including Grade A offices, serviced offices, co-working spaces, hybrid workspace and other types of flexible workspace and lower specification office space suitable for SMEs and business services. Residential uses are not a key priority in this location. Policy BC1: Prioritising office use of the Bunhill and Clerkenwell AAP sets out when residential uses may be considered acceptable in this area.
  - (ii) **CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road:** New business floorspace is a priority in these Spatial Strategy areas, particularly on White Lion Street, Pentonville Road and upper floor locations across Angel Town Centre. A variety of business floorspace typologies is encouraged along Pentonville Road and around Kings Cross/York Way, including business space which meets the needs of SMEs. Spatial policies SP2: King's Cross and Pentonville Road and SP4: Angel and Upper Street set out when residential uses may be considered acceptable in this area.
  - (iii) **Priority Employment Locations (PELs):** Growth and intensification of business uses to provide for the SME sector, as well as meeting local/specialist needs, is the key priority within these areas. Increasing provision of space that is appropriate to meet the diverse needs of the SME economy is supported. Business floorspace should be prioritised in these areas. The provision of non-business uses will be managed in line with Policy B3: Existing business floorspace.
- B. The introduction of uses that could undermine the specific economic function of the locations identified in Part A will be resisted.
- C. In LSISs shown on Figure 4.1, the overriding priority land uses are industrial uses (light industrial, B2 general industrial, B8 storage and distribution and Sui Generis uses which are akin to industrial uses). The retention and intensification of industrial uses will be required as part of any proposal within a LSIS. The light industrial element of Class E continues to be sought in the LSIS and will be secured through condition. The provision of hybrid space is supported. The co-location of industrial use with office and/ or research and development uses will be permitted where there would be an intensification of industrial use on the site (either through new floorspace or the redevelopment/modernisation of existing floorspace) and it can be demonstrated that the continued industrial function of the LSIS would remain. The introduction of some non-industrial uses could undermine the primary industrial economic function of LSISs and will therefore only be allowed where proposals comply with the co-location criteria as set out above and/or Policy B3: Existing business floorspace, Part D, where relevant.






- D. All development proposals within LSISs must prevent or mitigate impacts on air quality, in line with Policy S7: Improving air quality and promote sustainable transport in line with Policies T2: Sustainable transport choices and T5: Delivery, servicing and construction. Proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts.
- E. Proposals for office, research and development and light industrial floorspace that meets local and/or wider demand should be located on upper floors in the Primary Shopping Area of designated Town Centres consistent with Policy R2, but are considered suitable on any floor elsewhere in designated Town Centres and in LSAs subject to the relevant criteria in Policies R3 and R4 respectively.
- F. Outside of the locations mentioned in Parts A, C and E, new business floorspace is acceptable where it would not detract from the character of the local area; and would not detrimentally impact on residential amenity. Proposals for new business floorspace in these locations must be accessible to all in accordance with the priority for sustainable modes of transport set out in Policy T1, and must not prejudice the overall aim of reducing the need to travel.
- G. All development proposals involving non-industrial business floorspace (including affordable workspace provided in line with Policy B4) must have regard to the following:
  - (i) Business floorspace must allow for future flexibility for a range of occupiers, including future subdivision and/or amalgamation, and provide a range of unit types and sizes, including a significant proportion of small units, particularly for SMEs. Full separation of business and residential floorspace is required where business floorspace forms part of a mixed use residential development.
  - (ii) Provision of a good level of amenity for occupiers of the business floorspace, including adequate levels of daylight and sunlight; and access to communal/ ancillary facilities including meeting rooms.
  - (iii) The development of new business floorspace must incorporate the highest inclusive design standards achievable in context, and meet the travel and transport needs of those for whom public transport remains inaccessible.
  - (iv) Applicants must clearly demonstrate how the design of proposals individually and cumulatively contribute to providing the range of spaces required to support the primary function/sector of the particular area in which it is located.
  - (v) Ancillary uses must be clearly linked to the operation of the business floorspace.
- H. Proposals for new industrial and warehousing uses must provide:
  - (i) satisfactory access and servicing, including off-street loading, appropriate delivery arrangements in line with Policy T5, and adequate yard space; and
  - (ii) good quality design which provides space that is adaptable to meet the needs of a range of industrial uses and occupiers, including sufficient clear internal ceiling/eaves heights and loads, and adequate goods lifts.
- I. Where proposed, live-work units will be considered to be C3 residential floorspace and will not be considered business or employment floorspace. Such units will not contribute towards the maximisation requirement set out in Part A of this policy. Existing live/work units are classed as business floorspace; proposals involving the


change of use/loss of existing live/work units will be assessed against Policy B3: Existing business floorspace.

- 4.16 Delivering an increase in business floorspace is a key objective for this Local Plan. The number of jobs in the borough is projected to increase substantially; our evidence suggests that there will be an additional 50,500 jobs in the borough up to 2036. Continued levels of growth are forecast within the professional and technical services sectors, which generate the most demand for office space. These job projections, when translated into floorspace requirements, demonstrate a need for an additional 443,000sqm of office floorspace. Islington's pipeline of business floorspace has consistently shown a net loss in recent years, and without strong policy requirements, it is unlikely that business floorspace will be delivered at a level that would accommodate the projected employment increases. This demonstrates that Islington has a severely constrained supply-demand balance, where demand greatly exceeds supply.
- 4.17 Growing competition between residential and commercial uses is putting pressure on land markets and has led to an ongoing erosion of business space in Islington, particularly secondary/affordable business space over the last decade. This has been further exacerbated by the introduction of the office to residential permitted development right in 2013. The intensification of business uses will be directed to the CAZ, the Bunhill and Clerkenwell AAP area, the CAZ fringe Spatial Strategy areas of Angel and Upper Street; and King's Cross and Pentonville Road PELs, with LSISs being a focus for industrial uses; these locations are shown on Figure 4.1, with each PEL and LSIS listed below for information. The introduction of non-business uses in these areas could undermine their primary economic function and will therefore not be allowed.
- 4.18 The south of the borough has an important role in supporting Central London's economy including the knowledge economy due to its strategic position within the CAZ. Other areas outside the CAZ such as Priority Employment Locations and Town Centres are important employment hubs that support economic growth in the borough and supply affordable office space suitable for SME occupiers. A supply of offices outside the CAZ is also important and serves different markets. Amongst other things these locations support the establishment of knowledge networks between the CAZ and other areas, including other neighbouring boroughs. These locations suffered significant losses in previous years due to the introduction of permitted development rights. Considering the marked losses of office to residential in past years and the constrained supply, it is important that office floorspace is protected and maximised to ensure that there is a balanced supply to meet demand in key business floorspace locations across the borough.
- 4.19 Whilst recognising the benefits and flexibility of Class E in different parts of the borough, the Council will use conditions to ensure that in new proposals the office and research and development floorspace is secured for those specific activities in the CAZ, Bunhill and Clerkenwell AAP area and the CAZ fringe Spatial Strategy areas of Angel and Upper Street and King's Cross and Pentonville Road and PELs. The restriction of other elements of class E in this context is justified and proportionate based on the harmful impacts that changes to business floorspace could have on the wider economy.

**Figure 4.1: Local Plan Business Designations**



-  Central Activities Zone
-  Bunhill and Clerkenwell AAP Area
-  CAZ fringe spatial strategy areas
-  Priority Employment Locations
-  Locally Significant Industrial Locations

 0 metres 500 1000 2000  
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4.20 The PELs are as follows:

- Balls Pond Road East
- Seven Sisters Road
- Holloway Road North
- Wedmore Street
- Finsbury Park
- Camden Road/Parkhurst Road
- St George's Road
- Highbury Corner
- New North Road
- Balls Pond Road West
- Hornsey Road/Marlborough Road
- Pine Grove
- Baron Street
- King's Cross
- Northampton Street
- Aberdeen Lane
- Northdown Street
- Hornsey Road/Fairbridge Road
- Old Dairy Court
- Stroud Green Road
- North Road
- Margery Street/Easton Street
- Purley Place
- Cobble Lane

4.21 The LSISs are as follows:

- Vale Royal/Brewery Road
- Melody Lane
- North Road
- Offord Road
- Pemberton Gardens
- Station Road

4.22 Local and regional evidence is clear that the CAZ is the location with the most demand for Grade A office space. Aside from Grade A office space, other workspace typologies are supported in the CAZ. The Bunhill and Clerkenwell AAP sets out an area wide policy to prioritise office space, with detail on the type of workspace required within relevant AAP Spatial Strategy areas. Maximisation of office floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. The Bunhill and Clerkenwell AAP area covers most of the CAZ within Islington, with a small area of the CAZ outside the AAP area. The CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road – are also important business locations, as detailed in the respective Spatial Strategy policies for these areas (policies SP2 and SP4). CAZ fringe locations take pressure off the central London office market and can provide lower cost space (relative to the CAZ) which is suitable for SMEs. These areas, particularly along the growth corridors of Pentonville Road, White Lion Street and York Way, are suitable locations where provision of a mix of business spaces – including flexible SME space, secondary offices as well as Grade A office space – will be encouraged.

- 4.23 Outside of the CAZ, there is a growing small business economy which is clustered in various areas across the borough. These PELs accommodate a range of spaces to meet the varied needs of occupiers. Business uses must continue to be prioritised and intensified in these locations. Property market indicators show that growing numbers of occupiers are becoming more 'footloose' and these dynamics have encouraged a rapid expansion of different types of business workspace including flexible workspace, 'hybrid' space, light industrial, studio and production space, and co-working space. These types of space are particularly attractive to the small business economy and will be encouraged in existing PELs and Town Centres.
- 4.24 Islington has one of the lowest levels of industrial stock in comparison to the other central London boroughs, largely due to the significant loss of industrial land in recent years. The Vale Royal/Brewery Road LSIS is the borough's largest concentration of industrial/warehousing/employment land; Policy SP3 sets out the Spatial Strategy for this area. There are several other smaller LSISs which also provide important industrial capacity in the borough.
- 4.25 Industrial floorspace is vitally important as an economic driver in its own right but also to support other economic functions, including servicing both the wider borough and Central London economies. Within LSISs in particular, the principal objective is to retain and intensify light industrial, B2 general industry and B8 storage and distribution uses. Office and research and development floorspace will only be considered if they are included as part of a scheme where it can be clearly demonstrated that there would be an intensification of industrial floorspace and the continued industrial function of the LSIS would remain. Other non-industrial uses which are not considered ancillary to the development could jeopardise the long term sustainability, economic function and future economic growth of the Locally Significant Industrial Sites.
- 4.26 The Council recognises the importance that LSISs have as an economic driver in the borough and Central London economies. Existing B2 general industrial and B8 storage and distribution will continue to be protected from change of use to non-industrial. New light industrial floorspace within LSISs will be secured and protected through the use of conditions in order to protect the primary economic function of the LSISs and avoid further losses of industrial floorspace to other Class E uses. The borough has lost a significant amount of industrial land over recent years. The proportionate use of conditions to secure light industrial uses in the borough's 6 LSISs is essential to protect the primary industrial function of the last remaining concentrations of industrial land in the borough and their role in supporting Islington's and London's economy.
- 4.27 Improving air quality is a key aim of the Local Plan, for this reason growth must be managed sensitively. Whilst Islington safeguards, protects and encourages the intensification of industrial uses, these can adapt to the challenges of a 21<sup>st</sup> century Islington. Policy S7 sets out detailed requirements which development proposals must meet to ensure that adverse impacts on air quality are prevented or mitigated, and that reasonable opportunities to prevent negative impacts on air quality are investigated and implemented. While there are a number of industrial uses that would not cause particular concerns regarding air quality, certain industrial uses could (without specific mitigation) lead to adverse impacts on air quality, due to the specific use or, more likely in the LSIS context, due to associated increases in vehicle movements. The Local Plan transport policies promote sustainable modes of transport and limit car parking; these policies will be important considerations when assessing development proposals, in conjunction with Policies S7, T2, T5 and other relevant Local Plan policies. For avoidance of doubt, the policy aim to intensify industrial uses in the LSIS would not outweigh air quality considerations, meaning that any proposed

intensification of use which creates unacceptable impacts on air quality will be refused.

- 4.28 Where new business floorspace is provided in the borough, conditions may be attached to the permission to remove any applicable permitted development rights and/or restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). The Council will also use conditions to ensure that new office, research and development and light industrial floorspace is secured and protected as such longer term. For example, this may include restricting business floorspace to offices or light industrial uses only, within Class E. The condition could be worded as follows:

*Operation of Section 55(2)(f) of the Town and Country Planning Act 1990 is precluded with regard to permitted office/ light industrial use [DELETE AS APPLICABLE]. The premises shall only be used for office/ light industrial use [DELETE AS APPLICABLE] and for no other purpose (including any other purpose within Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 and subsequent Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.*

- 4.29 Town Centres and LSAs are mixed-use in nature and have several functions, including retail, services and entertainment. Many of these centres also serve as important business locations. The development of new business floorspace is encouraged in these locations. Outside of identified locations, business floorspace is encouraged provided the character and vitality of the specific locality is not undermined; there is no impact on residential amenity; and the proposal is accessible to all in accordance with transport policies.
- 4.30 High quality design is expected from all new development. Local occupier demand in Islington indicates a range of types and sizes of new workspace is needed. New development should provide business space that is designed to ensure that occupiers can continuously adapt to changing economic and market circumstances. The design of new business floorspace should reflect the functions of the specific economic area. For example, Grade A office space is most appropriate in the CAZ and Bunhill and Clerkenwell AAP area, whereas hybrid space is considered most suitable in the LSISs, particularly the Vale Royal /Brewery Road LSIS; flexible workspace for small businesses is particularly suitable in PELs and Town Centres outside the CAZ. These examples are not an exhaustive list of the types of space required, relative to location, and other best practice guidance and case-specific information may be used to inform the type of space that is sought.
- 4.31 Ancillary uses in offices must only be provided where they are clearly linked to the operation of the business floorspace. It is increasingly common for offices to have ancillary event spaces, bars and cafes, which may utilise roof terraces or other external areas. Such ancillary uses must be fully assessed in line with Policy DH5 and other relevant Local Plan policies. To be genuinely ancillary, an event space, café or bar must be small-scale and must only hold an on-license to serve alcohol (not an off-license). Use of ancillary event/café/bar space must be limited to occupiers of the office building and relevant visitors.
- 4.32 The development of new business floorspace must meet the needs of our increasingly diverse communities and adapt to their different and evolving demands. The Council recognises that the public transport system still remains inaccessible to many. Accessible parking and drop-off bays, and inclusive cycle parking, will be required from new business development, in line with Policy T3.



- 4.33 Other inclusive design features such as step free access, accessible toilets, end-of-trip facilities and safe egress and evacuation for all must also be incorporated into new business development, in line with the guidance in the Inclusive Design SPD. Developments must also provide adequate provision for mobility scooter storage and charging.
- 4.34 Proposals that include revolving doors will be resisted. Entrances that feature revolving doors with separate pass doors are not an acceptable solution; such a solution is not inclusive as they result in separate treatment by the creation of secondary entrances.
- 4.35 The design of business floorspace should be flexible and wherever possible include the following design features<sup>23</sup>:
- Floor to ceiling heights which allow at least 3 metres of free space, and up to 5 metres in industrial buildings to allow for the introduction of mezzanines;
  - Strategic lay-out of entrances, entry cores, lift cores, loading facilities and fire escapes, to allow mixing of uses within the building; grouping of services including plumbing, electrics, cabling, communications infrastructure and circulation;
  - Full separation of business and residential floorspace, where forming part of a mixed use residential development. Alternative layouts may be acceptable where it can be demonstrated that sufficient measures are put in place and secured to ensure that the amenity of residents and businesses is protected, particularly with regard to safety, privacy and security;
  - Flexible ground floor access systems that can easily be adapted for goods delivery (e.g. through adaptable façade panels); and
  - Good standards of insulation to mitigate any overspill from future alternative uses in the building.
- 4.36 Live/work units, due to the higher property value of residential units, are generally used for residential purposes in Islington and do not generate significant employment. Where proposed, live-work units will be assessed as residential units and will not be considered to contribute to the overall proportion of business floorspace within proposals. They will also be subject to all other relevant Local Plan policies, including the requirement to provide affordable housing set out in Policy H3. For proposals involving the loss of existing live-work units, their loss will be assessed against Policy B3.

### **Policy B3: Existing business floorspace**

- A The Council will protect existing business floorspace throughout the borough.
- B Proposals resulting in the net loss of business floorspace within the CAZ, Bunhill and Clerkenwell AAP area, PELs, LSISs, Town Centres, LSAs, and non-designated locations, either through change of use or redevelopment, will be refused unless there are exceptional circumstances which demonstrate:

<sup>23</sup> Other design requirements may be applicable, to be determined in line with other Local Plan policies and/or relevant guidance.

- (i) there is no demand for the use of the floorspace, unit, building and/or site for a business use appropriate to the role and function of the area. Evidence must be submitted demonstrating that such space has been vacant and continuously marketed for a period of at least 24 months, in line with Appendix 1. There is no requirement for business floorspace to be vacant before the start of the marketing period, however evidence of vacancy will be required at the time of application. For proposals for loss of Class E, this must include marketing for the current use as well as other Class E uses (where a particular element of Class E has been secured by condition Part C applies); and
  - (ii) the loss of business floorspace – either individually or cumulatively – would not compromise the operation of the wider area, and that the proposed non-business use is compatible with existing uses (including consideration of amenity impacts on uses in the vicinity). Or
  - (iii) where it can be robustly evidenced that the existing building and/or site is no longer suitable for its existing business use and the existing building and/or site cannot reasonably be redeveloped for continued business use.
- C For proposals where the business floorspace is conditioned to be within a particular Class E use, the property must be marketed for that particular use for at least 6 months to demonstrate that there is no longer demand for that use before being able to utilise full Class E flexibility, as set out in Appendix 1.
- D Where existing business uses are industrial in nature – i.e. light industrial uses (subject to provisions of Class E), B2 general industrial or B8 storage and distribution uses, or Sui Generis uses which are akin to industrial uses – net loss of floorspace will only be allowed where the following marketing requirements have been met:
- (i) marketing requirements for proposals involving the net loss of industrial uses within the LSIS must market the floorspace for continued industrial use;
  - (ii) where a proposal is outside an LSIS, marketing must be primarily for industrial use but could include marketing for other business uses (offices and research and development) as a potential option.

4.37 To meet the identified need of 443,000sqm of office floorspace up to 2036, the Local Plan aims to promote new business floorspace and ensure that existing business floorspace is strongly protected; this dual approach is integral to Policy B1, and both strands must operate together to achieve the overarching objective of meeting employment projections. Intensification, renewal and modernisation of existing space is particularly encouraged. To ensure that short term economic uncertainties do not impact the delivery of business floorspace in the medium term, marketing evidence will be required for a period of 24 months. As stated in Policy B3, Part B (i), there is no requirement for business floorspace to be vacant before the start of the marketing period, however evidence of vacancy will be required at the time of application. Although Islington's economy is strong and is set to grow even further, there may be instances where market demand dips but will likely pick back up in line with medium to long term projections. This approach means that once the market regains strength, business floorspace has not been lost unnecessarily as the marketing period is long enough to allow for market fluctuations.

- 4.38 Islington has lost a significant amount of business floorspace over recent years. Although there were overall gains in the amount of office space permitted and completed through the planning application process during this period, this increase has been all but eradicated by the introduction of the office to residential permitted development right. At the time of writing, approximately 53,000sqm of office space had been given prior approval to convert to residential use as a result of the permitted development right. Given this significant reduction to Islington's stock of office floorspace, and in light of the high projected need for floorspace to accommodate new jobs, it is essential to ensure further losses to existing business space are minimised.
- 4.39 To ensure the ongoing protection of office floorspace in the CAZ, and in addition to this policy, the Council has put in place an Article 4 Direction to remove the Class E to residential permitted development right in the CAZ.
- 4.40 Industrial uses have seen wholesale losses in recent years. There continues to be significant pressure to redevelop Islington's remaining industrial land for other uses, due to its often perceived lower value. However, as noted in Policy B2, a good supply of industrial land is integral to ensuring inclusive economic development in Islington and Central London. Islington's Employment Land Study forecasts further losses of industrial land, some 90,000sqm up to 2036. Given the importance of industrial land, the Local Plan will strongly resist the loss of all industrial uses. The Council will ensure that a sufficient supply of industrial land is maintained to meet future demand in the borough, and that the retention, enhancement and provision of additional industrial capacity is adequately managed and monitored, consistent with the London Plan.
- 4.41 PELs and Town Centres are important clusters of businesses and enterprises. To ensure there is an adequate supply of business units and premises in these locations, proposals which result in a net loss of business floorspace will be strongly resisted.
- 4.42 Proposals involving the net loss of business floorspace in the CAZ, Bunhill and Clerkenwell AAP area, LSISs, PELs, Town Centres, LSAs and non-designated locations, must demonstrate there is no demand for the use of the floorspace, unit, building and/or site, for a business use appropriate to its role and primary economic function. Where a net loss of business floorspace is proposed, clear and robust marketing and vacancy evidence for a period of 24 months must be provided to clearly demonstrate there is no demand. The evidence must prove that there is no reasonable prospect of the unit, building, and/or site being used for business purposes in the medium term. Evidence of strategic and local assessments of demand and supply must also be provided. Appendix 1 sets out the information to be provided in relation to marketing and vacancy evidence. Planning applications will be refused if all the criteria set out in Appendix 1 are not met.
- 4.43 Existing industrial uses, including on non-designated industrial sites, will be protected by ensuring there is no net loss of industrial floorspace as part of any development proposals. For avoidance of doubt, industrial uses include physical floorspace as well as any other space linked to the operation of the industrial use, including external/yard space. Policy B3 Part B would apply to any proposals within LSISs, and Policy SP3 would also apply to any proposals within the Vale Royal/Brewery Road LSIS.
- 4.44 Replacing business uses with non-business uses (particularly residential use) could compromise the operation and viability of the wider area/cluster. Where a proposal for a non-business use satisfies the marketing criteria set out in Appendix 1, it must also demonstrate to the Council's satisfaction that the proposal would not compromise the operation and viability of the wider area, and would not negatively impact the primary economic function of the area or the local economy. There may be genuinely

exceptional circumstances where an existing building or site is considered to be no longer suitable for continued business use. Where this can be robustly evidenced, there will be no requirement to complete the full marketing campaign. In such situations it should be demonstrated that the building or site is no longer suitable for its existing business use and cannot be reasonably redeveloped to re-provide a viable replacement/alternative business use on the site in order to justify the loss of business floorspace. In such exceptional situations a detailed site report will be required setting out the justification for this. The detailed site report should consider the market demand for the existing building or site in the form of an appraisal, taking into account the current condition/specification and likely occupational demand. The detailed site report should further consider whether any identified deficiencies limiting market demand can be overcome through refurbishment and/or redevelopment and consider the feasibility of this.

- 4.45 Proposals for the redevelopment of existing business floorspace for the provision of non-business uses must demonstrate that the proposed non-business use is compatible with existing uses, and does not have a detrimental individual or cumulative impact on the role and economic function of the wider area. An individual impact may not seem as significant from smaller schemes, as opposed to the impact from larger schemes; however, smaller losses may add to the cumulative impact. Some uses, such as residential use, may not be compatible with the existing businesses use. This may be of particular importance within LSISs, where industrial uses may have noise and transport related impacts. Relevant Local Plan policies, including the agent-of-change principle set out in Policy DH5, will be used to assess impacts.

## **Policy B4: Affordable workspace**

- A. Within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road):
- (i) major development proposals involving 1,000sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/ research of development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development and/or a Sui Generis use akin to office/ research and development floorspace GIA) to be leased to the Council at a peppercorn rent for a period of at least 20 years.
- (ii) Major development proposals involving 10,000sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace GIA) to be leased to the Council at a peppercorn rent in perpetuity.
- B. Within the Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS) and other LSISs, major development proposals involving 3,000sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development

and/or a Sui Generis use akin to office/research and development floorspace GIA) to be leased to the Council at a peppercorn rent for a period of 20 years.

- C. Within the remaining Town Centres and PELs, major development proposals involving 2,500sqm or more net additional office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace must incorporate 10% affordable workspace (as a proportion of proposed office and/or research and development and/or a Sui Generis use akin to office/research and development floorspace GIA) to be leased to the Council at a peppercorn rent for a period of 20 years.
- D. All proposals which provide affordable workspace must prepare an Affordable Workspace Statement to be submitted alongside the relevant planning application.
- E. Affordable workspace must be built to at least Category A fit out, and must provide a high standard of amenity for occupiers, including access to relevant servicing and facilities.
- F. Proposals for major commercial development not covered by Parts A to C – such as hotels and retail – may be required to provide affordable workspace and/or affordable retail space, subject to viability. Priority will be given to on-site provision.
- G. Site-specific viability assessments will only be accepted in exceptional circumstances. This could include:
  - (a) where a significant shift in macro-economic conditions has occurred which has a demonstrable negative impact on the delivery of development.
  - (b) where a development is proposed which is of a wholly different type and is therefore not reflected by any of the typologies used in the viability assessment that informed the Local Plan.
  - (c) where a development is proposed which demonstrates a very close alignment to a typology shown to be unviable at full policy compliance in the viability assessment that informed the Local Plan.

Where site-specific viability assessments are accepted, proposals must provide the maximum viable amount of onsite affordable workspace, informed by detailed viability evidence consistent with the Development Viability SPD. Where the Council accepts a level of affordable workspace that does not comply with policy requirements, the Council will impose a late stage review mechanism which would be triggered three months prior to practical completion and will reassess the construction costs and commercial values of the scheme at that point in time.
- H. Off-site financial contributions for affordable workspace may be sought in exceptional circumstances. The following exceptional circumstances may be considered:
  - (i) Where the affordable workspace to be provided on site does not meet the qualitative criteria, and where it can be demonstrated that the on-site provision of such workspace is inappropriate.
  - (ii) Where a proposal demonstrates exceptional circumstances outlined in Part G, a site-specific financial viability assessment can also be used to determine the maximum viable off-site affordable workspace financial contribution.
- I. On mixed use proposals which deliver on-site affordable housing, in exceptional circumstances, where the provision of affordable workspace will undermine the

ability to the scheme to secure affordable housing compliant with the Policy H3:  
Genuinely affordable housing, the provision of affordable housing will take priority.

- 4.46 The nature of London's economic growth and sharp rise in population have combined to place particular stress on land markets. These stresses are particularly evident in Islington given its location within the CAZ, in close proximity to central London. Rapidly rising land values are leading to growing competition for space between the residential and commercial property markets, which leads to increases in business rents and makes the borough a more unaffordable place to do business. This is especially an issue for SMEs who are generally more cost-conscious and sensitive to rising rents. Such firms are unable to benefit from locating near to other similar firms, which damages their prospects and also stymies the development of particular sectors.
- 4.47 The SME sector plays a key role in the borough's economy; therefore, ensuring a sufficient supply of space suitable for these businesses is a key priority. A key objective of the Local Plan employment policies is the encouragement of the SME economy, through nurturing space that is appropriate to its diverse needs, including affordable workspace.
- 4.48 Affordable workspace is business floorspace/workspace which is leased to the Council at a peppercorn rent for a period of at least 20 years, and managed by a Council approved operator (which could be the Council itself or a Council-approved operator selected through a commissioning process in return for social value). Rental values for end occupiers will ultimately depend on the quality of space and its location, and will be considered on a case-by-case basis through the Council's Affordable Workspace Commissioning Process; however, rents (including service charges) must be significantly below the prevailing market rate for the specific sector and/or location, otherwise the workspace would not be affordable. To ensure there is no conflict of interest, the Council runs a competitive procurement process to manage the affordable workspaces that are secured through the planning process, in line with the Council's Procurement Rules. Through this process the council assesses potential organisations to manage the spaces through the following criteria: workspace management (including proposed workspace model and financial due diligence), property management and social value outcomes. The Council's Inclusive Economy team will lead on the selection of a Council-approved operator once affordable workspace is secured. Operators will be expected to cover business rates and other related building costs. More information is provided in the Council's Affordable Workspace Strategy.
- 4.49 For the avoidance of doubt, floorspace which does not meet these requirements will not be considered to be affordable workspace for the purposes of Policy B4. This includes stand-alone small business units, although such units may be required in addition to affordable workspace, under Policy B2. Proposals for business floorspace (including various different typologies such as individual desk spaces and co-working space) at a discounted market rent let directly to an end occupier will not be considered to be affordable workspace (regardless of the level of discount) if the space is not managed by a Council-approved operator, or the Council itself (incorporating requirements for letting the head lease at peppercorn rent, with the space being let and managed by a Council approved operator).
- 4.50 The policy requirements will apply to net additional floorspace brought forward as part of new development, including redevelopment or extension of existing floorspace.
- 4.51 A requirement for affordable workspace will also apply to any major development proposals involving 3,000sqm or more gross office and/or research and development

and/or a Sui Generis use akin to office/research and development floorspace<sup>24</sup> within the Vale Royal/Brewery Road LSIS and other LSISs. Policies SP3 (with regard to the Vale Royal/Brewery Road LSIS specifically) and B2 are clear that industrial uses within light industrial, B2 general industrial and B8 storage and distribution uses are the priority uses within the LSISs. Notwithstanding this, in circumstances where office and research and development and Sui Generis uses akin to office and research and development uses are proposed, affordable workspace would be required from any such proposal as set out above. There is no general requirement for seeking affordable workspace from industrial/hybrid uses within the LSISs as seeking affordable workspace from non-office/ research and development uses is more likely to constrain viability of such uses and therefore may preclude them coming forward, contrary to policy aims; however, office and research and development floorspace has no such viability concerns, and hence any proposals which would allow for the development of office or research and development must provide affordable workspace.

- 4.52 In exceptional circumstances (based on robust justification including viability information consistent with the requirements of the Development Viability SPD), where the Council accepts a level of affordable workspace that does not comply with the policy requirements, the Council will impose a late stage review mechanism which will reassess the construction costs and commercial values of the scheme at a future date. Where site specific viability assessments are accepted, in circumstances where on-site affordable workspace was provided at the application-stage, any surplus arising from the late stage review will be used to extend the peppercorn rent period. In circumstances where on-site affordable workspace was not provided at the application-stage, any surplus arising from the late stage review will be used to provide off-site financial contribution towards affordable workspace.
- 4.53 Viability work undertaken by the Council suggests that large schemes in certain locations can deliver affordable workspace at peppercorn rent in perpetuity. This applies to schemes of 10,000sqm or more net floorspace within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas as set out in Policy B4 A (ii).
- 4.54 Off-site contributions for affordable workspace may be sought in exceptional circumstances. These will be determined case-by-case but will generally be where the Council is not satisfied with the proposed size or quality of the affordable workspace. This will be informed by engagement with relevant stakeholders including the Council's Inclusive Economy team. The following formula will be used to calculate off-site contributions<sup>25</sup>:

**Step 1:** calculate projected office rental values from subject property or comparables (on a per square metre per annum basis).

**Step 2:** Identify 10% of floorspace in square metres (NIA)

**Step 3:** 10% of floorspace (from step 2) x rental value per square metre (from step 1) = rent per annum

**Step 4:** identify office yields from subject property or comparables (All Risks Yield)

<sup>24</sup> Sui Generis floorspace akin to office/ research and development is any floorspace where the predominant use is office and/or research and development but the overarching lawful use is Sui Generis by virtue of elements of other uses which would not constitute an ancillary use.

<sup>25</sup> This formula may be updated in future in line with market trends and through a SPD.

**Step 5:** calculate multiplier as follows:

$$(1+i)^n - 1) / (i (1+i)^n)$$

*n* = number of years at peppercorn rent (20 years)

*i* = All Risks Yield (calculated as Yield divided by 100)

**Step 6:** rent per annum x multiplier = level of Affordable Workspace Contribution required

- 4.55 An Affordable Workspace Statement must be provided to accompany any planning application involving affordable workspace. The statement must be developed at the earliest possible stage of development, ideally at pre-application stage, so it can meaningfully influence the affordable workspace to be delivered. Applicants must engage with all relevant stakeholders on the production of the statement, including the Council. The statement must set out key information on how affordable workspace will be delivered and how its future operation will co-exist alongside other uses proposed. Information on how affordable workspace requirements have informed and influenced the design and layout of proposals must also be provided.
- 4.56 The design of affordable workspace will vary, depending on the end occupier or sector; however, all affordable workspace units must be built to at least Category A Fit Out. There is no standard definition for Category A Fit Out, but for the purposes of this policy, it must include, as a minimum:
- raised floors and suspended ceilings;
  - internal surface finishes;
  - installation of mechanical and electrical services;
  - toilets and a kitchenette;
  - blinds; and
  - basic fire detection systems.
- 4.57 Applicants must engage with the Council at the earliest possible stage of development – ideally pre-application stage - to ensure that the design is appropriate. Where additional fit-out requirements are identified, the Council may require a higher standard to be provided, for example Category B Fit Out or specific aspects of Category B Fit Out such as floor boxes, partitioning and/or specific IT requirements.
- 4.58 The location of the affordable workspace within a development is a particularly important consideration; this must not be an afterthought comprising whatever space is leftover, particularly if such space was located below ground floor. Affordable workspace is suitable below ground floor in principle but detailed, proactive consideration must be given about how such space will operate in conjunction with other uses within the development; its suitability for a range of occupiers; and the level of amenity for occupiers, including levels of daylight and sunlight, inclusive design requirements and ceiling heights.



- 4.59 Applicants must have regard to any relevant standards, guidance and/or best practice produced by the Council or other relevant bodies such as the British Council of Offices (BCO). Applicants must demonstrate that affordable workspace incorporates:
- flexible internal arrangements that permit a number of different internal work areas to be accessed from shared spaces;
  - good standards of internal sound insulation;
  - access to shared spaces and facilities, such as communal breakout space, meeting rooms, kitchen areas, bike storage and goods lifts; and
  - external space reserved for loading/unloading.
- 4.60 Affordable retail unit(s) may be required in certain circumstances. Such units would be let at a rate below the market rate, taking into account the location and the specific retail sector. It is expected that an affordable retail unit would usually be a small retail unit, which will help incentivise occupation by small and independent retailers.

### **Policy B5: Jobs and training opportunities**

- A. On-site construction job and training opportunities for local residents are required from developments of 10 residential units or above; hotels, student accommodation or hostels with 20 or more rooms; and non-residential developments with an uplift in floorspace of 1,000sqm GEA or greater of employment floorspace.
- B. Financial contributions from all major developments to help support initiatives which tackle worklessness will be sought having regard to the Planning Obligations (Section 106) SPD and its future updates and/or other relevant supplementary documents.

- 4.61 Islington has a strong economy which makes a significant contribution to London's overall economy. The number of jobs in the borough increased by almost 30,000 between 2005 and 2015, and the latest figures from 2013 indicate that there were 1.36 jobs for every resident. However, significant inequality exists and Islington has consistently shown an unemployment rate higher than the London average, demonstrating an apparent mismatch between the skills held by residents, and those required by employers.
- 4.62 Given the number of jobs in Islington is expected to increase by 50,500 up to the 2036, it is a key priority for the Council that local residents are able to access these jobs. This is a cross-cutting objective which requires action from a range of Council departments and external agencies. Planning policies are just one way of supporting residents into work. On-site construction training opportunities will be required from major residential development; hotels, student accommodation or hostels with 20 or more rooms; and non-residential developments with an uplift in floorspace of 1000sqm GEA or greater. Other jobs and training opportunities, including apprenticeships, will be required from developments where there is an uplift of 1000sqm GEA of employment floorspace (i.e. any employment generating use).

- 4.63 The Planning Obligations (Section 106) SPD provides further detail on the contributions required by Policy B5.
- 4.64 Another contributor to the much wider response to worklessness in the borough is the Council's iWork service. In conjunction with local partners, iWork supports unemployed Islington residents into work. The team provides a variety of services, from one-to-one employment support and focused support for young adults, to CV development and help accessing childcare bursaries. The iWork service will be promoted to developers at the earliest possible stage in the development process to ensure that local residents can benefit from new development.
- 4.65 The Council will consider how planning powers, including planning obligations, can be utilised to support the work of the iWork service. This may include the introduction of a requirement for contributions toward childcare bursaries, as part of any future revision of the Planning Obligations (Section 106) SPD. The cost of childcare can be a major barrier which prevents parents returning to the workplace. Expanding the number of childcare bursaries will help to address this and therefore benefit families (in terms of improving quality of life and enabling additional income) while improving the local workforce.

## Retail, leisure and services, culture and visitor accommodation

### Policy R1: Retail, leisure and services, culture and visitor accommodation

#### Retail, Leisure and Services

- A. Town Centres are a focal point for commercial, cultural and civic activity in the borough. There are four Town Centres in Islington: Angel; Nags Head; Finsbury Park; and Archway. Each Town Centre has its own character and serves different functions, which must be maintained and enhanced. Each Town Centre is covered by a specific Spatial Strategy, set out in chapter 2. The Town Centre boundaries are defined on the Policies Map and shown in Figures 4.2 to 4.5 below.
- B. The Council will seek to ensure that all Town Centres develop in a way that supports their continued vitality and viability to meet the needs of local residents, and provide a diverse retail and leisure experience for residents, workers and visitors alike.
- C. Primary Shopping Areas are where retail uses are concentrated in Islington's Town Centres. The Primary Shopping Area boundaries in each Town Centre are defined on the Policies Map and shown in Figures 4.2 to 4.5 below. Where possible retail uses will be maintained in Primary Shopping Areas. Outside the Primary Shopping Area, a range of main Town Centre uses are considered suitable, in order to promote and encourage diverse shopping and leisure destinations.
- D. LSAs provide more local services, particularly essential convenience retail which caters for daily shopping needs. Some LSAs also have a more diverse mix of commercial uses, particularly leisure uses, which can help to sustain the vibrancy of these areas. LSAs are identified on the Policies Map.
- E. There are a number of other retail and leisure uses that provide a valuable service to local communities but are not within specifically designated areas. These dispersed uses, particularly within retail and café/restaurant use, will be protected where possible.
- F. Residential uses may be acceptable on upper floors in town centres and local shopping areas where they contribute to the vitality and viability of the designated retail area, and reflect existing character.
- G. Small shops/commercial units contribute to the unique character of Islington and support local businesses. The Council will protect existing small shops/commercial units where possible. The Council will promote new small retail provision as part of new developments at ground floor.
- H. Specialist Shopping Areas, such as Fonthill Road and Camden Passage, add to the unique selling proposition and character within Angel and Finsbury Park Primary Shopping Areas, and contribute to the vitality and viability of the borough. Retail uses in this area will be strongly protected, including retail use on upper floors.

- I. Retail, service and leisure uses will be resisted where, by virtue of their location and/or concentration, they would have negative impacts on the character, function and amenity of an area or would negatively impact on the health and wellbeing of the borough's residents.
- J. Within retail areas, streets will be actively managed to balance the demands on the public realm from businesses, particularly restaurants and cafés, and the need for easy pedestrian movement. Active frontages will be promoted.
- K. New retail development must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.

### **Culture and the Night-Time Economy**

- L. Cultural uses are an essential part of Islington's social and economic fabric and their loss or diminution will be strongly resisted.
- M. Islington has a varied night-time economy which the Council will seek to protect and enhance where appropriate. Concentrations of night-time economy uses exist in the borough including in designated Cultural Quarters. The Council will work with partners to support and manage a thriving and safe night-time economy that is well-served by safe, convenient and sustainable night-time transport.
- N. Angel Town Centre and part of the Clerkenwell and Farringdon area are designated Cultural Quarters. Development proposals within Cultural Quarters should be consistent with Policy R10 by providing new/improved cultural uses and/or uses which support the cultural function within the Quarter and the character of the area. The Cultural Quarter boundaries are defined on the Policies Map.
- O. Pubs are part of Islington's social fabric and they contribute positively to Islington's culture, character and economy. The loss of pubs will be resisted and new pubs encouraged where appropriate.
- P. The development of new cultural and night-time economy uses must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.

### **Visitor Accommodation**

- Q. To ensure that land is safeguarded for uses which are greater strategic priorities in Islington, development, redevelopment and/or intensification of visitor accommodation will only be supported in specific locations.
- R. Visitor accommodation must be well-designed, accessible and sustainable.

## **Retail, leisure and services**

4.66 In order to meet identified need, the evidence base identifies need for 6,341sqm of convenience floorspace and 12,247sqm of comparison floorspace to be provided by the end of the plan period<sup>26</sup>. Islington, on the whole, has a robust and thriving retail,

<sup>26</sup> The 6,341sqm figure was identified in the Retail and Leisure Study (RLS) by assuming that new convenience floorspace will be operated by a foodstore retailer. However, the RLS notes that a higher

leisure and service offer which serves the needs of residents and workers and is part of what attracts visitors to the borough. However, there are significant structural challenges facing the retail sector, from internet shopping to changing retailer and customer requirements and demands. Retail centres in Islington therefore need to adapt and futureproof for these changing circumstances while maintaining a level of retail needed to cater for local communities and workers; the future for Town Centres is as a 'place to be' rather than solely a 'place to buy'. They are also places which encourage social interaction and play an important part in cohesive communities.

- 4.67 Major Town Centres at Angel and Nag's Head are at the top of the borough's retail hierarchy, followed by District Town Centres at Archway and Finsbury Park. Town Centres are the key focus for new retail and leisure development. Policy R3 supports a town centre first approach in order to retain the retail hierarchy.
- 4.68 LSAs sit below Town Centres on the retail hierarchy. These areas feature smaller scale, local retail uses. Dispersed retail uses are at the bottom of the hierarchy.
- 4.69 Each of Islington's four Town Centres has its own distinct character. Development must respect and enhance this, whilst meeting any requirements for new retail. Development proposals which cause harm to the character, amenity, function, and/or vitality and viability of a Town Centre will be resisted.
- 4.70 Each of Islington's Town Centres includes a Primary Shopping Area designation. The Primary Shopping Area (PSA) is located in the core of each Town Centre and the Council is seeking the PSA to remain the focal point for retail. Outside of the Primary Shopping Area there is greater flexibility both for Class E uses and other suitable main Town Centre uses to help increase the diversity and vibrancy of uses.
- 4.71 LSAs and dispersed retail and leisure uses are an important part of Islington's retail offer. They complement the more significant retail offer in designated Town Centres and play an important role in serving the needs of residents across the borough. They provide a convenient, valuable service to their surrounding communities by meeting the day-to-day shopping needs of residents, workers and visitors as well as providing other services including some leisure uses. LSAs also play an important social role for the surrounding community, providing a commercial focal point and meeting point where people can interact and socialise. These areas contribute to the character and identity of an area.
- 4.72 Development proposals will be resisted where they result in an unacceptable concentration of night-time economy uses, hot food takeaways, betting shops and other gambling facilities, financial and professional services such as payday loan shops or other similar uses. It is important to ensure a mix and balance of complementary day and night-time uses that creates an attractive and vibrant area that co-exists successfully with neighbouring residential areas and does not significantly compromise wellbeing. Certain types of uses can cause detrimental cumulative impacts as a result of their concentration or location. The Council will therefore resist applications for such uses where they would cause harm.
- 4.73 Residential uses in Town Centres and LSAs can be detrimental to the function of a retail centre, especially if they occupy units on the ground floor or below. Breakages in retail frontages, especially in the centre of frontages can have adverse impacts on the

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figure of 11,323sqm of convenience retail floorspace will be needed if local/discount supermarket formats transpire to be the preferred format in the borough. The Council will monitor the delivery of town centre uses and delivery of convenience and comparison floorspace.

vitality, viability and character of shopping areas. Occupation of upper floors by residential uses are more appropriate although these must not harm the functioning of retail and leisure centres in the borough.

- 4.74 The highest possible inclusive design standards, including step free access, must be incorporated into new retail development, in line with the Inclusive Design SPD and other relevant Council guidance. Developments must also provide adequate provision for mobility scooter storage and charging.
- 4.75 Retail to residential prior approval applications, currently permitted under Part 3, Class M of the General Permitted Development Order (“the GPDO”) will be assessed against relevant Local Plan policies related to prior approval categories; such policies are material to the prior approval determination. The most relevant prior approval category related to land use is condition M.2(1)(D), which requires an assessment of whether it is undesirable for the building to change to residential use because of the impact of the change of use:
- (i) on adequate provision of retail and professional/financial services, but only where there is a reasonable prospect of the building being used to provide such services; or
  - (ii) where the building is located in a key shopping area, on the sustainability of that shopping area.
- 4.76 Applicable policies will be dependent on the location of the building subject to the application, for example Policies R2 and R3 will apply to applications in the Primary Shopping Area and Town Centres, while Policy R4 will apply to applications in LSAs. In the absence of a definition of the term ‘key shopping area’ set out in the GPDO, a key shopping area (for the purposes of any prior approval assessment) will be considered to be any Town Centre or LSA designated in the Local Plan.
- 4.77 Dispersed shops are not key shopping areas, hence they will be assessed under the first criterion of condition M.2(1)(D). Given the densely populated nature of the borough, which creates significant demand for retail uses, it is considered that dispersed shop buildings will always have a reasonable prospect of being used to provide retail services.

### **Culture and the Night-Time Economy**

- 4.78 The Council seeks to protect and enhance the variety of cultural attractions in Islington which contribute to the economy as well as enhancing the lives of residents and visitors. There is no set list of ‘cultural’ uses. The Council will encourage existing businesses and premises to diversify and introduce a new or enhanced inclusive cultural offer. Typical cultural attractions include pubs, theatres, working men’s clubs, bingo halls, music venues, galleries, museums, bars, nightclubs, restaurants, conference centres, and community festivals. Islington has a wealth of cultural attractions which belies its size as the second smallest borough in London; this includes several museum and archive sites, various music venues and cinemas, a strong community arts sector and a number of dance and theatre venues (providing London’s largest theatre offer outside the West End), notably the renowned Sadler’s Wells, King’s Head and Almeida theatres in Angel and the Park Theatre in Finsbury Park.
- 4.79 Islington’s Arts Strategy sets out the borough’s vision and approach to enhancing artistic and cultural potential to enrich people’s lives and further the development of a modern dynamic economy.

- 4.80 Islington has a 24-hour economy, with uses operating at night playing an integral role. The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am<sup>27</sup>. Activities associated with the night-time economy are varied and include eating, drinking, entertainment, shopping but also include cleaning, hospitality, logistics and distribution, transport and medical services which employ a large number of night-time workers. These varied activities all require good quality infrastructure to make the movement of people efficient, safe and attractive.
- 4.81 The Council will generally support the diversification of daytime uses to extend their opening hours and offer alternative daytime and night-time activities in appropriate locations, depending on existing concentrations and amenity impacts.
- 4.82 Cultural and night-time economy uses in Town Centres and the CAZ allow for a critical mass of these uses to support a vibrant and viable clustering, in areas which are commercially-focused and therefore less likely to lead to adverse amenity impacts, especially for residential uses as set out in Policy R10 Part A. There are also benefits in the form of containing adverse impacts such as noise and being able to direct resources for the management of night-time economy activities. However, encouraging a critical mass does not detract from the importance of balancing needs so that a variety of existing and new uses can thrive.
- 4.83 Islington is a small but diverse borough with four designated Town Centres (Angel, Nags Head, Archway and Finsbury Park) as well as the Bunhill and Clerkenwell wards which together make up the majority of Islington's part of the CAZ. The Council recognise that culture is varied and perceived differently across the borough with different centres having a varied level of appeal. Where relevant, Spatial Strategy policies and the Bunhill and Clerkenwell AAP provide further detail on the cultural offer of specific centres/areas.
- 4.84 The amenity of local residents and businesses in the vicinity of licensed premises will be considered and protected. Islington Council's licensing policy mitigates impacts such as noise, odour and litter. The Council's Licensing Team and licensing policy is separate to the Planning Department and planning policies. However, the Council's licensing team must be consulted on any planning application which proposes a licensable activity. In most cases, except in exceptional circumstances, the Council's licensing policy expects applicants to have planning consent before making an application for a premises license.
- 4.85 The highest possible inclusive design standards, including step free access, must be incorporated into new culture and night-time economy development, in line with the Inclusive Design SPD and other relevant Council guidance. Developments must also provide adequate provision for mobility scooter storage and charging.

### Visitor Accommodation

- 4.86 Islington has a strong record of delivering visitor accommodation. Well-designed visitor accommodation in appropriate locations can play an important supporting role in the Islington and London economy, facilitating tourism and supporting the operations of other businesses while also having some direct (relatively low density) employment benefits.
- 4.87 However, business floorspace is the main driver of economic growth in the borough, and is considered the best means to meet Islington's significant jobs projections with a

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<sup>27</sup> The 'night-time economy includes the 'evening economy' which describes economic and leisure activity between the hours of 6pm - 12pm.

projected additional floorspace need for office use of 443,000sqm by 2036. Considering the role of visitor accommodation as a supporting use, alongside the significant past delivery, the Council considers that locations for visitor accommodation (both new-build accommodation and/or redevelopment/intensification of existing visitor accommodation) must be restricted to ensure that visitor accommodation does not limit the achievement of other priorities, particularly economic and housing growth.

## Policy R2: Primary Shopping Areas

- A. In order to meet retail needs and support a retail function within Primary Shopping Areas (PSA), the Council is seeking a percentage of retail use at a minimum of 60% in Angel and Nag's Head Major Town Centres; 55% in Finsbury Park District Town Centre; and 50% in Archway District Town Centre.
- B. New development at ground floor in the PSA should contribute to the retail function as set out in Part A and will be appropriately conditioned to maintain this.
- C. Proposals for Class E uses which do not contribute to the retail function at the ground floor within the PSA must:
  - (i) prevent/mitigate any individual or cumulative impact on the objective to maintain the vitality, viability, character and vibrancy of the retail function of the Primary Shopping Area;
  - (ii) provide an active main town centre use frontage at ground floor level, particularly where fronting main transport/pedestrian route(s); and
  - (iii) ensure there is no harmful break in the continuity of the active frontage.
- D. Where ground floor retail floorspace is conditioned for that use, and a proposal is seeking a change of use to another Class E use or full Class E flexibility, the proposal must demonstrate continuous marketing evidence for a period of 6 months, to demonstrate that there is no reasonable prospect of the unit being used for continued retail use.
- E. Proposals for change of use on the ground floor from Class E to other main town centre uses will be required to demonstrate that the premises have been vacant for at least 12 months. Continuous marketing evidence to cover this period must be provided to demonstrate that there is no reasonable prospect of the unit being used in its current use as well as other main town centre E uses as set out in Appendix 1, to demonstrate that no main town centre E use is viable.
- F. Proposals for change of Class E use on the ground floor of premises in the PSA to residential, outside of the Specialist Shopping Area, will be required to demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for retail, Class E or other appropriate main Town Centre uses.

4.88 The Council seeks to support the vitality and viability of Islington's Town Centres, meet retail needs and maintain a retail function. Primary Shopping Areas contain the



greatest concentration of retail; are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres, ensuring their continued vibrancy, vitality and viability. Where proposals within Town Centres fall outside the Primary Shopping Area, Policy R3 will apply.

- 4.89 To ensure a critical mass of retailing uses is maintained within Primary Shopping Areas, the retail function will be supported through use of conditions to ensure that new proposals contribute to the PSA function. Whilst recognising the benefits and flexibility of Class E in different parts of the borough, the Council considers use of conditions in the PSA at ground floor is appropriate to ensure that new proposals for retail floorspace is secured for those specific activities.
- 4.90 To determine the existing Primary Shopping Areas retail make-up percentage figure, the number of 'retail' units with a ground floor presence within the Primary Shopping Area should be divided by the total number of units with a ground floor presence within the Primary Shopping Area. A unit with a ground floor presence would include those with additional space below and/or above ground floor level. Other methods to calculate the percentage, for example considering only specific frontages, will not be acceptable for the purposes of monitoring Policy R2. The Camden Passage and Fonthill Road Specialist Shopping Areas provide a unique retail proposition that contributes to the character of Angel and Finsbury Park Town Centres. These are included in the PSA but where development is proposed in these areas, Policy R7 is applicable.
- 4.91 Appendix 1 sets out the information to be provided in relation to marketing and vacancy of floorspace.
- 4.92 While the loss of space below and above ground floor level may not trigger Policy R2 where a ground floor use is unaffected, Policy R3 Part C may apply.
- 4.93 To ensure the Primary Shopping Areas sustain their vitality and function as important retail hubs of Town Centres and the borough, it is important to avoid harmful breaks in active frontages. What constitutes a 'harmful break' will be assessed on a case-by-case basis taking into account site specific circumstances, but generally refers to the introduction of a use that detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-main town centre uses in the centre of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.

### **Policy R3: Islington's retail hierarchy**

- A. The Council will seek to maintain and enhance the retail, service and leisure function of Islington's four Town Centres, which are designated on the Policies Map and shown on Figures 4.2 to 4.5.
- B. Proposals for main Town Centre use floorspace should be located within a designated Town Centre. Proposals for these uses outside a designated Town Centre will only be permitted where they meet relevant criteria under Part C, D, E or F.

## **Town Centres**

- C. Any development proposed within a designated Town Centre must:
- (i) ensure adverse impacts on vibrancy, vitality, viability and character of the centre are fully mitigated.
  - (ii) provide a frontage which engages positively with local character and the street scene. Where historic shopfronts and features are present, these must be retained.
  - (iii) provide a high quality design including meeting policies related to accessibility and sustainability;
  - (iv) provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated.

## **Central Activities Zone**

- D. The CAZ is the primary office location and offices will be supported and secured in line with Policies BC1 (Bunhill and Clerkenwell AAP) and B1. Proposals for other elements of Class E including retail and other main Town Centre use floorspace in the CAZ may be acceptable where:
- (i) the scale of the development would not have an adverse individual or cumulative impact on the character, function, vitality and viability of Islington's Town Centres or LSAs. An impact assessment may be required to fully assess potential impacts;
  - (ii) the proposal can be accommodated without adverse impact on the amenity of residents and businesses; and
  - (iii) the proposal does not involve the loss of existing business floorspace in line with Policy B3; complements the overarching business floorspace focus within the CAZ; and does not detract from the policy requirement to maximise the amount of business floorspace as part of new development.

## **Local Shopping Areas**

- E. Proposals for development of up to 200sqm of main Town Centre uses in LSAs are not required to meet the sequential test. Proposals in excess of 200sqm must meet the sequential test and actively investigate and consider preferable locations in line with the Council's retail hierarchy. An impact assessment may also be required for proposals in excess of 200sqm, to assess the impact of larger proposals on the existing character and function of the LSA and relevant neighbouring LSAs and Town Centres.

## **Edge of centre/Out of centre**

- F. Any proposal for main Town Centre uses in an edge-of-centre location outside LSAs or in an out-of-centre location must:
- (i) meet the sequential test and actively investigate and consider sequentially preferable locations in line with the Council's retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and
  - (ii) provide an impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or LSAs.

### **Residential use in town centres**

- G. Additional conventional housing in town centres is acceptable subject to compliance with the following criteria and other relevant policies, Applications involving the change of use from existing Class E and/or main Town Centre uses, to residential use must:
- (i) follow the 'agent-of-change' principle consistent with Policy DH5.
  - (ii) ensure that the proposed residential use does not affect the operation of any continued main Town Centre use floorspace; and
  - (iii) provide high quality dwellings with a high standard of residential amenity, consistent with other relevant policies, including those relating to housing standards, design, accessibility and sustainability.
- H. New conventional housing in Town Centre locations not involving change of use of existing main Town Centre uses is supported. Proposals should be located on upper floors and must address criteria set out in Part G(i) to (iii).

4.94 Figures 4.2 to 4.5 below show the four designated Town Centres and the Primary Shopping Area of each centre:

Figure 4.2: Angel Town Centre boundary (including Primary Shopping Area)

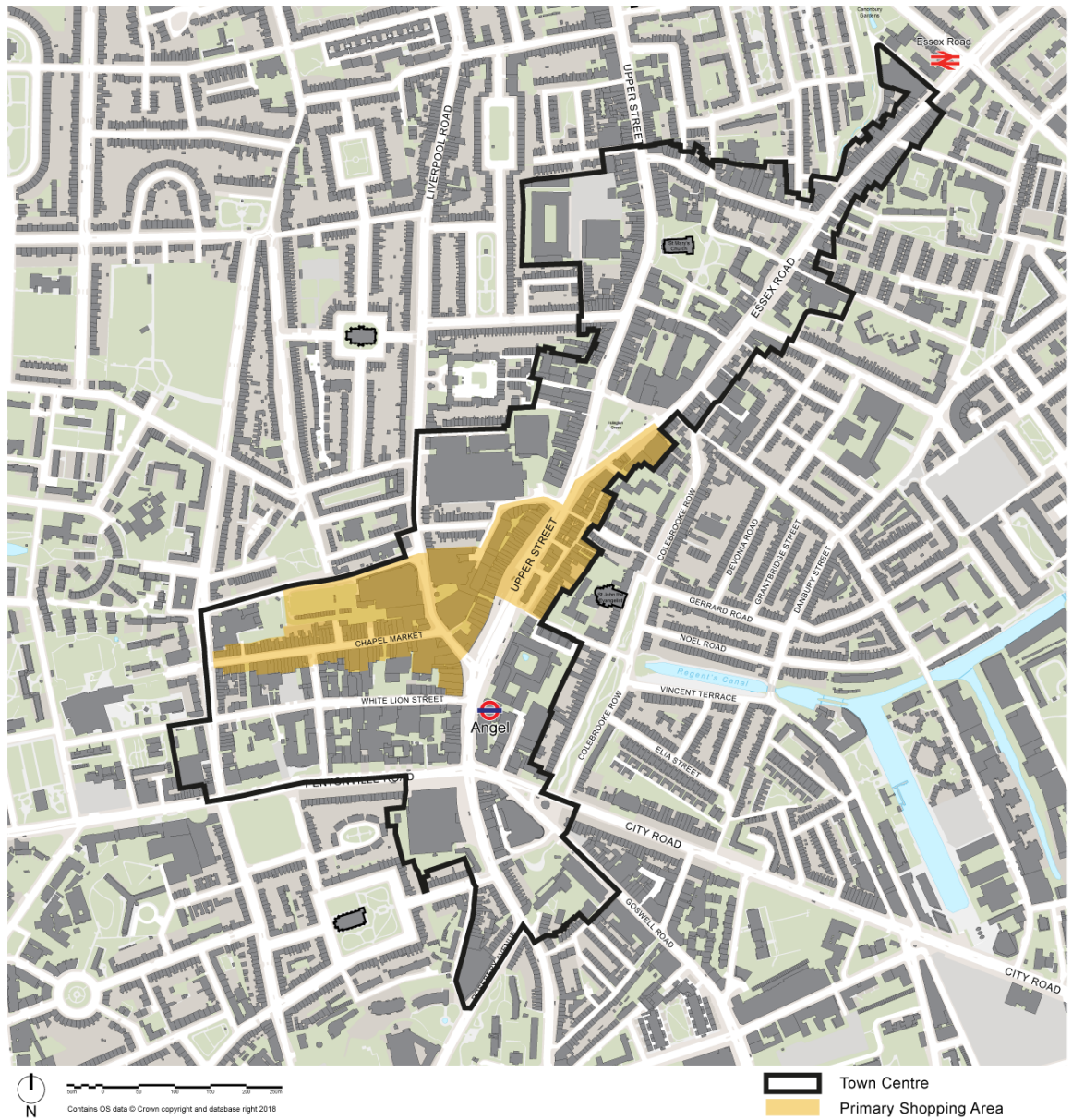


Figure 4.3: Nag's Head Town Centre boundary (including Primary Shopping Area)

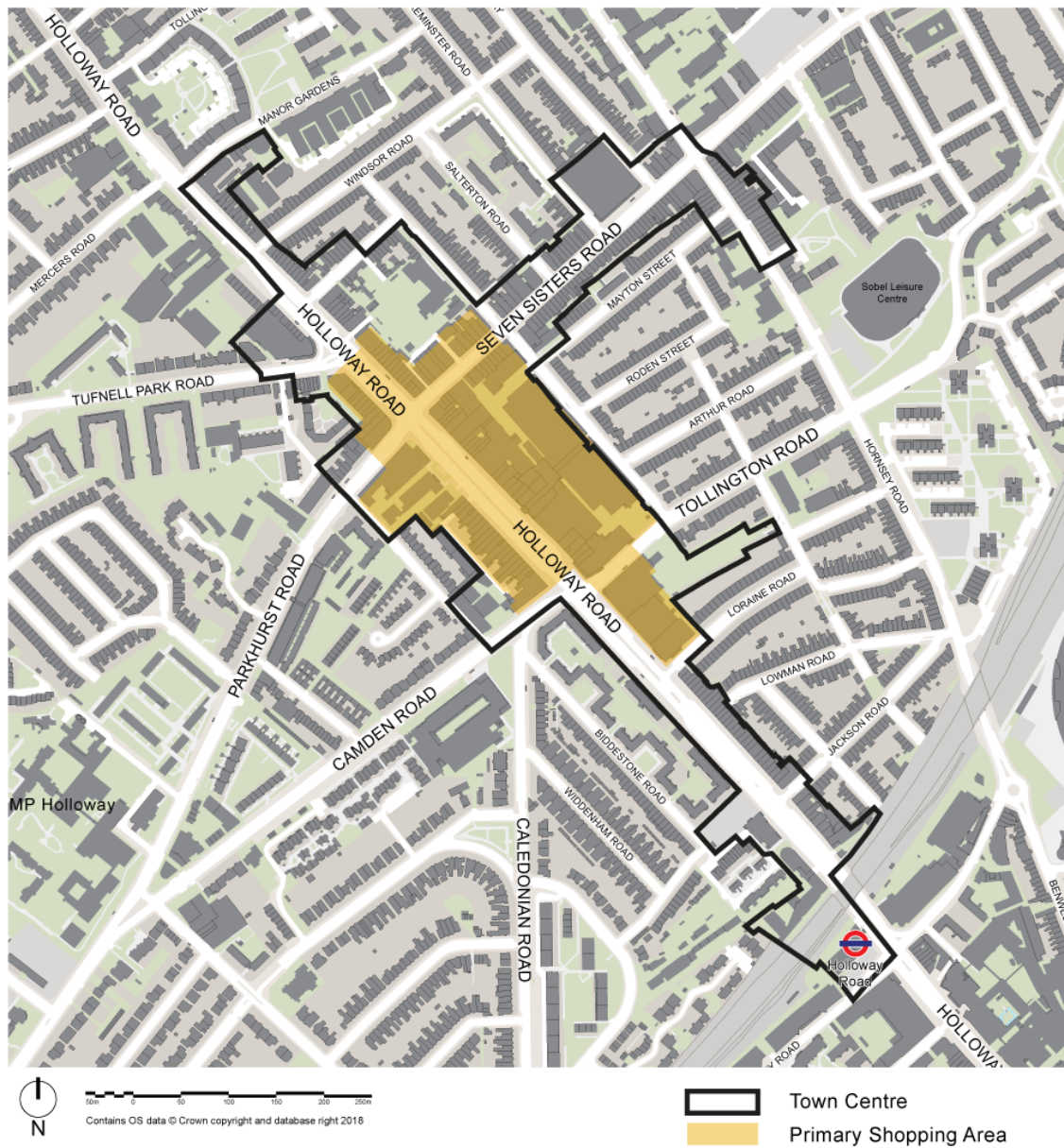


Figure 4.4: Archway Town Centre boundary (including Primary Shopping Area)

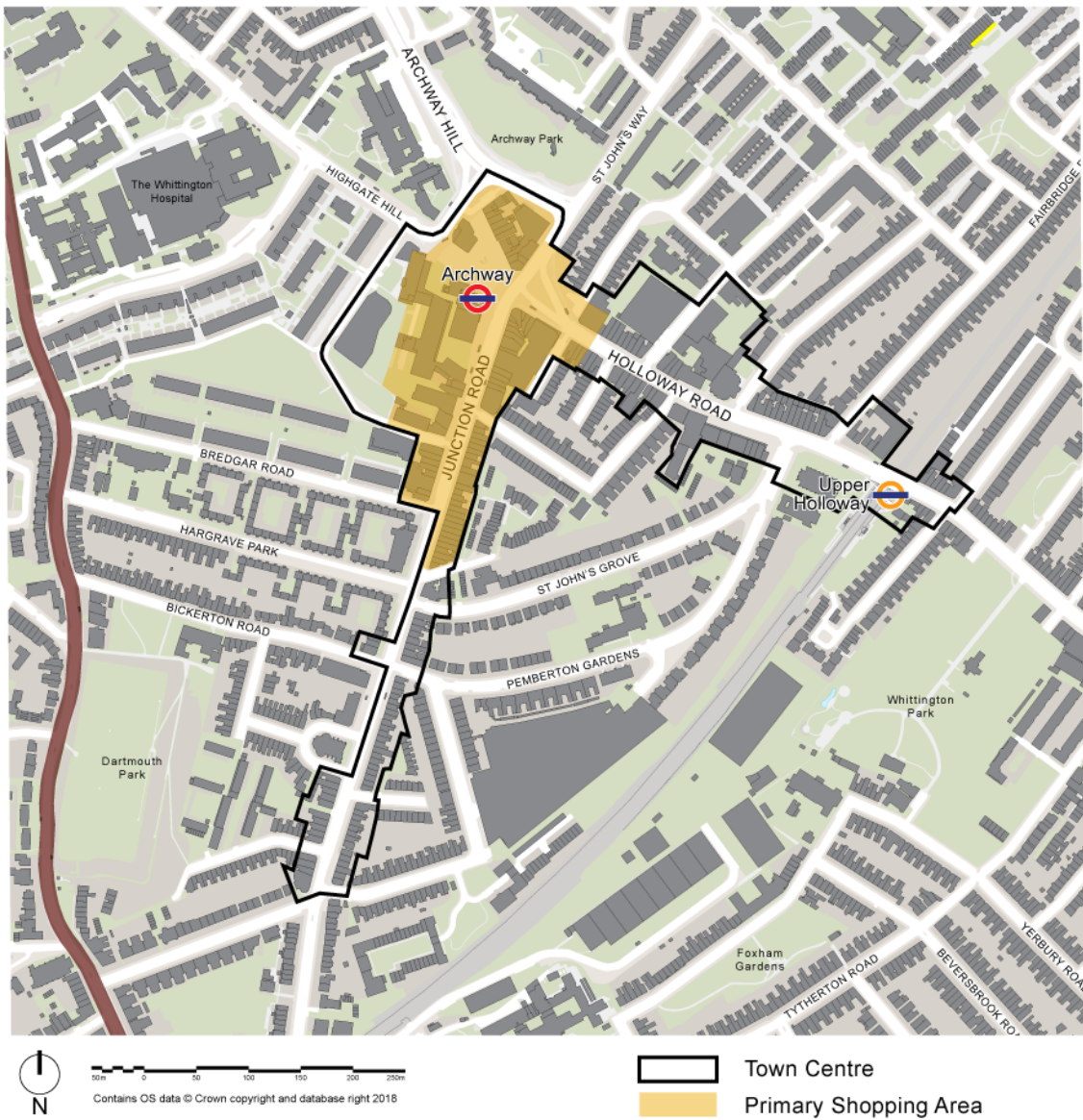
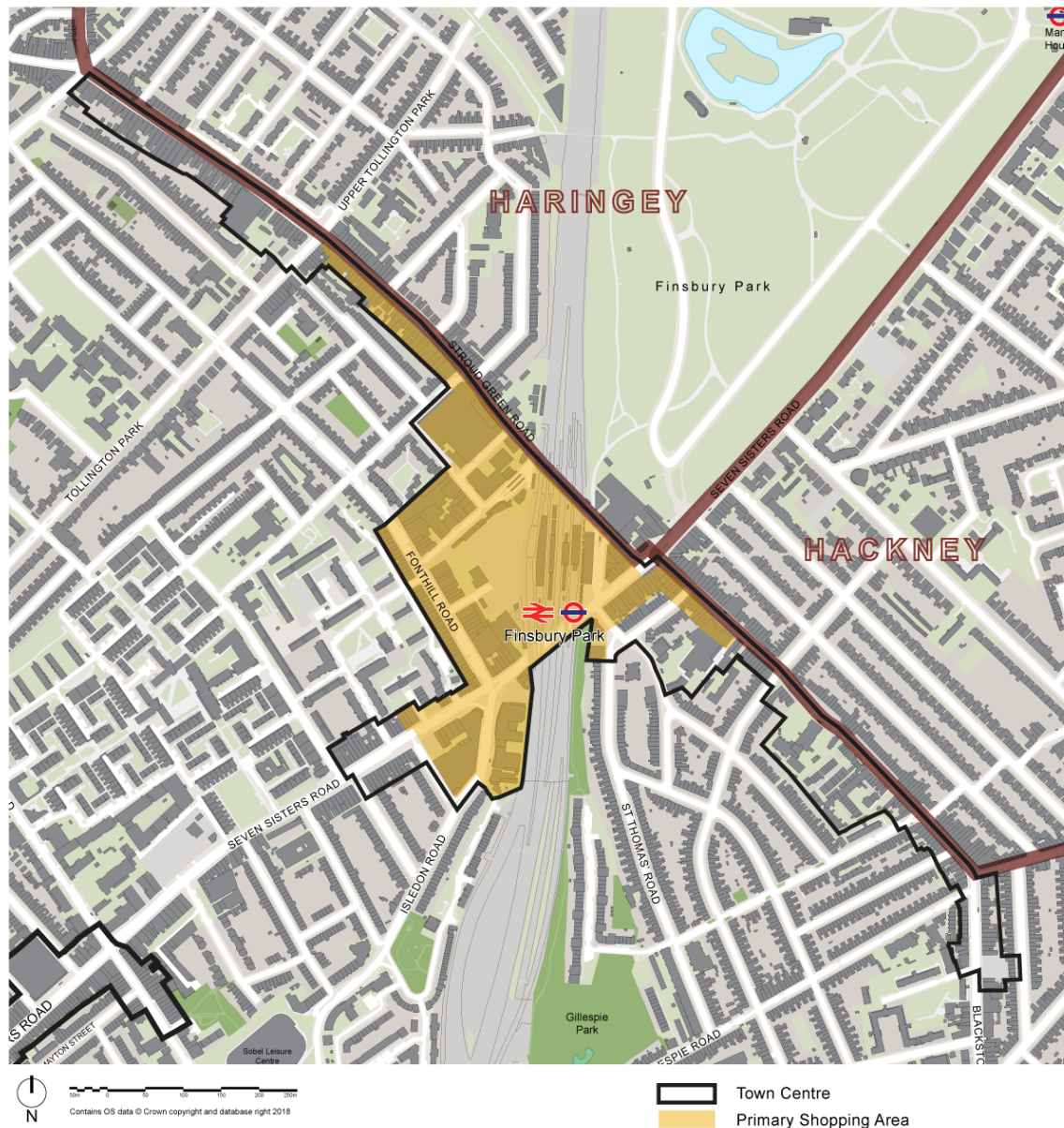


Figure 4.5: Finsbury Park Town Centre boundary (including Primary Shopping Area)



- 4.95 Islington's Town Centres are the primary focus for retailing in the borough. The core of retail in Town Centres is focused in Primary Shopping Areas (see Policy R2), with locations outside of this suitable for a range of main Town Centre uses<sup>28</sup>.
- 4.96 Ensuring that retail and other important services and facilities (such as solicitors, post offices, groceries and newsagents) remain readily accessible is essential to the vitality and viability of Town Centres. Focusing retail and services within Town Centres will contribute to the inclusivity and sustainability of local communities and the local economy, and reduce the number and length of trips undertaken.
- 4.97 To promote the economic and cultural function of Town Centres, in line with the National Planning Policy Framework, the Council will apply a sequential approach to assessing applications for retail, services, entertainment, assembly and leisure uses outside of the Town Centres<sup>29</sup>. For the purposes of this policy, the local impact assessment threshold is 0sqm, meaning that any proposal in an edge-of-centre or out-of-centre location may be required to submit an impact assessment. The level of detail provided in the impact assessment must be proportionate to the scale of the proposed development.
- 4.98 Offices are also considered a Town Centre use however such applications will be considered in relation to other relevant Local Plan policies and their impact on the predominant retail and leisure function of Town Centres.
- 4.99 London's CAZ has a unique role in the retail hierarchy. The CAZ function is primarily linked to business floorspace, but retail uses are important supporting uses. The CAZ contains clusters of retail premises, notably at Angel (partly covered by the CAZ), which is a designated Town Centre. There are four LSAs within the CAZ, covered by Policy R4 and the Bunhill and Clerkenwell AAP. Given the nature of the CAZ, retail uses are also dispersed in numerous other locations. Proposals for new main Town Centre use floorspace within the CAZ may be appropriate where it would not undermine the overarching business function of the CAZ, and would not detrimentally affect the vitality and viability of Town Centres and/or local amenity. An impact assessment may be required where the proposed scale of retail could have adverse impacts on nearby Town Centres, LSAs or other undesignated clusters of retail, service and leisure uses.
- 4.100 Impact assessments, as defined in the NPPF, will sometimes be required for development outside of town centres depending on the floorspace thresholds set out in policies. The purpose of an impact assessment is to assess the impact on the viability of neighbouring or linked retail centres as well as the quantitative and qualitative impacts of the proposed use on the function and character of the location. An impact assessment must consider relevant main town centre uses, including Class E uses.
- 4.101 Residential uses in town centres can contribute towards a mix of uses that support healthy town centres. Upper floors are appropriate for residential uses where adverse impacts can be prevented/mitigated. Change of use of upper floors to residential use must not compromise main town centre uses' ability to effectively occupy the ground floor premises. Proposals for residential uses must ensure that the side or rear of a

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<sup>28</sup> Office uses are also suitable Town Centre uses; however, proposals for Office uses in Town Centres will be assessed against Policy B2.

<sup>29</sup> The sequential approach does not apply to F.1/F.2 uses. Applications for new F.1/F.2 uses will be assessed against Policy SC1. In certain circumstances some E uses that provide a clinic, health centre, nursery, day centre function will not be required to adhere to the sequential test but may be conditioned to operate in that use.



building used for waste, refuse and/or servicing by commercial uses is not unreasonably compromised. Breaks in active frontages affects the viability, vitality and vibrancy of the centre, and therefore is detrimental to the retail and commercial function of Town Centres. Ground floor and basement levels can often also provide ancillary space for storage or backroom functions.

4.102 With regard to facilitating access to upper floor residential units, this must not affect the continued operation of any E, Sui Generis or F.2 main Town Centre use floorspace, or impact the street scene or the provision of an active frontage. The loss of such floorspace to facilitate access would trigger Part G of Policy R3, unless it was of such a small scale that it was considered de minimis. Other policies may also apply, for example Policy DH7.

## **Policy R4: Local Shopping Areas**

- A. All proposals must maintain and enhance the retail and service function of the Local Shopping Areas (shown in Figure 4.6 and on the Policies Map).
- B. Proposals involving the change of use from E – including ground floor, basement and first floor space - to non-E main town centre use must demonstrate that:
  - (i) the premises have been vacant for a continuous period of at least six months and continuous marketing evidence to cover this period has been provided which demonstrates that there is no reasonable prospect of the unit being used in its current E use in line with requirements in Appendix 1;
  - (ii) there would not be a significant adverse effect on amenity, particularly the surrounding residential amenity; and
  - (iii) the proposal does not cause any individual or cumulative adverse impact on the vitality, viability, character, vibrancy and function of the area.
- C. Development of main town centre uses over 200sqm must meet the requirements in Policy R3 Part E.
- D. Applications for the change of use of Class E and/or Sui Generis main Town Centre use floorspace to residential use and/or a use other than those specified in Part B must:
  - (i) demonstrate that the premises have been vacant for a continuous period of at least two years and continuous marketing evidence to cover this period has been provided, which demonstrates that there is no reasonable prospect of the unit being used in its current use and any other use which could reasonably be assumed to occupy the premises;
  - (ii) prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and function of the area;
  - (iii) comply with the 'agent-of-change' principle consistent with Policy DH5;
  - (iv) not create a harmful break in the active frontage of the Local Shopping Area;
  - (v) ensure that access to the proposed residential use does not affect the operation of any continued main Town Centre use floorspace or impact on the

street scene and the provision of an active frontage, especially where the loss of floorspace is proposed to facilitate access; and

- (vi) provide high quality dwellings with a high standard of residential amenity, consistent with other policies relating to housing standards, design, accessibility and sustainability.

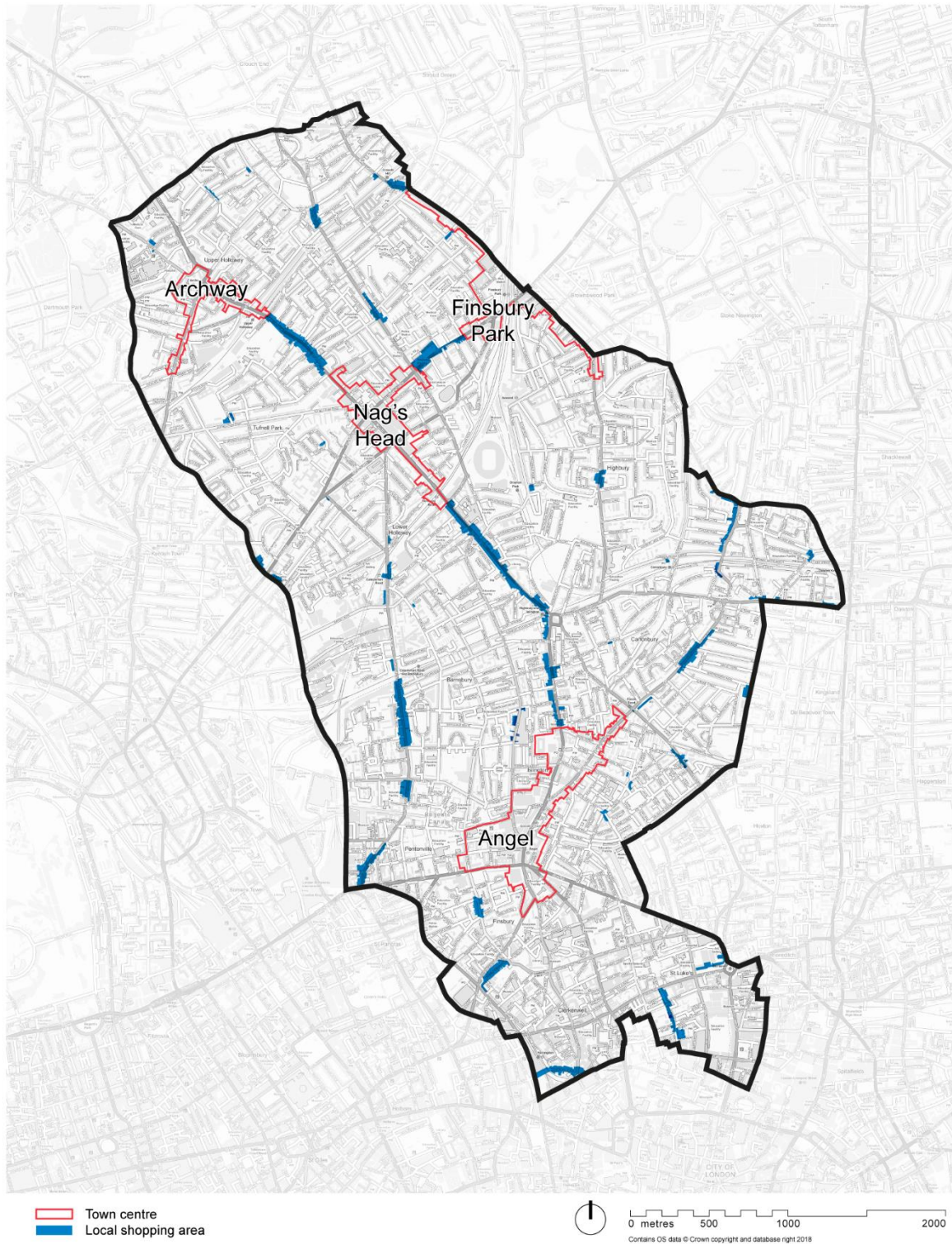
E. Any applications for new residential uses in a Local Shopping Area not involving change of use of existing main Town Centre uses must be located on upper floors. Proposals must address criteria set out in Part D (ii), (iii), (v), and (vi) of Policy R4.

4.103 LSAs are an important part of Islington's retail offer. These areas vary in size and the role they provide. There are 40 LSAs in Islington, as follows:

1. Hillrise
2. Whitehall Park
3. Highgate Hill
4. Crouch Hill
5. Hornsey Road North
6. Hornsey Road (Tollington)
7. Tollington Park
8. Seven Sisters Road
9. Upper Holloway
10. Campdale
11. Cardwell Terrace
12. Hillmarton Terrace
13. Brecknock Road
14. Highbury Barn
15. Drayton Park
16. Grosvenor Avenue
17. Newington Green
18. King Henry's Walk
19. Ball's Pond Road
20. St Paul's
21. Lower Holloway
22. Roman Way
23. Caledonian Road (Cottage Road)
24. Caledonian Road (Central)
25. Caledonian Road (Copenhagen Street)
26. Liverpool Road/Barnsbury Street
27. Upper Street
28. Canonbury Place
29. Embassy
30. Essex Road
31. Southgate Road
32. New North Road
33. St Peters Street
34. Kings Cross
35. Amwell Street
36. Packington Estate
37. Exmouth Market
38. Whitecross Street
39. Old Street
40. Farringdon

4.104 Figure 4.6 shows the location of LSAs within Islington.

Figure 4.6: Local Shopping Areas (NB: Town Centre boundaries shown for context)



- 4.105 The impact of proposals will therefore affect LSAs differently, with the loss of retail and service uses in smaller LSAs being felt more acutely. The impact on the amenity of local users of a LSA will depend on its size, the current mix of uses, and its proximity to other centres (whether that be LSAs or Town Centres).
- 4.106 LSAs are not immune from wider changes to the retail environment, and therefore need to be resilient to any future changes, such as increases in online shopping. For LSAs to be resilient they need to be able to change use class more flexibly in response to changing demands and trends in local shopping. In the context of LSAs the six-month period of vacancy and marketing evidence for a change of use from E to non-E main town centre use or conditioned retail to other E uses reflects this increased flexibility.
- 4.107 Non-retail main town centre uses refer to those uses that provide an active frontage and enhance the function of Town Centres through employment or the provision of leisure and retail services. Non-retail main town centre uses may include professional/financial services, cafes/restaurants, offices, research and development, light industrial, indoor recreation, outdoor recreation, assembly and community, pubs, hot food takeaways and some further Sui Generis uses. However, non-retail main town centre uses can vary in their impact, therefore proposals of this nature (including what constitutes a suitable non-retail main town centre use) will be assessed on a case-by-case basis.
- 4.108 An impact assessment may be required for proposals for main town centre uses of more than 200sqm in line with Policy R3 Part E, to assess the impact of larger proposals on the character and function of the LSA and relevant neighbouring LSAs/town centres.
- 4.109 For proposals that are marketed within Class E, Appendix 1 sets out the requirements. Applicants must engage with Appendix 1 closely and submit marketing evidence in line with this. Where a proposal seeks a change from an E to a non-E main town centre use, the premises must be vacant and marketed for 6 months. This ensures that suitable E uses that have the ability to provide key goods and services, and leisure uses like cafes/restaurants are demonstrated not to be in demand before a change of use away from Class E takes place. Where a proposal seeks the change of use from a retail use specifically secured through condition, the premises should be marketed for the specific conditioned use for six months.
- 4.110 In order to protect the function of LSAs, proposals to change the use of ground floor units (including space below ground floor) from main Town Centre use floorspace to residential use will be required to provide marketing and vacancy evidence for a period of two years, to demonstrate that there is no continued demand for the existing use and any other use which could reasonably be assumed to occupy the premises.
- 4.111 Proposals of this nature must also not cause a harmful break in the continuity of active frontages. What constitutes a 'harmful break' will be assessed on a case-by-case basis taking into account site specific circumstances, but generally refers to the introduction of a use that does not complement the LSA and detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-main town centre uses in the centre of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.
- 4.112 Residential uses may be suitable on upper floors in LSAs where they adhere to specified criteria set out in the policy. With regard to facilitating access to upper floor

residential units, this must not affect the continued operation of any main Town Centre use floorspace, impact the street scene or the provision of an active frontage. The loss of such floorspace to facilitate access would trigger Part E of Policy R4, unless it was of such a small scale that it was considered de minimis. Other policies may also apply, for example Policy DH7.

## **Policy R5: Dispersed retail and leisure uses**

- A. The Council will support and protect retail uses located outside designated Town Centres and LSAs. Proposals involving the loss of dispersed retail units and cafes/restaurants – including ground floor, basement and first floor space to non-E main town centre use – must:
- (i) Demonstrate that the premises have been vacant for a continuous period of at least one year. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use or any other suitable E use; and
  - (ii) provide evidence that there will be accessible provision of essential daily goods (typically convenience retail) within a short walking distance (within 300m).
- B. Where a new retail development comes forward in some circumstances where there is a particular local need, the council will seek to condition the unit in retail use to provide essential daily goods.
- C. Proposals for the change of use of dispersed retail or café/restaurant units to residential use will only be considered acceptable where Part A of this policy is satisfied, where high quality dwellings with a high standard of residential amenity will be provided consistent with other policies and standards relating to housing and design.

4.113 Local shops located outside designated Town Centres and LSAs can provide a valuable service to the local community by providing for essential day-to-day needs. Their accessibility is particularly important for those with mobility difficulties.

4.114 There has been a loss of a number of local shops, particularly to residential use, in recent years. Continuous marketing evidence will be required for proposals for the Change of Use of existing retail units, demonstrating lack of demand for retail or an appropriate commercial use that provides an essential service to residents. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.

4.115 Protection of retail units can assist with work to mitigate the prevalence of food deserts in the borough, in line with the overarching plan objective on healthy environments. Food deserts are where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems. Accessible provision of essential goods has multiple benefits including a balanced diet, active travel, reduced transport congestion, and increased social contact.

4.116 Dispersed café/restaurant leisure units can contribute positively towards the vibrancy and character of places outside of Town Centres and LSAs, especially in residential areas. These units often provide an inclusive meeting place within a community, contributing to community cohesion and can significantly increase the wellbeing and social interaction of those with mobility issues such as older people. Facilitating social contact through café/restaurant premises benefits mental health and promotes civic activity by providing spaces that can be used as informal community hubs. The Council will seek to protect such uses and any change of use must provide evidence that loss of the café/restaurant unit will not have an adverse impact on the local community. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.

4.117 Proposals for the Change of Use of dispersed retail or café/restaurant to residential use must demonstrate and ensure a high standard of design and residential amenity for occupants (consistent with Policy H4), and must not lead to unacceptable adverse impacts on the street scene and the character of an area.

## **Policy R6: Maintaining and enhancing Islington's unique retail character**

A. The Council views the retention of small shops as a baseline and places great weight on the need to retain any retail unit which currently or potentially could be utilised by small retailers. In order to encourage new provision of small retail units, the Council will seek to secure small retail units (generally considered to be units of around 80sqm GIA or less) suitable for occupation by small retailers by:

- (i) requiring proposals for new retail development to incorporate small retail premises, proportionate to the scale of the proposal and/or;
- (ii) requiring proposals for the redevelopment of small retail units to incorporate adequate re-provision of small units to compensate for any loss, particularly for essential services and/or;
- (iii) requiring proposals for major housing developments to incorporate small retail units where there is no accessible provision of essential daily goods available within a short walking distance (within 300m); and
- (iv) where appropriate, attaching conditions to permissions for small retail units, requiring planning permission to be sought for the future amalgamation of units into larger premises; specifying a certain level of convenience goods in order to protect and promote essential services; and/or making planning consent personal to a specific individual/organisation.

B. In order to maintain Islington's retail character, particularly the prevalence of small retail units, the Council will resist the amalgamation of individual E use units. Amalgamation of retail units may be suitable where development proposals demonstrate that the intensification of use would not:

- (i) detrimentally affect the street scene and/or character of the local area; and/or

- (ii) cause unacceptable adverse impacts on the local environment and/or amenity, including impacts from altered/intensified delivery and servicing arrangements.

4.118 Islington's many small shops help lend the borough its special character and contribute to the identity of its neighbourhoods. Small shops provide an important role in servicing the day-to-day needs of local residents, workers and visitors, and can provide greater consumer choice and local employment. Certain types of small and independent shops perform an essential service and must be easily accessible to all residents. These essential services can include butchers, bakers, greengrocers, grocers, fishmongers, chemists, post offices, newsagents, cobblers, hardware stores, dry cleaners and laundrettes. The loss of retail units suitable for such shops, particularly units which contribute to local character, individuality, convenience and the wider commercial success of an area, will be resisted. Applicants for significant retail developments will be encouraged to seek out independent retailers for small units wherever possible.

4.119 For the purposes of Policy R6, a small retail unit is generally considered to be a unit of around 80sqm GIA or less, usually within E(A) use. Retention of units suitable for occupation by small retailers must be the starting point when drafting development proposals. Any proposals which have not explored the possibility of retaining these units will be resisted.

4.120 Proposals for new retail development in the borough must incorporate small E use premises suitable for occupation by small retailers. Proposals for major residential developments will also be encouraged to provide small retail units where no suitable retail provision is accessible within a short walking distance (300m or less). Proposals involving the loss of existing small E use units must re-provide small E use units. Where new small E use units are provided, the Council may put in place measures to control their occupation, and guard against future loss through use of relevant planning conditions.

4.121 The amalgamation of individual retail units can result in material impacts, primarily relating to physical changes and intensification of use. Amalgamation of retail units will be resisted where they materially and detrimentally affect the character of Islington's shopping areas, including the impact on active frontages. Amalgamated retail units may also result in different patterns of delivery and servicing; small supermarkets, for example, depend on very fast sales rates, which (where adequate storage is not available) requires 'just in time' deliveries. This can result in more traffic movements by delivery vehicles, which in turn can impact on residential amenity and environmental quality, and cause adverse impacts on the local highway. Where unacceptable adverse impacts arise, the amalgamation of individual retail units will be resisted. Policy T5 will be used to assess proposed delivery and servicing arrangements.

## **Policy R7: Markets and specialist shopping areas**



- A. The Council will seek to maintain, and support the enhancement of, existing markets within the borough.
- B. New markets are encouraged in Town Centres and appropriate locations in the CAZ, where they support and enhance the function of a specific locality and do not adversely impact any predominant 'bricks-and-mortar' based uses.
- C. The Council will continue to protect and promote the role of Specialist Shopping Areas at Camden Passage and Fonthill Road. Proposals should not result in the percentage of retail uses in the Specialist Shopping Areas falling below 75%. Proposals for change of use from E use to non-E main town centre uses must demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued retail use or other E class leisure uses which would complement the specialist shopping function. Marketing in SSAs must follow the requirements set out in Appendix 1.
- D. In order to not diminish their unique function and character, proposals for the change of use from main town centre uses to residential of any part of the premises, including upper floors or ancillary space, will be required to demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for retail use, Class E or other appropriate supporting main Town Centre uses, in line with Appendix 1.
- E. Regardless of the resulting percentage of retail uses, proposals that result in the partial loss of retail floorspace (including ancillary floorspace) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the retail unit and/or collectively undermine the function of the Specialist Shopping Area.
- F. Any individual or cumulative impacts on the vitality, viability, character, vibrancy and predominantly retail function of the Specialist Shopping Area should be prevented and/or mitigated.

4.122 There are three well established street markets in Islington, at Chapel Market, Exmouth Market and Whitecross Street, as well as the covered market at Nag's Head and other regular markets in certain locations including Camden Passage and Archway. Markets are very popular with shoppers and visitors because of their vibrancy and the range and variety of goods on offer. Markets also add to the character of local areas, create employment opportunities, support regeneration and promote social interaction. They can also act as a testing ground for new small businesses.

4.123 The Council wishes to see markets continue and thrive, and will encourage a co-ordinated approach to development and management of markets in matters such as deployment of signage, pavement furniture and other market infrastructure. New markets must make a positive contribution to character and support the existing function of the proposed location whilst complementing existing retail and services. If markets are poorly designed and managed, they can cause harm to surrounding areas in terms of congestion of local roads and pavements, rubbish and refuse, storage and noise.

4.124 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.

4.125 Fonthill Road has a rich history of fashion manufacturing and wholesale commerce. The upper floors of buildings on Fonthill Road were used as workshops and are now generally used either for storage or have been converted to other uses. The Council will seek to retain these upper floor ancillary spaces (e.g. storage space, back office) in all Specialist Shopping Areas to support the effective operation of the retail units or for stand-alone uses – including SME units for creative enterprises – which complement the area and do not adversely impact the ongoing operation of the area. Proposals that result in the partial loss of retail floorspace (including ancillary floorspace) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the retail unit and/or collectively undermine the function of the Specialist Shopping Area.

4.126 To determine the percentage of retail uses in Specialist Shopping Areas, the total number of retail units within the Specialist Shopping Area should be divided by the total number of units within the Specialist Shopping Area. The Fonthill Road Specialist Shopping Area incorporates some units on Wells Terrace as well as those on Fonthill Road. The Camden Passage Specialist Shopping Area includes units on Camden Passage, Camden Walk, Charlton Place and Pierrepoint Row.

4.127 The addresses included in the Specialist Shopping Areas are as follows:

#### Fonthill Road

- 86-164 (even) Fonthill Road
- 93-149 (odd) Fonthill Road
- 2-3 Wells Terrace

#### Camden Passage

- 1-53 (all) Camden Passage
- 2-10 (even) Charlton Place
- 17 Charlton Place
- 1-6 (all) Camden Walk
- Pierrepoint Row (all)

### **Policy R8: Location and Concentration of Uses**

- A. Proposals will be resisted where they result in an unacceptable concentration of uses, such as night-time economy uses, hot food takeaways, betting shops and other gambling facilities and payday loan shops. The wide range of Class E uses also allows for overconcentration of certain uses, such as but not limited to café/restaurants, which have potential to cumulatively cause heightened adverse amenity impacts. Concentration of uses will be assessed based on the number of

units within a 500m radius of the proposed development. Proposals must be accompanied by sufficient information to allow for assessment of concentration and potential impacts, including information on how these uses will be managed and operated.

- B. In addition to the general assessment of overconcentration in Part A:
- (i) proposals for hot food takeaways (Sui Generis Use) will be resisted within 200m of primary and secondary schools.
  - (ii) proposals for hot food takeaways (Sui Generis Use) will be resisted where:
    - a. they would result in 4% or more of total units being in hot food takeaway use, in LSAs of 26 units or more; or
    - b. they would result in two or more hot food takeaway units, in LSAs with 25 units or less.
  - (iii) proposals for betting shops and adult gaming centres will be resisted where:
    - a. they would result in 4% or more of total units being in betting shop/adult gaming centre use, in LSAs of 26 units or more; or
    - b. they would result in two or more betting shop/adult gaming centre units, in LSAs with 25 units or less.
  - (iv) proposals for betting shops or adult gaming centres in Town Centres will not be permitted where there is an existing betting shop or adult gaming centre within 200m walking distance; or where the resulting amount of betting shops and adult gaming centres would exceed 1.5% of the total units in the Town Centre.
- C. Where proposals for uses serving food and drink are permitted – particularly cafe/restaurant and hot food takeaway uses, and retail uses such as coffee shops and sandwich bars – a condition will be attached to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard.
- D. Where proposals for betting shops, adult gaming centre, payday loan shops, high interest 'rent-to-own' retail stores, pawnbrokers and other similar uses are permitted, conditions may be attached (where relevant) to:
- (i) require the display of information about local credit unions, debt advice services and/or gambling addiction charities;
  - (ii) require the operator to sign up to, and operate in compliance with, any scheme(s) which promotes community safety and/or other good practice; and
  - (iii) require the display of information about any applicable interest rates, fees and charges.

4.128 Due to the borough's densely developed, mixed-use nature, a range of main Town Centre uses occur in close proximity to places where people live, work, study and socialise. It is important to ensure a mix and balance of complementary day and night-time uses that creates an attractive and vibrant area that co-exists successfully with neighbouring residential areas and does not significantly compromise wellbeing. Certain types of use can cause detrimental cumulative impacts as a result of their concentration. The Council will resist applications for such uses where they would cause harm to the vitality and viability, character, function and amenity of an area

and/or negatively impact on the health and wellbeing of the borough's residents. The impact on deprived areas in particular will be assessed.

- 4.129 In assessing the likely impacts of a proposal, regard will be had to the type of use, proposed hours of opening, size of premises, operation and servicing, and measures to mitigate odour and noise from the premises. The Council will also consider whether the proposal is likely to increase or create a negative cumulative impact in the surrounding area (generally within a 500m radius of the site). The 500m radius is established as a sensible straight line distance from the location of the proposed use to measure cumulative impacts taking account of Islington's relatively small spatial area and dense urban development. Proposals will be resisted that would result in unreasonable negative cumulative impacts that cannot be adequately mitigated. The Council's Licensing Policy will also be a material consideration in assessing potential impacts of proposals.
- 4.130 The policy has restrictions (percentage and/or quantum of units) for hot food takeaways (Sui Generis) and betting shops and adult gaming centres (Sui Generis). These restrictions are necessary due to the adverse impacts on health and wellbeing and vitality and viability of retail centres that these uses can cause. These restrictions are part of a wider comprehensive approach to tackle the causes of ill health, in co-operation with other Council departments including Public Health. The restrictions, either the percentage or the quantum, may be updated in the future through an SPD.
- 4.131 The level of overweight or obese children in Islington is consistently above both the national and London average. Evidence shows that nearly two thirds of schools in Islington have at least one hot food takeaway within 200m of the school entrance. As part of a comprehensive package of measures to tackle this issue, the Council will resist proposals for hot food takeaways within 200 metres of primary and secondary schools.
- 4.132 All applications for Sui Generis Hot Food Takeaway's or Betting Shops must provide a Management and Operating Strategy which includes all the standard information needed when the operator applies for a premises licence. Management and Operating Strategies must also consider any other potential impacts on vitality, viability, character, amenity, function and health and wellbeing.
- 4.133 Hot food takeaway uses are often associated with unhealthy food, but they are not the only type of premises to serve unhealthy food; retail and café/restaurant uses such as newsagents, coffee shops and cafes also often sell/serve unhealthy food. Applications for relevant retail, café/restaurant and hot food takeaway uses will therefore be conditioned to achieve, and operate in compliance with, the Healthier Catering Commitment standard. This will help provide easier access to healthier food across the borough.
- 4.134 Islington has a relatively high number of betting shops, compared with other boroughs in London and across the country. Betting shops can have a variety of adverse impacts on communities including worsening mental health (particularly with incidences of problem gambling) and exacerbating incidences of anti-social behaviour and crime. There is evidence of betting shops clustering in deprived areas, and this will be a key consideration as part of any assessment of overconcentration. Tools and evidence such as the gambling-related harm risk index produced by Geofutures may be utilised to inform this assessment.
- 4.135 Betting shops, payday loan shops, high interest 'rent-to-own' retail stores, pawnbrokers can have adverse impacts on health and wellbeing. The Council requires

that any of these premises must operate in a transparent manner and clearly display information relating to interest rates; fees; charges; and information about debt advice and gambling support.

4.136 Further information on the implementation of Policy R8 is provided in the Location and Concentration of Uses SPD.

### **Policy R9: Meanwhile/temporary uses**

- A. Applications for meanwhile/temporary use of individual vacant E, F.2 or Sui Generis uses in Town Centre locations and in the CAZ will be appropriate where:
- (i) the temporary use sought is a retail, professional/financial service, café/restaurant, office, entertainment – such as cinema, bingo, music halls, indoor recreation, or outdoor recreation use or is a suitable community and/or cultural use;
  - (ii) the period of meanwhile/temporary permission is less than 6 months, and no more than one previous temporary permission have been granted since the last permanent occupation of the unit/building/site;
  - (iii) potential adverse amenity impacts are prevented or mitigated; and
  - (iv) the meanwhile/temporary use does not preclude permanent use of the site for appropriate main Town Centre uses, which includes consideration of the amount of previous temporary permissions.
- B. Vacant plots/sites planned for redevelopment must investigate provision of meanwhile/temporary uses prior to commencement of any redevelopment work. Any meanwhile/temporary use of such sites will be appropriate where:
- (i) the meanwhile/temporary use does not preclude permanent use of the site, particularly through the length of any temporary permission;
  - (ii) the proposed meanwhile/temporary use contributes to the function of the area where it is located or meets a specific need identified by the Council;
  - (iii) potential adverse amenity impacts are prevented or mitigated; and
  - (iv) the proposed use meets all other Local Plan policies relevant to the use.

4.137 Vacant premises can detrimentally affect the vibrancy, vitality and viability of places. The efficient use of land is crucial to sustain a vibrant and engaging built environment and vacant premises can provide opportunities for businesses to establish themselves. This is especially applicable to start-ups and businesses within the creative industries. Despite the flexibility introduced by Class E which combines a large range of activities into one use class there are still circumstances where meanwhile use may be beneficial.

4.138 The Council will encourage meanwhile/temporary use of retail, professional/financial service, café/restaurant, office, entertainment such as cinema, bingo, music halls,

indoor recreation or outdoor recreation and pubs main Town Centre use units/building/sites in the CAZ and Town Centres, where potential adverse impacts are prevented/mitigated. Temporary use must not preclude permanent occupation of units/buildings/sites, and the Council expect marketing exercises for permanent occupation for an appropriate use to continue throughout the temporary occupation (pending consistency with relevant policies). Meanwhile/ temporary permissions sought for cultural or community uses should refer to the Plan's glossary definitions in Appendix 8.

- 4.139 Any meanwhile/temporary use consistent with criteria in Policy R9 will not count as occupancy for the purpose of continuous vacancy (as required by other Local Plan policies), provided that the total cost of renting the unit for temporary occupants is free or at a very low percentage of the prevailing market rate for similar uses in the area; and the units are let, as a priority, to start-ups or small businesses. Without such rent reductions for temporary occupiers, the Council will consider that the temporary use breaks the continuous vacancy period required by other Local Plan policies.
- 4.140 If the Council consider a site/premises/unit has been made deliberately vacant to secure temporary permission, the application will be refused.
- 4.141 Meanwhile/temporary uses have the potential to create adverse amenity impacts on the surrounding environment. Adverse amenity impacts could include noise from ingress and egress of the building or space, anti-social behaviour, inappropriate servicing and delivery, vibration, access and safety, amongst other things. The temporary nature of a use is not enough, by itself, to mitigate any adverse impacts. All applications for temporary use must demonstrate that all potential adverse impacts are prevented/mitigated. Evidence must be submitted to the Council as part of an application that considers potential adverse amenity impacts and the measures to be undertaken to mitigate these impacts.
- 4.142 Meanwhile/temporary uses can help activate space in the daytime, for example, cultural or night-time economy uses which do not ordinarily open during the day. The Council will encourage temporary/meanwhile uses in such circumstances, where proposals are consistent with the other requirements of Policy R9.
- 4.143 To encourage meanwhile/temporary use of vacant retail, professional/financial service, café/restaurant, office, entertainment – such as cinema, bingo, music halls, indoor recreation, or outdoor recreation, pub or hot food takeaway units, the Council will explore the potential to implement a meanwhile/temporary Use Local Development Order (LDO) which permits temporary uses in specific locations, where certain conditions are met.
- 4.144 Although Islington will have few significantly sized vacant sites/plots awaiting redevelopment, developers and landowners of such sites/plots must investigate options for utilising any sites/plots for meanwhile/temporary uses, including utilising existing buildings within sites/plots. The range of meanwhile/temporary uses could be more wide-ranging than those identified in Part A of the Policy; applications will be assessed on a case-by-case basis but the proposed meanwhile/temporary use must demonstrate how potential adverse amenity impacts will be addressed; and how it will contribute to the function of the area where the site/plot located or meet a specific need identified by the Council. The latter could include provision of temporary affordable/supported housing similar to projects implemented elsewhere in London, such as the Place/Ladywell project in the London Borough of Lewisham. Relevant Local Plan policies related to the temporary use would apply to the assessment of any

meanwhile/temporary use, for example Policy H4 with regard to temporary housing. Temporary open space or food growing space may also be appropriate.

## **Policy R10: Culture and the Night-Time Economy**

- A. New cultural uses should be located in the CAZ or Town Centres, particularly in Cultural Quarters. Such uses should:
- (i) complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation, of these uses, in line with the 'agent-of-change' principle;
  - (ii) be accessible by a range of sustainable transport modes, including walking, cycling and public transport; and
  - (iii) provide high quality buildings that are designed to be inclusive, accessible and flexible.
- B. Proposals involving the redevelopment, re-provision of cultural uses, intensification of existing cultural uses (except for public houses), or the provision of new cultural uses, including in locations outside of the CAZ and Town Centres must:
- (i) ensure that the function and role of the existing cultural use is not diminished or put at risk by any proposed changes, particularly where proposals involve development of other uses (including sensitive uses such as residential) as part of mixed use redevelopment;
  - (ii) provide high quality buildings that are designed to be inclusive, accessible and flexible, and in the case of proposals for intensification, explore opportunities to improve design standards in existing buildings;
  - (iii) be conditioned to ensure retention of the specific cultural use; and
  - (iv) where there is a significant intensification of the cultural use, incorporate appropriate measures to limit effects of sound, vibration and other effects of the re-provided/intensified cultural use on existing and potential future land uses in the area, in line with the 'agent-of-change' principle.
  - (v) where use is only intended to operate during evening/night-time hours, investigate potential for allowing daytime uses to activate the space, including on a meanwhile basis.
- C. The loss and/or change of use of cultural facilities in the borough will be strongly resisted. Any proposals for the loss and/or change of use of such facilities must:
- (i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued cultural use or other suitable cultural uses. Marketing should also be considered for main town centre uses consistent with the character and function of the area where relevant. Such evidence must meet the marketing and vacancy requirements set out in Appendix 1;

- (ii) ensure that the character of an area and/or any wider cultural function is not adversely impacted by the loss; and
- (iii) ensure that the proposed use is appropriate for the area, including through assessment against the agent-of-change Policy DH5.

D. Proposals for new night-time economy uses (including redevelopment/intensification of existing night-time economy uses) will only be acceptable within the CAZ or in Town Centres. Where proposed, night-time economy uses must:

- (i) complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation, of these uses, in line with the 'agent-of-change' principle;
- (ii) promote access via sustainable modes of transport and avoid reliance on private vehicular transport, including private hire vehicles; and
- (iii) investigate potential for allowing daytime uses to activate the space, including on a meanwhile basis, where the use is only intended to operate during evening/night-time hours.

4.145 Cultural uses are unique assets which add significant value to the social fabric and economy of Islington. Such uses often have distinct social and economic benefits, although cannot be specifically defined (in terms of planning use classes). Cultural facilities evident in Islington includes music and other entertainment venues, cinemas, artist studios and galleries, theatres, pubs, museums and the Emirates Stadium, working men's clubs, arts and crafts spaces, bingo halls, community centres, in addition to a number of heritage assets. Some of these are also night-time economy uses.

4.146 The impact of development in close proximity to cultural uses is arguably the biggest threat which these uses face; close proximity is considered to be any distance where vibration, noise – including airborne noise— and/or the operation of a cultural use – such as regular ingress/egress routes – could cause amenity impacts for surrounding uses. The 'agent-of-change' principle set out in Policy DH5 requires that the person or organisation responsible for change – such as a planning applicant who proposes new residential units near an existing cultural use – is responsible for managing the impact of that change. Cultural uses are inherently sensitive to the introduction of new uses, given their function can generate noise and significant pedestrian movements. It is therefore important that new uses in close proximity to cultural uses fully prevent any adverse impacts which may arise in future (such as noise complaints, which give rise to licensing restrictions and incur costs and administrative burdens) and give cultural uses maximum opportunity to continue operating and contributing to Islington's cultural offer. This must also include reasonable opportunity for cultural uses to expand their offer.

4.147 The approach to cultural uses operates in tandem with other policies aimed at ensuring that Islington maintains its role for shopping, business, education and culture, alongside the need to deliver housing to meet the borough's housing target. Therefore, while strong protections are in place to protect the continued operation of existing cultural uses where new development is proposed, the reverse also applies, and new or significantly intensified cultural uses must follow the 'agent-of-change' principle to



ensure that any potential adverse impacts on uses in the immediate area – particularly uses sensitive to noise such as residential – are prevented or satisfactorily mitigated. Where cultural uses are intensified or re-provided as part of redevelopment, conditions will be attached to any permission to remove any applicable permitted development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that specific cultural use(s) are retained and that any future loss is assessed against Local Plan policies via a planning application.

4.148 In certain circumstances, where agreed by the Council, non-physical measures, particularly a deed of easement, may be used to mitigate residual impacts which cannot be mitigated through physical measures alone; this is a legal agreement which essentially gives existing noise generating uses immunity from future complaints from occupiers of new development.

4.149 A Cultural Quarter designation reflects an area where there is already a broader level of cultural activity which must be retained and enhanced. Renewal and enhancement of heritage or otherwise distinct townscape can support the function and role of Cultural Quarters. Residential use is particularly sensitive to noise and other potential impacts of cultural uses, therefore new residential uses (both conventional and non-self-contained) within Cultural Quarters should seek to mitigate negative impacts on the Cultural Quarter in line with the agent of change principle.

4.150 Islington has designated two Cultural Quarters:

- Angel Town Centre is designated as a Cultural Quarter to reflect its role as the principal cultural destination in Islington and the contribution that this confluence of cultural uses makes to the wider Islington and London economy.
- Part of the area around Clerkenwell and Farringdon is designated as a Cultural Quarter to protect and promote the unique concentration of cultural uses and heritage assets in this area, and reflect the concentration of related creative industries.

4.151 A Cultural Quarter can contribute to wider objectives around improving the quality and economic vitality of an area. Key to the success of a Cultural Quarter is the encouragement of a mix of supporting daytime and night-time uses, which can include space for arts and creative industries and meanwhile uses, to support the overall cultural function. However, it is important that the development of cultural uses within each quarter responds to the character and function of the respective areas.

4.152 The loss of cultural facilities, not just in the most significant commercial parts of the borough but also in other smaller/dispersed locations, can have a significant detrimental impact on local character and the function of an area. Such loss will be strongly resisted.

4.153 Music venues in particular – including pubs which have a frequent live music offer – highlight the potential dual economic and social role of a cultural use. They are frequented by people from all walks of life, which fosters inclusivity; and can contribute significantly to the local economy both in their own right and as a destination which encourages supporting activities. Across London, music venues are in decline due largely to development pressures and an increase in residential uses located in close proximity to existing venues. Falling within the definition of a cultural use and also part of the night-time economy, music venues - usually F.2 or Sui Generis use - will be afforded strong protection in the future. The Council supports development of new music venues where appropriate.

- 4.154 The daytime use (including meanwhile/temporary use) of cultural venues that operate solely or predominantly at night can greatly enhance the cultural offer and economy of Town Centres and the CAZ. This can increase employment and add to the vibrancy of an area. Retail, professional/financial services, cafes/restaurants, pubs, and offices, research and development and light industrial uses are considered particularly suitable uses in this context.
- 4.155 Appropriate design is a case-by-case issue taking into account the context of a specific site/area. Particular design issues which may be relevant to the cultural and night-time economy venues includes noise, inclusion, safety, surveillance and crime prevention. The Council will require all new development to satisfy inclusivity principles in line with the Inclusive Design in Islington SPD and the Islington Urban Design Guide, as well as relevant best practice and guidance. It is important for cultural facilities to be accessible to all and allow disabled Islington residents and visitors to participate fully in Islington's rich cultural offer.
- 4.156 The Council's strategic employment policy notes the importance of the 24-hour economy, which ensures that a variety of economic activities – both activities which drive and support economic growth – can take place across the borough to help achieve the Council's economic ambitions. The specific night-time economy plays an important role in realising these ambitions. There is crossover between night-time economy uses and cultural uses but the latter holds a wider definition. For the purposes of this policy, night-time economy uses generally fall within the café/restaurant, pub, hot food takeaway, entertainment and recreation and further sui generis uses, although this is not considered exhaustive and could include other uses – for example some F.1 uses such as art galleries.
- 4.157 Night-time economy uses can contribute positively to the vitality and vibrancy of Town Centres and the CAZ. However, if not properly managed, such uses can result in adverse amenity impacts for local residents and businesses (both individual and cumulative impacts) generated from anti-social behaviour, litter, noise and disturbance. To achieve a balance and protect the amenity of the borough's predominantly residential areas, night-time economy uses will generally be directed towards Islington's Town Centres or the CAZ. Proposals outside these areas are considered inappropriate.
- 4.158 Proposals involving night-time economy uses in the CAZ which fall within the boundary of the Bunhill and Clerkenwell AAP will be assessed against relevant policy in the Bunhill and Clerkenwell AAP as well as any other relevant Local Plan policies.
- 4.159 Licensing and Planning are separate functions and refusal of licensing would not result in planning consent automatically being refused. However, the Council's Licensing Policy, which identifies areas affected by negative cumulative impacts of entertainment and similar uses, will be a material consideration in assessing proposals. Planning determinations (including planning conditions) will have regard to Islington's Licensing Policy in relation to proposed hours of opening, operation and servicing, and measures to mitigate odour and noise from the premises. The Council's Environmental Health and Public Health functions are also important considerations for any proposals involving new night-time economy uses.
- 4.160 Specific clusters of night-time economy uses contribute more significantly to the night-time economy, particularly within the night-time economy clusters identified in the London Plan, and therefore the introduction of sensitive uses may threaten the effective operation of night-time uses more acutely in these areas.

## Policy R11: Public Houses

- A. The Council will resist the redevelopment, demolition and Change of Use of any Public House which:
- (i) has demonstrable community/social value and/or;
  - (ii) contributes to the cultural fabric of the borough, including consideration of any historic/heritage features; and/or
  - (iii) contributes to the economy of the borough, particularly the night-time economy.
- B. Applications for the Change of Use, redevelopment and/or demolition of a Public House which meets any of the criterion in Part A must demonstrate that:
- (i) the Public House has been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no realistic prospect of the unit being used as a Public House in the foreseeable future. Such evidence must meet the marketing and vacancy requirements set out in Appendix 1;
  - (ii) the proposed alternative use will not detrimentally affect the character, vitality and viability of the area; or the amenity or future operation of land uses in the immediate area (including ongoing operation of the Public House where a partial change of use is proposed, e.g. on upper floors);
  - (iii) appropriate, documented measures have been undertaken to improve the viable operation of the public house, which have proven unsuccessful;
  - (iv) the condition of the pub is conducive to occupation; and
  - (v) significant features of historic or character value are retained.
- C. Visitor accommodation which is proposed on any non-operational upper floors of a Public House, and which is clearly subservient to the Public House function, may be appropriate where:
- (i) any adverse impacts on the operation of the Public House, particularly relating to issues of security, are prevented through design;
  - (ii) the visitor accommodation does not lead to any intensive additional delivery and servicing requirements;
  - (iii) visitor accommodation achieves the highest possible inclusive design standards;
  - (iv) proposals comply with design requirements set out Policy R12 Part D; and
  - (v) visitor accommodation is designed, leased and operated as a hotel for temporary occupation. Where necessary, conditions will be used to ensure that visitor accommodation is not permanently occupied.

4.161 Islington's Public Houses form an integral part of the urban fabric and many are closely associated with the life and identity of local communities; a pub can be the focal point

of a neighbourhood or street and can play an important social and economic role, either in a specific locality or across a wider area.

- 4.162 Islington has retained a substantial number of Public Houses, which are valued by local residents and visitors to the borough, but there is increasing pressure to convert pubs to other uses. The Council will resist proposals that result in the removal or change of use of a Public House, particularly where this would result in loss of heritage and/or social/community value, and/or would constitute the loss of a pub which contributes to the night-time economy.
- 4.163 When assessing a pub's community value, the Council has no set criteria it will use to make this assessment but this could include consideration of factors such as comments made on the proposed application, petitions and/or asset of community value designations.
- 4.164 Public houses can contribute positively to the vitality of Town Centres, LSAs and communities in Islington. They can also contribute to the night-time economy and serve the leisure demands of residents and visitors alike. The contribution to the night-time economy will be thoroughly assessed for applications seeking a change of use from a pub use.
- 4.165 Continuous marketing and vacancy evidence will be required, demonstrating lack of demand for the Public House. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace. The marketing and vacancy requirement applies to full and partial change of use, including proposals which propose change of use in conjunction with a retained pub use. Such proposals must market the pub in its entirety.
- 4.166 Applications for the Change of Use, redevelopment and/or demolition of a Public House which meets any of the criterion in Part A must demonstrate appropriate, documented measures have been undertaken to improve the viable operation of the public house. These measures could include the proactive diversification of the pub's offer through the introduction of a food offer, the serving of non-alcoholic beverages; sports screenings; events such as pub quizzes, live music, comedy, community events; and/or the use of the pub as a hub for parcel collection, amongst other things.
- 4.167 The condition of a public house must not preclude occupation. If a public house is in poor condition, it will not be an attractive proposition for prospective tenants, which undermines the marketing requirement set out in Policy R11.
- 4.168 Proposals for the change of use (either full or partial change of use), redevelopment and/or demolition of a Public House must prevent/mitigate adverse impacts on local amenity or future operation of land uses in the immediate area, in line with Policy DH5.
- 4.169 The change of use of non-operational upper floors of Public Houses – i.e. upper floors which are not being utilised by the Public House as bar space, dining rooms, kitchens or other such use – to visitor accommodation may be appropriate where, inter alia, it does not affect the continued operation of the Public House and is clearly subservient to the Public House function, – i.e. it does not detract from the primary public house use in terms of scale, access arrangements and/or signage.
- 4.170 Any change of use from a pub must maintain an active frontage which engages positively with the street scene. Public Houses often provide an active frontage which engages with a wide demographic in the daytime and night-time, therefore a loss of an active frontage may be detrimental to the character of an area.

- 4.171 Where a public house proposes to use any non-operational upper floors for visitor accommodation, proposals must ensure bedrooms are wheelchair accessible in line with Policy R12 (unless this provision is demonstrated to be impractical due to design limitations). Further guidance can be found in the Inclusive Design in Islington SPD.

## **Policy R12: Visitor accommodation**

- A. Proposals involving the development, redevelopment and/or intensification of visitor accommodation will only be permitted on:
- (i) sites allocated for visitor accommodation; or
  - (ii) sites with existing visitor accommodation in Town Centres and the CAZ
- B. Proposals under Part A(ii) involving the redevelopment/intensification of existing visitor accommodation will only be permitted where:
- (i) delivery of other priority uses, particularly business floorspace, is not possible, in line with relevant policies and priorities; and
  - (ii) the proposal is consistent with other Local Plan policies, particularly relating to design, sustainability and transport.
- C. Visitor accommodation which is proposed on any non-operational upper floors of a Public House, and which is clearly subservient to the Public House function, may be appropriate as set out in Policy R11. Such visitor accommodation must meet criteria set out in Policy R11 Part C.
- D. All proposals involving visitor accommodation – development, redevelopment and/or intensification – must fully address the following criteria:
- (i) Any adverse impacts on nearby residential amenity, including cumulative impacts, must be prevented or appropriately mitigated;
  - (ii) Appropriate arrangements must be put in place for pick up/drop off, service delivery vehicles and coaches, appropriate to the size of the visitor accommodation;
  - (iii) Where visitor accommodation is provided as part of a mixed-use development, full separation of uses must be provided where possible;
  - (iv) A good standard of amenity and safety is provided, with an acceptable level of noise, vibration, daylight and sunlight. Proposals must be inclusive, providing at least 10% of all rooms to wheelchair accessible standards (fully fitted from occupation); and
  - (v) Ancillary facilities which are open for public use and create employment opportunities for local residents – such as restaurants, gyms and conference facilities – must be provided where appropriate.
- E. The Council will afford preference to visitor accommodation that is designed, leased and operated as a hotel for temporary occupation. Where necessary, conditions will be used to ensure that visitor accommodation is not permanently occupied.

F. Any proposal for the change of use of existing conventional or non-self-contained residential accommodation to visitor accommodation (both temporary and permanent change of use) will be refused.

- 4.172 Visitor accommodation refers to any building or place that provides temporary or short term accommodation on a commercial basis. This includes hotels, hostels, bed and breakfasts, some apart-hotels and any other visitor accommodation model that meets this definition.
- 4.173 Development, redevelopment and/or intensification of visitor accommodation will be suitable on sites specifically allocated for visitor accommodation in the Local Plan. The NPPF regards visitor accommodation as a main Town Centre use. While Islington will not permit new-build visitor accommodation in Town Centre locations, redevelopment/intensification of existing visitor accommodation in Town Centres and the CAZ may be acceptable.
- 4.174 On current mixed use sites, the intensification of visitor accommodation may be acceptable in line with the policy requirements but policies that promote the maximisation of other priority uses will be given precedence in terms of assessing the proposed mix of uses.
- 4.175 A key priority of the Local Plan is the maximisation of business floorspace and development of new housing, particular affordable housing. Therefore, redevelopment/intensification of existing visitor accommodation must fully consider opportunities for development of other uses which are considered a greater priority.
- 4.176 Co-location of visitor accommodation and other uses may be suitable where security issues are prevented via full separation of uses. Applications for new visitor accommodation must set out how security measures and other potential adverse impacts – including after-hours ingress and egress by guests – would be mitigated via submission of a detailed management strategy.
- 4.177 Visitor accommodation is considered an acceptable use on upper floors of Public Houses in Islington, as it can support the continued operation of the Public House and hence ensure the retention of an important community facility. Such proposals must meet criteria in Policy R11.
- 4.178 Well-designed, accessible, sustainable visitor accommodation is likely to remain attractive to a range of visitors for the long-term, whereas poorly designed accommodation is likely to become redundant more quickly, potentially manifesting in additional demand for visitor accommodation in the future. At least 10% of new hotel bedrooms must be wheelchair accessible, which includes additional rooms created through redevelopment and/or intensification of existing visitor accommodation. Wheelchair accessibility refers to, inter alia:
- sufficient wheelchair turning space;
  - wheelchair accessible bathrooms; and
  - sufficiently wide doorways and doors that do not restrict a person's ability to access rooms with ease.

- 4.179 The 10% wheelchair accessible rooms will be required to be fitted from the outset of the development, including all spatial provisions, fixtures and fittings. Further information on requirements can be found in the Inclusive Design in Islington SPD.
- 4.180 Visitor accommodation and ancillary facilities must also be designed to be 'visitable'. This refers to the provision for people of all physical abilities to access the visitor accommodation through step free access with appropriate lobby dimensions and a wheelchair accessible lift. The Inclusive Design in Islington SPD sets out the specific standards for visitability.
- 4.181 Visitor accommodation is very energy intensive due to the amenities and facilities that are commonly provided; it also has significant levels of water consumption. It is therefore essential that any development, redevelopment and/or intensification of visitor accommodation incorporates all relevant sustainable design measures, in line with relevant sustainable design policies in chapter 7.
- 4.182 All proposals must demonstrate that all visitor accommodation rooms will provide an adequate standard of amenity to occupants, particularly in terms of circulation, outlook, ventilation (in accordance with the sequential cooling hierarchy set out in Policy S6) and noise insulation. Design of visitor accommodation must also provide appropriate levels of daylight for occupants.
- 4.183 Proposals involving redevelopment and intensification of existing visitor accommodation rooms must look to enhance the quality of existing rooms in line with the design, accessibility and sustainability requirements set out in the Local Plan.
- 4.184 Apart-hotels often display characteristics associated with permanent, self-contained housing. Some are more akin to hotels in the type of services they provide, but may result in different impacts. Apart-hotels/serviced apartments may therefore fall within the C1 or C3 Use Classes, depending on their characteristics, such as (amongst others):
- minimum/maximum lease lengths;
  - presence of on-site staff/management;
  - presence of reception, bar or restaurant;
  - provision of cleaning and administrative services; and
  - ownership of units/ability to sell on open market
- 4.185 Where apart-hotels are considered to fall within the C3 Use Class, proposals will be assessed via relevant housing policies in the Local Plan including the requirement to provide affordable housing. Conditions will be used to ensure units are subject to minimum lease lengths. For proposals within the C1 Use Class, the Council will take steps to ensure that units would not be used or occupied by permanent households, including students, on the basis that this would be contrary to the sustainable development of Islington and would put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days) to preclude permanent occupation of C1 units.
- 4.186 The Deregulation Act 2015 relaxed restrictions on the use of residential premises as short-term visitor accommodation, meaning that properties being used as short-term visitor accommodation will require planning permission only where lettings are in excess of 90 nights in any calendar year or lettings are offered by somebody who isn't the Council Tax payer at the property. This has led to a significant increase in the use of residential accommodation as short-term lettings, facilitated by commercial short-term lettings websites such as Airbnb and One Fine Stay. There is particular concern

that widespread use of residential accommodation as short-term lets is causing amenity impacts for nearby residents and leading to security and privacy issues, especially where short-term lets are within blocks of flats where several properties are accessible by the same entrance. The short-term letting phenomenon is also undermining efforts to meet local housing need by limiting the use of residences for permanent occupation; it is a loss of housing supply.

4.187 There is also pressure to utilise non-self-contained accommodation, particularly student accommodation, as short term lets over the summer period, which could also undermine action to meet housing need, as well as causing security, safety and privacy issues.

4.188 This issue is primarily an enforcement matter, but any applications to convert existing residential accommodation – both self-contained and non-self-contained dwellings – to visitor accommodation will be refused. For avoidance of doubt, this includes applications for permanent and temporary change of use.



# 5 Green infrastructure

## Policy G1: Green infrastructure

- A. Green infrastructure is an integral part of what makes the borough sustainable, healthy, welcoming and attractive. It is extremely important in terms of addressing the Local Plan vision and objectives. Development proposals must preserve and enhance existing green infrastructure, and, where relevant, provide new green infrastructure. Opportunities to connect new/enhanced green infrastructure to existing green infrastructure must be thoroughly investigated.
- B. Developers must consider green infrastructure at an early stage of the design process as part of an integrated design approach and incorporate the provision of green infrastructure into the design rather than as an 'add on' at the end of the design process.
- C. Development proposals must assess the value and benefits of existing green infrastructure on-site and adjacent to sites; and identify interventions that could improve green infrastructure value and benefits.
- D. Sites with a low existing green infrastructure value represent particular opportunities to increase green infrastructure functions. The Council will not consider existing site circumstances as the baseline for new provision.
- E. Major developments are required to conduct an Urban Greening Factor (UGF) assessment in accordance with the methodology in the London Plan. Schemes must achieve an UGF score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 general industry and B8 storage and distribution uses).
- F. Development must contribute to the implementation of green infrastructure strategies including the All London Green Grid.

5.1 Green infrastructure refers to the network of green spaces, street trees, green roofs, and other assets such as natural drainage features. For the purposes of the Local Plan, the term 'green infrastructure' is inclusive of 'blue infrastructure' which refers to water-related infrastructure/assets such as rivers, canals and ponds. A strategic approach to green infrastructure ensures these assets are planned, designed, and managed in an integrated way to meet multiple objectives, including:

- promoting mental and physical health and wellbeing;
- encouraging social interaction, bringing together people from across the community;

- adapting to the impacts of climate change, including helping to reduce flood risk;
- improving air and water quality;
- encouraging walking and cycling;
- conserving and enhancing biodiversity and ecological resilience; and
- promoting more traditional functions of green space such as play, sport, and recreation.

5.2 Green Infrastructure is a form of natural capital, which provides direct and indirect benefits to people. These benefits include clear air and water, cooling to lessen the impacts of climate change, provision of a better environment for walking and cycling, promoting healthier living, and providing habitats for biodiversity and ecological resilience. Development of the green infrastructure network is particularly important in Islington. Islington has the highest population density of any local authority area in England. Large areas of the borough are deficient in public open space with limited opportunities to create significant new open spaces. In addition, the population of Islington is projected to grow, putting further pressure on this limited resource.

5.3 The Council supports the concept of natural capital accounting whereby the value of green infrastructure is assessed including economic benefits that are not generally included in financial accounting balance sheets. Through this process the true value of green infrastructure to people living, working, and visiting Islington can be identified.

5.4 Green infrastructure interventions include:

- creation of parks and gardens, sport pitches and facilities, and allotments and community gardens;
- creation of habitats within open spaces and on buildings, such as green roofs, vertical greening and planting on terraces;
- planting trees and natural landscaping on streets, waterways, and railway lines;
- protecting watercourses and waterbodies;
- provision of wildlife habitat features, such as bird and bat boxes;
- incorporating insect attracting plants in landscape schemes;
- designation of local green spaces through the neighbourhood plan process;
- protecting and enhancing sites with geodiversity value<sup>30</sup>;
- Sustainable Urban Drainage Systems (SUDS) such as incorporating green roofs, tree pits and rain gardens; and making existing green spaces accessible to the public.

5.5 The London Plan includes an interim London wide UGF model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. Islington Council will use the London wide model in the determination of planning applications, but may in time develop a local model through further supplementary guidance. Consistent with the London Plan B2 general industry and B8

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<sup>30</sup> The London Plan and supporting guidance provides further information on geodiversity. There are no designated Locally Important Geological Sites (LIGS) in the Local Plan, although Finsbury Gravel (near Sadler's Wells) may have particular geodiversity value as noted in the London Foundations SPG (March 2012).

storage and distribution uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is.

- 5.6 The Council will expect developers to design urban greening into developments from the earliest possible stage and take every opportunity to incorporate urban greening interventions into their development. This includes a requirement for green roofs and/or vertical greening set out in Policy G5. Appropriate information which provides sufficient detail on the type(s) of green infrastructure proposed – including the UGF score it would achieve - and justification for the specified green infrastructure provision must be provided.
- 5.7 The Mayor of London has published the All London Green Grid SPG to support the implementation of the green infrastructure policies of the London Plan. A series of Area Frameworks expand on this by setting out objectives and strategic opportunities. The Council expects schemes to implement these green infrastructure strategies where they apply.

## **Policy G2: Protecting open space**

- A. All public open space identified on the Policies Map and significant private open spaces are protected from development. The exception to this is where development associated with the use of the canal is proposed, including changes to existing canal facilities. Relevant criteria are set out in Policy SP2: King's Cross and Pentonville Road and Policy BC4: City Road of the Bunhill and Clerkenwell AAP. Such development may be acceptable where it meets the relevant criteria in these policies and does not unacceptably impact the quality and function of the open space.
- B. Development within the immediate vicinity of public open space must not impact negatively on the amenity, ecological value and functionality of the space. All impacts must be prevented/mitigated through the design of the scheme.
- C. The Council will protect open space on housing estates. Where development is proposed on open spaces on housing estates, on-site re-provision of the same quantum of space of an improved quality is encouraged. Full loss of open space on housing estates will be resisted. Proposals which will lead to a net loss but which will re-provide a quantum of on-site open space which is both functional and useable may be acceptable where:
- (i) the lesser amount of space is of a higher quality;
  - (ii) multi-functional use of the space is encouraged, for example use as play space and/or climate change mitigation (as appropriate);
  - (iii) permeability and connectivity within and between spaces is improved, ensuring that the space remains substantially undeveloped and open, and that accessibility to the general public is improved;
  - (iv) rationalisation of estate car parking has been fully explored, in order to offset the loss of open space as far as possible and in accordance with the Council's car-free policy. Where the existing estate car parking has not been rationalised as part of the proposal, robust justification must be provided to explain why; and

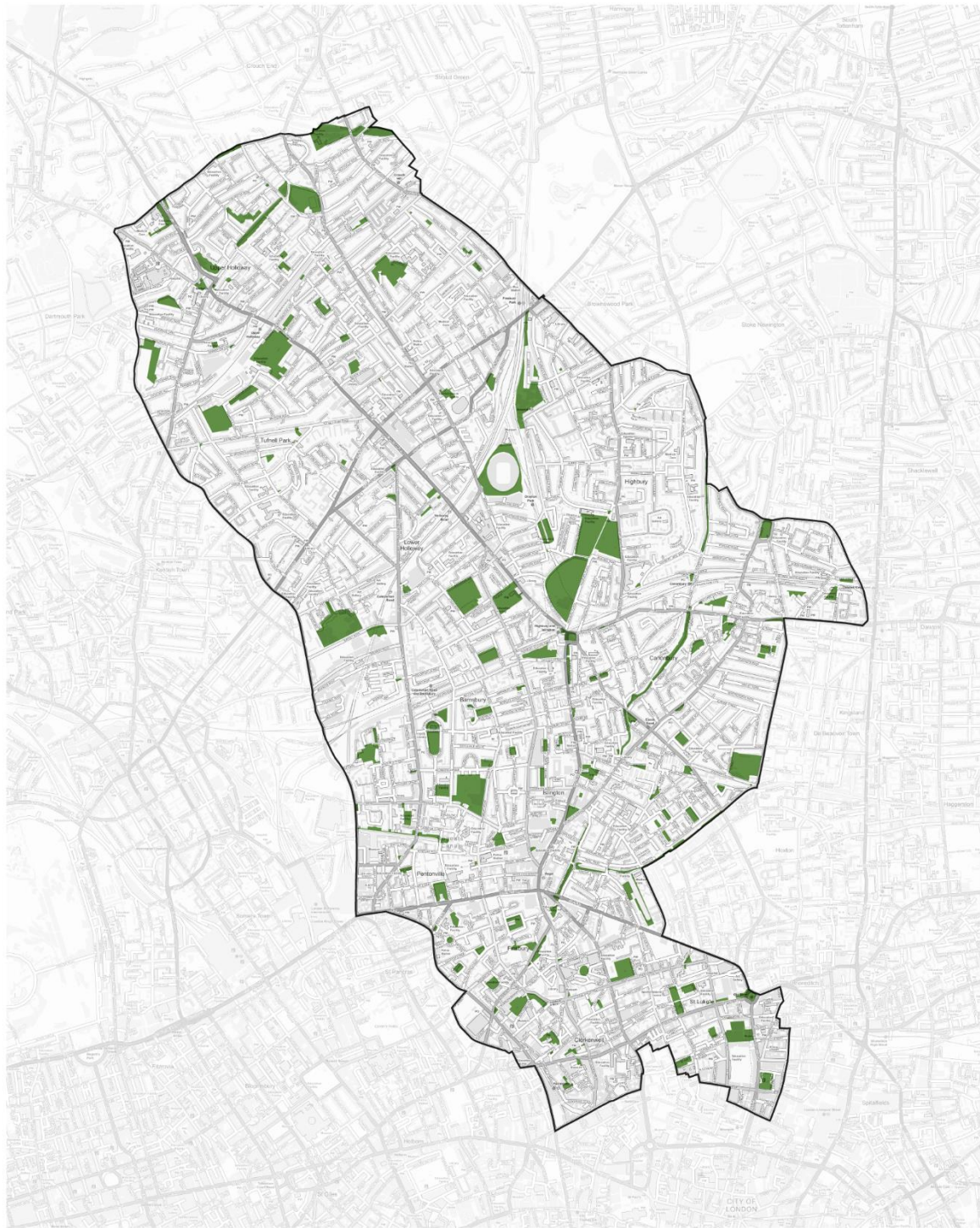
- (v) improvements to alternative open space provision in the immediate area are investigated and secured, to offset the loss of open space as part of the proposal.
- D. Development of private open spaces will be permitted unless, individually or cumulatively:
- (i) the site makes a valuable contribution to the character and appearance of the surrounding area, including its open aspect;
  - (ii) the site is of biodiversity value, including consideration of ecological connectivity in the wider area;
  - (iii) the site is of social or community value, for example, areas that provide access to green space and nature;
  - (iv) the site makes, or has the potential to make, a contribution to mitigating the impacts of climate change, including urban cooling and reducing flood risk; or
  - (v) the development would have a harmful impact on the amenity of future or neighbouring occupiers through its future development.

5.8 Islington benefits from a range of open spaces including parks and gardens, natural green spaces and corridors, allotments and community gardens, urban hard landscaped areas like civic spaces and public realm, cemeteries and churchyards, open space on housing estates, playgrounds, and canal spaces. Islington is also home to two spaces identified as Metropolitan Open Land - Highbury Fields and Parkland Walk. Areas of open water like the Regent's Canal and City Road Basin are considered public open space because of the amenity, sport and recreation value and the wildlife habitat value.

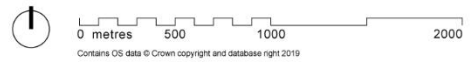
5.9 However, Islington is the most densely populated local authority in the country with one of the lowest amounts of greenspace per person, resulting in intensive use of open spaces and areas of open space deficiency. Open spaces in Islington are under pressure and it is essential to protect and expand provision of open space particularly given the projected population growth.

5.10 The Council will protect all public open spaces, and significant private open spaces not designated on the Policies Map where such spaces are identified during the plan period, for example during the assessment of a planning application. Designated public open spaces are identified on the Policies Map and listed in Appendix 6. For reference, Figure 5.1 also shows the location of these spaces:

**Figure 5.1: Local Plan Public Open Space Designations**



 Designated open space



- 5.11 Islington has many large housing estates spread across the borough which are home to around 400 open spaces. These spaces are not formally designated as open space, however they constitute a significant resource and are highly valued by the community. As well as being multi-functional spaces which have many of the same attributes as designated open space, these spaces act as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates.
- 5.12 These spaces must be protected, although some net loss of space as part of redevelopment may be acceptable where specific criteria are addressed.
- 5.13 All significant private open spaces are protected from development under Policy G2 Part A. These are larger scale open spaces (generally greater than 1000m<sup>2</sup>) which make a significant contribution to open space in the borough. Significant private open spaces include Charterhouse Square, the Honourable Artillery Company Grounds and a number of churchyards in the borough. These spaces are not identified on the Policies Map and further significant private open spaces may be identified due to their size or significance in Islington.
- 5.14 Private open spaces, including private gardens, are an integral part of the boroughs green infrastructure. Private open spaces are protected under Policy G2 Part D, unless they are significant private open spaces which are protected under Policy G2 Part A. Existing green roofs are considered to be private open spaces for the purposes of this policy. These undesignated open spaces are essential to the character and appearance of the borough and can also help improve amenity, air quality, drainage, cooling, biodiversity, ecological connectivity, and access to nature, as well as health and wellbeing (although a private open space may not perform all these functions). Their protection is particularly important in Islington due to the high density of development and open space deficiency.
- 5.15 Gardens, including front gardens, are at particular risk in the borough and have been under increasing pressure from development over recent years. While development in one garden may have only a small impact, the cumulative effects of reduced garden space (at a local and regional level) is significant, for example by collectively reducing the amount of permeable surfaces to deal with increasing risks of surface water flooding; by reducing biodiversity and ecological connectivity; and by impacting on the overall open and green character of the borough.
- 5.16 In relation to the development of private open spaces, a proposal will be assessed based on the character and value of the private open space and its relationship to the site surroundings. Development proposals must maintain the open aspect of the site and retain the existing functionality of the site in terms of factors including amenity value, biodiversity value and mitigation of climate change impacts. Development proposals for impermeable paving will be resisted on small surfaces such as front gardens and driveways (see Policy S9). Soft landscaping features should be retained and enhanced where possible, and permeable surfaces should be used where hard landscaping is required.
- 5.17 The Council will protect existing allotments and other community gardening projects.

## Policy G3: New public open space

- A. Developments in excess of 200 net additional residential units or 10,000sqm net additional gross external floorspace, or where a specific need has been identified by the Council, are required to provide on-site publicly accessible public open space. The level of provision must be proportionate to the size of the proposal and the number of intended occupiers/users. Public open space must be provided in addition to private amenity space and landscaping and must provide unrestricted public access, in perpetuity.
- B. Public open space should normally be green public open space, such as a public park. Areas of new or improved hard landscaped public open space, such as civic space, may be considered appropriate instead of green public open space in certain areas (such as Town Centres), and will be assessed on a case-by-case basis. In such cases it must be demonstrated that the provision of green public open space is not possible or appropriate. Hard landscaped space must maximise greening features such as planting and permeable paving.
- C. New or improved public open space provision must:
  - (i) create/improve links with other green infrastructure and permeability with the wider area;
  - (ii) maximise biodiversity benefits and access to nature, by incorporating areas of biodiversity that complement surrounding habitats and support the Council's Biodiversity Action Plan;
  - (iii) maximise sustainability benefits, including urban cooling and sustainable drainage, including the use of permeable surfaces;
  - (iv) be designed to be safe and accommodate and encourage physical activity for all, promoting walking, cycling and social interaction; and
  - (v) be overlooked, designed and managed to meet diverse and changing needs.
- D. The temporary use of sites (such as those awaiting development) for public open space, sport and recreation, or nature conservation must be considered. This includes very small sites such as pocket parks and the use of parking spaces as parklets.

5.18 Due to the low levels of existing open space, the dense urban nature of the borough, and projected population growth, the pressure on existing open space is very high, which creates a clear need for new open space, particularly public open space. To meet this demand, the Council will ensure that new developments contribute towards new and improved public open space. Large development sites – such as the Holloway Prison site - offer an opportunity to deliver a significant amount of high quality public open space. Access to such space must be unrestricted, meaning that spaces are readily available to the public at all times (especially during daylight hours) regardless of ownership or management.

5.19 Access to green space has a positive influence on physical and mental health. Green space in a local area can also lead an increase in life expectancy. Green space is

particularly beneficial when it is easily accessible and can be encountered as part of daily life. The aesthetic value of green space, viewed from a window for example, can also be beneficial to mental health. Developments proposals are encouraged to consider opportunities for the provision of on-site community gardening, including food growing and allotments.

- 5.20 Open space, including space within housing developments, must be overlooked; and designed and managed to meet diverse and changing needs for play, recreation and leisure for all ages, and a productive ecology. These open spaces must maximise green infrastructure benefits and should normally be green. Hard landscaped areas will only be considered where it has been demonstrated that green space is not possible or appropriate. Hard landscape must incorporate permeable paving. These spaces must still maximise green infrastructure benefits, and include through routes in new developments.
- 5.21 The Council will seek on-site open space from large developments, to meet the increased demand for open space that these developments will create and to help address the existing shortfall of provision in Islington. The level of provision must be proportionate to the size of the proposal and the number of intended occupiers/users. Evidence suggests that a standard of open space of 5.21sqm per resident and 2.6sqm per employee should be provided. This standard must be used to inform the level of public open space provision.
- 5.22 Public open spaces within the functional vicinity of a Site of Importance for Nature Conservation (SINC) should be planted with species that are beneficial to wildlife and complement the species composition in the SINC. Planting must include native species and local provenance species where appropriate, and non-native plants with biodiversity value may be suitable in some locations.
- 5.23 Temporary use of sites for open space is encouraged. It is not uncommon that sites in London are left vacant as opportunities for their development are explored. Site owners are strongly encouraged to make these spaces available to the local community for meantime open space use, such as raised beds or 'skip gardens' which can provide space for food growing.

## **Policy G4: Biodiversity, landscape design and trees**

- A. All developments must protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting and enhancing connectivity between habitats.
- B. Development should protect Sites of Importance for Nature Conservation (SINCs). SINCs are areas designated for their importance for wildlife, biodiversity and access to nature and are shown on the Policies Map. The level of protection will be commensurate with the status of a SINC and the contribution it makes to the wider ecological network (refer to paragraph 5.27). Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:



- 1) Avoid damaging the significant ecological features of the site;
- 2) Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site;
- 3) Deliver off-site compensation of better biodiversity value. Refer to paragraph 5.30 for further detail.

C. Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions must submit a Landscape Design Strategy (as part of the Sustainable Design and Construction Statement) which maximises green infrastructure, biodiversity and sustainable drainage. This must consider landscape design holistically from the outset of the design process and demonstrate the following:

- (i) An integrated approach to hard and soft landscaping design, prioritising soft landscaping and urban greening, including areas of unconstrained planting;
- (ii) Consideration of existing and proposed trees, hedges, shrubs and other vegetation of landscape or environmental significance, and their impact on biodiversity, sustainable drainage, air quality and urban cooling;
- (iii) Achieving a functional, attractive and inclusive design;
- (iv) Maximising biodiversity benefits and ecological connectivity, including through the protection and enhancement of existing biodiversity, and the incorporation of new areas of biodiversity and opportunities for wildlife, including green roofs and vertical greening. Development proposals must aim to secure a net gain in biodiversity value, with a clear priority for on-site measures;
- (v) Incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design as part of an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation;
- (vi) Incorporation of suitable wildlife habitats, including micro-habitats;
- (vii) Consideration of the potential impact on biodiversity of lighting, noise or shading, and adoption of a lighting scheme design that minimises impacts on biodiversity;
- (viii) Provision of a robust planting design that can sustain itself without intensive maintenance and/or intervention;
- (ix) Incorporation of appropriate maintenance arrangements that will be put in place from the outset of the development, including a requirement for a specific management plan secured by planning condition where necessary; and
- (x) Integration of food growing opportunities, where feasible and practical.

D. All developments must protect and enhance site biodiversity, including wildlife habitats, trees and measures to reduce deficiencies in access to nature. Developments involving refurbishment and/or extension of existing buildings must be designed and implemented to reduce impact on existing species and their habitats.

- E. Biodiversity benefits and ecological connectivity must be maximised through planting design, ecological landscaping, and the incorporation of areas of biodiversity that complement surrounding habitats and support the Council's Biodiversity Action Plan. Species chosen for planting must maximise biodiversity benefit, be beneficial to wildlife and complement the existing habitat. Habitat features must be incorporated on-site to support existing species of wildlife and provide opportunities for new wildlife.
- F. All developments, including refurbishment works, must carry out ecological surveys and assessments wherever the proposed development is likely to have an impact on protected species; habitats or priority species identified in the borough's Biodiversity Action Plan; and/or is either within or in close proximity to a SINC(s).
- G. All developments are required to minimise impacts on existing trees, hedges, shrubs and other significant vegetation, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development. The Council will normally refuse permission or consent for the removal of protected trees, i.e. trees subject to a Tree Preservation Order (TPO) and trees within a conservation area; and for proposals that would have a detrimental impact on the health of protected trees.
- H. Any loss of or damage to trees or other significant planting, or adverse effects on their growing conditions or survival, will only be permitted where it is demonstrably unavoidable in order to meet other relevant Local Plan policy requirements (as agreed with the Council). In such circumstances, the developer must follow the following hierarchy, with each step down justified by evidence and agreed with the Council:
  1. Replace tree provision on site,
  2. Replace tree provision directly adjacent to the site on land owned by the developer,
  3. Pay a financial contribution to the Council to provide appropriate re-provision.

5.24 Biodiversity describes the abundance and variety of life on earth; including animals, birds, trees, plants, insects and fungi. Biodiversity is concerned with the interactions within and between species and the communities, habitats and ecosystems in which they occur.

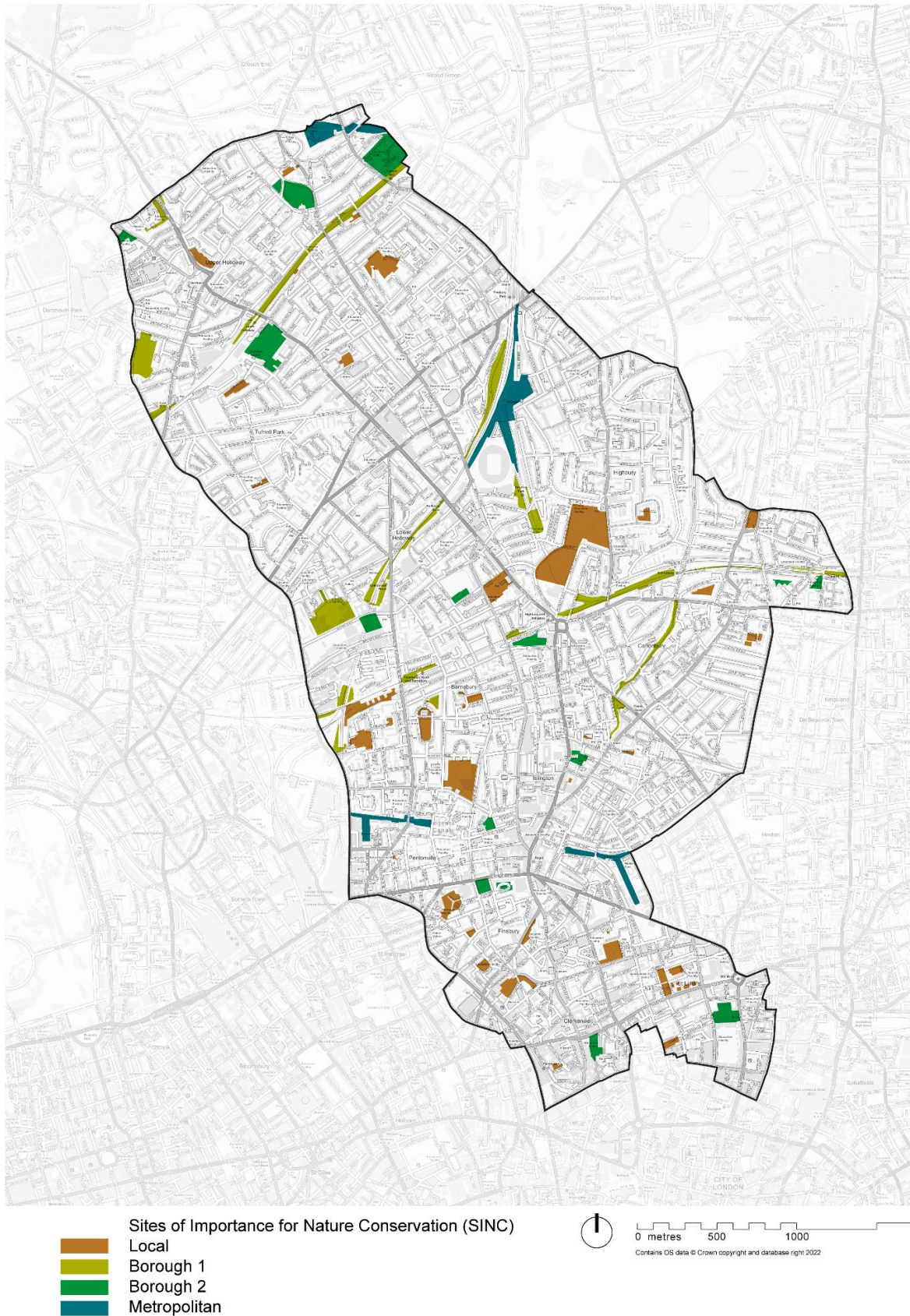
5.25 The protection and enhancement of biodiversity in densely developed urban areas, such as Islington, is very important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature within the borough. Changes to the built environment can have a significant effect on biodiversity, including protected species, and the ability of people to experience and enjoy nature.

5.26 Biodiversity and access to nature have a positive influence on physical and mental health, as well as social and community wellbeing, by providing opportunities for relaxation, exercise, social interaction, outdoor recreation and education. Providing opportunities for people to get involved in looking after natural green spaces also helps to protect and enhance biodiversity for the future. Connectivity between habitats is an important part of biodiversity value and refers to wildlife corridors, such as those

provided by railway sidings, connected rear gardens, and the Regent's Canal and New River.

- 5.27 Parts of Islington are deficient in access to nature, meaning individuals living further than 1km walking distance from a designated SINC. The designation of SINCs takes into account a number of factors, including size, use, access, habitat and species representation, richness and rarity, as well as the ability to be recreated. Sites of Metropolitan Importance contain the best examples of London's habitats, including particularly rare species, while sites of Borough Grade 1 Importance are of particular significance at the borough level, with some having a high social value for local communities; Metropolitan and Borough Grade 1 sites therefore have the strongest protection. Sites of Borough Grade 2 and Local Importance are of ecological value, and also of value to local communities, and are therefore afforded strong protection.
- 5.28 Assessment of planning applications must consider improvements to SINCs since adoption of this policy (where informed by updated surveys), particularly where the biodiversity value of sites of Borough Grade 2 and Local Importance has improved to a degree which makes them akin to Metropolitan and Borough Grade 1 sites. Likewise, sites which are currently undesignated but which improve to a degree which makes them akin to a designated SINC in terms of biodiversity value, must be considered on a par with formally designated SINCs for the purposes of any planning assessment.
- 5.29 Designated SINCs are identified on the Policies Map and listed in Appendix 6. For reference, Figure 5.2 also shows the location of these spaces:

Figure 5.2: Sites of Importance to Nature Conservation (SINC) Designations



- 5.30 Proposals which will adversely affect sites of significant biodiversity value - including SINC's - will only be considered in exceptional circumstances where high quality re-provision is provided, including provision of at least equal habitat area and value. Other relevant Local Plan policies on green infrastructure and design of open space must be met in full. Preservation of existing biodiversity, including wildlife habitats, is strongly preferred over re-provision as any redevelopment of an existing space will necessitate its total loss and replacement with a space that has to be established with plants and wildlife over time; this carries the risk that the replacement space will be less successful than that which it replaces.
- 5.31 Islington's wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds. These and other species have seen large population declines, and are dependent on built areas for their survival. Walls can provide habitats for many species of plants, including ferns and mosses, and also provide spaces for invertebrates. All wildlife habitats must be designed in accordance with the Council's Biodiversity Action Plan, and in many cases will include micro habitat creation. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings must utilise opportunities to attract new species to a site, including the incorporation of artificial nest boxes/bricks within developments to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats.
- 5.32 Ecological surveys must identify potential development impacts likely to harm the ecology of the site and recommend mitigation and enhancement measures. Where a survey is required, this must occur early in the design process of a proposal and be undertaken by an appropriately qualified ecologist. Further details of the triggers and requirements for ecological surveys and assessments is set out in the Environmental Design SPD. The requirement for ecological surveys and assessments to be submitted in this policy also applies to refurbishment works which may impact species using the existing building, such as swifts or bats. The scale and detail of the survey will be dependent on the likely impacts on biodiversity.
- 5.33 The achievement of ecological credits under the relevant BREEAM scheme will assist non-residential developments to meet the requirements of this policy.
- 5.34 Landscape design is integral to the design and functioning of the whole development and the wider area and is not something that can be considered after a building has been designed or built. Landscape and buildings need to be considered together from the start of the design process, and therefore a Landscape Design Strategy (as part of the Sustainable Design and Construction Statement) must be submitted as part of the planning application, including for outline planning applications. The Sustainable Design and Construction Statement (SDCS) must include an assessment of existing biodiversity on-site (supplemented by more detailed surveys where required), followed by investigation of the potential to enhance biodiversity value and soft landscaping within the development site, as an integral part of the design of a development. Islington's Streetbook and Inclusive Landscape Design SPDs set out practical objectives, design considerations and minimum standards to help ensure barriers to the use of public spaces are designed out and flexibility is built into any landscape design proposal.
- 5.35 Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions are required to submit a Landscape Design

Strategy as part of the SDCS. Large extensions will generally be those of 100sqm and over. The level of detail provided in the SDCS must be proportionate to the scale of proposed development and allow the Council to fully assess the proposals against relevant planning policies. Further details regarding the Landscape Design Strategy are outlined in the Environmental Design SPD.

- 5.36 The incorporation of SUDS based bodies of water, such as rain gardens and ponds, must seek to maximise biodiversity benefits. SUDS based water features may also provide amenity and recreation benefits; however, it must be demonstrated that these functions will not undermine the overall biodiversity value of the site, and that biodiversity benefits can be provided elsewhere on the site. SUDS must also be used in the landscape to maximise water efficiency where practical, through the incorporation of water butts for the irrigation of soft landscaping and rainwater recycling systems. Biodiversity and amenity benefits of SUDS solutions can be maximised by using water in the environment and incorporating attractive and safe SUDS features, such as small ponds and rain gardens, which make use of clean water at the surface to enhance landscape design, create a sense of place and create ecological habitats. Designing-in rainwater re-use opportunities reduces demand for fresh mains water for external use. Policy S9 provides more detail on SUDS. Further guidance is also set out in the Environmental Design SPD.
- 5.37 Development proposals must consider potential indirect effects on on-site biodiversity and local wildlife, such as noise, shading or lighting. This is particularly important for sites that are adjacent to or near SINC's, other sites of biodiversity value and green corridors. The SDCS must demonstrate that lighting schemes have been designed to minimise impacts on biodiversity. Lighting can have negative impacts on roosting bats, and bats that are feeding or commuting to feeding areas. Birds can also be affected by lighting, as well as some types of amphibians.
- 5.38 Trees, hedges, shrubs and other significant vegetation are of particular value in Islington due to the borough's dense urban nature and limited amount of green space. Vegetation not only provides visual and amenity enhancement to the built environment, but also provides habitats for birds and invertebrates. Trees help to reduce impacts on air quality and the contribution to climate change by capturing and storing carbon dioxide through 'carbon sequestration'. Trees and other types of vegetation are a vital part of adapting to climate change through the provision of urban cooling, which is important due to projected future temperature increases as a result of climate change and the 'urban heat island effect' which cause temperatures in dense urban areas to be warmer than the surrounding areas. Green spaces and trees also have a positive impact on reducing flood risk, which is important in the context of the projected increase in intense rain showers due to climate change.
- 5.39 Developments are required to minimise any impacts on trees, hedges, shrubs and other significant vegetation, including through the provision of sufficient space for the crowns and root systems of existing and proposed trees and their future growth. This will include assessment of appropriate rooting volumes and the use of modular rooting systems where appropriate. Effective planting design of trees, shrubs and other significant vegetation, including appropriate choice of species, the manner of their planting and subsequent maintenance, is required in order to ensure high nature conservation value, long life and maximum impact; this includes areas of unconstrained planting where planting is not constrained by any structures beneath it, and which is directly connected to the soil profile/sub strata below.
- 5.40 Underground servicing can affect existing trees and/or can limit where new trees are located. Proposals involving existing and/or proposed underground servicing must

ensure that the requirements for protecting existing trees and proposing new trees are fully considered. Developments are required to provide adequate and appropriate building foundations, which are a prerequisite for retaining trees and allowing for supplementary planting. The proposed foundation depths of new structures will therefore not be an acceptable reason for curtailing planting. Where soil volumes are provided they must be sufficient for the trees to attain their canopy potential. Tree planting on the roof of new buildings is also encouraged, where feasible.

- 5.41 Planting must be beneficial to wildlife and complement the existing habitat and/or be suited to the local environment where there is no existing habitat. Native species and local provenance species must be planted, where appropriate, and non-native plants may be suitable in some locations providing they have biodiversity value, for example plants for pollinators. Planting must be robust in order to withstand variation in climatic conditions, and sustain itself during climate fluctuations. Planting that is reliant on long term watering (after initial plant establishment, i.e. the first two years), particularly during long dry periods, is not considered robust or sustainable.
- 5.42 The impact of developments on trees will be assessed in accordance with the Council's Tree Policy (and other relevant Council guidance related to trees), and all other statutory provisions and relevant material considerations.
- 5.43 Development proposals which are likely to affect trees within the application site or on land adjacent to the site (including street trees) are required to follow the process outlined in BS5837:2012 and include an up-to-date Arboricultural Impact Assessment, which must include a Tree Constraints Plan and Tree Survey. If the impacts identified require tree protection or identify special working methods within the root protection area of retained trees, an Arboricultural Method Statement and Tree Protection Plan (to BS5837:2012) will also be required.
- 5.44 In exceptional circumstances, where loss of, or damage to, trees or other significant planting on a development site is unavoidable, mitigation through prompt replacement of equal value is expected on-site in the first instance, as outlined in Part H, as close to the initial tree loss as feasible. The replacement planting must re-provide at least equal canopy cover and/or equal environmental amenity and townscape, biodiversity and urban cooling benefit. All tree planting must comply with the requirements of BS8545:2014 - Trees: from Nursery to Independence in the Landscape.
- 5.45 Full canopy cover replacement is required, and if this is not possible, canopy cover replacement in 10 years' growth projection may be acceptable. This will be partially dependant on what is considered to be reasonable for the development in question. The Council's Tree Service is carrying out research, with others in the arboricultural profession, into the tree valuation systems, growth patterns and success of canopy cover re-provision to develop an improved system to calculate canopy cover requirements.
- 5.46 Where there are constraints to planting and re-planting cannot occur on-site, or only partial canopy cover can be re-provided, the development will be required to provide evidence to justify why it is not feasible. Once this is established to the Council's satisfaction, it may then be accepted that off-site compensation is appropriate, or that a financial contribution of the full cost of appropriate re-provision is required. The Council will always prioritise planting over a financial contribution, unless there are exceptional circumstances in relation to compliance with other policy requirements.
- 5.47 Replacement planting must be in accordance with the following hierarchy. Evidence must be provided to justify methods lower in the hierarchy:

1. Trees replaced on-site.
2. Trees planted directly adjacent to the site on land owned by the developer.
3. If the developer cannot replace the required canopy cover/trees and there is a deficit of canopy cover/trees, then a financial contribution will be secured via S106 or S278 agreement for planting trees on public land directly adjacent to the site (e.g. parks, open space, highways). The level of contribution could include the creation of the tree pits; the cost of the tree itself; the cost of tree planting; and watering and maintenance for up to three years.
4. If there are no sites available directly adjacent to the site, then the financial contribution will be used to plant trees on public land within the same ward as the initial tree loss.
5. Where planting is not feasible within the same ward as the initial tree loss within the timeframes allotted, then trees will be planted on public land elsewhere in the Borough.

5.48 Recognised valuation systems such as i-Tree Eco or CAVAT must be used to inform suitable replacement planting based on the value of the benefits of the trees removed.

5.49 Pruning of retained trees and shrubs on proposed development sites may be required to facilitate the erection of scaffolding and protective hoardings. Where the Council deems proposed pruning to be satisfactory, this must be carried out in accordance with BS3998:2010. Compliance with the requirements for the pruning works will be secured through planning condition prior to the commencement of any construction or site preparation works.

## **Policy G5: Green roofs and vertical greening**

- A. Developments proposals must use all available roof space to incorporate biodiversity-based extensive green roofs, subject to other planning considerations. Developments involving the extension of existing buildings must seek to retrofit extensive green roofs on existing roof areas where feasible, in addition to providing green roofs on the extension.
- B. Green roofs must be considered at the earliest possible stage of designing a proposal to ensure their effective operation. They must be designed to:
  - (i) maximise benefits for biodiversity, sustainable drainage and cooling;
  - (ii) promote ecological diversity including planting based on wildflowers and a maximum of 25% sedum planting;
  - (iii) have a varied substrate depth of average 80-150mm, unless it can be demonstrated that this is not reasonably possible; and
  - (iv) be easily monitored, allowing for an ongoing effective process to inspect and monitor the quality of the green roof.
- C. Major development proposals must accommodate surface water storage, where sustainable drainage requirements are applicable in accordance with Policy S9, by incorporating blue roof stormwater attenuation, unless it can be demonstrated that this is not possible.



- D. Developments proposing the installation of roof level solar panels are required to incorporate the panels over a green roof area to form a 'bio-solar roof', where the overarching biodiversity and drainage functions of the green roof will not be adversely affected.
- E. Biodiversity-based extensive green roofs are the Council's clear priority in terms of green roof provision. The installation of intensive or semi-intensive green roofs to provide amenity space will only be acceptable where it is clearly demonstrated that this is required to meet other policy requirements, and where the primary biodiversity, sustainable drainage and cooling functions of the green roof will not be adversely affected. Dedicated areas of biodiversity-based planting must be maximised on intensive or semi-intensive green roofs and amenity space must not cover the majority of roof space.
- F. Major developments are encouraged to consider tree planting and food growing opportunities as part of intensive and semi-intensive green roofs where feasible, and where the additional weight requirements can be supported.
- G. New-build developments, and all major applications (including those involving refurbishments) must maximise the greening of vertical surfaces as far as reasonably possible. Vertical greening must be designed to:
  - (i) maximise benefits for biodiversity, sustainable drainage and cooling;
  - (ii) avoid excessive water demand and employ a watering system that does not rely on mains water supply or a pumped irrigation supply;
  - (iii) promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan, including nesting boxes for birds or bats where possible;
  - (iv) provide growing conditions suitable for the selected plant species, and require minimal maintenance; and
  - (v) incorporate planting rooted in soil from both ground level and roof level planters where practical.
- H. The design and management of green walls must include consideration of building structure and character, including architectural and historic features, in order to ensure such features are preserved and damage is avoided. A management plan may be required and conditioned to guarantee that any measures are carried out.

5.50 Urban greening - through green roofs and vertical greening - is particularly important on constrained sites where there is limited space for other forms of green space. Green roofs and green walls are a form of natural capital and provide an opportunity for enhancing biodiversity and creating different types of new habitats in the built environment, supporting a wide range of species. These features form an important part of green infrastructure and play a useful role in connecting existing areas of habitat and supporting rare and protected species, as well as providing a broad range of other sustainability benefits. They will also help to achieve the UGF requirements set out in the London Plan and Policy G1. Designers are encouraged to consult a suitably qualified ecologist for advice on the planting and growing conditions of green roofs and vertical greening. This will also assist developments in achieving credits

related to ecology in the relevant BREEAM schemes, where applicable. Effective monitoring arrangements must be discussed and secured as part of assessment of applications.

- 5.51 Green roofs are vegetated layers that sit on top of the conventional roof surfaces of a building. Green roofs cannot be considered as a direct replacement for green space lost to development as they will tend to have more limited biodiversity potential due to their raised location and limited depth of growing medium; however, they do have multiple benefits. They improve biodiversity by supporting a wide range of plant life and providing alternative ecological habitats for insects, bats and birds. Green roofs also contribute to minimising flood risk by reducing surface water run-off; improve air quality; improve thermal efficiency and cooling of buildings through the insulation they provide; and provide urban cooling to mitigate the 'urban heat island effect'.
- 5.52 'Extensive' green roofs are able to establish a self-sustaining plant community, and are suitable for installation on the majority of building types because they have low management requirements and do not usually require artificial irrigation. Extensive green roofs designed for biodiversity must include a varied substrate depth and be planted and seeded with a wide range of wildflowers. These features will provide good habitat for wildlife including native invertebrate species, nesting and foraging for a number of bird species, and pollinators such as bees. Extensive green roofs must not be publicly accessible, except for necessary maintenance, in order to ensure the biodiversity of the roof can thrive. Development proposals must prioritise biodiversity-based extensive green roofs in favour of intensive and semi-intensive green roofs, unless it can be demonstrated that an intensive or semi-intensive green roof will enhance the biodiversity, sustainable drainage and cooling functions of the green roof. Accessible intensive or semi-intensive green roofs with areas of amenity space will not be allowed unless it can be demonstrated this is necessary to meet other policy requirements, including those relating to the provision of private open space. Clear and convincing evidence must be provided to demonstrate that provision of alternative on-site amenity space is not possible in order to justify why an extensive roof cannot be installed.
- 5.53 'Intensive' and 'semi-intensive' green roofs require higher levels of design and maintenance and can provide different degrees of accessible amenity space such as rooftop gardens and food growing areas. These types of roofs must be installed on a stronger structure in order to support the additional weight requirements of deeper soils or substrate and features such as paths. As a result, they can often support a greater diversity of planting and richer ecology including shrubs and tree planting, in addition to wildflowers found on extensive green roofs. Intensive green roofs can provide very effective sustainable drainage as they can support the weight requirements of blue roof storage, which can also be used to irrigate the planting and trees.
- 5.54 The incorporation of biodiversity-based extensive green roofs on all available roof space must be provided as part of all new-build developments, major refurbishments, and extensions larger than 100sqm. All other developments must investigate the potential for incorporating a green roof. Where it is demonstrated that the incorporation of a green roof is not feasible or practical, it must be demonstrated that other forms of greening have been investigated and maximised as part of the development, in order to maximise soft landscaping and biodiversity in line with strategic priority to enhance green infrastructure. All development proposals are encouraged to incorporate green roof elements and planting on terraces and balconies, subject to other planning considerations.

- 5.55 Due to the densely developed nature of the borough, there may be competing demands on the proposed use of roof spaces, including the provision of rainwater attenuation, renewable energy generation through solar panels, and amenity space. High quality design must aim to resolve any potential conflicts between creating green roofs, providing renewable energy and supplying amenity space on roofs. Dual uses on roofs will be encouraged where they will not have a negative impact on the primary functions of the green roof to provide biodiversity, sustainable drainage and cooling benefits.
- 5.56 The installation of 'bio-solar' roofs will be encouraged which incorporate solar panels over the green roof area. Combining solar panels with green roofs brings together the benefits of an extensive green roof with the energy-generating capability of solar PV arrays and can enhance the biodiversity of the green roof by providing shading and wetter areas as rainwater run-off from the panels sheds water onto the green roof. In addition, the green roofs can also help to regulate the temperature of solar panels, improving their efficiency.
- 5.57 Green/blue roofs can contribute to the requirement for all developments to ensure that surface water run-off is managed as close to its source as possible and to reduce run-off rates, in accordance with Policy S9.
- 5.58 A blue roof is an attenuation tank at roof or podium level which can provide stormwater attenuation to minimise surface water flood risk, avoiding the need for expensive excavated or basement attenuation tanks. The combination of a blue and green roof can be used to provide rainwater harvesting which allows the attenuated water to be used to irrigate the green roof as part of an integrated approach to water management on a site. Blue roofs can make up the drainage and support layer on both extensive and intensive green roofs. Where a blue roof is demonstrated not to be possible, attenuation must be provided through additional drainage layers in the green roof. Developments that incorporate a blue roof must be designed to cope with the additional weight, which also provides an opportunity to integrate tree planting alongside the blue roof where feasible.
- 5.59 Vertical greening is particularly important where site constraints limit other urban greening possibilities and biodiversity enhancements. For example, green walls can provide the possibility of growing plants in locations that would not normally support vegetation.
- 5.60 Green walls provide similar benefits as green roofs in terms of biodiversity, air quality, thermal efficiency and cooling, and they can have flood risk alleviation benefits where they are irrigated via rainwater run-off, which helps reduce surface water run-off. In addition, green walls have a visible greening effect which provides an attractive design feature and important visual amenity provision especially in built-up areas with a lack of green space, allowing people to experience biodiversity.
- 5.61 Depending on the particular plant species used, green walls can provide nesting habitats for birds, berries for birds in winter, flowers for pollinators, and important habitats for insects. Green walls can also provide amenity and energy conservation benefits and help to protect walls from rain and sun damage. Species chosen for planting, and suitable growing conditions, must be informed by Islington's Biodiversity Action Plan.
- 5.62 The incorporation of green walls must include plants that are planted in the ground and climb directly up wall surfaces, and trellis to provide vegetation cover, such as ivy.

Green walls can also include planting in roof level planters which hangs down the building, where practical, which can be incorporated as part of a green roof.

- 5.63 Impacts on the building structure and associated maintenance requirements are important considerations when determining the effectiveness of a green wall. Green wall design must include consideration of maintenance requirements in order to ensure that plants receive sufficient water and nutrients from the ground. In order to be a sustainable greening feature, the watering system for the green wall must use natural watering and must not rely on mains water supply as its predominant water source. Rainwater must be harvested for the irrigation of vertical greening, where possible, however the irrigation system must not require pumping; it is preferable to use natural watering from above through roof top attenuation. Rooting greening in the ground (or at roof level) will ensure that water demand is minimised. However, it will not be possible to store rainwater for the irrigation of vertical greening on a year-round basis, therefore vertical greening may require some mains water supply in times of low rainfall and drought.
- 5.64 Vertical greening is considered to be suitable as part of new-build and major developments across Islington, including in conservation areas and on listed buildings (subject to appropriate permissions). Proposals involving vertical greening must be assessed in line with relevant design and heritage policies; the benefits of vertical greening (where fully compliant with Policy G5) are likely to attract significant weight in such assessments. In order to ensure that architectural and historic features are preserved and damage to buildings is avoided, special consideration must be given to the weight of the green wall and the impact it may have on the structural fabric and material of the building.

## 6 Sustainable Design

### Policy S1: Delivering Sustainable Design

- A. The Council will seek to ensure the borough develops in a way that maximises positive effects on the environment and improves quality of life, whilst minimising or avoiding negative impacts. Ensuring sustainable design will reduce fuel poverty, and improve long term energy security for Islington residents and businesses; minimise the contribution of development in Islington to climate change and ensure that developments are designed to mitigate the effects of climate change, in line with the three strategic objectives of the Committee on Climate Change to reduce energy demand, decarbonise heat and decarbonise electricity.
- B. The Council will promote zero carbon development, with the aim that all buildings in Islington will be net zero carbon by 2050. To ensure that Islington is on the right trajectory to achieve this target, sustainable design must be considered holistically from the start of the design process and all development proposals are required to demonstrate how they will comply with all relevant sustainable design standards and policies during design, construction and operation of the development.
- C. All development proposals must maximise energy efficiency and minimise on-site greenhouse gas emissions in accordance with the following energy hierarchy:
- be lean: use less energy and manage demand during operation. Energy demand (both annual and peak) must be minimised as far as possible through consideration of building fabric energy efficiency as an integral part of the design, with a focus on building form and passive design in addition to specification.
  - be clean: supply energy efficiently and cleanly, and utilise local energy resources (such as heat networks and secondary heat).
  - be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
  - be seen: monitor, verify and report on energy performance.
- D. The Council will work with partners and local communities to improve the energy efficiency of the existing building stock and wider public realm, with a particular focus on increasing energy efficiency of homes and businesses. Islington's carbon offset fund will be used to implement projects to reduce carbon emissions from the existing building stock.
- E. The Council will promote the extension of existing heat networks and the delivery of new heat network infrastructure. Heat networks have the potential to contribute significantly to climate change mitigation through the decarbonisation of heat, minimising fuel poverty, and maximising energy resilience.

- F. All development proposals are required to adopt an integrated approach to water management which considers flood risk, sustainable drainage, water efficiency, water quality and biodiversity. All development proposals will be expected to reduce water demand and meet best practice water efficiency targets.
- G. The Council will promote a circular economy approach to design and construction to keep products and materials in use for as long as possible and to minimise construction waste. A central part of this is ensuring developments are designed to be flexible and adaptable to changing requirements and circumstances over their lifetime.
- H. All new development must be designed, constructed and operated to limit contribution to air pollution and to improve air quality as far as possible, as well as reducing exposure to poor air quality, especially among vulnerable people.

- 6.1 'Carbon' is used in this chapter as a shorthand term for all greenhouse gases. London's carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.
- 6.2 Reducing the environmental impact of development whilst supporting growth is particularly challenging in dense urban locations with high levels of growth, such as Islington. However, growth and change can also provide opportunities to support the development of more sustainable buildings and neighbourhoods that are designed to minimise their contribution to, and mitigate the effects of, climate change, while also improving quality of life.
- 6.3 The Committee on Climate Change has three strategic objectives as part of the overall aim to minimise emissions and reduce the impact of development on climate change:
- Reducing energy demand;
  - Decarbonising heat; and
  - Decarbonising electricity.
- 6.4 Requiring developments to maximise energy efficiency and minimise greenhouse gas emissions in accordance with the energy hierarchy will contribute to achieving these overall objectives, and will ensure that Islington is on the right trajectory to achieve its target for all buildings in Islington to be net zero carbon by 2050. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent. Seeking to achieve these objectives will not only reduce the contribution of development to climate change, but will also contribute to reducing fuel poverty and enhancing energy resilience.
- 6.5 The Council has declared an environment and climate emergency and will strive to achieve net zero carbon by 2030, ahead of the formal 2050 target set out in Policy S1. The Sustainable Design policies set out in the Local Plan will be kept under review and the Council may provide further supplementary guidance, ahead of any future Local Plan review, to facilitate delivery of the target earlier than 2050. Ultimately, planning is only part of meeting the net zero carbon target; our sustainable design policies are very ambitious but the ability to meet the target largely depends on many other measures outside the planning system, including changes to national legislation.

- 6.6 While each stage of the hierarchy is important, priority is for developments to reduce energy demand through energy efficiency measures in the first instance because this is the most efficient and cost effective way to reduce emissions, while also reducing fuel poverty. Reducing emissions as far as possible through energy efficient design means there will be less emissions to be reduced at the later stages of the energy hierarchy. Proposals which attempt to achieve the policy targets solely/largely through renewable energy, such as PV panels, instead of first ensuring that energy demand is minimised as far as possible through consideration from the start of the design process, will be resisted, and will not constitute the best use of land. The energy hierarchy therefore prevents poor building design being compensated for by high on-site renewable generation. Furthermore, prioritising energy efficient design ensures that the associated carbon reductions are guaranteed because they are an intrinsic part of building design, while renewable energy, such as solar PV panels, could then be removed or fail at a later date, leaving a poorly performing building.
- 6.7 The decarbonisation of heat is recognised as the biggest challenge facing UK energy policy today, and is one of the three key strategic objectives of the Committee on Climate Change. The UK has made good progress on decarbonising the National Grid; however, very limited progress has been made on decarbonising heating, which still relies largely on combustion of gas, coal, oil and biomass to generate heat. Heating and hot water for UK buildings make up around 40% of energy consumption and 20% of greenhouse gas emissions. Natural gas remains by far the most common form of heating in UK homes, therefore a key goal of the decarbonisation of heat is reducing reliance on natural gas.
- 6.8 The use of low or zero carbon energy in new developments, including low-carbon heat networks and secondary sources, will be required to enable the decarbonisation of heat and electricity, and will strengthen Islington's energy resilience by enabling developments to benefit from local low-carbon energy sources. The extension of existing heat networks and the delivery of new heat network infrastructure is a key priority for the decarbonisation of heat, and will also help to minimise fuel poverty by reducing energy bills for local residents, including the most vulnerable residents. A strategic masterplan vision for potential heat networks in Islington has been developed as part of a multi-phase project, which included borough wide energy mapping, carried out by Buro Happold. Islington's strategic vision for heat networks is to develop the initial clusters and form interlinks within the borough and to adjacent boroughs.<sup>31</sup>
- 6.9 Islington's existing heat networks have developed around gas engine combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of National Grid electricity decarbonisation, and there is increasing evidence of adverse air quality impacts related to their use. In order to minimise negative impacts on air quality, CHP technologies used to develop heat networks will only be acceptable where they do not emit significant levels of Nitrogen Oxides (NO<sub>x</sub>).
- 6.10 The expansion of Islington's heat networks is a priority for the Council, particularly because heat networks offer opportunities to transition to zero carbon heat sources faster than individual building approaches. Low-emission CHP technology using natural gas will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network in Islington, with planned future transition to cost-effective secondary sources, including low-grade waste heat. The Council is committed to transition to the use of secondary sources to power heat networks in the long term; however practical limitations relating to the use of these sources (such as

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<sup>31</sup>The development of proposed future networks is not guaranteed and they are subject to change.

government direction, available technology and funding requirements) mean that natural gas CHP may be an appropriate heat source to develop the borough's heat networks in the interim. The transition to heat networks powered by secondary sources will ultimately be driven by central government and the evolution of carbon reduction targets through updates to the Building Regulations.

- 6.11 The energy mapping undertaken by Buro Happold suggests that there are a number of sources of low grade heat in the Borough, including London Underground ventilation, data centres and substations. Identifying and capturing such sources of low carbon heat will be key to moving beyond natural gas CHP in the future when heating systems will be required to specify a lower annual carbon content of heat.
- 6.12 The Local Plan policies will ensure that Islington is on the right track to turn the Paris Agreement's aspiration to limit the temperature rise to 1.5°C into action. It will take a substantial period of time for developments in Islington to meet the 2050 net zero carbon target due to the extent of the changes required. The development industry will need time to make the necessary changes to incorporate more efficient construction methods/approaches and low carbon heating systems, as well as ensuring the target does not undermine the viability of development or restrict required development growth.
- 6.13 Minimising the effects of climate change on people and the environment is a fundamental consideration in sustainable design. Increasing temperatures bring increased risk of overheating, both within buildings and, at a more macro scale, through the 'urban heat island effect'. Increases in the frequency and intensity of heavy rainfall bring increased risk of surface water flooding. Climate change is a particular concern in the context of ongoing development and intensification of the built environment. In response, developments must be designed and constructed in ways that mitigate the effects of climate change. Design must address overheating and the 'urban heat island effect' through measures such as the orientation of buildings and use of solar shading to minimise solar gain; the use of natural ventilation; and the incorporation of green infrastructure to provide urban cooling. Flood risk must be managed and mitigated through the incorporation of SUDS and utilising flood proof design.
- 6.14 An integrated approach to water management will encourage water to be considered holistically across a site, and in the context of links with wider-than-site level plans. A reduction in mains water demand will be achieved through requiring compliance with water efficiency targets such as BREEAM and the national targets set in Building Regulations.
- 6.15 A circular economy approach is one where materials are retained in use at their highest value for as long as possible, and are then re-used or recycled, leaving a minimum of residual waste. This approach aims to minimise the wider environmental impacts of materials and construction processes. Buildings must be designed to be adaptable, flexible and able to respond to change in order to extend a building's useful life, ensuring resource efficiency and avoiding unnecessary demolition. Buildings must be made from sustainably-sourced, low impact components and materials that can be re-used or recycled, and building design must enable deconstruction in order to ensure the maximum value of building components can be recovered at the end of the building's life.



## Policy S2: Sustainable Design and Construction

- A. All development proposals are required to submit a Sustainable Design and Construction Statement which must demonstrate that the proposal meets all relevant sustainable design policies. The Sustainable Design and Construction Statement must show how sustainable design has been considered holistically from the start of the design process and is integrated throughout the construction and operation of the development.
- B. The Sustainable Design and Construction Statement submitted by all major developments, minor new build developments, and larger minor extensions must include the following details:
- (i) Energy Strategy - demonstrate how the net zero carbon target will be met within the framework of the energy hierarchy and justify the heat source selection in accordance with the heating hierarchy. For detailed requirements see Policy S4: Minimising greenhouse gas emissions; and Policy S5: Energy Infrastructure.
  - (ii) Adaptive Design Strategy – demonstrate how the application addresses circular economy principles, including the impact and efficiency of construction materials, and how the development has been designed to adapt to change. For detailed requirements see Policy S10: Circular Economy and Adaptive Design.
  - (iii) Landscape Design Strategy – demonstrate an integrated approach to hard and soft landscape design which maximises urban greening, soft landscaping, biodiversity and sustainable drainage, including the incorporation of SUDS into the landscape design. For detailed requirements see Policy G4: Biodiversity, landscape design and trees.
  - (iv) Integrated Water Management and Sustainable Drainage – demonstrate an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically. Major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet the drainage requirements. For detailed requirements see Policy S9: Integrated Water Management and Sustainable Drainage.
  - (v) Operational sustainability – demonstrate how the development will be designed to facilitate ongoing effective and sustainable use, management and maintenance. For detailed requirements see Policy S4 Minimising greenhouse gas emissions and Policy S6: Managing Heat Risk.
  - (vi) Air Quality - demonstrate how the development will be designed, constructed and operated to limit its contribution to air pollution, improve local air quality, and reduce exposure to poor air quality, especially for vulnerable people. For detailed requirements see Policy S7: Improving air quality.
- C. The Sustainable Design and Construction Statement submitted by smaller minor extensions and minor changes of use must demonstrate that all relevant sustainable design requirements have been considered. The level of information provided in the statement must be proportionate to these requirements.

- D. Developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement, including through the Green Performance Plan (where relevant) and other submitted sustainable design details, by:
- (i) allowing Council officers access to the development;
  - (ii) submitting information to the Council when requested; and
  - (iii) where necessary, through payment of a reasonable monitoring fee set by the Council. Where it is established that a fee is required payment will be secured through a legal agreement.

- 6.16 All developments must submit a SDCS, including developments involving the creation of new buildings; refurbishment and redevelopment of existing buildings; changes of use; and extensions (including basements, roof extensions, and loft conversions). Developments involving extensions to existing buildings must consider the sustainable design implications in relation to the building as a whole, in addition to the extension. 'Larger minor extensions' referred to in Part B of this policy include minor extensions of 100sqm or more.
- 6.17 Guidance and minimum information requirements for each section of the SDCS, depending on the application type, are set out in the Environmental Design SPD. The level of detail provided must be proportionate to the scale of proposed development and allow the Council to fully assess the proposals against relevant planning policies. Early engagement with the Council through pre-application advice is encouraged, to discuss and agree the scope of the SDCS and the required level of detail.
- 6.18 Smaller minor extensions (less than 100sqm) and minor changes of use may not need to provide the detailed information set out in Part B of this policy. Such smaller-scale applications must provide an SDCS with information proportionate to the scale of sustainable design requirements required by Local Plan policies. These types of development are likely to have less significant sustainable design implications, especially as they are required to meet minimum energy efficiency requirements under the Building Regulations.
- 6.19 All developments must be designed and managed to promote ongoing operational sustainability, demonstrated as part of the SDCS. A development will only perform to its full potential in use if it is effectively operated and maintained, and is flexible enough to meet changing user demands over time. A building and its systems must be designed to facilitate effective use, management (including performance monitoring), maintenance, and adaptation to changing requirements over a long lifetime. Operational sustainability must also be achieved through raising awareness of environmental issues including the provision of appropriate information, training and support to building/site operators, maintenance personnel and building users in general on how to use, maintain and adapt the building effectively and how to monitor, evaluate and optimise performance in use. Ensuring the operation of the development is adaptable to changing user needs will also help to support sustainable lifestyles.
- 6.20 As set out in Part D of this policy, developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement. Monitoring is expected to be carried out by the developer or building operator, primarily in relation

to operational emissions through the submission of a Green Performance Plan (GPP). Monitoring of other elements of the SDCS, such as air quality, may also be required in order to ensure policy objectives are being achieved.

- 6.21 In cases where an acceptable GPP cannot be agreed, or where effective performance monitoring of the SDCS cannot be carried out, the policy makes provision for the payment of a fee to enable the council to undertake additional monitoring responsibilities. The level of the fee will depend on the type and amount of monitoring required and will therefore need to be agreed on a case by case basis.

### **Policy S3: Sustainable Design Standards**

- A. Major and minor residential developments involving refurbishment or extensions are required to achieve a final (post-refurbishment) certified rating of Excellent under BREEAM Domestic Refurbishment 2014 (or equivalent scheme) and must make reasonable endeavours to achieve an Outstanding rating.
- B. Major and minor new-build residential developments must achieve a four-star rating (as a minimum) under the BRE Home Quality Mark scheme.
- C. All non-residential and mixed-use developments proposing 500sqm or more net additional floorspace are required to achieve a final (post-construction stage) certified rating of Excellent as part of a fully fitted assessment within BREEAM New Construction 2018 (or equivalent scheme), and must make reasonable endeavours to achieve an Outstanding rating. A 'verification stage' certification at post occupancy stage must also be achieved, unless it can be demonstrated that this is not feasible.
- D. Major non-residential and mixed-use refurbishment developments are required to achieve a final (post-construction) certified rating of Excellent under BREEAM UK Non-Domestic Refurbishment and Fit-out (or equivalent scheme) and must make reasonable endeavours to achieve an Outstanding rating. The scope of works of the development must include a full fit-out, unless it can be demonstrated that this is not feasible.
- E. All developments assessed under BREEAM New Construction 2018 (as required by Part C) and Non-Domestic Refurbishment and Fit-out schemes (as required by Part D) are required to score the following minimum 'credits', in addition to the minimum acceptable requirements for a BREEAM excellent rating:
  - (i) At least 50% of credits on Environmental impacts from construction products (Mat 01);
  - (ii) At least 1 credit on Responsible sourcing of materials (Mat 03), in addition Criterion E(i);
  - (iii) At least 50% of credits on Construction waste management (Wst 01);
  - (iv) All credits on Water consumption (Wat 01), or a minimum of 3 credits where rainwater and/or greywater recycling is demonstrated not to be feasible;

- (v) The second credit on energy monitoring (Ene 02 – Sub-metering of high energy load and tenancy areas), where feasible;
- (vi) Reasonable endeavours must be made to achieve two credits under the Ene 01 exemplary level criteria, in order to demonstrate zero carbon development; and
- (vii) BREEAM New Construction only - all 4 credits for Energy modelling and reporting as part of Reduction of energy use and carbon emissions (Ene 01).

F. All developments assessed under BREEAM Domestic Refurbishment 2014 (as required by Part A) are required to score the following credits, in addition to the minimum acceptable requirements for a BREEAM excellent rating:

- (i) At least 50% of credits on Environmental impact of materials (Mat 01);
- (ii) At least 50% of credits on Responsible sourcing of materials (Mat 02); and
- (iii) All credits on Refurbishment site waste management (Was 2).

G. All minor non-residential new build developments and minor non-residential extensions of between 100sqm and 500sqm are required to demonstrate how all credits for Water consumption (Wat 01) would be achieved under the relevant BREEAM scheme. A minimum of 3 credits must be achieved where rainwater and/or greywater recycling is demonstrated not to be feasible, in order to achieve water credits equivalent to an Excellent standard.

6.22 All developments must achieve the highest feasible level of the relevant sustainable design standard in order to ensure high standards of sustainable design and contribute to the Council's overarching sustainability objectives. The Council will assess development proposals by using the Building Research Establishment Environmental Assessment Methodology (BREEAM)<sup>32</sup>. BREEAM is a sustainability assessment and certification scheme for the built environment and provides a widely recognised and well understood framework for the promotion of sustainable design. It allows for the assessment and rating of the environmental life cycle impacts arising from different types of developments, including energy, pollution, water, materials, health and wellbeing, and waste. Compliance with BREEAM will help to mitigate the life cycle impacts of new and existing buildings on the environment and allow developers to demonstrate to the Council that development is truly sustainable.

6.23 Residential proposals were formerly required to achieve certification under the Code for Sustainable Homes (CSH) assessment method, which has now been withdrawn. Residential developments may still carry out a voluntary assessment using the CSH in order to ensure high sustainable design standards. Where new national sustainable housing standards are introduced in the future which would lead to better, more effective implementation of sustainable design objectives, Islington's policies will be interpreted in relation to these standards and further guidance may be provided in a revision of the Environmental Design SPD. In order to ensure residential development

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<sup>32</sup> The Local Plan details requirements based on the current BREEAM standards. Any updates published during the plan period would apply. The Council may provide guidance on any relevant BREEAM updates through a SPD.

continues to meet high sustainable design standards, this policy requires the achievement of alternative standards to the CSH.

- 6.24 BREEAM Domestic Refurbishment 2014 (covered by Part A of this Policy) applies to alterations to existing dwellings, including domestic conversions, change of use projects and extensions; it allows both the extension and the existing dwelling to be included as part of the assessment as necessary. A post-refurbishment stage assessment or review is required in order to confirm the final 'as refurbished' performance of the building; this must be certified after practical completion of the refurbishment works.
- 6.25 The BREEAM Domestic Refurbishment scheme does not apply to new-build developments. The Fabric Energy Efficiency Standard (FEES) will be applied to new-build residential developments in order to reduce carbon emissions through fabric energy efficiency, as set out in Policy S4: Minimising greenhouse gas emissions.
- 6.26 Achieving a rating under the BRE Home Quality Mark (covered by Part B of this Policy) is one way of demonstrating the standard of a new residential dwelling. The Home Quality Mark has been designed to ensure the construction of high quality sustainable homes that will meet the long-term needs of occupants, including measures for carbon emissions, sustainable materials, air quality and natural daylight. This scheme allows the sustainability credentials of new homes to be compared more easily, and, where adhered to alongside FEES requirements, will help developers to demonstrate compliance with the relevant policies.
- 6.27 Table 6.1 identifies the different sustainable design requirements for residential developments.

**Table 6.1: Sustainable Design Standards for residential developments**

Sustainable Design Standard	Major resi new-build	Minor resi new-build	Major resi refurb	Minor resi refurb
Fabric Energy Efficiency Standard <sup>33</sup>	✓	✓	✗	✗
BRE Home Quality Mark	✓	✓	✗	✗
BREEAM Domestic Refurbishment	✗	✗	✓	✓

- 6.28 The BREEAM New Construction 2018 scheme (covered by Part C of this Policy) can be used to assess the environmental life cycle impacts of new non-residential buildings at the design and construction stages. 'New construction' is defined as development that results in a new standalone structure, or a new-build extension to an existing structure. A threshold of 500sqm has been applied to ensure that larger minor developments achieve this requirement.

<sup>33</sup> FEES requirements are set out in Policy S4.

- 6.29 A fully fitted assessment will ensure that the fit out of the development meets the sustainable design policy requirements, including those relating to energy efficiency, water efficiency, and sustainable materials. Fully fitted developments assessed under BREEAM New Construction 2018 must achieve a ‘verification stage’ certification at post occupancy stage, unless it can be demonstrated that this is not feasible. The New Build Verification Stage incentivises project teams to close the gap between the design intent and actual in-use performance of buildings, and can be used to inform the GPP as part of the requirements set out in Policy S4.
- 6.30 Where it can be demonstrated to the Council’s satisfaction that the end occupier of the development has exceptional requirements which necessitate a shell only or shell and core fit out, a BREEAM New Construction 2018 shell only or shell and core assessment must be undertaken; and the BREEAM Non-domestic Refurbishment and Fit-out scheme must be used to assess the subsequent fit-out of the building, to upgrade the project to a BREEAM New Construction fully fitted rating and certification. This enables speculative shell only and shell and core projects to achieve fully fitted status once the occupiers are known, even though the construction works and finishing stages will be carried out separately. In these cases, the requirement to fully fitted status will be secured via legal agreement or planning condition, as appropriate.
- 6.31 The BREEAM UK Non-Domestic Refurbishment and Fit-out scheme (covered by Part D of this Policy) assesses the environmental life cycle impacts of existing non-domestic buildings at the refurbishment and fit-out stages. The scope of works being assessed must include a full fit-out unless it can be demonstrated to the Council’s satisfaction that the end occupier of the development has particular requirements which necessitate a shell only or shell and core building. As with schemes covered by Part C (and detailed in paragraph 6.29 above) the subsequent fit-out of the building must upgrade the project to a BREEAM New Construction fully fitted rating and certification; this will be secured via legal agreement or planning condition, as appropriate.
- 6.32 Table 6.2 identifies the different sustainable design requirements for non-residential developments.

**Table 6.2: Sustainable Design Standards for non-residential developments**

Sustainable Design Standard	Non-resi new-build over 500sqm	Mixed use new-build over 500sqm	Major non-resi refurb	Major mixed use refurb
BREEAM New Construction 2018	✓	✓	✗	✗
BREEAM UK Non-Domestic Refurbishment and Fit-out	✗	✗	✓	✓

- 6.33 Achieving the specified credits in Parts E and F of this Policy will ensure high standards of sustainable design are adopted and will enable delivery of other Local

Plan sustainability objectives. Developments assessed under BREEAM New Construction 2018 and BREEAM UK Non-Domestic Refurbishment and Fit-out must take a robust approach to minimising the environmental impacts of material use. Compliance with criterion 1 under Responsible sourcing of materials (Mat 03) is a minimum requirement as part of these BREEAM assessments. Criterion 1 specifies that all timber and timber-based products used on the project are legally harvested and traded timber as per the UK government's Timber Procurement Policy (TPP).

- 6.34 All major developments assessed under BREEAM must make reasonable endeavours to achieve an Outstanding rating in accordance with this policy. In order to demonstrate that reasonable endeavours have been made, applicants must provide details of which additional BREEAM credits have been targeted as part of the SDCS. Particular efforts must be made to achieve an Outstanding rating in relation to energy performance and modelling. If the Outstanding rating is deemed not to be feasible, details must be provided to justify this; schemes which do not adequately demonstrate this may be refused. Should the relevant BREEAM scheme be replaced or amended during the lifetime of the plan the equivalent replacement requirements will be applied by the Council.
- 6.35 While minor developments are not required to achieve a formal BREEAM certification, Part G requires minor non-residential developments to demonstrate how BREEAM credits in relation to water consumption would be achieved in order to maximise the efficient use of water. Further details of water efficiency standards are set out in Policy S9.

#### **Policy S4: Minimising greenhouse gas emissions**

- A. All development proposals are required to demonstrate how greenhouse gas emissions will be reduced in accordance with the energy hierarchy (set out in Policy S1) as part of the SDCS. Major developments, minor new build developments, and larger minor extensions must provide a more detailed energy assessment as part of the SDCS.
- B. Until the end of 2021, major residential developments and minor new-build residential developments of one unit or more are required to comply with the interim Fabric Energy Efficiency Standard (FEES), as defined by the Zero Carbon Hub. 'Full' FEES will apply from the start of 2022 onwards.
- C. All major developments and minor new-build residential developments of one unit or more must be net zero carbon. These developments must demonstrate, as part of the SDCS, how the net zero carbon target will be met within the framework of the energy hierarchy.
- D. The following on-site reductions in carbon emissions are required in accordance with the energy hierarchy:
- (i) Major developments must achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27 per cent beyond Part L of the Building Regulations.

- (ii) Major developments able to connect to an existing heat network must achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 39 per cent beyond Part L of the Building Regulations.
  - (iii) Minor new-build residential developments of one unit or more must achieve a minimum on-site reduction in regulated emissions of at least 19% beyond Part L of the Building Regulations, unless it can be demonstrated that such provision is not feasible.
- E. In addition to meeting the minimum on-site reduction targets in Part D, all major development proposals must calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- F. All developments are required to reduce energy demand through energy efficiency measures in the first instance, in accordance with the energy hierarchy. Major developments are required to achieve the following reductions in demand as part of achieving the overall reduction targets in Part D of this policy:
  - (i) Major non-residential development must achieve at least 15 per cent out of the overall reduction target through energy efficiency measures in order to reduce energy demand.
  - (ii) Major residential development must achieve at least 10 per cent out of the overall reduction target through energy efficiency measures in order to reduce energy demand.
- G. Where it is clearly demonstrated that the zero carbon target cannot be fully achieved on-site, any shortfall must be provided through a cash in lieu contribution to Islington's carbon offset fund. All major developments and minor new build developments of one unit or more will be required to pay the full cost of offsetting the remaining regulated emissions, unless it can be demonstrated that this is not viable, in which case the maximum viable payment for offsetting will be required based on a viability assessment. Such payments will be secured through a legal agreement.
- H. Proposals for householder extensions must contribute to reducing emissions from the whole building as far as possible. The SDCS must demonstrate that cost-effective energy efficiency measures have been applied to the existing property, where practical, in addition to requirements applicable to the extension itself.
- I. Major developments must submit a Green Performance Plan (GPP) detailing the actual measurable outputs for the occupied building in relation to energy consumption and carbon emissions, based on the commitments in the SDCS.
- J. The SDCS - and where appropriate, GPP - for all major developments must include the following information in order to maximise fabric energy efficiency, reduce the performance gap and provide more accurate information to design teams:
  - (i) An assessment of predicted future energy use based on PHPP for residential and low energy non-domestic buildings; and CIBSE TM54 for non-domestic buildings (or any equivalent methodology), rather than Part L only assessments. Predicted energy use must be declared in kWh/m<sup>2</sup>/yr and kWh/yr and this will become one of the GPP indicator targets in the future.
  - (ii) Confirm the actual performance values achieved in comparison to the original energy targets stated in the SDCS, and to submit the associated



evidence including site photographs of insulation installation and the construction manager's declaration. This information must be submitted to the Council prior to occupancy as part of the final GPP.

- (iii) Carry out an air tightness test and thermographic survey. The test reports, along with details of any remediation measures, must be provided to the Council prior to occupancy as part of the final GPP.

- 6.36 This policy seeks to minimise Islington's contribution to climate change, reduce fuel poverty and improve long term energy resilience.
- 6.37 The energy hierarchy must inform the design, construction and operation of new buildings. Major developments, minor new build developments, and larger minor extensions (i.e. over 100sqm) must provide a more detailed energy assessment (proportionate to the size of the development) through an Energy Strategy (as part of the SDCS) which must contain the information set out in London Plan Policy SI2: Minimising greenhouse gas emissions, including measures to reduce carbon emissions beyond Part L of the Building Regulations. This policy refers to the Building Regulations 2013. If these are updated, the new regulations will be used to inform the policy threshold.
- 6.38 This must be achieved by minimising energy demand through fabric energy efficiency measures as far as possible in the first instance, before seeking to address how low carbon energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to reduce peak energy loadings.
- 6.39 The fabric energy efficiency of a building is not only the result of the thickness of insulation but also of the area of external envelope and its complexity, particularly in terms of thermal bridges, increased heat loss areas and window proportions. As building form has a direct influence on energy efficiency, energy demand must be minimised by improving fabric energy efficiency with a focus on building form as well as specification.
- 6.40 Part B of this Policy requires all relevant residential developments to comply with the FEES, which is available as part of the Government's Standard Assessment Procedure (SAP), used to assess and compare the energy and environmental performance of dwellings. The FEES has been developed by the Zero Carbon Hub to ensure that zero carbon homes prioritise a holistic approach to energy efficiency that assesses both specification and form components under one metric. While Building Regulations Part L helps to assess and value better specifications, it does not allow assessment of efforts to design and build more efficient building forms. In contrast, the FEES offers greater flexibility in the ways energy efficiency can be achieved, providing a more effective tool for valuing and quantifying efforts made to design a more energy efficient building form, alongside increases in energy efficient specifications. The FEES will encourage future best practice by ensuring the design of more energy efficient residential buildings that do not rely too heavily on on-site low carbon energy sources and off-site carbon offsetting to reduce emissions.
- 6.41 The FEES targets are the proposed maximum space heating and cooling energy demand for zero carbon homes that would normally be needed to maintain comfortable internal temperatures. The Zero Carbon Hub has recommended that kWh/m<sup>2</sup>/yr is used to measure this, and that the targets are based on two types of residential development and two FEES levels. Up to the end of 2021, this policy

requires compliance with the 'interim' FEES levels set out in Table 6.3 below. From the start of 2022 onwards, the FEES requirement will be increased to 'full' FEES.

**Table 6.3: FEES requirements**

Type of residential development	Interim FEES (2020-2021)	Full FEES (from 2022)
<b>Mid-terrace houses and blocks of flats</b>	< 43 kWh/m <sup>2</sup> /yr	< 39 kWh/m <sup>2</sup> /yr
<b>Semi-detached, end of terrace and detached houses</b>	< 52 kWh/m <sup>2</sup> /yr	< 46 kWh/m <sup>2</sup> /yr

- 6.42 Energy modelling carried out as part of the London Borough of Islington Energy Evidence Base concluded that compliance with the 'interim' FEES, and future transition to 'full' FEES, will discourage poorly efficient buildings (i.e. those proposing an inefficient form alongside inefficient specifications) while still allowing a wide range of residential development typologies to be developed. The FEES have the potential to assist scheme viability because designers will be able to achieve greater energy efficiency by improving building form, in addition to specification, which is likely to be cost neutral or potentially cost positive. Compliance with the FEES levels recommended by the Zero Carbon Hub not only supports carbon reduction, but also long term energy security and the reduction of fuel poverty for future residents. The FEES does not apply to residential developments involving refurbishment and extension; however, these developments are encouraged to maximise energy efficiency through a focus on building form (e.g. for a proposed new extension) in addition to specification, in accordance with the FEES.
- 6.43 In addition to compliance with the FEES, all developments are encouraged to adopt recognised and successful fabric first approaches such as Passivhaus and AECB Building Standard (previously known as Silver Standard), which go beyond the policy levels, in order to promote best practice fabric energy efficiency. Further detail is set out in the Environmental Design SPD.
- 6.44 In accordance with the energy hierarchy, after reducing emissions as far as possible through fabric energy efficiency, all developments must seek to supply energy efficiently and cleanly (with reference to Policy S5), followed by incorporating renewable energy. The Council supports the development of renewable energy technologies, subject to meeting wider policy requirements in relation to design, green roofs, amenity and air quality.
- 6.45 All developments are required to maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal), and other renewable technologies which the Council considers are appropriate. The use of innovative building materials and smart technologies must also be maximised. This approach will reduce carbon emissions, as well as promoting energy resilience and alleviating fuel poverty by reducing energy costs to occupants.
- 6.46 Solar photovoltaic technology provides a reliable source of clean renewable electricity which is generated at or near the point of use and is increasingly cost competitive with

grid electricity. All developments are encouraged to utilise roof spaces more effectively for the installation of photovoltaic panels (PVs), where feasible and practical, in order to ensure that applicants go beyond the minimum number of panels required to achieve the necessary carbon reduction target, taking into account other policy requirements relating to roof spaces, particularly the provision of green roofs. Further on-site opportunities for PVs must also be considered, alongside other types of renewable energy where appropriate, such as wind power and hydro-power.

- 6.47 Compliance with the FEES must be used as the primary mechanism for major residential developments to achieve the on-site emissions reduction target in Part D. While minor new-build residential developments are not required to meet a specific energy efficiency target as part of this policy (as is required for major developments in Part F), compliance with the FEES will ensure that emissions are reduced through energy efficiency measures as far as possible, beyond Building Regulation requirements. All other minor developments are not required to achieve specific carbon reduction targets or energy efficiency targets beyond Building Regulation requirements. Achieving energy credits as part of a BREEAM rating will assist major non-residential developments in meeting the energy efficiency target.
- 6.48 While minor developments are unlikely to have significant sustainable design implications on their own, the cumulative impact on energy consumption and carbon emissions is significant. Minor developments, including new-build developments, changes of use, conversions of properties to residential units, and extensions to existing buildings can result in increased carbon emissions due to heating and lighting demands caused by increased occupancy and, in the case of new builds and extensions, increased surface area. The Building Regulations help to ensure, to some degree, that carbon emissions from minor developments are minimised by setting minimum energy efficiency requirements for new-build and existing developments, including material changes of use and extensions. However, the current Building Regulations do not require consequential improvements to an existing dwelling when it is extended.
- 6.49 Part H of this Policy requires, where practical, householders to apply energy efficiency enhancements to the existing building, in addition to the extension itself, as this represents a cost-effective opportunity to minimise carbon emissions and reduce energy bills. The design and construction of extensions to existing dwellings must prioritise fabric energy efficiency measures with a focus on form in addition to specification, based on same principle as the FEES. Further information on appropriate energy efficiency measures is set out in the Environmental Design SPD.
- 6.50 All developments including minor developments are encouraged to use innovative energy saving measures to minimise carbon emissions, where these do not conflict with other policy requirements. This includes measures that can be taken into account in SAP calculations, such as the use of waste water heat recovery systems, and will therefore have an impact on the proposed carbon reductions for a development. Developers must weigh-up the effectiveness, appropriateness and costs of a particular system in comparison to other available technologies, and then decide how best to meet the overall carbon reduction target.
- 6.51 Major developments are required to achieve the minimum on-site reduction targets specified in Part D by reducing the total operational emissions from the site. Operational emissions are those associated with energy consumption as part of the operation of a development, including emissions from plant or equipment. The total operational emissions include regulated emissions (i.e. those covered by the Building

Regulations) and unregulated emissions (i.e. those not covered by the Building Regulations, such as emissions associated with cooking and small appliances).

- 6.52 The required minimum on-site reduction targets in Part D will increase over time in future updates to the Local Plan, as will the required minimum reductions in energy demand, in order to ensure that Islington is on the right trajectory to meet the 2050 net zero carbon target. The gradual changes in targets will take account of the reducing costs of more efficient construction methods and the availability of low and zero carbon heat.
- 6.53 Operational carbon emissions will make up a declining proportion of a development's whole life carbon emissions as operational carbon targets become more stringent. In order to fully capture a development's carbon impact, a whole life-cycle approach must be adopted which captures not only a building's operational emissions from energy consumption (regulated and unregulated), but also captures its embodied emissions (i.e. those associated with raw material extraction, manufacture and transport of building materials, and construction) and emissions associated with maintenance and eventual material disposal. Carbon reductions resulting from actions taken to reduce overall life-cycle emissions from development are additional reductions and will not be considered as part of achieving the minimum on-site carbon reduction targets in Part D, as these relate solely to the operational emissions from a building's energy consumption.
- 6.54 Major developments and minor new-build residential developments of one unit or more are expected to achieve net zero carbon targets on-site, rather than relying on offset fund payments to make up any shortfall in emissions. Where the net zero carbon target cannot be fully achieved on-site, all projected residual carbon emissions will be offset through a financial contribution as follows:
- For minor new-build residential developments, all remaining regulated emissions will be offset based on a flat fee of £1000 per new flat and £1500 per new house<sup>34</sup>.
  - For all major developments, all remaining regulated emissions will be offset based on the nationally recognised non-traded price of £95/tonne for a period of 30 years. This price has been tested as part of the viability assessment for the London Plan and may be updated through the Environmental Design SPD should the evidence base change.
- 6.55 The remaining carbon emissions to be offset must be clearly stated in the SDCS. The Council will assess each development individually to verify any projected residual carbon dioxide emissions and calculate the financial contribution to offset these emissions. The contributions towards offsetting projected residual carbon emissions will be secured by a legal agreement and are not addressed by the Council's CIL charge. The carbon offsetting contribution cannot be funded through CIL under the CIL Regulations 2010 (as amended) because it is not considered to be infrastructure, as defined under the Planning Act 2008.
- 6.56 The Council's Affordable Energy Board is responsible for decisions regarding the allocation of carbon offset payments and this will be assessed on case by case basis. Offset fund payments will be ring-fenced to implement measures and projects that reduce carbon emission from the existing building stock in the borough, such as energy efficiency improvements to social and private housing. The spending of carbon offset payments and the monitoring of carbon savings delivered will be managed by

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<sup>34</sup> These fees may be updated in the future through a SPD.

the Council. Further details on the implementation of the offset policy are set out in the Environmental Design SPD.

- 6.57 Major developments are required to submit a GPP detailing the actual measurable outputs for the occupied building in relation to energy consumption and carbon emissions, based on the commitments in the SDCS. A draft GPP must be provided with the planning application, and, where the end occupier is known, the plan must be developed jointly with them. A full GPP with updated targets adjusted to reflect new information on occupancy, and full details of monitoring arrangements, must be submitted within six months of occupation. This will ensure that development is able to mitigate and adapt to climate change, consistent with the requirements of the NPPF. The GPP must set out arrangements for monitoring and reporting on the progress of the plan over the first two years of occupancy, and arrangements for the handover of the plan, where the occupier is different to the developer. Further guidance is provided in the Environmental Design SPD.
- 6.58 A key aim of the GPP is to address the 'performance gap', i.e. the (usually significant) disparity between the predicted/modelled energy performance of buildings at design stage and their actual operational performance. Surveys of completed buildings reveal a substantial gap between design expectations and delivered performance, especially energy performance. Addressing the degradation of performance between the planning stage and detailed design/construction stage will help to make Islington's carbon reduction policies more effective and will have a direct impact on delivering better performing buildings, and ultimately achieving the Council's strategic aim of minimising the contribution of development in Islington to climate change.
- 6.59 Seeking to more accurately predict the future energy performance of a building by using metrics such as Passive House Planning Package (PHPP) or Chartered Institute of Building Services Engineers (CIBSE) TM54 will enable designers to consider factors that impact a building's actual operational performance at an earlier stage in the planning process. This will also enable a more accurate determination of the anticipated energy consumption and carbon emissions that can be used to verify the performance of the constructed building in operation, which is not possible with Building Regulation Part L percentage reductions. Planning and design carbon metrics based exclusively on Building Regulation Part L percentage improvements cannot be measured once a building is in operation and this makes efforts to reduce the performance gap very challenging. Metrics such as PHPP or CIBSE TM54 will ensure that design and construction choices are well informed, and therefore drive the design of better residential and non-residential buildings.
- 6.60 The predicted energy use of development must be declared in kWh/m<sup>2</sup>/yr and kWh/yr to address the issue of heat demand. This metric is appropriate to measure energy demand because it is independent of fuel type and as it has a number of benefits including design flexibility, consideration of building form, and being a known 'currency' for energy efficiency. The calculation of predicted energy use must be undertaken pre-planning, and updated during design and construction as part of the SDCS. The calculation can then be verified during operation and must be reported through the GPP. Once the use of PHPP or CIBSE TM54 to calculate predicted energy use has been established, designers must use these methodologies to assess actual energy demand which will enable the future adoption of fabric first approaches based on performance metrics, such as Passivhaus and AECB Building Standard. Preventing poor quality construction will also help to reduce the performance gap.

- 6.61 The Council is committed to working with key stakeholders, such as the Mayor of London, in order to promote good practice and information sharing in relation to energy performance.

## Policy S5: Energy Infrastructure

- A. All major developments are required to have a communal low-temperature heating system. Heating systems must have a maximum annual carbon content of heat of less than 280 gCO<sub>2</sub>/kWh, calculated using the carbon emissions factor for grid electricity from the most recently available BEIS energy projections (UEPs) for the first 25 years of operation of the building. The heat source for the communal heating system must be selected in accordance with the following heating hierarchy:
1. connect to local existing or planned heat networks (subject to parts F and G below).
  2. use zero-emission or local secondary heat sources (in conjunction with heat pump, if required).
  3. use low-emission CHP (only where there is a case for CHP to enable the delivery of an area-wide heat network).
  4. use ultra-low NO<sub>x</sub> gas boilers.
- B. CHP and ultra-low NO<sub>x</sub> gas boiler communal or heat network systems (numbers 3 and 4 in the heating hierarchy set out in Part A) must be designed to ensure that they meet the requirements of Policy S7.
- C. Larger minor new-build developments should have a communal heating system where feasible and select the heat source for the system in accordance with the heating hierarchy in Part A of this Policy.
- D. Minor new-build developments with an individual heating system are required to prioritise low carbon heating systems.
- E. As part of the SDCS, all major developments must demonstrate that they have assessed the feasibility of heat network connection (including a Shared Heat Network) or other appropriate heat sources, in accordance with the heating hierarchy, in order to ensure low and zero carbon heating options are prioritised. Larger minor developments that are able to connect to a heat network under Part G must assess the feasibility of connection as part of the SDCS.
- F. All major residential developments and larger minor new-build residential developments are required to provide an estimate of the anticipated heat unit supply price (£/kWh), annual standing charge and estimated annual maintenance costs of their proposed heating system within the SDCS. Major applications must provide estimates of the life cycle costs of the proposed heating system using CIBSE quoted plant lifetimes.
- G. Major developments located within 500 metres of an existing heat network, and larger minor new-build developments located within 50 metres, must be designed to connect to that network at the time of construction, including provision of the means to connect to that network and a reasonable financial contribution to the connection

charge, unless a feasibility assessment demonstrates that connection is not reasonably possible. An existing heat network includes a planned network that will be in existence by the anticipated time of practical completion.

- H. Major developments located within 500 metres of a planned future heat network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission must be designed to be able to connect to that network in the future. Developers are required to commit to connection and contribute to the cost of connection via a legal agreement, unless a feasibility assessment demonstrates that connection is not reasonably possible.
- I. Where connection to an existing or future heat network is not possible, major developments must develop and/or connect to a low or zero carbon Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible.
- J. Where connection to an existing or future heat network is deemed possible under parts G and H above, major developments are required to provide a preferred energy strategy and an alternative energy strategy (as part of the SDCS). The preferred energy strategy should be enacted based on connection to a heat network. In cases where it is not reasonably possible to connect to a heat network the alternative energy strategy should be enacted and the heat source will be selected in accordance with the heating hierarchy. Minor developments that are able to connect to a heat network are required to provide details of the connection as part of the SDCS.
- K. The Council will support the development of heat networks and energy centres in principle, subject to meeting wider policy requirements, including on design and air quality.
- L. The SDCS should set out a strategy for how the development will be future-proofed to achieve zero carbon emissions on-site by 2050. Where the development is able to connect to a heat network, the SDCS must demonstrate how the heat network will be future-proofed to achieve zero carbon and the timeline for achieving this.

6.62 The selection of heat sources for major developments and larger minor developments in line with the heating hierarchy will ensure that developments prioritise low and zero carbon heating options in order to contribute to the decarbonisation of heat, and therefore, the reduction of carbon emissions. The use of low and zero carbon heating options, particularly heat networks and secondary heat sources will also help to reduce fuel poverty and increase energy resilience. Examples of secondary heat sources include recovering waste heat from London Underground ventilation shafts, recovering energy from the cooling requirements of datacentres, and using canal water for heating. Waterways such as canals can be an important local energy resource that can be used for both heating and cooling.

6.63 The use of existing or planned heat networks must be prioritised. Developments must connect to a heat network if they are located within the specified distance of an existing or future network in accordance with Parts G and H. Larger minor new-build developments are defined as developments involving five units or more, or 500sqm of floorspace or more. Such developments must have a communal heating system where feasible.

- 6.64 Where connection to a heat network is not possible (due to distance or feasibility), all developments must consider alternative low and zero carbon heat options in accordance with Policy S5.
- 6.65 The appropriateness of using individual and communal Air Source Heat Pump (ASHP) systems will be considered by the council on a case-by-case basis and will depend on the heat loads associated with the development as ASHPs perform better where heat can be delivered using lower flow/return temperatures.
- 6.66 Where the use of ASHPs is considered appropriate, a high specification of fabric energy efficiency will be expected to ensure the system operates efficiently and to reduce peak electricity demand. Where feasible, it must be demonstrated that an ASHP system provides one external point of connection enabling heat and hot water supply from a future heat network system. The use of ASHPs will continue to be reviewed as Building Regulation carbon factors are updated, and as domestic fossil fuel heating systems are gradually phased out. Islington's Environmental Design SPD contains further information on the use of ASHPs.
- 6.67 Development proposals incorporating variable refrigerant flow (VRF) heat pump systems will be treated in the same way as any other ASHP-based systems, and must also ensure they comply with the overheating and cooling requirements in Policy S6. VRF systems use a refrigerant as the cooling and heating medium and are generally specified to provide both cooling and heating.
- 6.68 Proposals for the use of low-emission CHP systems to support area-wide heat networks will continue to be considered on a case by case basis and will only be acceptable where there is a strategic case for low-emission CHP systems to support the delivery of area-wide heat networks as part of the transition to the use of secondary sources to power heat networks in the long term. Low-emission CHP in this policy refers to those technologies which inherently emit very low levels of NO<sub>x</sub>.
- 6.69 The use of ultra-low NO<sub>x</sub> gas boilers as the heat source for the communal heating system of major and larger minor developments will be considered by the council on a case-by-case basis and will only be acceptable where it can be demonstrated that heat network connection and zero-emission or local secondary heat sources are not feasible. Gas will only be considered as the heat source for communally heated developments as part of a hybrid system involving heat pumps. This may be particularly relevant in refurbishments where less can be achieved with the building fabric, and higher heating flow temperatures are therefore needed. The use of direct electric heating as the heat source for a communal heating system will only be acceptable in very exceptional circumstances and is unlikely to be suitable as part of a modern building design.
- 6.70 A key consideration when selecting heat sources that use natural gas is their impact on air quality due to the resulting NO<sub>x</sub> emissions, with Nitrogen Dioxide (NO<sub>2</sub>) in particular having a major impact on air pollution. This policy adopts an integrated approach to energy supply to ensure that the selection of heat sources will result in low or zero emissions of both carbon dioxide and NO<sub>x</sub>. In order to avoid further deterioration of existing poor air quality, all development proposals using CHP in Islington must provide evidence to demonstrate that emissions related to energy generation will be equivalent or lower than those of an ultra-low NO<sub>x</sub> gas boiler. CHP and ultra-low NO<sub>x</sub> gas boiler communal or heat network systems must be designed to ensure that they have no significant impact on local air quality.



- 6.71 The most appropriate low carbon heating systems for use in minor new-build developments with an individual heating system will be Air Source Heat Pumps (ASHPs). A high standard of fabric energy efficiency is particularly important where the use of an individual ASHP is proposed. The use of individual ASHPs as the heat source for minor new-build residential developments will only be acceptable where the development will achieve minimal heat demands. Passivhaus standards or similar are strongly encouraged. The council must be satisfied that operational, control and fuel poverty issues have been minimised. The use of smart energy systems and tariffs should be used to help reduce energy bills.
- 6.72 The use of direct electric heating as the heat source for the individual heating system of a minor development will only be acceptable in exceptional circumstances where it can be demonstrated that an ASHP is not feasible. Due to the high running costs associated with direct electric heating, such systems will only be acceptable where the building has been designed to have a very high standard of fabric energy efficiency (Passivhaus standards or similar) and heat demand has been reduced to a very low level. The use of ultra-low NO<sub>x</sub> gas boilers as the heat source for the individual heating system of a minor development will only be acceptable in exceptional circumstances where it can be demonstrated that an ASHP or direct electric heating is not feasible.
- 6.73 In order to contribute to the decarbonisation of heat, applicants will be required to specify heating systems with a maximum annual carbon content of heat of 280 gCO<sub>2</sub>/kWh. This will eliminate the installation of high carbon heating systems such as poorly efficient gas boiler systems and heat networks using natural gas fired CHP systems that do not have established plans for low carbon heat in the short to medium term. It will also promote the use of lower carbon heating systems such as efficient low NO<sub>x</sub> individual and communal gas boilers.
- 6.74 The maximum annual carbon content may be reduced further in future supplementary guidance, to encourage even lower carbon heating technologies to be adopted. Reducing the cap in the future may not affect electrical heating systems due to the projected reductions in the carbon content of electricity; however, the cap is an important tool to drive ongoing carbon reductions in other heating technologies, such as low carbon heat network systems, consistent with Islington's strategic vision for heat networks.
- 6.75 Heat generation and distribution systems are generally specified to enable buildings to achieve a reduction in carbon emissions in line with planning requirements, and the carbon factor of heat from several key technologies is calculated based on the carbon content of electricity. Unfortunately, due to the evolving carbon content of electricity, Part L of the Building Regulations currently uses outdated carbon factors for electricity. The results of any calculations based on these outdated carbon factors are misleading and the carbon reductions identified at planning stage are not accurate assessments of future carbon emissions/reductions from the chosen heating systems. This could lead to the wrong conclusions being drawn when comparing heating systems, resulting in the selection of a heating system with a higher carbon content over one with a lower carbon content, and preventing the borough from meeting future carbon reduction targets.
- 6.76 In order to enable better informed decisions to be made when selecting heating systems, applicants are required to calculate the carbon content of heat using the carbon emissions factor for grid electricity from the most recently BEIS energy projections (UEPs) for the first 25 years of operation of the building, in addition to Building Regulation Part L calculations. The use of more accurate emissions factors to

calculate the carbon content of heat will contribute to the decarbonisation of heat and help the borough to meet future carbon reduction targets.

- 6.77 In order to minimise fuel poverty linked to energy prices, the consequences of energy supply decisions at the planning stage must be assessed not only in terms of carbon efficiency, but also in terms of the likely energy supply prices. This is particularly important in the context of promoting low carbon heating systems because some systems, such as direct electric heating, can be low carbon while also leading to high energy bills. Part F of this Policy seeks to resolve this by requiring all residential developments to estimate the anticipated heat unit supply price (£/kWh), annual standing charge and estimated annual maintenance costs of their proposed heating system; and requiring major applications to provide estimates of the life cycle costs of the proposed heating system using CIBSE quoted plant lifetimes.
- 6.78 Specific design standards to enable connection and future connection to heat networks are set out in the Environmental Design SPD. Heat networks and communal heating systems must be designed, constructed and operated to a high standard in accordance with CIBSE CP1: Heat Networks: Code of Practice (or any relevant successor document), which sets minimum and best practice standards. The design and construction of developments that are required to connect to an existing or planned heat network in accordance with this policy must also comply with this Code of Practice, and this must be demonstrated as part of the SDCS. Compliance with this Code of Practice will promote best practice standards for heat networks across the supply chain.
- 6.79 All developments required to connect to an existing or planned heat network in accordance with this policy are required to ensure that the future heat network operator will be registered with the Heat Trust Scheme (or any other equivalent/future customer protection scheme). The Heat Trust Scheme is operated by a not-for-profit company that was established in 2015 and is sponsored by the Association for Decentralised Energy. The scheme offers protection for heat network customers and ensures that their rights are protected, which links to the Council's objective of addressing fuel poverty.
- 6.80 The Council will assess whether a development can reasonably connect to an existing heat network or can be designed to connect to a planned heat network based on a feasibility assessment, which must be submitted (as part of the SDCS) at the earliest possible stage of the planning process, ideally at pre-application stage. The feasibility assessment will assess the technical feasibility of a development's heat demand being supplied in part or wholly through connection to a heat network, and the financial reasonableness of the proposed connection charges. The Council, or relevant Energy Service Company, will provide relevant information to inform the feasibility assessment, including an assessment of the approximate cost of connection. Feasibility assessments must consider a range of factors, including:
- the size and use class of the development, and the associated heat load and energy demands;
  - the capability of the network to supply part or all of the heat demand;
  - the location of the development and the distance to network pipes;
  - physical barriers e.g. roads and railways;
  - other developments in the vicinity that may also be required to connect to the network; and

- an assessment of the financial implications of connection, using a Whole Life-cycle assessment methodology.
- 6.81 The feasibility assessment will be carried out using a whole life-cycle assessment methodology, including maintenance requirements, to be outlined by the council. Assessing the feasibility of heat network connection using a whole life-cycle assessment methodology will capture a building's operational emissions from energy consumption as well as its embodied emissions. This will enable the council to make a fair comparison between the whole life-cycle carbon emissions from developments connected to a heat networks and those using other heat source options. Further guidance on what will be expected as part of a whole-cycle assessment methodology will be provided in a revision of the Environmental Design SPD and/or Net Zero Carbon SPD.
- 6.82 Where connection of a development to an existing or future planned heat network is required in accordance with parts G and H of this Policy, and is deemed to be feasible, developers are required to commit to connection prior to occupation via a Section 106 agreement for major developments, and a Unilateral Undertaking for minor developments. The legal agreement will include provision for a reasonable financial contribution to the Council to enable connection and the submission of an updated energy strategy prior to implementation. Major developments located within 500 metres of a planned future heat network are required to be designed to be able to connect to that network in the future, in accordance with Part H of this Policy. Within the legal agreement, a cut-off point will be defined in accordance with Part G of this Policy, which will be the latest point at which a decision can be made in relation to connection to a planned network. If at this time it is not possible to agree connection to a network due to the network being unlikely to be complete within the 3 years after the grant of planning permission, the alternative energy strategy will be enacted.
- 6.83 Each of Islington's planned future heat networks is included on Islington's CIL Regulation 123 Infrastructure List (CIL 123 List) as infrastructure that may be funded by CIL. The CIL funding is intended to increase the size of the overall network to bring more sites within a reasonable connection distance. Developments required to be designed to connect to an existing or future heat network in line with Parts F and G of this Policy must contribute to the cost of connection via a legal agreement. This financial contribution specifically relates to the cost of connection of a site to a heat network. It is not covered by CIL and is a separate cost to the funding required for the development of heat network infrastructure. The CIL 123 List excludes works that will be funded through Section 106 obligations in accordance with the tests set out in Regulation 122 of the CIL Regulations 2010 (as amended).
- 6.84 Where connection to an existing or planned heat network is not possible, developments with a communal heating system must fully explore any opportunities to support the establishment of new heat networks through developing and/or connecting to a Shared Heat Network (SHN) between neighbouring existing buildings or new developments using a low or zero carbon heat source. Such shared networks will contribute to the development of borough-wide heat networks. Whether development of, or connection to, a SHN is reasonably possible will be assessed by the Council, based on a feasibility assessment which will consider a number of factors, including:
- the size and nature of the heat load within the development and neighbouring communally heated sites;
  - the distance between the sites;
  - any physical barriers e.g. roads and railways;

- the practicality of connection, including willingness of existing building owners, timing of schemes and any other legal or management issues; and
- the carbon reduction likely from such a connection, including the feasibility of use of low or zero carbon technologies.

6.85 Where a SHN is created, the anticipated carbon reductions must be assessed and agreed by the Council.

6.86 In addition to prioritising low and zero carbon heating options, development proposals are required to identify opportunities to maximise renewable energy production on-site in accordance with the energy hierarchy set out in Policy S1. The local generation of zero carbon electricity and heat through renewable energy will supplement grid decarbonisation at the national and international level and further contribute to the decarbonisation of heat. This includes the use of energy from waste schemes that are connected to a heat network, as well as PVs, solar thermal panels and ASHPs. Innovative low and zero carbon technologies will also be supported. It should be noted that any renewable energy and carbon reductions from the use of ASHPs are partly offset by the electricity used to run the ASHP.

## **Policy S6: Managing heat risk**

- A. Development proposals must minimise internal heat gain and the impacts of the 'urban heat island effect' through design, layout, orientation and materials.
- B. All developments (excluding smaller minor extensions) must demonstrate, as part of the SDCS, how the proposed design will reduce the potential for overheating and reliance on air conditioning systems, and maximise the incorporation of passive design measures in accordance with the following cooling hierarchy:
  1. minimise internal heat generation through energy efficient design.
  2. reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls.
  3. manage the heat within the building through exposed internal thermal mass and high ceilings.
  4. provide passive ventilation, such as cross ventilation.
  5. provide low energy mechanical ventilation.
- C. Use of technologies from lower levels of the hierarchy will not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.
- D. Major developments are required to include details of internal temperature modelling under projected increased future summer temperatures, to demonstrate that the risk of overheating has been addressed as part of the SDCS.
- E. Smaller minor extensions (those smaller than 100sqm) are encouraged to reduce the potential for overheating through the design of the extension, with particular

reference to levels 1, 2 and 3 on the cooling hierarchy. The use of active cooling measures will not be accepted, unless it can be demonstrated that other methods higher up the hierarchy cannot be used to deliver sufficient heat control.

- 6.87 Managing heat is an important concern in Islington in the context of an increasing population and higher summer temperatures caused by climate change. The 'urban heat island effect' means that temperatures will be intensified in dense urban areas such as Islington. It is caused by extensive built up areas absorbing and retaining heat during the day and night leading to temperatures in some parts of London being several degrees warmer than the surrounding area. High temperatures can cause or worsen serious health conditions, particularly among children and the elderly. Ensuring buildings are designed and constructed to be comfortable in higher temperatures, without resorting to energy intensive air conditioning, is therefore crucial.
- 6.88 The cooling hierarchy seeks to manage heat risk in new developments and requires developments to incorporate measures which will ensure adaptation to rising summer temperatures, while minimising energy intensive cooling. The first step of the hierarchy is to minimise internal heat generation through energy efficient design. There are a number of low-energy-intensive and passive measures that can mitigate overheating risk, including solar shading, building orientation and solar-controlled glazing, as well as ensuring energy efficient lighting and appliances which will not only reduce energy demand but also reduce heat generation.
- 6.89 Soft landscaping and urban greening including green roofs and trees can provide some mitigation of the heat island effect through evapotranspiration. Evapotranspiration is the process by which water is transferred from the earth to the atmosphere by evaporation from the soil and other surfaces, and by transpiration from plants, which provides a cooling effect. Green roofs and green walls can also manage heat gain in buildings by shading roof and wall surfaces.
- 6.90 Some aspects of energy efficient building design can lead to increases in overheating risk, including high proportions of glazing, increases in the building air tightness, and reduction of thermal bridges. Such energy efficiency measures mean that there may be cases where low energy mechanical ventilation with heat recovery (level 5 in the cooling hierarchy) is more energy efficient and better for air quality than natural ventilation, and therefore may be suitable for use within a development. Robust justification for use of low energy mechanical ventilation must be provided as part of the SDCS, with clear reasons why higher levels of the cooling hierarchy are not appropriate.
- 6.91 Increased use of active cooling systems, such as air conditioning systems, is generally not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the 'urban heat island effect'. However, in exceptional circumstances, active cooling systems may be suitable, where, overall, it would be more energy efficient and better for air quality than natural ventilation, due to potential aspects of energy efficient design noted in paragraph 6.90 above; and where low energy mechanical ventilation is demonstrably unfeasible. Where active cooling systems are provided, they must be designed to re-use the waste heat they produce and future heat networks are expected to be supplied with heat from waste heat sources such as building cooling systems.
- 6.92 Where it is demonstrated that mechanical ventilation or active cooling are required, these must be used as part of a mixed mode cooling system to supplement passive

cooling and other measures higher up the cooling hierarchy. Full-building mechanical ventilation and active cooling systems must only be considered as a last resort. The use of mechanical ventilation or active cooling will only be acceptable where best practice energy efficiency standards have been achieved, or in the case of residential developments, where the required FEES has been achieved.

- 6.93 Modelling of major developments under predicted future temperatures is required as part of the SDCS to ensure buildings are fully adapted to the changing climate. Requirements for thermal modelling are set out in the Environmental Design SPD. Major developments are required to include details of measurable outputs for the occupied building in relation to overheating risk as part of the GPP, based on the commitments in the SDCS.
- 6.94 All major developments (including refurbishments) must demonstrate that overheating has been effectively addressed by meeting the standards in the latest CIBSE guidance on assessing and mitigating overheating risk in new developments. CIBSE TM 59 must be used for domestic developments and CIBSE TM 52 must be used for non-domestic developments. CIBSE TM 49 guidance and datasets must also be used to ensure that all new development is designed for the climate it will experience over its design life. The GLA's Energy Planning Guidance provides further information on how these guidance documents and datasets should be used. In addition, internal temperature modelling must use weather files based on the latest climate change projections in order to assess the development against projected future summer temperatures. Further details are set out in the Environmental Design SPD.

## Policy S7: Improving Air Quality

- A. All development proposals must mitigate or prevent adverse impacts on air quality, and investigate and implement all reasonable opportunities to improve air quality. Development proposals will be refused where they would:
- (i) cause significant harm to air quality, cumulatively or individually;
  - (ii) lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
  - (iii) reduce any air quality benefits that result from active measures/activities which seek to improve air quality; or
  - (iv) create unacceptable risk of high levels of exposure to poor air quality.
- B. Major developments, minor new build developments, and larger minor extensions must be at least Air Quality Neutral through provision of on-site measures. Such developments are required to submit an Air Quality Assessment (AQA) as part of the SDCS; the level of detail of the AQA must be proportionate to the scale of proposed development, but must include details of how Air Quality Neutral will be achieved. A preliminary AQA must be carried out before designing the development, to inform the design process.
- C. Minor developments not covered by Part B are encouraged to be at least Air Quality Neutral through on-site measures, where feasible.

- D. Developments in excess of 150 net additional residential units or 10,000sqm net additional gross external floorspace must be Air Quality Positive and implement measures on-site to actively reduce air pollution as far as possible.
- E. Measures to address air quality implemented in line with relevant requirements in Parts A to D must be implemented through on-site design solutions, to prevent or minimise increased exposure to existing air pollution and make provision to address local air quality issues. Particular care must be taken with developments that are in Air Quality Focus Areas (AQFAs) or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. Where adequate mitigation is not provided, planning permission may be refused.
- F. Where it can be demonstrated that on-site measures are impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that at least equivalent air quality benefits can be demonstrated. Where off-site measures cannot be provided to a sufficient standard, a financial off-setting contribution secured through a legal agreement may also be acceptable.

- 6.95 Air pollution is one of the most significant challenges facing Islington. Air pollutants have a significant impact on health, quality of life and life expectancy, and the risk of exposure to air pollution is often worse in deprived areas, as these areas are often located near to busy roads and have a lack of green space. Poor air quality contributes to numerous diseases and conditions, particularly among more vulnerable people such as children, older people and those with existing health conditions. Air pollution also has associated impacts on the economy through medical costs and lost productivity. In addition, air pollution impacts the environment through its negative effects on the quality of water, soil and ecosystem health, which can be very damaging for biodiversity and wildlife.
- 6.96 Islington's Air Quality Strategy outlines the proposed actions in Islington to reduce air pollution and lower exposure to the main pollutants between 2019 and 2023. New developments must be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible, and reduce the extent to which the public are exposed to poor air quality, including vulnerable people. Major developments, minor new build developments, and larger minor extensions must be at least Air Quality Neutral; this means that new development must not contribute to air pollution, or, if this is not possible, that any air polluting emissions are mitigated on-site. This will ensure that development does not worsen the air quality in the area in which it is located.
- 6.97 An Air Quality Positive approach is required for all development in excess of 150 net additional residential units or 10,000sqm net additional gross external floorspace. Air Quality Positive means that the development must actively contribute to removing pollution through the use of on-site design measures to benefit the air quality of the surrounding area. Further information on the Air Quality Positive approach is set out in the London Plan. The Council may provide further guidance on air quality, including potential revised thresholds for Air Quality Neutral and Positive, through a SPD.
- 6.98 It may not always be possible in practice for developments to minimise impacts sufficiently using on-site measures alone. Where a development can provide evidence to demonstrate that on-site measures are impractical or inappropriate, for example due to a particularly constrained site or the limited scope of the development works, off-site measures to improve local air quality may be acceptable. It must be demonstrated that

off-site measures will provide at least equivalent air quality benefits to those required on-site. In cases where off-site measures cannot be provided to a sufficient standard, a financial off-setting contribution secured through a Section 106 agreement may also be acceptable. The level of the contribution will be considered by the council on a case-by-case basis and will be based on the air quality benefits that would have been required on-site.

6.99 The whole of Islington is covered by an Air Quality Management Area (AQMA), where national air quality objectives in relation to NO<sub>2</sub>, PM10 and PM2.5 are not likely to be achieved. In addition, the GLA has identified specific AQFAs to assist boroughs with targeting air pollution hotspots as part of action planning. AQFAs are locations of high human exposure where national air quality objectives are exceeded and where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. Several AQFAs are located in Islington, as identified in the London Plan (or in other published updated documentation). Developments proposed in areas that no longer exceed air quality limits due to improvements to air quality must not harm air quality and cause the area to return to poor air quality levels.

6.100 Major developments, minor new build developments, and larger minor extensions are required to submit an AQA and preliminary AQA as part of the SDCS. The aim of the preliminary AQA is to assess:

- the most significant sources of pollution in the area;
- constraints imposed on the site by poor air quality;
- appropriate land uses for the site based on the air quality that potential occupants will be exposed to. Uses considered to be particularly sensitive to air quality issues include residential, education, hospitals and care homes for older people. Locations considered likely to have particularly significant air quality issues include sites close to roads (particularly those on lower floors on the TfL Road Network and Borough Principal Road Network) and those affected by certain industrial processes; and
- appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality, including building design and site layout, and urban greening to provide pollution absorbing benefits, particularly tree and hedge planting.

6.101 As the design evolves further assessments must also be carried out in order to ensure that impacts from emissions are prevented or minimised as far as possible, and to fully quantify the expected effect of any proposed mitigation measures, including the cumulative effect where other nearby developments are also underway or likely to come forward.

6.102 When assessing a development's impact on local air quality, the Council will consider pollution, smells and fumes from construction and operation, including fixed plant, such as boiler and emergency generators, and any associated transport. Impact assessments must always include all relevant pollutants. Industrial, waste and other working sites may need to include on-site vehicles and mobile machinery as well as fixed machinery and transport sources.

6.103 The two pollutants causing most concern in London and Islington are NO<sub>2</sub> and Particulate Matter (PM). While traffic emissions are largely responsible for these pollutants, predominantly through exhaust emissions, and brake and tyre wear and



dust, emissions associated with the construction and operation of developments in Islington also have a significant impact on air quality.

- 6.104 Despite significant improvements in air quality, parts of Islington have consistently exceeded EU limits for NO<sub>2</sub> for many years, mainly along the A1 Holloway Road from Highbury to Archway; Angel Town Centre; Seven Sisters Road at Finsbury Park; Old Street and surrounding areas in the south of the borough; and the King's Cross/Caledonian Road area. While Islington is not breaching current EU limits for PM levels, it is in breach of the World Health Organisation (WHO) limits, which are lower.
- 6.105 Emissions associated with the operation of developments are mainly caused by the use of natural gas in the form of gas boilers and gas engine CHP as the main heat source for space and water heating, which results in NO<sub>x</sub> emissions, with NO<sub>2</sub> in particular having a major impact on air pollution. Improvements to air quality can be achieved through the adoption of an integrated approach to energy supply which maximises both air quality and climate change benefits and ensures heating systems do not have a significant impact on local air quality. This will be achieved through the selection of heat sources that result in low or zero emissions of both carbon dioxide and NO<sub>x</sub>, in accordance with the heating hierarchy set out in Policy S5. In relation to air quality, low or zero emission heating and energy refers to the level of NO<sub>x</sub> emissions produced by a heating or energy system. Low-emission systems are those which inherently emit very low levels of NO<sub>x</sub>.
- 6.106 The operation of new developments can lead to an increase in transport related emissions. Islington's car-free policy seeks to reduce these pollutants and improve air quality by ensuring that no new parking spaces or permits will be allowed as part of new development. Policy T3 provides further detail on the operation of the car-free policy.
- 6.107 Air pollution resulting from the construction process, including Non-Road Mobile Machinery, also contribute to poor air quality in the borough. Policy T5 has specific requirements relating to construction practices. Other guidance, such as the GLA control of dust and emissions from construction and demolition best practice guidance, may also be applicable.
- 6.108 New development in the vicinity of canals can lead to the overshadowing of solar panels on canal boats, leading to the use of energy generators which have adverse impacts on air quality. Where a proposed development is likely to cause detrimental overshadowing of solar panels, including those on canal boats, the council will expect the development design to be modified where possible, in line with Policy PLAN1, supporting text paragraph 1.67.

## **Policy S8: Flood Risk Management**

- A. A site specific Flood Risk Assessment (FRA) will be required for:
- (i) proposals on sites of 1 hectare or greater;
  - (ii) new development proposing more than 100sqm increase in floorspace in a critical drainage area;

- (iii) proposals involving a change of use in development type to a more vulnerable class;
  - (iv) 'Highly Vulnerable' development located in an area of High or Medium surface water flood risk; and/or
  - (v) 'More Vulnerable' development located in an area of High surface water flood risk.
- B. The site-specific FRA must assess in detail the risk of flooding to and from a proposed development, from all sources but focusing particularly on surface water flooding, taking climate change projections into account. Where a development is located within a Critical Drainage Area (CDA) or Local Flood Risk Zone (LFRZ), or where the site includes a 'High' surface water flood risk area, the site-specific FRA must give particular consideration to the extent and impacts of flood risk.
- C. Groundwater flooding must be investigated in detail as part of the site-specific FRA where development is located in an area identified as having potential for groundwater flooding.
- D. As part of the site-specific FRA, development proposals must:
- (i) carry out a Sequential Test in order to ensure that the vulnerability classification of the proposed development is appropriate to the level of flood risk;
  - (ii) carry out an Exception Test (parts a and b) to ensure the proposed development will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall; and
  - (iii) demonstrate a sequential approach to development layout within the development site, in order to ensure that the most vulnerable elements or land uses within a development are located in the lowest risk parts of the site.
- E. The site-specific FRA must demonstrate how flood risk will be managed and mitigated to ensure the development is safe from flooding and the impacts of climate change for its lifetime. This must include assessment of appropriate flood proof design and construction methods, and SUDS.
- F. 'Highly Vulnerable' development, including basement dwellings, proposed in 'High' surface water flood risk areas, and/or where there is potential for groundwater flooding of property situated below ground level or potential for groundwater flooding to occur at surface, are required to incorporate appropriate flood proof construction methods in order to mitigate the risk of flooding. Essential infrastructure associated with proposed developments in 'High' surface water flood risk areas must be located above ground floor level, where possible.

6.109 As a Lead Local Flood Authority (LLFA), Islington Council has lead responsibility for monitoring and managing local flood risk in the borough through the planning system, including surface water drainage, groundwater and ordinary watercourses, taking into account new development in land use plans and strategies<sup>35</sup>. A key responsibility of the Council as a LLFA is to seek opportunities to reduce the risk of flooding from the

<sup>35</sup> [Flood risk management: information for flood risk management authorities, asset owners and local authorities](#)

sewer network through consultation with Thames Water; and to determine key areas for maintenance and flood alleviation schemes.

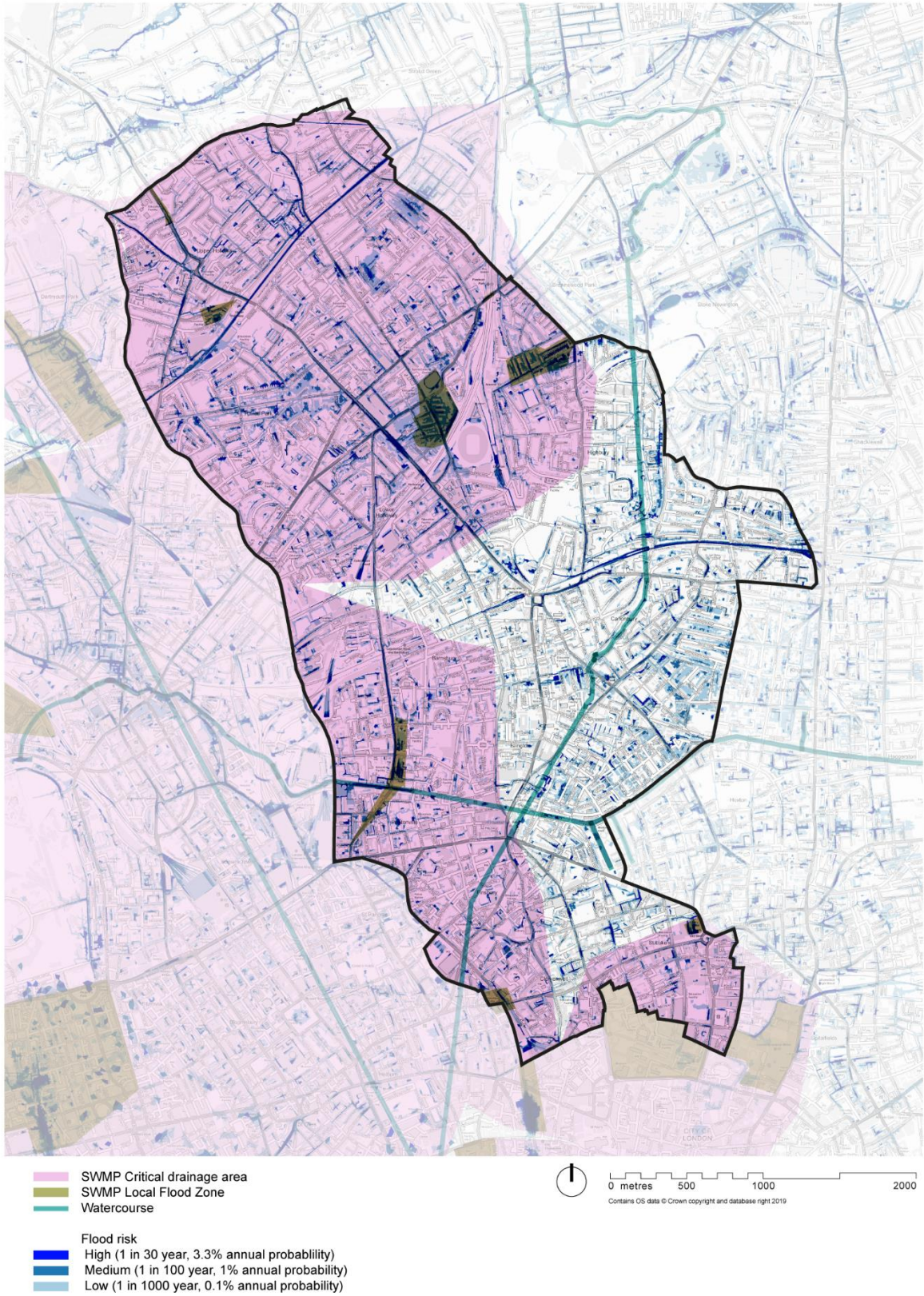
- 6.110 Islington's flood risk management policies have been informed by the Level 1 Strategic Flood Risk Assessment (SFRA), which reviews all sources of flooding in the borough. Islington is located entirely in Flood Zone 1 which means there is a low risk of fluvial (river) flooding<sup>36</sup>; however there is risk of flooding to development from other sources in Islington, including from groundwater, sewers, artificial sources, and surface water.
- 6.111 Islington is at particular risk from surface water flooding due to the densely developed nature of the borough and a large extent of impermeable surfaces. Surface water flood risk in Islington is predicted to rise as climate change increases the frequency and intensity of heavy rainfall, and as ongoing development and intensification of the borough increases the volume of surface and waste water draining to the combined sewer.
- 6.112 Islington's SFRA provides detailed information regarding the areas at risk from surface water flooding across the borough based on the Environment Agency's 'Risk of Flooding from Surface Water (RoFSW)' mapping; data from Islington's Surface Water Management Plan (SWMP); and detailed borough-wide surface water modelling undertaken by CVU in 2017. Figure 6.1 below shows the surface water flood risk in Islington based on data from Islington's SWMP and the EA's RoFSW.
- 6.113 While the Environment Agency's RoFSW data and the detailed borough-wide surface water modelling datasets are the most recent and up-to-date surface water modelling that has been undertaken at the time of writing, the Environment Agency's Flood Warning Information Service<sup>37</sup> and interactive flood risk maps must also be checked for any updates to the data and used to inform the site-specific FRA.

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<sup>36</sup> Flood Zone 1 Definition: Land having a less than 1 in 1,000 chance of river flooding each year (0.1% AEP), [Flood risk and coastal change PPG](#)

<sup>37</sup> [Environment Agency's Flood Warning Information Service](#)

**Figure 6.1: Flood Risk from Surface Water (Islington Surface Water Management Plan and Environment Agency data)**



6.114 Part A of the Policy draws on the NPPF requirements in relation to when a site-specific FRA is required for developments located in Flood Zone 1. The NPPF requires a site-specific FRA to be submitted for development located in an area with critical drainage problems, as defined by the Environment Agency. While there are currently no Environment Agency defined CDAs in Islington, Part A requires a site-specific FRA to be submitted for developments located in a CDA as defined by Islington’s SWMP; this approach is recommended by Islington’s SFRA.

6.115 The SWMP defines a CDA as “a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more LFRZ during severe weather thereby affecting people, property or local infrastructure”. A LFRZ is identified in the SWMP as “discrete areas of flooding that do not exceed the national criteria for a ‘Flood Risk Area’ but still affect houses, businesses or infrastructure. A LFRZ is defined as the actual spatial extent of predicted flooding in a single location.”

6.116 Figure 6.1 demonstrates that more than half of the Borough is located within one of Islington’s three CDAs. Islington’s SWMP identified eight LFRZs which are all located within one of the three CDAs. A specific development within a CDA is not necessarily at higher risk from surface water flooding compared to a development outside of a CDA. However, the location of a development within a CDA indicates that it is within a catchment area which contributes to flooding in a LFRZ.

6.117 The flood risk vulnerability classifications for different development uses referred to in Part A of this Policy are defined in Annex 3 of the NPPF and repeated in Table 6.4 below. Where a new development is classified as ‘More Vulnerable’ or ‘Highly Vulnerable’, or where a change of use will result in an increase in the vulnerability classification, the FRA must demonstrate how the flood risks to the development will be managed so that it remains safe through its lifetime, including provision of safe access and egress.

**Table 6.4: Flood Risk Vulnerability Classification<sup>38</sup>**

Vulnerability Classification	Development Uses
Essential Infrastructure	<ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.</li> <li>• Wind turbines.</li> <li>• Solar farms</li> </ul>

<sup>38</sup> [Flood Risk Vulnerability Classifications](#)

Highly Vulnerable	<ul style="list-style-type: none"> <li>• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings<sup>39</sup>.</li> <li>• Caravans, mobile homes and park homes intended for permanent residential use.</li> <li>• Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”).</li> </ul>
More Vulnerable	<ul style="list-style-type: none"> <li>• Hospitals.</li> <li>• Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non–residential uses for health services, nurseries and educational establishments.</li> <li>• Landfill* and sites used for waste management facilities for hazardous waste.</li> <li>• Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.</li> </ul>
Less Vulnerable	<ul style="list-style-type: none"> <li>• Police, ambulance and fire stations which are not required to be operational during flooding.</li> <li>• Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non–residential institutions not included in the “more vulnerable” class; assembly and leisure.</li> <li>• Land and buildings used for agriculture and forestry.</li> <li>• Waste treatment (except landfill* and hazardous waste facilities).</li> <li>• Minerals working and processing (except for sand and gravel working).</li> <li>• Water treatment works which do not need to remain operational during times of flood.</li> <li>• Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.</li> <li>• Car parks.</li> </ul>
Water-Compatible Development	<ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> </ul>

<sup>39</sup> Policy DH4 sets out requirements for new basement development.

	<ul style="list-style-type: none"> <li>• Lifeguard and coastguard stations.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</li> </ul>
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\* Landfill is as defined in Schedule 10 of the Environmental Permitting (England and Wales) Regulations 2010

6.118 The identification of ‘High’, ‘Medium’ and ‘Low’ surface water flood risk is based on data from the Environment Agency’s RoFSW dataset. This provides an indication of the broad areas likely to be at risk of surface water flooding (i.e. areas where surface water would be expected to flow or pond), as opposed to the susceptibility of individual properties to surface water flooding. The RoFSW provides bandings of Low (within the flood extent during a 1 in 1000 year rainfall event), Medium (within the flood extent during a 1 in 100 year rainfall event) and High (within the flood extent during a 1 in 30 year rainfall event) surface water flood risk. The areas at risk of flooding from surface water based on the RoFSW data are displayed in Figure 6.1. The RoFSW modelling demonstrates that areas at ‘High’, ‘Medium’ and ‘Low’ risk of surface water flooding largely follow human-made features such as roads and rail lines, particularly in high risk areas. Surface water flooding is also identified around properties in low risk areas, particularly in areas of low topography around Canonbury and Clerkenwell Road, as well as the Upper Holloway area between Tollington Road and the Emirates Stadium, and on Holloway Road.

6.119 The site-specific FRA must establish whether a proposed development is likely to be affected by current or future flooding from any source and whether it will increase flood risk elsewhere. The assessment must be proportionate to the degree of flood risk and must also be appropriate to the scale, nature and location of the development. When assessing FRAs, the Council will consider the potential contribution of a development to flood risk off-site and the cumulative impact of new development on flood risk.

6.120 While there is a low risk of fluvial (river) flooding in the borough, all site-specific FRAs must investigate the risk of surface water flooding in detail, and where relevant, groundwater, sewers, and artificial sources must also be assessed, utilising the mapping presented in Islington’s SFRA. The SWMP CDAs and LFRZ, and the Environment Agency’s RoFSW dataset shown in Figure 6.1 must be used as a starting point for the site-specific FRA to indicate areas with a potential for surface water flood risk in the Borough.

6.121 The assessment of surface water flood risk to a development as part of the site-specific FRA must take climate change projections into account. In Islington, climate change is likely to predominantly increase flood risk from surface water. The Environment Agency guidance “Flood risk assessments: climate change allowances” describes when and how to use climate change allowances in flood risk assessments<sup>40</sup>. The guidance updates previous climate change allowances to support the NPPF. Previously an allowance for a 30% increase in peak rainfall intensity from climate change was applied, however based on the new guidelines a 40% increase is applied.

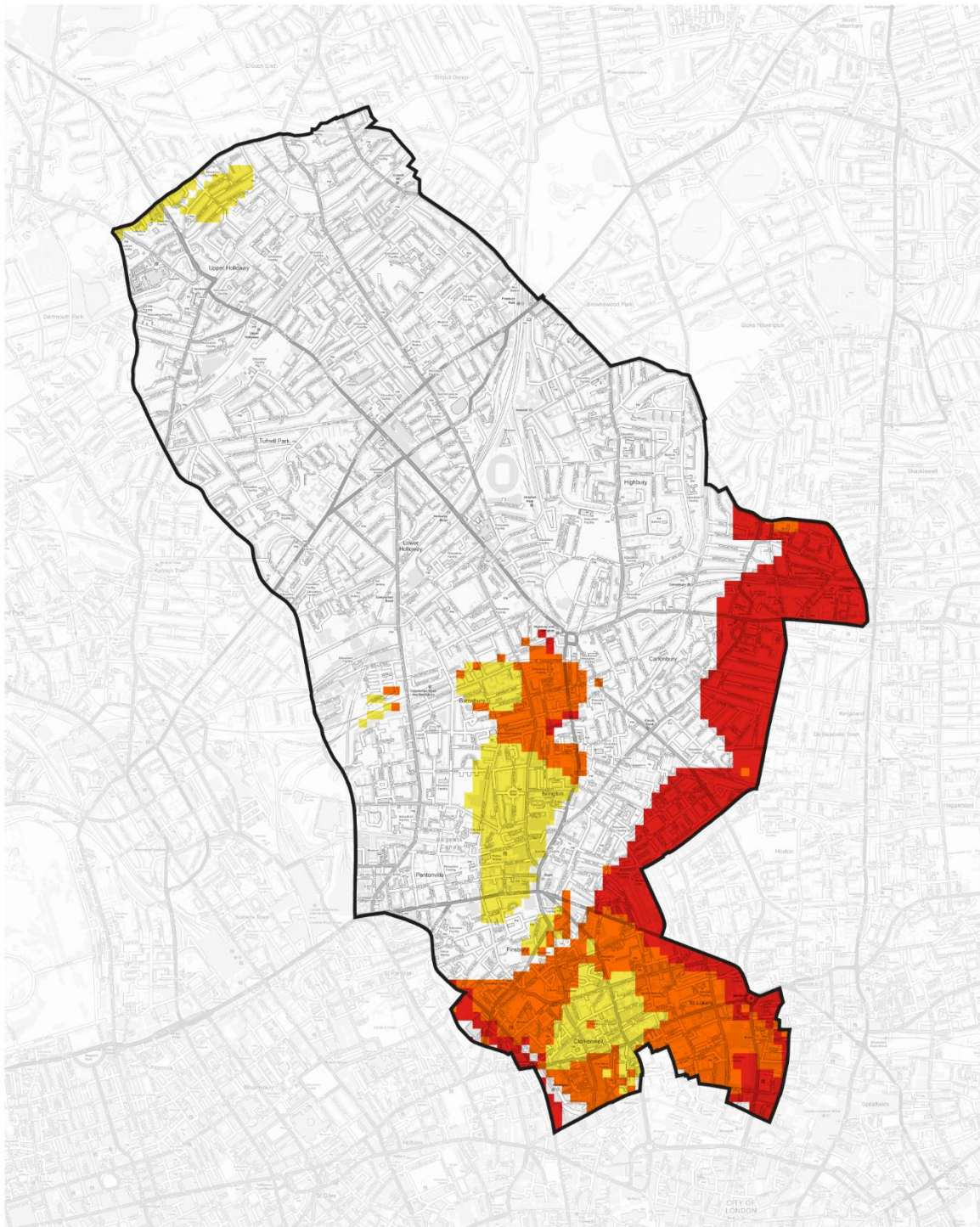
6.122 The site-specific FRA must investigate groundwater flooding in detail using mapping from Islington’s SFRA. Figure 6.2 identifies areas of the borough that have ‘potential for groundwater flooding of property situated below ground level’ or ‘potential for




<sup>40</sup> [Environment Agency Flood risk assessments: climate change allowances guidance](#)


groundwater flooding to occur at surface', based on data from the British Geological Survey and presented in the SFRA.



**Figure 6.2: Potential for groundwater flooding**



-  Limited potential for groundwater flooding to occur
-  Potential for groundwater flooding of property situated below ground level
-  Potential for groundwater flooding to occur at surface

 0 metres 500 1000 2000  
Contains OS data © Crown copyright and database right 2019

- 6.123 The NPPF requires all plans to apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. The sequential approach must be used in areas known to be at risk now or in the future from any form of flooding. The aim of the sequential test is to steer new development away from areas at risk of flooding to areas with the lowest risk of flooding from any source, and to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. As a result, the application of the sequential test will help to ensure that development can be delivered safely and sustainably, avoiding proposals that are inappropriate on flood risk grounds.
- 6.124 The sequential test must be applied as part of the site-specific FRA using the procedure for demonstrating the Sequential Test for Planning Applications set out in PPG<sup>41</sup>. This procedure includes identifying 'reasonably available' alternative sites. In Islington, the main concern is surface water flood risk and this must be taken into account when deciding on the appropriateness of a site location. The Sequential Test must refer to Islington's SFRA mapping and EA flooding data to assess the flood risk on the site and to compare it to alternative sites if appropriate. The Council will also determine whether the development vulnerability is appropriate to the level of flood risk on the site.
- 6.125 The constrained nature of the borough and development pressure mean that it is unlikely that there will be alternative locations where developments could be located. As a result, vulnerable development types will likely be permissible in areas of medium or high surface water flood risk (based on the Environment Agency's RoFSW mapping) on the condition that they achieve the drainage requirements set out in Policy S9; incorporate sufficient flood resilient/resistant measures where required; and apply the sequential approach to development layout. This means that in the majority of cases Part (a) of the Exception Test can be met when any potential flood risk will be outweighed by other sustainability factors. A site specific flood risk assessment can help determine whether part (b) of the Exceptions Test can be met. Part (b) of the Exceptions Test will be met when it can be demonstrated that the development will be safe during its lifetime, considering climate change, without increasing flood risk elsewhere and where possible reduce flood risk overall. This can be achieved through the use of mitigation and adaptation measures.
- 6.126 In addition to the application of the sequential test at the individual development level, the sequential test has been applied as part of the Sustainability Appraisal (SA) of sites which have been allocated in the Local Plan. The requirement to apply the Sequential Test to proposed developments can be considered adequately demonstrated if the Sequential Test has already been carried out for the same development type on the specific site as part of the SA; or the development vulnerability is appropriate to the flood risk, as determined by the Council. If either of these two criteria has not been met, then it is necessary to undertake a Sequential Test for the site.
- 6.127 A sequential approach must be applied within development sites in order to locate the most vulnerable elements of a development in the lowest risk areas of a site; for example, residential developments should be restricted to areas at a lower probability of flooding, whereas parking, open space or proposed landscaped areas can be placed on lower ground with a higher probability of flooding. Decisions regarding the layout and design of a site must consider flood risk at an early stage to provide an opportunity to reduce flood risk within the development site. This is particularly

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<sup>41</sup> [Planning Practice Guidance – Sequential Test for Planning Applications](#)

important in larger development proposals as they will include a variety of land uses and potentially varying vulnerability to flooding.

- 6.128 If development pressure creates a need to develop more vulnerable land uses in higher flood risk areas on the site, appropriate mitigation measures must be incorporated that are proportionate to the flood risk and would not increase the risk of flooding to surrounding areas. In particular, the sequential approach to site layout will help to ensure that vulnerable development types located in areas of 'Medium' or 'High' surface water flooding will be safe for their lifetime. Further detail on the sequential approach to locating development within a site is set out in the PPG.
- 6.129 Detailed investigation into the sustainable management and mitigation of flood risk will be expected as part of the site-specific FRA. Design teams are encouraged to engage with the Council at the earliest opportunity to establish appropriate management and mitigation techniques. Developments located in areas identified as being at particular risk of surface water flooding (as denoted by RoFSW High Risk Areas and LFRZs), must provide additional detail on mitigation measures, including SUDS.
- 6.130 The PPG sets out the ways in which new development can be made flood resistant and resilient through designing buildings to avoid flooding in the first instance, for example by raising finished floor levels and access levels, and introducing thresholds to buildings. Careful consideration must also be given to the development layout as a way to avoid the impacts of flooding, particularly in relation to vulnerable uses. In addition to design, the potential impacts of flooding to property and people can be mitigated using a range of flood proof construction measures including use of suitable materials and construction techniques for floors, walls, doors and windows and fittings.
- 6.131 When a proposal involves the re-development of existing buildings comprising more than one property, the use of flood proof construction methods must focus on individual properties to ensure risk is mitigated effectively for all properties involved. Appropriate mitigation measures must be incorporated that are proportionate to the flood risk and would not increase the risk of flooding to surrounding areas. Further guidance on flood proof design and construction is also provided in the Environmental Design SPD.
- 6.132 The site-specific FRA must ensure that surface water generated by the site is managed in a sustainable manner and does not increase the flood risk to existing buildings or infrastructure in the neighbouring area. This will be particularly important in relation to development located in a CDA. Potential overland flow paths must be considered to ensure that buildings do not obstruct flows and all opportunities must be taken during development to reduce existing surface water run-off rates, in accordance with Policy S9.
- 6.133 The detailed borough-wide surface water modelling for Islington undertaken in 2017 and presented in Islington's SFRA must be used alongside the Environment Agency's RoFSW data to provide a more detailed assessment of surface water flood risk in the borough, to inform the planning of appropriate mitigation measures for proposed developments. The detailed Borough wide surface water modelling shows that surface water flooding predominantly follows roads and heavily urbanised areas including Hornsey Road, Holloway Road and Courtauld Road. Surface water ponding is present in areas of low topography around Wray Crescent, Gillespie Road and to the south of Downcross Street.
- 6.134 The detailed surface water modelling includes an output with 40% allowance for climate change, in accordance with the Environment Agency Guidance on flood risk

assessments: climate change allowances. This means that a 40% increase in peak rainfall intensity for the 1 in 100 year storm event is applied. The SFRA provides an indication of the implications of climate change on surface water flood risk in Islington.

6.135 Where basements are proposed, the risk of surface water and/or groundwater flooding must be considered in detail. Appropriate mitigation measures must be investigated, including raised thresholds and inclusion of storage for surface water in such developments.

6.136 Assessments for developments within flood risk areas must make reference to local flood warning and emergency procedures, and emergency planning strategies must be put in place in order to direct people to safety during times of flooding.

## **Policy S9: Integrated Water Management and Sustainable Drainage**

- A. All development proposals must adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and in the context of links with wider-than-site level plans. Water management must be considered as early as possible in the design process.
- B. All development proposals must ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy (repeated below), with priority given to green features over grey features:
  - 1. rainwater use as a resource (for example rainwater harvesting, blue roofs).
  - 2. rainwater infiltration to ground at or close to source.
  - 3. rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens).
  - 4. rainwater discharge direct to a watercourse (unless not appropriate).
  - 5. controlled rainwater discharge to a surface water sewer or drain.
  - 6. controlled rainwater discharge to a combined sewer.
- C. Development proposals for impermeable paving will be resisted, including on small surfaces such as front gardens and driveways, unless they can demonstrate that the level of run-off will not exacerbate flood risk in the area, both direct and cumulative risk.
- D. Drainage must be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- E. All developments are required to demonstrate that appropriate SUDS have been implemented in accordance with the drainage hierarchy to ensure that surface water run-off rates and volumes entering open space are predictable and water at the surface is clean and safe. All developments must identify how the initial run off from a site following a rainfall event will be dealt with; and demonstrate that an appropriate

maintenance plan will be put place providing details of how the SUDS will be maintained after implementation to ensure their continued effectiveness.

- F. Major developments creating new floorspace, and major changes of use that will result in an intensification of water use, must be designed to achieve the following standards:
- (i) Surface water flows from the site must be reduced to a greenfield run-off rate (8 litres/second/hectare for Islington), where feasible. Where it is demonstrated that achieving a greenfield run-off rate is not feasible due to the site conditions, run-off rates must be minimised to as close to the greenfield rate as possible.
  - (ii) The volume of run-off that must be stored on-site must be calculated based on the nationally agreed return period value of a 1 in 100-year storm event plus a 40% allowance for climate change for the worst storm duration. Where the site-specific FRA indicates that an additional volume of run-off must be stored above and beyond the amount calculated based on the method above, this must be provided on site.
- G. Major developments involving works to an existing building should reduce run-off rates for the site as a whole, rather than focusing solely on new buildings.
- H. All major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet policy requirements.
- I. All minor new build developments of one unit or more are required to reduce existing run-off levels as far as possible. Where this is demonstrated not to be possible, existing run-off levels must be maintained as a minimum.
- J. SUDS must be designed and implemented as a central part of the SDCS, using an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation. All developments must maximise areas of soft landscaping and other permeable surfaces to support this, in accordance with Policy G4.
- K. All developments must demonstrate that they have minimised the use of mains water and have been designed to be water efficient, through the SDCS. Water use must be minimised as part of all developments by reducing water demand in the first instance through the installation of water efficient fittings and appliances, and the use of water saving measures. Developments must use smart metering, and retrofitting of water efficiency measures is encouraged where feasible.
- L. Where feasible, developments located adjacent to a waterway, such as a canal, must utilise the waterway to supply non-potable water for on-site needs, including landscape irrigation.
- M. Residential development must minimise water consumption in accordance with the Optional Requirement of the Building Regulations, achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption). Non-residential developments, including refurbishments, must minimise water consumption by achieving all credits on Water consumption (Wat 01) under the relevant BREEAM scheme, in accordance with the requirements of Parts E and G of Policy S3.

- N. Major developments and/or developments with high/intense water usage - including hotels, hostels, and student housing - are required to incorporate a rainwater and greywater recycling system. Minor developments must incorporate rainwater recycling, where feasible and practical.
- O. The development of land affected by contamination must not create unacceptable risks to human health and the wider environment, including local water resources. Assessment and remediation of any contaminated land must be carried out before any development commences on site.
- P. All developments are required to protect water quality and demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development. All developments must assess and mitigate any potential impact on groundwater; only appropriate land uses should be located within groundwater Source Protection Zones (SPZs).
- Q. All development proposals located adjacent to the New River or Regent's Canal are required to protect and improve the benefits provided by the water environment to help to ensure that these waterways can reach and maintain good ecological status, in accordance with the recommendations of the Thames River Basin Management Plan (TRBMP).

6.137 Islington is at risk from surface water flooding due to the densely developed nature of the borough and a large extent of impermeable surfaces. All developments must adopt an integrated approach to water management and ensure that surface water is managed sustainably and effectively. LLFAs are a statutory consultee in relation to the use of SUDS in planning applications for major developments. As an LLFA, the Council must ensure that SUDS are incorporated into all major development proposals where appropriate, and that they adhere to necessary national and local SUDS standards. This includes providing technical advice on surface water drainage on major developments where required, and ensuring that appropriate maintenance arrangements are put in place. Rainwater must be managed as close to the top of the drainage hierarchy as possible. For many sites, it may be appropriate to use more than one form of drainage, for example, a proportion of rainwater can be managed by more sustainable methods, with residual rainwater managed lower down the hierarchy.

6.138 Priority must be given to source control methods which prevent surface water from leaving the site. Source control of surface water is critical in an urban environment such as Islington with its larger areas of impermeable surfaces, and must be incorporated on all schemes to reduce the rate and volume of surface water run-off. Infiltration techniques, such as porous surfaces, will only be possible in non-clay areas. Green drainage features that are part of the natural environment must be prioritised over grey features which involve hard surfaces, engineered solutions and conventional drainage systems. Impermeable paving will be resisted in order to limit a negative cumulative effect on surface water flood risk.

6.139 Where it is demonstrated that volumes cannot be managed at or close to source, run-off must be controlled through attenuation for gradual release to an adjacent waterway (where appropriate and subject to the appropriate permissions); or to surface water sewers or drains. Drainage by gravity must be prioritised over pumped systems. Attenuation above ground is preferable to attenuation below ground or in a basement because pumping is normally required to empty a below ground attenuation tank which

requires energy use and has risks of mechanical failure. Attenuation above ground can also be utilised to maximise additional biodiversity or amenity benefits.

- 6.140 The use of rainwater as a resource is particularly beneficial as part of an integrated approach to water management with drainage and water efficiency benefits. A blue roof is an attenuation tank at roof or podium level which can provide rainwater attenuation and minimise surface water flood risk. Rainwater is collected within the roof structure before being discharged at a defined controlled rate via a restrictive flow outlet. Blue roofs are particularly beneficial on constrained sites where there is no space to incorporate SUDS measures as part of soft landscaping, or where construction is being carried out within flood sensitive and additional run-off storage is required. Blue roofs can be installed as part of the drainage and support layer for a green roof.
- 6.141 The use of a blue roof will only be acceptable where it can be clearly demonstrated that the suitability of options higher up the hierarchy have been investigated fully and incorporated where possible. In cases where a blue roof is an appropriate option, it is particularly important that the design implications are considered as early as possible in the design process. As the installation of a blue roof has weight load implications, a structural engineer must be engaged with from the early stages of the design process.
- 6.142 Green roofs are effective drainage measures as they provide interception storage and will typically intercept the first 5mm or more of rainfall depending on the depth and type of substrate. Green roofs also provide treatment of the pollutants carried in the initial run-off from the site following a rainfall event and have additional biodiversity benefits. The combination of a blue and green roof allows the attenuated water to be used to irrigate the green roof. Further information is provided in Policy G5.
- 6.143 SUDS must be implemented as part of all development proposals in accordance with the drainage hierarchy, unless it can be demonstrated that this is not possible. SUDS help to manage flood risk by reducing the quantity of water run-off from a development entering drains and pooling on hard surfaces, especially at peak periods. As SUDS reduce the need for expensive conventional drainage systems, they can also provide cost savings. In order to be effective, SUDS require an appropriate level of maintenance after implementation, which must be accounted for in the early planning and development stages through a maintenance plan.
- 6.144 Particular types of SUDS can help to improve the quality of water run-off by filtering out pollutants and providing physical, chemical or biological treatment of water to remove contaminants. Surface water can pick up pollutants as it runs across a site, which in turn enters the combined storm water and sewer system. Where land is contaminated, the design of drainage and SUDS techniques must take this into account, for example by avoiding measures that involve infiltrating water into the subsoil.
- 6.145 The initial run-off from a site following a rainfall event is also known as the 'first flush' (normally the first 5mm or more) and can carry accumulated silt and pollutants. Green roofs can effectively treat the pollutants carried in the first flush, and other measures such as swales and bio-retention areas can provide additional cleaning of run-off to improve water quality.
- 6.146 Major developments creating new floorspace, and major changes of use that will result in an intensification of water use, are required to achieve a greenfield surface water run-off rate where possible. These types of developments will increase the volume of internal wastewater draining to drains and sewers, which in combination with surface water run-off, will contribute to flood risk on and around the site. Major developments

proposing an increase in impermeable areas will also lead to additional surface water run-off that must be reduced.

- 6.147 The greenfield run-off rate in Islington, referred to in Part F of this Policy, has been set by the Environment Agency at 8 litres/second/hectare (or equivalent for sites under one hectare). On sites where it can be demonstrated that this is not possible, a higher rate of run-off, as set out in the policy, may be agreed with the Council. The volume of run-off that must be stored on-site must be calculated based on the nationally agreed return period value of a 1 in 100 years storm event, plus an allowance of 40% for an increase in rainfall intensity from climate change - in accordance with Environment Agency guidance<sup>42</sup> - to ensure the volume of run-off from the site can be stored on the site in the future. In Islington, climate change is likely to predominantly increase flood risk from surface water.
- 6.148 The London Sustainable Drainage Proforma is required by all LLFAs to accompany Sustainable Drainage strategies submitted with planning applications and forms part of planning application validation requirements. In Islington, the proforma will be required for major developments as part of the SDCS and will assist developers and designers in meeting the sustainable drainage requirements included in this policy<sup>43</sup>. The proforma sets a clear standard for the information that must be provided in a Sustainable Drainage strategy for all development in London and is intended to ensure that key information is provided with the initial planning application. This reduces the need to request additional information throughout the assessment process and prevents delays in approval. The initiative is supported by the GLA and the London Drainage Engineers' Group to encourage greater consistency in both the applications and the LLFA information requests. The proforma is available from the GLA website<sup>44</sup>.
- 6.149 Achieving surface water run-off targets under the relevant BREEAM scheme will also contribute to meeting the policy requirements.
- 6.150 Minor new build schemes will be expected to show that they have utilised all available techniques to avoid increasing run-off and to reduce it as far as possible. This could include maximising areas of green roofs (and blue roofs where appropriate), particularly on new buildings; maximising areas of soft landscaping; ensuring all hard surfaces are permeable or drain into permeable features; and making use of other SUDS techniques, such as raingardens, as appropriate.
- 6.151 The design and implementation of SUDS should be demonstrated as part of the SDCS. The protection and enhancement of areas of biodiversity value must be considered when determining the suitability of SUDS. This will promote an integrated approach that incorporates SUDS into the landscape design in order to maximise biodiversity and water use efficiency, alongside the amenity and recreation benefits of SUDS. Opportunities for the use of SUDS for educational and interactive purposes must also be explored where feasible. Further details on Landscape Design Strategies are set out in Policies G4 and S2. Further guidance on SUDS is set out in the Environmental Design SPD. The adoption of appropriate SUDS measures must be informed by relevant best practice and standards, particularly the Construction Industry Research and Information Association (CIRIA) SUDS Manual.
- 6.152 The combination of climate change bringing periods of drought, expanding population and increased water usage means that water demand in the future will outstrip supply

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<sup>42</sup> [Flood risk assessments: climate change allowances.](#)

<sup>43</sup> Further information is provided in the Environmental Design SPD.

<sup>44</sup> [London Sustainable Drainage Proforma](#)



unless mains water demand is reduced. All developments are required to minimise the use of mains water as part of an integrated approach to water management. The Optional Requirement of the Building Regulations included in Part K of this Policy requires that water use in new dwellings is limited to 110 litres per person per day. As this includes 5 litres for external water use, the target for internal use is 105 litres per person per day. The requirement for non-residential developments to minimise water consumption in accordance with BREEAM is set out in Policy S3. In order to achieve BREEAM requirements in relation to water consumption, water use demand must be reduced first, with rain and greywater recycling being necessary to achieve a higher number of credits.

6.153 Examples of water efficient fittings and appliances include lower flow taps, reduced-capacity baths, and water-efficient showerheads, all of which can help reduce energy consumption as well as water consumption. Further details on water efficient fittings and appliances is provided in the Environmental Design SPD. The use of measures such as water efficient fittings, smart metering, and water saving and recycling measures will help to achieve lower water consumption rates and ensure that buildings are designed for future water requirements and pressures. Rainwater and greywater recycling systems capture rainwater or greywater and then treat the water for re-use on-site. They are particularly appropriate for use in major developments and/or developments with high or intense water use, because these developments have high water demand, which makes the use of such systems feasible. The suitability and feasibility of different systems will depend on an assessment of water demand, potential harvested supply (including consideration of available roof space), and any other cost/benefit issues.

6.154 Land cannot always be assumed to be free from pollution as no accurate historic records exist for waste disposal or for industrial processes. Developers of land which may be polluted (based on the historic use or other relevant information such as the Islington Contaminated Land Inspection Strategy 2010 or any future update) will be required to undertake remedial work to the satisfaction of the Council. Preliminary details of the proposed decontamination will be required as part of any planning application before it is considered.

6.155 Contaminated land raises risks for pollution of groundwater and must therefore be remediated in line with recommended standards<sup>45</sup>. All developments must assess and mitigate any potential impact on groundwater throughout planning, construction, operation, and decommissioning phases of a development or operation. The area of influence of activities must also be assessed, taking account of all current and future groundwater uses and dependent ecosystems. The aim is to avoid potentially polluting activities being located in the most sensitive locations for groundwater. A sensitive location with respect to groundwater will depend on the hazard posed by the development and importance of the groundwater location.

6.156 SPZs are areas of influence around groundwater sources used for public drinking and are defined around large and public potable groundwater abstraction sites. The purpose of SPZs is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction. Potentially polluting developments include petrol stations, and industrial or commercial developments that rely on the use of chemicals, such as dry cleaners and car repair workshops.

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<sup>45</sup> Part 2A of the Environmental Protection Act 1990, the contaminated land regime and any replacements/updates.

6.157 There are three groundwater SPZs within Islington. One SPZ covers much of the southern half of the borough and is classed as a Zone II - Outer Protection Zone (defined as 400 day travel time to the source). There are two smaller SPZs within this area that are classed as Zone I - Inner Protection Zones (defined as 50 day travel time to the source). Further information (including an interactive map of SPZs) is published by the Environment Agency<sup>46</sup>. In addition, there are groundwater sources within the London Boroughs of Hackney and Haringey whose SPZs fall partly within Islington.

6.158 Further guidance on the protection of groundwater and locating appropriate land uses in SPZs can be found in the Environment Agency's Groundwater Protection Guides<sup>47</sup>.

## Policy S10: Circular Economy and Adaptive Design

- A. All developments must adopt a circular economy approach to building design and construction in order to keep products and materials in use for as long as possible and to minimise construction waste.
- B. Buildings must be made from components and materials that can be re-used or recycled. Building design must enable deconstruction to ensure the maximum value of building components can be recovered and re-used at the end of the building's life. Where demolition and remediation works are necessary, materials must be re-used and/or recycled.
- C. A minimum 10% of the total value of materials used in the construction of both major and minor developments must derive from recycled and re-used content in the products and materials selected.
- D. All developments must be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use.
- E. All major developments (including refurbishment and redevelopment of existing buildings), minor new build developments, and larger minor extensions are required to provide an Adaptive Design Strategy as part of the SDCS. This must demonstrate how a circular economy approach has been adopted as part of the building design and construction, and how the building will adapt to change over its lifetime. The Strategy must include evidence to demonstrate that the development will be designed and constructed to:
  - (i) last as long as possible and suit its anticipated lifespan – the strategy must specify the intended overall design life of all buildings in the development;
  - (ii) avoid construction waste and the unnecessary demolition of structures;
  - (iii) be built in layers to allow elements of buildings to be replaced overtime, supporting a modular design;
  - (iv) be adaptable – the plan form, layout and structure enables the building to be adapted to respond to change and/or adapted for various uses throughout its life;

<sup>46</sup> [Groundwater source protection zones guidance](#)

<sup>47</sup> [Environment Agency Groundwater Protection Guides](#)

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| (v)  | enable ease of deconstruction - building materials, components and products can be disassembled and re-used at the end of their useful life; and                                     |
| (vi) | maximise the re-use and/or recycling of all materials arising from demolition and remediation works.   |
| F.   | All development must minimise the environmental impact of materials through the use of sustainably-sourced, low impact and recycled materials, using local suppliers where feasible. |
| G.   | All developments are required to minimise the impact of construction on the environment and comply with Islington's Code of Practice for Construction Sites.                         |

6.159A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. A circular economy approach will save resources, improve resource efficiency and help to reduce carbon emissions. The adoption of circular economy principles will also help to reduce waste production as part of the aim for developments to produce net zero-waste. The successful implementation of a circular economy approach requires the establishment of strategy and policies beyond the local level, from the Mayor of London and Central Government. The North London Waste Plan sets out further details in relation to London's approach to waste. Designing and constructing buildings that can be adapted and deconstructed, and which are made from materials and components that can be re-used or recycled, will contribute to making a more regenerative and sustainable built environment.

6.160 Building design must be viewed holistically, with a building being considered as the sum of its component parts, and in the context of the building design life and the likely future needs of users. A central consideration when designing and constructing a new building, or when extending the life of an existing building, must be how the building can be kept in use for as long as possible to ensure resource efficiency. There are various factors which can contribute to a building becoming obsolete, including build quality, physical deterioration, technology changes, market forces, and regulation. Building design must consider how the building can respond to change within its life and be adapted to suit a variety of uses, users, and configurations, to prevent (or delay as far as possible) the onset of obsolescence. Design features that enable adaptation must be incorporated within the building.

6.161 In order to support a circular economy approach, all developments must be designed to be adaptable and able to respond to change. The extent to which a building must be adaptable to changes in land use and market demands will vary depending on the land use type. Residential developments are unlikely to require a change of use in the future and are designed for a longer life span. In contrast, non-residential developments are likely to have a shorter life-span, and therefore it is especially important that non-residential developments are designed to be adaptable and flexible. In addition, different types of non-residential development will have varying requirements in terms of adaptability and this will also vary depending on the operations and operators within a development. For example, office developments must be designed to be particularly adaptable because the tenant/operator is likely to change more often. All development types must be designed to be adapted to changes in the physical environment. In particular, building form, layout and structure must be designed to address overheating and flood risk, particularly in the context of climate change, where feasible and practical. The design of adaptable building forms,

and adaptations to the form of existing buildings, must maximise fabric energy efficiency in accordance with Policy S4.

- 6.162 The densely developed nature of boroughs such as Islington, with few vacant or empty sites, means that any new construction is usually preceded by the demolition of existing building infrastructure. However, mechanical demolition fails to respect the values of building components as reusable materials and therefore it is vital that consideration is given to deconstruction as a method of taking down a building in order to ensure the maximum value of building components and enable materials to be recovered at the end of the building's life. Design for deconstruction may take longer than demolition and require more labour, however the materials recovered through the deconstruction process have a high and instant value that can be realised. Demolition also has energy impacts in terms of embodied energy of different materials and also the energy used to demolish a building; air quality is also negatively affected by demolition. Achieving BREEAM credits in relation to materials will assist non-residential developments in reducing the environmental impact of the materials used and promote efficiency in the consumption of construction products. BREEAM requirements are set out in Policy S3.
- 6.163 The SDCS must outline how the building design has been developed to be adaptable, and it must detail the commitments that will take the design through to construction. Applications should include details of adaptive design proportionate to the scale of the development. Applicants must consider the use of building life cycle assessments using Building Information Modelling (BIM) to ensure resource efficiency (from production and procurement to construction and disposal), alongside practical and aesthetic value, as a means of demonstrating consideration of all elements of sustainable design.
- 6.164 The sustainable procurement of materials, including the use of recycled, low impact and sustainably-sourced materials can be achieved by maximising materials ratings on the BRE Green Guide. Targeting relevant BREEAM credits in relation to materials will assist non-residential development to achieve these requirements.
- 6.165 All developments must comply with Islington's Code of Practice for Construction Sites in order to minimise the possible negative effects of construction, such as air pollution, noise and vibration, traffic congestion, dust and contamination of land and water and disturbance of local ecology. Policy T5 provides further information.

# 7 Public Realm and Transport

## Policy T1: Enhancing the public realm and sustainable transport

- A. A coherent and inclusive public realm, in conjunction with effective transport, are key elements of ensuring delivery of the Local Plan objectives. All development proposals must take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling (known as active travel). Applicants must provide appropriate information to allow proper assessment of transport impacts and show how these impacts can be addressed, as set out in Appendix 3.
- B. The design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, must prioritise practical, safe and convenient access and use by sustainable transport modes, namely walking, cycling and public transport and must include accessible parking provision. Private vehicle use, other than that required by Blue Badge holders, will be restricted in Islington as far as possible, as it is not sustainable and is a key cause of emissions and congestion.
- C. Freight, logistics and delivery vehicles may be acceptable forms of vehicular transport to enable the functioning of development where appropriate, according to the principles and requirements set out in this policy.
- D. All new development will be car-free, which will contribute to the strategic aim for a modal shift to sustainable transport modes. Private motor vehicles, including electric vehicles and motorcycles, will not be accommodated as part of new development in the borough and are not a priority form of transport.
- E. Transport developments are encouraged to adopt a design-led approach to recognise the role of streets as places.

- 7.1 Increases in Islington's resident and working population suggests that demand for transport - both within and through Islington - will continue to be a significant issue for the Local Plan to address in terms of the location of development and its integration with cycling, walking and public transport infrastructure. Consideration of transport and land use together, at the earliest possible stage of a development proposal, could contribute to a reduction in travel distances and thus a reduction in traffic congestion and pollution. The cumulative effect of new development may not on its own make a significant difference to overall levels of movement over the plan period, but when combined with movements associated with existing development there could be a significant impact, which must be assessed fully. Improving integration of transport and land use also encourages efficient use of space which is more conducive to modes of transport such as walking, cycling and public transport.

- 7.2 The Islington Transport Strategy was adopted on 26 November 2020. It sets the Council's vision for a fairer, healthier, safer, greener transport environment in the borough by 2041. Its overarching themes are the delivery of People Friendly Streets, Vision Zero and a borough wide programme of Low Traffic Neighbourhoods. The Low Traffic Neighbourhoods are a long term initiative that restrict through traffic to create more space for people walking and cycling on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area.
- 7.3 To allow for proper consideration of the transport impacts of a development proposal, applicants must submit either a Transport Assessment and Full Travel Plan, or a Transport Statement and Local Level Travel Plan, in line with the thresholds set out in Appendix 3. Travel plans must reflect the Council's priority sustainable transport modes and support active travel. The submitted information is required to be sufficiently detailed and accurate to enable the Council to fully assess the development proposal. This may include traffic modelling to demonstrate that development proposals will not have an impact (individually or cumulatively) on the flow of traffic. A road safety audit/assessment may also be necessary on specific schemes. The Travel Plan/Local Level Travel Plan must inform other documentation submitted as part of a planning application, including Design and Access Statements, as part of a holistic approach to ensure that inclusive or specific transport options are available to meet the needs of all users, including disabled people.
- 7.4 Islington is extremely well connected in terms of public transport. Many areas of Islington have a PTAL rating of 6a or 6b (the highest possible rating) meaning that the vast majority of the borough has superb public transport connectivity and frequency of service. However, PTAL ratings do not take account of the accessibility of public transport options, which means that the needs of certain transport users, particularly those with mobility, sensory or cognitive impairments, may not be factored in. It is vitally important that specific measures are put in place to enable that these users have easy access to the transport network.
- 7.5 All proposals must promote the development of active and inclusive environments that provide safe opportunities for everyone, specifically the most vulnerable users, to be physically active through sustainable modes of travel. The needs of people walking to, around and from developments are the most important influence on scheme and public realm design, as every user of a building or the public realm use footways as the first and last part of their trip, regardless of whether another mode has been used for the larger part. Cycling has significant public health benefits, both strategic – for example, by not exacerbating already poor air quality – and individual – for example, by promoting healthy physical activity. Increased cycling can also ease the strain on the rest of the transport network through reduced road and rail congestion; this includes increased provision of cycle hire infrastructure (in addition to, not in lieu of, cycle parking). By taking a strategic approach to promoting cycling, Islington aim to improve circumstances for existing cyclists and incentivise new cyclists. Bus services also provide important accessible transport. In all cases, this necessitates provision of safe, convenient infrastructure.
- 7.6 Well-functioning public transport is essential to the sustainable development of the borough. The growing population, and projected economic growth across Islington and London puts great pressures on public transport infrastructure, some of which is already extremely congested.
- 7.7 The strategic objective of the car free policy is that Islington will be able to maintain a pro-active approach to development in order to meet housing need and facilitate jobs

growth without an unacceptable worsening of air pollution, road congestion, noise and road safety. The policy aims to decouple development from traffic generation, changing the mode of spatial development from car-based to walking, cycling and public transport oriented development. Parking within the curtilage of residential properties has negative impacts on biodiversity, flood risk, visual amenity, healthy lifestyles, air quality, traffic congestion and highways safety. Such applications will normally be refused; however, the needs of disabled people will be taken into account and exceptions may be made where appropriate.

- 7.8 The rise of app-based, on-demand mobility has been rapid, and dramatic. However, on-demand mobility apps are not considered to be a substitute for public transport, as they can never move the same volume of passengers around a city nearly as efficiently or effectively. Furthermore, quality and continuity of service, universal availability and equality of access cannot be guaranteed by privately-provided, unregulated services. The contribution of car-based on-demand mobility apps also increases the number of motor vehicles on London's roads.
- 7.9 While it is important to provide movement along a street, considering other functions is essential to create a sense of place and achieve a fulfilling environment which people enjoy to inhabit, walk, meet and cycle. A design-led approach is key to achieving new standards of excellence and recognising the fundamental and various roles of streets. It can also help in reducing the dominance of the vehicle and ensure slower vehicle speed and safer driver behaviours. Changing the road width, junction design and appropriate use of surface material are some examples of these design tools. A design-led approach can also help in meeting the ten indicators of the Mayor of London's Healthy Streets approach which aims to improve health and encourage active travel modes.
- 7.10 The Council will work with different stakeholders including TfL, London Underground, bus operators, developers and Crossrail 2, to deliver mutually beneficial schemes. With regard to TfL, the Council will work in partnership to deliver the aspirations on healthy streets/liveable neighbourhoods set out in the Mayor's Transport Strategy. The Council will also work closely with TfL to deliver borough-level improvements to public transport, the public realm and cycling infrastructure.
- 7.11 Crossrail 2 is a new proposed railway linking the national rail network in Surrey and Hertfordshire via an underground tunnel through London and Islington, with a station being planned in Angel. It is not yet funded but could be operational in the early 2030s, pending funding and relevant permissions. The Safeguarding Direction requires the London Borough of Islington to consult TfL on planning applications it receives that fall within the boundaries shown on the safeguarding plans within the borough before granting planning permission. The Site Allocations DPD identifies sites that are safeguarded for the purpose of Crossrail 2.

## **Policy T2: Sustainable Transport Choices**

- A. Development proposals must demonstrate that negative impacts on the safe and efficient operation of existing and planned improvements of sustainable transport infrastructure – e.g. the public realm, cycle lanes (including the TfL Strategic Cycle

network or lanes feeding into this network), bus routes/stops – are mitigated/prevented.

- B. All pedestrian and cycling infrastructure and facilities are required to be designed in accordance with relevant guidance and/or best practice standards.
- C. The use of shared space to jointly meet the needs of motorised traffic, walking and cycling will be resisted where it involves a single surface. Shared spaces may be acceptable where it has been demonstrated that they deliver logical, legible, inclusive and safe environments that respond to their context.

### **Walking**

- D. All new developments in the borough must be designed to incentivise walking by:
  - (i) delivering high quality public realm improvements that are secure, safe, legible, inclusive and create permeable environments;
  - (ii) resisting proposals that have a negative effect on public realm;
  - (iii) ensuring that pedestrian crossings are convenient and avoiding (where appropriate) complex and/or long pedestrian crossings and unnecessary pedestrian guardrails; and
  - (iv) ensuring safe, convenient and continuous routes for pedestrians that follow desire lines and form networks.

### **Cycling**

- E. All new developments in the borough must be designed to incentivise cycling by:
  - (i) ensuring safe, convenient and continuous routes for cyclists that follow desire lines and form networks;
  - (ii) demonstrating that there are no road safety conflicts between pedestrians, cyclists and vehicles entering, parking and/or servicing the development. Cyclist entrances to buildings, cycle stores and parking must be safe and convenient for all and cycle lanes must be demarcated from other pedestrian and road traffic;
  - (iii) providing cycle parking and associated circulation space for ease of use of cycle parking, in accordance with Appendix 4; and
  - (iv) providing inclusive and accessible end-of-trip facilities for cyclists, at a level proportionate to the size of the development and the required level of cycle parking.

### **Public Transport**

- F. The Council will work in partnership with TfL, the bus and rail operators, developers and other relevant agencies/stakeholders in order to:
  - (i) implement measures to give buses priority over other private motor vehicles (including continuous bus priority measures along whole route corridors);
  - (ii) create and enhance the public realm around bus and rail stations to improve pedestrian/public transport user and cycling experience;
  - (iii) ensure network infrastructure and service improvements increase access (including step free access), capacity and public transport interchange improvements to local bus, rail and tube stations;



- (iv) develop the network of services to meet the travel needs of local residents and businesses; and
- (v) ensure that bus stops and bus stopping areas are well located and designed, accessible and comfortable for all.

**Minimising the impact of non-sustainable transport modes**

- G. Developments which involve the ongoing use of private vehicles are likely to cause adverse impacts on the sustainable transport network and undermine the car-free policy aims to reduce congestion and vehicle emissions. Planning applications for developments involving the ongoing use of a private vehicle(s) – regardless of whether parking is provided in line with Policy T3 – will only be approved where:
- (i) clear and compelling evidence is provided to demonstrate that use of a vehicle(s) is essential for the use to function effectively (e.g. Use Class B8 storage and distribution uses);
  - (ii) the applicant can demonstrate that the transport impacts of the development have been satisfactorily mitigated, including consideration of potential for obstruction of the public realm and sustainable transport infrastructure;
  - (iii) it can be demonstrated that the use of private vehicles has been minimised; and
  - (iv) opportunities for using more sustainable alternative modes of transport are maximised as part of the design of a proposal.

7.12 The Local Plan promotes sustainable transport choices in order to mitigate the impact of developments on the environment, improve air quality, reduce health impacts, respond to congestion affecting roads and public transport, and promote healthier lifestyles. Walking is a priority mode of transport; development proposals must be designed from the outset to facilitate walking to and from the development, in line with the Council’s Inclusive Landscape Design and Streetbook SPDs, as well as the Mayor’s Transport Strategy<sup>48</sup> and TfL’s Healthy Streets Indicators<sup>49</sup>.

7.13 Shared space (single space) is a design approach which aims to declutter the public realm through the removal of features such as kerbs, road surface markings, designated crossing places and traffic signs. While they can lead to sustainable transport benefits, through the reduction of vehicle trips and increases in pedestrian and cycle usage, they can involve the use of single surfaces, which have inherent safety issues. Single surfaces are particularly detrimental to vulnerable pedestrians such as visually, hearing and cognitively impaired people, who can find shared space schemes dangerous and difficult to navigate. Therefore, the use of single surface shared space, which involves the removal of kerbs, will be resisted. Shared space must deliver logical, legible, inclusive and safe environments, informed by a contextual appraisal. Kerbs must be a minimum height of 60mm.

7.14 Pedestrian crossings must be designed to be convenient, accessible and inclusive for people to use, and must have regard to desire lines. Staggered, long and complex crossings are considered unsuitable. This also includes avoiding the use of guard

<sup>48</sup> [Mayor’s Transport Strategy](#)

<sup>49</sup> [Healthy Streets Indicators](#)

railing wherever appropriate. Road junctions must be designed to cater for the ease of crossing by all users.

- 7.15 As a borough on the edge of central London with a relatively flat topography, there is scope to improve cycle ridership levels in Islington. This could include road safety improvements such as vehicle/cycle segregation and the promotion of quiet and cleaner routes for walking and cycling. The Council will ensure that new development contributes effectively to enabling the borough's cycling potential to be met, in a way that meets the needs of all residents and visitors. The Streetbook SPD provides further guidance.
- 7.16 The Council supports cycling infrastructure improvements that adhere to guiding principles and achieve the good design outcomes set out in the London Cycling Design Standards. TfL's Strategic Cycling Analysis 2017 identified Kentish Town to Wood Green via Archway going up Junction Road, and Camden Town to Tottenham Hale via Nag's Head on Seven Sisters Road as two of their top priority cycling connection routes with the greatest potential to serve people who currently cycle, and to enable more people to cycle in the borough. In January 2018, the Mayor of London announced the development of the Camden to Tottenham Hale cycle route. Islington will continue to collaborate with TfL to design and deliver this new route, and to progress the Kentish Town to Wood Green route. New developments must not preclude the delivery of cycle infrastructure improvements, particularly along corridors identified as part of TfL's Strategic Cycle Network or which have the potential to feed this network.
- 7.17 All transport schemes and infrastructure must provide holistic benefits and provide safe, accessible and step-free transport solutions for all sustainable modes, including interchange between these modes. They must incentivise use by a range of users and remove barriers to use as far as possible.
- 7.18 The lack of secure and accessible cycle parking is commonly recognised as one of the main barriers to cycling. Cycle parking – including accessible cycle parking spaces for mobility bicycles and tricycles, for cyclists with disabilities, as well as cycles for parents with children - must be provided as part of development proposals, including, but not limited to, uses within the E(a) and F.2(a) (shops), E(c) (financial and professional services), E(b) (restaurants and cafés), E(c) (offices), F.1 (non-residential institutions), F.2(b) and E(d) (assembly and leisure) and Sui Generis Use Classes. Cycle parking provision (including accessible parking and visitor parking) must be provided in line with Appendix 4.
- 7.19 Accessible cycle parking must meet the needs of ambulant disabled cyclists as well as people using non-standard cycles, such as tricycles and cargo bikes. Cycle parking suitable for families must also be provided for family sized homes. This may include parking that can accommodate trailers/cargo bikes for children. Any area provided for cycle parking must be in addition to minimum residential space standards (including storage and amenity space) and minimum design requirements for employment floorspace.
- 7.20 End-of-trip facilities are essential in order to promote cycling as a legitimate mode of transport, especially for travel to workplaces. Facilities must be accessible, with provision of showers, lockers and clothes drying facilities sufficient to meet the peak needs of the development, based on the occupancy of the development and the amount of cycle parking proposed.

- 7.21 Dockless bike schemes have potential benefits in terms of increasing cycle patronage, but they often lead to significant street clutter and obstruction of pedestrian routes. Without greater oversight and control of dockless bike storage, such schemes will not be supported.

### **Policy T3: Car-free development**

- A. All new development will be car free.

#### **Residential Parking (including C3 and non-C3 residential use)**

- B. Vehicle parking or waiting for essential drop-off and accessible parking will be permitted for new homes. This does not include applications for vehicle parking within a site, the planning unit and/or within the curtilage of existing residential properties, including any undercroft or basement parking. Unless exceptional circumstances can be demonstrated, no parking permits will be issued to occupiers of these new homes.

#### **Non-Residential Parking**

- C. Parking will be allowed for non-residential developments where this is essential for operational requirements and therefore integral to the nature of the business or service (e.g. Use Class B8 storage and distribution uses). In such cases, parking will be permitted where an essential need has been demonstrated to the satisfaction of the Council and where the provision of parking would not conflict with other Council policies. Normal staff parking will not be considered essential and will not be permitted.
- D. Essential drop-off or essential operational parking considered acceptable in line with Parts B or C must:
- (i) be off-street and located to be accessible and convenient in relation to the development;
  - (ii) not impede pedestrian and cycle movements;
  - (iii) provide an accessible route from the parking space to the development; and
  - (iv) provide electric vehicle charging points.
- E. Where on-street drop-off or other essential parking is proposed, details must be submitted to demonstrate the need for on-street provision and to show that arrangements will be safe and will not cause a traffic obstruction or nuisance. Electric vehicle charging points must be provided where parking is justified; charging points must be located within the parking space or carriageway and must not obstruct pavements or cause other adverse public realm impacts.
- F. Planning applications for uses that require coach parking will only be permitted where the coach parking would not give rise to adverse impacts on road safety and congestion. Coach parking must be provided on-site, unless the applicant can identify an alternative location which satisfies the Council in terms of road safety

and congestion and other relevant planning matters. Such locations must not be directly outside the main entrance of developments and must not be at the expense of space provided to facilitate other sustainable modes of transport including buses.

### **Accessible parking**

- G. Accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed (for residential proposals); or one accessible parking space per 33 employees (for employment development). For other uses, the number of accessible spaces must be proportionate to the number of building users. Spaces will only be made available for Blue Badge holders who live or work in the development linked to the parking space. The Council will require accessible parking spaces to be located on-street and identified on plan. The cost of provision of parking spaces will be secured by a Section 106 legal agreement to enable the Council to install the accessible parking spaces as and when demand materialises from Blue Badge occupiers/employees. Spaces will generally not be required to be physically provided where this demand has not materialised. Where it is not possible to deliver designated spaces on street, for example due to insufficient space or issues with amending Traffic Management Orders, a financial contribution should be made towards investment in other accessible or sustainable transport initiatives where appropriate.

### **Car Clubs**

- H. The Council will support the provision of car clubs, including the provision of accessible car club parking spaces and/or contributions towards the provision of car clubs in the vicinity of the development, where appropriate. Car club vehicles must be 'clean', i.e. it must be powered by alternative fuels to minimise harmful impacts on the environment.

### **Car Parks**

- I. Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be refused. Redevelopment of existing car parks is strongly encouraged. Proposals for the redevelopment of existing car parks (public or private) for a different use will be subject to the car-free restriction within this policy. The artificial separation of sites to remove existing on-site parking areas (public or private) from the boundary of an application for the purposes of retaining car parking spaces will not be considered acceptable. All parking related to the existing use and/or building which is the subject of the application must be included as part of the application site.

### **Electric vehicles**

- J. Electric vehicles are not exempt from the car-free policy. However, the Council will require the provision of on-street charging points for vehicles where any parking is provided.

7.22 Motorised road transport generates congestion, pollution, noise and can compromise road safety for users of sustainable mode of transport. In Islington, these issues are further intensified due to the high population density and its central location in London. The only effective way of preventing adverse impacts associated with motorised road transport is to remove cars from the road while increasing the volume and

attractiveness of other sustainable modes. The projected advancement of electric and/or autonomous vehicles is not a solution to these issues, as they still take up physical space on the road and therefore can lead to a number of the same adverse impacts as physically operated vehicles.

- 7.23 Islington's car-free development policy applies borough-wide and aims to reduce the dominance of cars in the borough while also achieving a reduction in vehicle pollutants, particularly NO<sub>2</sub>, PM10 and PM2.5. Car-free development means that no parking provision will be allowed on-site and occupiers will not have the ability to obtain parking permits, except for required accessible parking. The car free policy will apply to any residential development within C3 or non-C3 Use Classes (and land within the curtilage of such development). For avoidance of doubt, it applies to any residential use created through new build, change of use, conversion and/or subdivision of existing residential properties. Where appropriate, parking provision for essential drop-off and operational parking (for non-residential uses) may be permitted. Other motor vehicles such as vans, lorries and motorcycles are covered by the term 'car free'.
- 7.24 Some residents moving into car-free homes might face exceptional circumstances, in particular, existing residents in social rented housing who have a parking permit, who move to different accommodation or return to a site after the development has been completed (such as with estate redevelopment). In such circumstances, occupiers may be allowed the right to keep a parking permit.
- 7.25 Accessible transport initiatives may include the provision of accessible parking, and a range of inclusive alternatives. Accessible parking must be provided on-street. For residential development, on-street accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed. For employment uses, one on-street parking space must be provided for every 33 employees. For other uses, the number of accessible bays must be proportionate to the number of building users.
- 7.26 Only Blue Badge occupiers/employees will be eligible to use accessible parking spaces. Spaces will only be activated when demand materialises, either when a dwelling is occupied by a Blue Badge holder or a Blue Badge holder is employed. Provision must be in accordance with best practice standards, as set out in the Council's Planning Obligations (Section 106) and Inclusive Design SPDs, and BS8300:2009.
- 7.27 The Council will support and encourage temporary use of existing under-utilised parking spaces for other uses, such as parklets or cycle storage. Alternative uses must be easily demountable.
- 7.28 In conjunction with the Council's Highways team, the developer must identify suitable locations for accessible bays (which must be within 75m of the entrance(s) of the proposed development) and pay for the conversion of suitable bays. The amount payable will be determined based on a standard cost of conversion. An example of contributions where it is not possible to deliver designated spaces on the street would be to fund a Taxicard scheme for transport users with mobility and/or sight impairments. Further information is set out in the Planning Obligations (Section 106) SPD.
- 7.29 Car clubs provide an alternative to car ownership that helps to reduce traffic and parking congestion, reduce air pollution and climate change impacts from transport, allows more equitable and efficient use of public space and increases travel options for all social groups, particularly helpful for families. Car clubs support the Council's car

free policy and help to mitigate the transport impacts of a development compared with private car ownership.

- 7.30 The redevelopment of existing car parks for alternative uses will be subject to the car free policy. The number of car parking spaces existing on-site will not be accepted as a justification to provide car parking in contravention to the car-free policy, or to provide delivery, servicing, drop-off and accessible parking above requirements identified in the submitted Transport Assessment and agreed by the Council. The artificial separation of sites to remove existing on-site parking areas from the boundary of an application for the purposes of retaining car parking spaces will not be considered acceptable. All parking related to the existing use and/or building which is the subject of the application must be included as part of the application site.
- 7.31 Electric vehicles are not a priority mode of transport; they are preferable to petrol/diesel vehicles but still rank significantly below walking, cycling and public transport. Parking for electric vehicles is subject to car-free policy. Where use of motor vehicles is unavoidable, such as for deliveries, the Council encourages use of electric vehicles. The electricity grid is not yet decarbonised although a transition to renewable energy is under way, so the carbon footprint of electric vehicles is reducing. More importantly however, the scarcity of road space mean the effects of congestion cannot be mitigated which justifies the Council's clear priority for walking, cycling and public transport as priority modes of travel.
- 7.32 The Council is facilitating the provision of electric vehicle charging points, as well as helping car club operators to achieve a diesel free fleet and enabling the electrification of the borough wide car club network. Where parking is provided, for example, accessible parking, car clubs and parking for essential operational needs, electric vehicle charging points must be provided, to help facilitate move away from petrol and diesel powered vehicles. Charging points must be provided within the parking space itself to minimise street clutter and avoid impacts on the pedestrian environment; there may be exceptions where charging points are incorporated into existing street furniture – e.g. lampposts – and adverse impacts on the public realm can be fully prevented. The Streetbook SPD will be used to assess the impacts of new electric vehicle charging points on the pedestrian environment.

#### **Policy T4: Public realm**

- A. All development proposals must engage positively with the public realm and must ensure that the public realm:
- (i) is permeable, legible and designed with regard to pedestrian and cycle desire lines;
  - (ii) provides for the safety and convenience of all users, including those with mobility, sensory and or cognitive impairments;
  - (iii) increases natural surveillance, including through the provision of adequate lighting;
  - (iv) contributes to the quality and quantity of green infrastructure; and

- (v) promotes positive behaviours and social activities and encourages a diverse range of users to make use of space and facilities available.
- B. Any remodelling of the public realm and/or streets, through a stand-alone proposal or as part of a wider development proposal, must be based on a contextual appraisal and the findings of a Route:Place analysis. All proposals must be designed in accordance with the Streetbook SPD and must maximise opportunities to deliver other policy objectives.
- C. Street surface material(s) must:
  - (i) be durable and non-slip in all weather conditions;
  - (ii) be permeable to avoid exacerbating flood risk;
  - (iii) be contextual and reflect and enhance the character of particular areas; and
  - (iv) enhance the quality of the surrounding architecture.
- D. Privately Owned Public Spaces (POPS) must provide a detailed management plan which sets out how the space will be used and managed. Management plans must detail how the space can be utilised by a range of users; and how the space contributes to mixed and balanced communities. POPS must operate indistinguishably from public space. Adherence to management plans will be secured through legal agreement.
- E. Free, publicly available provision of unisex accessible toilet, baby change and drinking water facilities should be provided within easy reach of any new or enhanced public realm where users are encouraged to dwell.
- F. Design of the public realm must take into account Hostile Vehicle Mitigation measures, ensuring that the correct level of protection is provided without imposing unnecessary restrictions on people using the public realm in the area.

7.33 The success of any development within the public realm depends largely on how it relates to and fits within its wider context. Development proposals must provide a contextual appraisal, proportionate to the scale of the development. The appraisal must inform the design of the site, and will provide a critical reference point throughout the design process and ensure public realm elements are fully integrated to all proposals at the earliest possible stage. Proposals which do not engage proactively with the public realm and explore opportunities for improvements/better links will be resisted.

7.34 To analyse the character, qualities and potential of public realm, a Route:Place analysis must be conducted as part of the contextual appraisal. This analysis provides references to classify streets according to their place and movement qualities. A useful starting point is to consider where the public realm or street in question is currently located on Route:Place spectrum and where they should more appropriately sit. More guidance on the Route:Place analysis is provided in the Streetbook SPD.

7.35 Assessments of the public realm must be made in an inclusive manner. Tools such as the 'Pedestrian Environment Review System' (PERS) are a walking audit tool and can be very useful in assessing the quality of the public realm associated with a development. However, the methodology relies heavily on the auditor's professional judgement. Therefore, any such study is backed up by objective reference to recognised standards, as agreed with the Council on a case-by-case basis.

- 7.36 The privatisation and commercialisation of public space will be resisted. POPS are publicly accessible spaces which are provided and maintained by private landowners. Even though the spaces have public qualities, such as free entry and 24-hour access, there are often constraints to their use, including some with restricted access arrangements.
- 7.37 Where POPS form part of a development proposal, a detailed management plan must be provided which sets out how the space will be used and managed. POPS must operate as de facto public space open to all groups; it must not exclude specific groups of users. The terms and conditions of their management and activities allowed will be defined case by case through the submission of the management plan which will be secured through legal agreement.
- 7.38 Hostile/defensive architecture involves various forms of design intended to deter certain groups from using a space. Proposals that include hostile/defensive architecture are not consistent with the Council's fairness agenda and will be resisted. Public realm developments, including spaces outside public buildings, must incorporate Hostile Vehicle Mitigation measures at an early stage of the design process, instead of being retro-fitted. Applicants must engage with the Council and Metropolitan Police at the earliest possible stage of the proposal, for guidance on counterterrorism measures for public projects, including open spaces. A risk assessment must be submitted as part of a planning application, which must include an assessment of the risk of structural damage from an attack; identification of measures to minimise any risk; and how the perimeter is treated, including glazing. Such measures must be considered in light of all other policy requirements, including inclusive design requirements.
- 7.39 Free, publicly available provision of unisex accessible toilet, baby change and drinking water facilities should be provided within easy reach of any new or enhanced public realm. Publicly accessible, standalone toilets and baby change facilities are preferred, and these should be independently managed and policed, including details of maintenance (including any commitment for ongoing funding of maintenance). However, where such facilities are not practical (for example if other public realm functions and/or the amount of available space leave no scope for new facilities), access to toilets and baby change facilities may be provided as part of a Community Toilet Scheme. Such alternative provision will only be acceptable where there are firm guarantees that provision will be available in perpetuity, without restrictions (such as that provided in the City of London, Camden or Richmond).
- 7.40 With regard to drinking water facilities, successful schemes such as Refill London could be utilised in lieu of specific provision of new drinking water fountains. Any alternative provision will need to be fully accessible without restrictions and in perpetuity.
- 7.41 Streets, whatever scale, character, status and/or state of repair, can be defined in terms of their qualities as a place in which to dwell and a route by which to travel. Streets must form convenient, legible, continuous and adequately lit routes for pedestrians and cyclists, follow desire lines and form networks.
- 7.42 A co-ordinated and multi-functional approach to street furniture leads to better street design, for instance by combining signage and lighting; or better locating street furniture to fulfil its intended use and improve the legibility and quality of the streetscape and increase the quantity of pedestrian spaces. Poor design creates obstruction, clutter, unwelcoming and unsafe environments.



- 7.43 Street design can also improve pedestrian safety by reducing traffic speed and encouraging safer driving, for example by changing the road width, junction design and appropriate use of surface material.
- 7.44 Introducing more trees and greenery creates more attractive streets and public spaces, increases biodiversity and helps to mitigate the impacts of climate change and air pollution. This includes planted kerb extensions, pavement planters, landscaped central reservations, vegetated swales, permeable paving, and street trees. Provision of green infrastructure must be balanced against the Local Plan inclusive design policies.
- 7.45 Further guidance on street design is provided in the Inclusive Landscape Design SPD, Streetbook SPD and the Inclusive Design in Islington SPD.

### **Policy T5: Delivery, servicing and construction**

- A. Delivery and Servicing Plans will be required for developments that may impact on the operation of the public highway, private roads, the public realm and/or the amenity of residents and businesses, by virtue of likely vehicle movements. These plans must demonstrate how safe, clean and efficient deliveries and servicing have been facilitated and any potential impacts will be mitigated. Delivery and Servicing Plans will be required to assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. Use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged.
- B. Proposed delivery and servicing arrangements must:
- (i) be provided off street wherever feasible, particularly for commercial developments over 200sqm GEA;
  - (ii) make optimal use of development sites;
  - (iii) demonstrate that servicing and delivery vehicles can enter and exit the site in forward gear;
  - (iv) submit sufficient information detailing the delivery and servicing needs of developments, including demonstration that all likely adverse impacts have been thoroughly assessed and mitigated/prevented. This includes impact on the amenity of local residents and businesses, for example, vehicle noise impacts from idling and reversing warning mechanisms and impacts due to the size of delivery vehicles;
  - (v) provide delivery and servicing bays whose use is strictly controlled, clearly signed and only used for the specific agreed purpose;
  - (vi) ensure that there are no adverse impacts on existing/proposed refuse and recycling facilities;
  - (vii) Ensure that the cumulative impact on sustainable transport modes is identified and suitably mitigated/prevented; this must include consideration of delivery and

servicing requirements of existing, planned and potential development in the area, particularly in Town Centres, designated employment areas and the CAZ; and

- (viii) Investigate potential for delivery and servicing by non-motorised sustainable modes, such as cargo cycles and 'clean' vehicles.
- C. For major developments, details of refuse and recycling collection must be submitted, indicating locations for collection vehicles to wait and locations of refuse and recycling bin stores.
- D. Development proposals in the vicinity of, or located on key routes connecting to, Locally Significant Industrial Sites must demonstrate that they have considered any impacts on logistics and transport movements that are integral to the continued industrial function of these areas.
- E. Where on street servicing is provided, details must be submitted to demonstrate the need for on street provision and that off street provision is not practical, and to show arrangements will be safe and will not cause traffic obstruction or nuisance. This may require specific traffic modelling.
- F. Major residential developments must demonstrate that adequate provision can be made for delivery vehicles servicing residents. Delivery storage facilities must be provided such as secure unattended or concierge managed delivery facilities.
- G. Development proposals – particularly major developments or any other site which may cause disruption during its construction - must adhere to best practice construction techniques to limit impacts on air quality and reduce noise and vibrations from construction and the transportation of construction waste. Information must be provided to identify and mitigate impacts, including a Construction Logistics Plan.

7.46 Full details of delivery and servicing requirements must be provided to enable full consideration of potential impacts. The assessment should be informed by the transport assessment submitted with an application, including consideration of:

- delivery hours;
- delivery frequency;
- service bay location;
- service bay operation (including swept path analysis), and
- size of servicing vehicles.

7.47 For commercial developments over 200sqm GEA, on-street servicing will only be allowed where it has been demonstrated that it would not be possible to provide servicing on-site due to site constraints and/or impacts on the quality of scheme, and where impacts on highway safety, capacity or congestion can be prevented or mitigated. The servicing and loading arrangements of an existing or previous use will not be taken into account with regard to justifying continued on-site servicing. Where delivery and servicing arrangements include private vehicles, preference must be given to light goods vehicles under 3.5 tonnes. Vehicles weighing more than 3.5

tonnes are more likely to cause adverse impacts for the local road network and public realm.

- 7.48 The Council will encourage local businesses to avoid peak hours for delivery and servicing, for instance through local voluntary agreements, such as servicing and delivery bonds.
- 7.49 Servicing on bus lanes will not be supported and rear access arrangements will be expected where front-access would interfere with the operation of bus lanes. The Council will, where appropriate, control aspects of servicing by condition and/or planning obligation.
- 7.50 The Council expects all development to comply with the best practice for construction, delivery and servicing, including the Islington Code of Practice for Construction Sites. Development must adhere to relevant best practice standards and safety requirements such as the Fleet Operator Recognition Scheme and the Construction Logistics and Community Safety programme.
- 7.51 A Construction Logistics Plan (CLP) must be provided to enable impacts to be properly assessed. For applications with significant transport impacts, a two-stage CLP (comprising an Outline and Detailed CLP) will be required, in line with TfL guidance. The Outline CLP must be provided as part of the planning application and the Detailed CLP must be secured by condition and discharged prior to commencement.
- 7.52 The Council expect developments to adopt best practice construction techniques to reduce noise and vibrations from construction, and encourage the transportation of construction waste and rubble out of London via rail or, where appropriate, waterborne freight, instead of lorry. This includes TfL's Code of Construction Practice.
- 7.53 Development proposals must demonstrate how emissions from the demolition and construction of buildings will be reduced following the Council's Code of Construction Practice, and how they will comply with the Non-Road Mobile Machinery Low Emission Zone where applicable.

## 8 Design and Heritage

### **Policy DH1: Fostering innovation and conserving and enhancing the historic environment**

- A. Islington supports innovative approaches to development as a means to increasing development capacity to meet identified needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough. In this context, an innovative approach is one that contributes to the delivery of the Local Plan objectives, including making the borough an inclusive and resilient place by ensuring the design of buildings meets contemporary standards, the needs of all users and mitigates against the impacts of climate change.
- B. Islington is a diverse place of many different areas which give the borough its character. Development can be accommodated throughout the borough, but the scale of development is dependent on a number of considerations, including design and heritage. The Council intends to develop design codes for some parts of the borough to provide clear design guidance for development in those areas.
- C. Development must protect or enhance the London View Management Framework views and Local Views (identified on the Policies Map).
- D. Development should protect or enhance the settings of Local Landmarks (identified on the Policies Map).
- E. The Council will conserve or enhance Islington's heritage assets – both designated and non-designated – and their settings in a manner appropriate to their significance, including listed buildings, conservation areas, scheduled monuments, Archaeological Priority Areas, historic green spaces, locally listed buildings and locally significant shopfronts.
- F. Site potential for development and site density levels must be fully optimised, in order to make the best use of the scarce land resource in the borough. High density does not automatically mean buildings need to be tall. The design of development must create a human scale and massing.
- G. Tall buildings can help make best use of land by optimising the amount of development on a site, but they can also have significant adverse impacts due to their scale, massing and various associated impacts. Tall building locations must be carefully managed and restricted to specific sites where their impacts can be managed through appropriate design.
- H. Basement development can contribute to accommodating needs, for instance growing families, but they can also have significant adverse impacts. Any development involving basements will be strictly controlled.
- I. The agent-of-change principle ensures that the individual/organisation proposing change is responsible for ensuring that existing uses in the area are not adversely

impacted, including through noise and vibration impacts. This principle will apply to all development proposals in the borough, and can include consideration of a wide range of planning issues, including compatibility of land uses and design.

- 8.1 Islington has a diverse character which is made up of a rich mix of buildings, streets, spaces and areas which all contribute to a strong sense of place. The way in which these elements interact and relate to each other and the wider urban environment adds to the borough's local distinctiveness.
- 8.2 The historic environment is generally defined as all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity. Islington's historic environment is highly valued and is a key element of the borough's character, distinctiveness, and success. There are numerous designated and non-designated heritage assets that contribute to Islington's historic environment; around half of Islington is designated as a conservation area and it is also home to approximately 4,500 statutorily listed buildings alongside numerous other heritage assets.
- 8.3 Islington has significant development needs, particularly for new housing and business floorspace, and also must maximise opportunities to mitigate the impacts of climate change and ensure that development is inclusive and accessible to all. Islington's character may need to evolve in order to accommodate these needs, and ultimately deliver the Local Plan objectives holistically. As part of any evolving character, protection of the historic environment must be reconciled with the environmental, social and economic needs and aspirations of people who live and work in the borough, although the conservation and enhancement of the historic environment can itself be a tool for meeting these aspirations.
- 8.4 The borough's built heritage is a resource which can help shape new development in the borough and the careful consideration and integration of heritage assets into new development schemes provides an opportunity for conservation and development to work together to transform the built environment. Heritage assets play a key role in enriching the fabric of the borough's townscape, and new development must seek to enhance them through high quality urban design and architecture which also creates safer and more inclusive places. Further guidance is provided in the Islington Urban Design Guide SPD.
- 8.5 This approach to the historic environment does not mean simply mimicking of what is already there; instead, it requires genuine engagement with, and a quality response to, the local context. Contemporary architecture and non-traditional materials can, in principle, make a positive contribution, although this will be assessed on a case-by-case basis. New development can also create new views and juxtapositions which add to the variety and texture of the setting of heritage assets.
- 8.6 The four design principles of Policy PLAN1 will enable an innovative approach to development in Islington whilst conserving and enhancing the historic environment. Innovative development can help to achieve a positive contribution and make the best use of land in the borough. Innovation goes beyond mere aesthetics; it is fundamentally about how we can accommodate new development – particularly delivery of affordable housing and other priorities - through intensification, achieving versatility and injecting life into an area.

- 8.7 Creating buildings of a human scale and massing, which accommodate high density development, is one way this could be achieved. It is expected that the majority of future growth will be accommodated in high-density development which has fully explored all opportunities to optimise the development potential of sites<sup>50</sup>. For example, a re-interpreted, modern take on mansion blocks which marries high density development of a human scale with provision of high quality design standards is an innovative approach which could optimise development capacity while simultaneously enhancing the built environment.
- 8.8 Innovation could also include new architectural styles and techniques such as modular construction, which could have benefits in terms of design and construction costs and deliverability of sites.
- 8.9 Innovative development and design must also use physical form to provide solutions to issues which arise through the process of developing proposals, rather than relying on future management arrangements of specific buildings; shortcomings in the latter frequently places unreasonable and unsustainable demands on the former. An example of this includes emergency evacuation arrangements; all developments must be compartmentalised (installing fire breaks not only between floors but within floors so that all users can escape horizontally to a place of another part of the building), and/or include provision of evacuation lifts (in addition to any requirement for fire-fighting lifts) that would provide a safe and secure evacuation route for mobility impaired individuals in an emergency.
- 8.10 The Council has commissioned a borough-wide characterisation study to provide an up-to-date and thorough understanding of the local character in various areas across the borough, taking into account a number of considerations including relevant heritage designations. The results of this work will be used to develop supplementary guidance on optimising development capacity across the borough, to support various policies and allocations set out in the Local Plan. This may include reference to specific suitable development typologies for certain areas or types of site.
- 8.11 Applicants for major schemes are encouraged to engage in pre-application discussions to inform the design of development proposals, and subsequently use Islington's Design Review Panel to provide constructive feedback on design proposals.

## **Policy DH2: Heritage assets**

- A. Planning and listed building consent applications must include a Heritage Statement which demonstrates a clear understanding of the significance of any heritage assets affected by the proposals, including any contribution to significance made by their setting; and assesses the potential impact on significance arising from the proposals. Heritage Statements must be informed by specialist heritage advice and must include sufficient information to allow full assessment of development proposals.

### **Conservation areas**

<sup>50</sup> Buildings which are 30 metres or more in height will trigger Policy DH3 Part B.

- B. Development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve or enhance the significance of the area, and must be of a high quality contextual design. Proposals that harm the significance of a conservation area must provide clear and convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted.
- C. Buildings, spaces, street patterns, views and vistas, uses and trees which contribute to the significance of a conservation area must be retained. The significance of a conservation area can be harmed over time by the cumulative impact arising from the loss of these elements which may individually make a limited positive contribution, but cumulatively have a greater positive contribution.

#### **Listed buildings**

- D. Proposals that harm the significance of a listed building (through inappropriate repair, alteration, extension, demolition and/or development within its setting) must provide clear and convincing justification for the harm. Substantial harm to, or loss of, a listed building will be strongly resisted.

#### **Historic green spaces**

- E. Islington's historic green spaces are important heritage assets and are listed in Appendix 6. Proposals which affect the significance of historic green spaces must ensure:
  - (i) the conservation or enhancement of the spaces themselves, their setting and any important features;
  - (ii) that the enjoyment, layout, design, character, appearance or setting of spaces, and key views out from the landscape, is maintained or enhanced; and
  - (iii) that any planned or potential future restoration is not prejudiced. The Council encourages the restoration and management of historic green spaces to enhance their value.
- F. Proposals that harm the significance of a historic green space must provide clear and convincing justification for the harm. Where proposals will cause substantial harm to their significance, they will be strongly resisted.

#### **Archaeology**

- G. Islington's Archaeological Priority Areas and scheduled monuments are identified on the Policies Map. Proposals which have the potential to affect archaeological remains and/or heritage assets of archaeological interest, particularly those within Archaeological Priority Areas and/or in proximity to scheduled monuments, are required to include an Archaeological Assessment and, where necessary Field Evaluation.
- H. Important archaeological remains must be retained in situ. Substantial harm to, or loss of, nationally important archaeological remains will be strongly resisted. Where this cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings. Where appropriate, public benefits should be sought by revealing and/or interpreting archaeological discoveries.

### **Non-designated heritage assets**

- I. Non-designated heritage assets, including locally listed buildings and shopfronts, must be identified early in the design process for any development proposal which may impact on their significance. The Council will encourage the retention, repair and re-use of non-designated heritage assets. Proposals that unjustifiably harm the significance of a non-designated heritage asset or their setting will generally not be permitted.

### **Views**

- J. There are a number of strategic views, local views and views of local landmarks within and across Islington. These give important views toward St. Paul's Cathedral, while some offer a unique panoramic view of Islington and other parts of London or a view of St. Paul's or a local landmark as part of the broader townscape (particularly street level views). Development must protect or enhance the London View Management Framework views and Local Views. Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view. Development proposals must provide appropriate supporting material – including 3D modelling - to verify the visual impact of proposed development on protected views.

### **Local Landmarks**

- K. Development in the vicinity of a Local Landmark should protect or enhance their settings. Heritage assessments for development affecting Local Landmarks should identify impacts on the building's role within the townscape.

### **Heritage at risk**

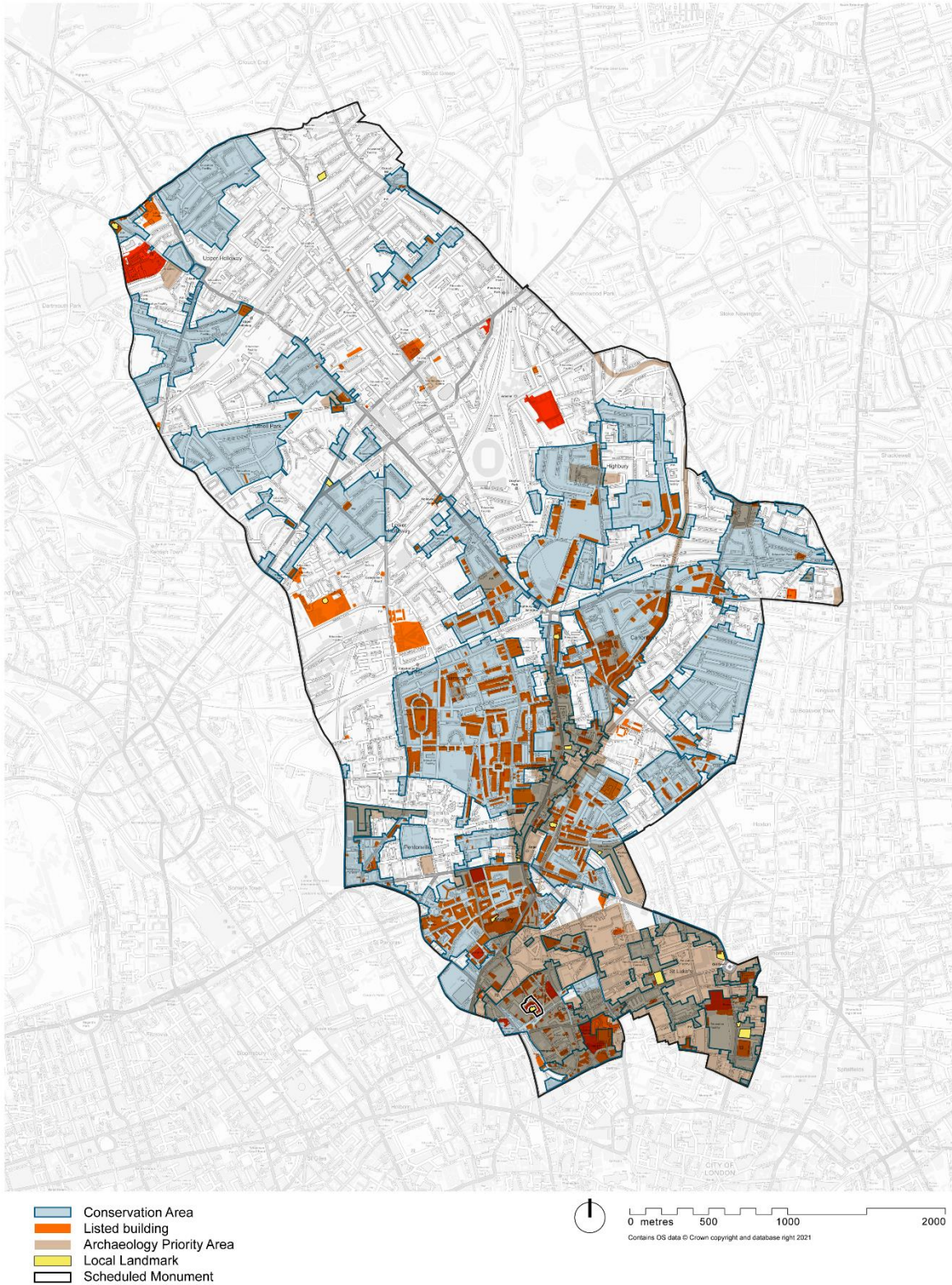
- L. Where development proposals involve 'at risk' heritage assets, opportunities must be sought to address the negative factors which contribute to the 'at risk' status.
- M. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset will not be taken into account in any decision.

8.12 Islington's heritage assets add to the borough's character and distinctiveness. Listed buildings, conservation areas, scheduled monuments, local landmarks and Archaeological Priority Areas are all designated heritage assets. However, the term heritage asset includes any valued component of the historic environment; it is not limited to specific buildings and structures, and can include spaces, views and other assets which are positively identified as having a degree of significance meriting consideration in planning decisions.

8.13 Figure 8.1 shows the extent of heritage assets across the borough:



Figure 8.1: Heritage assets<sup>51</sup>



<sup>51</sup> Details of listed buildings can be viewed on the [Historic England website](#)

- 8.14 The significance of a heritage asset is defined as the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 8.15 The setting of a heritage asset is defined as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 8.16 All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or undesignated. The extent and importance of a setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places<sup>52</sup>.
- 8.17 The Council will not permit substantial harm to (or total loss of significance of) a designated heritage asset unless it can be demonstrated that the substantial harm or total loss is necessary to fully address all other relevant Local Plan policy requirements including, inter alia, affordable housing, affordable workspace, inclusive design and sustainability standards; or where the following criteria is met in full:
- The nature of the heritage asset prevents all reasonable uses of the site;
  - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
  - Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - the harm or loss is outweighed by the benefit of bringing the site back into use.
- 8.18 Where the loss of a heritage asset is permitted, in whole or in part, the Council will take all reasonable steps to ensure that the new development will proceed after the loss has occurred.
- 8.19 Creative re-use and adaptation of heritage assets can contribute positively to its significance; however, in some cases, inappropriate re-use can significantly detract from the special interest of a heritage asset. In all cases, repair and re-use must enhance the quality of the building/asset, for example through inclusion of inclusive design and sustainability standards; and/or where it would help meet identified development needs in the borough. Regard must be had to relevant best practice and guidance including Historic England's Easy Access to Historic Buildings<sup>53</sup>.
- 8.20 The significance of conservation areas can be derived from various features including buildings, spaces, street patterns, views, vistas, uses, trees, and landscapes. The

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<sup>52</sup> Historic England's "[The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 \(2<sup>nd</sup> edition\)](#)" sets out advice on understanding setting and how it might contribute to the significance of heritage assets. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.

<sup>53</sup> [Historic England's Easy Access to Historic Buildings guidance](#)

Council has prepared conservation area statements and design guidelines for all of the borough's conservation areas. Where relevant, this guidance will be updated to reflect changes to the areas over time, which may be informed by further characterisation work, and link with future design codes/guidance. The Council has also set out guidance on the appropriate repair, alteration, or extension to listed buildings in the Islington Urban Design Guide SPD. The Council maintains a list of locally significant buildings and shopfronts which make a positive contribution to Islington's local character and distinctiveness.

- 8.21 Islington's listed buildings form a vital part of the borough's local character and distinctiveness. The special interest of a listed building may vary and will be assessed by an expert officer on a case-by-case basis. However, the following aspects are likely to have the potential to contribute to the significance of a listed building:
- External elevations including architectural detailing, roof forms, windows and doors;
  - External spaces and structures such as gardens, lightwells and boundary treatments;
  - Plan form including internal spaces and their hierarchy, partitions, ceilings, floors, staircases and chimney breasts; and
  - Interior decoration including architectural detailing, chimneypieces, floor surfaces, joinery and plasterwork.
- 8.22 Historic fabric is an important part of a listed building's significance. Retention of as much historic fabric as possible must be the starting point of any proposals, together with the use of appropriate materials and methods of repair. When repair, alteration or extension works are justified, they must relate sensitively to the original buildings and will normally require craftsmanship and professional skill of a high standard.
- 8.23 Materials used for repairs, alterations or extensions must be compatible with those already used on the building. The use of non-traditional materials may be acceptable where they respond sensitively to the significance of building and will not undermine structural integrity or performance of the building.
- 8.24 Frequently, later historic additions to listed buildings are of significance in their own right as part of the building's history. Generally, later fabric of significance must not be removed in order to restore a building to an earlier form. The Council will encourage the accurate reinstatement of lost original architectural detailing where it can be demonstrated that it will enhance the significance of a listed building. In such cases the Council will require applicants to provide adequate information confirming the historic authenticity of the work proposed.
- 8.25 Significance is derived from more than simply historic fabric and appearance: it may include the original purpose of the building, and the location, function and hierarchy of rooms, floor levels and circulation routes. Issues to consider include the impact on spatial quality, light levels and the relationship between spaces, both internal and external. Significance can be harmed by extension underground, loss of garden space or the infilling of a lightwell.
- 8.26 The integrity and authenticity of a listed building can be substantially harmed over time by the cumulative impact of works which may individually cause minor harm. Works that undermine the architectural integrity and authenticity of a listed building, such as ad hoc or piecemeal alteration, must therefore be avoided.

- 8.27 Historic England maintain a Heritage at Risk Register<sup>54</sup>, based on advice provided by LPAs. An ‘at risk’ heritage asset is one at risk of being lost as a result of neglect, decay or inappropriate development. Development proposals involving ‘at risk’ heritage assets must identify opportunities for the asset(s) to contribute to regeneration and place-making, and set out strategies for their repair and re-use. Applicants must engage with the Council and other relevant bodies at an early stage to inform identification of such opportunities.
- 8.28 The Council will use its statutory powers to ensure that listed buildings at risk from neglect or decay are appropriately maintained and repaired.
- 8.29 The Council maintains a list of locally listed buildings and shopfronts which make a positive contribution to Islington’s local character and distinctiveness. The Council will resist the removal of buildings, structures and shopfronts of architectural or historic interest listed on the Register of Locally Listed Buildings and Locally Significant Shopfronts, and will treat them as non-designated heritage assets in the decision making process.
- 8.30 The Council will protect the significance of historic green spaces listed in Appendix 6. These spaces are derived from the following sources<sup>55</sup>:
- Spaces listed on Historic England’s Register of Parks and Gardens;
  - Squares protected by the London Squares Preservation Act 1931; and
  - Areas listed on the London Parks and Gardens Trust’s Inventory of Historic Green Spaces.
- 8.31 The following Archaeological Priority Areas<sup>56</sup> are identified on the Policies Map:
- St Mary de Fonte Nunnery (Tier 1)
  - Priory of The Knights Hospitallers of St. John of Jerusalem (Tier 1)
  - The Charterhouse Carthusian Monastery (Tier 1)
  - Moorfields (Tier 2)
  - Islington Village (Tier 2)
  - Tollington settlement and Manor House (Tier 2)
  - Newington Green hamlet (Tier 2)
  - Kingsland medieval hamlet (Tier 2)
  - Barnsbury moated manor (Tier 2)
  - Moated Manor House for Barnsbury Manor (Tier 2)
  - Highbury Grange and Manor House (Tier 2)
  - Canonbury Manor House (Tier 2)
  - St Anthony’s Leper Hospital (Tier 2)
  - New River and New River Head Reservoirs (Tier 2)
  - Sadler’s Wells and New Wells Spas (Tier 2)

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<sup>54</sup> [Historic England Heritage at Risk Register](#)

<sup>55</sup> The policy will apply to any additional spaces added to these sources.

<sup>56</sup> [Further information on Archaeology Priority Areas](#)

- Post-medieval burial grounds (Tier 2)
  - Regents Canal, Basins and Wharves (Tier 2)
  - Civil War Defences (Tier 2)
  - St John's Street (Tier 2)
- 8.32 Tier 1 priority areas are known or believed, on present evidence, to contain non-designated heritage assets of archaeological interest of equivalent significance to scheduled monuments. Tier 2 priority areas are areas where there is specific evidence indicating the presence or likely presence of heritage assets of archaeological interest.
- 8.33 There is one scheduled monument in the borough – the Benedictine nunnery of St Mary, Clerkenwell, which is identified on the Policies Map.
- 8.34 All planning applications likely to affect important archaeological remains are required to include an Archaeological Assessment and may require trial excavations to establish the significance and vulnerability of surviving remains. Historic England recommend pre-application consultation with the Greater London Archaeological Advisory Service (Historic England) for all development sites over 0.5 hectares and for smaller development sites in Archaeological Priority Areas<sup>57</sup>.
- 8.35 Important archaeological remains must be retained in situ wherever reasonably practical, for example by careful design of foundations or avoiding damaging new basement excavations. Where preservation in situ cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings. Public benefits can be provided through revealing, conserving and interpreting significant remains or through public open days, displays, talks or educational activities.
- 8.36 Protected views policies are intended to operate over the long term, to preserve and enhance important public views now and for generations to come. The long term nature of the policies enables the policy to seek to enhance these public views where they have been adversely impacted by buildings. Over time when redevelopment of a building that has an adverse impact on a view (e.g. if blocks part of the view) occurs, the policy aim is for the new development to enhance the view and not to continue to adversely impact on the view. Islington is home to protected views comprising London View Management Framework views and Local Views . These are shown on the Policies Map and on Figure 8.2 below:

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<sup>57</sup> [GLAAS consultation guidelines](#)

Figure 8.2: Strategic and local views



8.37 The London Plan strategic views relevant to development in Islington are:

- Alexandra Palace to Central London
- Parliament Hill to Central London
- Kenwood to Central London
- Blackheath Point to Central London<sup>58</sup>

8.38 The London View Management Framework SPG provides further guidance on the management of these strategic views.

8.39 Local views are of equal quality to the London Plan strategic views and the Council will give equal protection to both types of views. The local views protected under Policy DH2 are:

- LV1: View from Farringdon Lane/Farringdon Road/Clerkenwell Road to St. Paul's Cathedral
- LV2: View from St. John Street to St. Paul's Cathedral
- LV3: View from the Angel to St. Paul's Cathedral
- LV4: View from Archway Road to St. Paul's Cathedral
- LV5: View from Archway Bridge to St. Paul's Cathedral
- LV6: View from Amwell Street to St. Paul's Cathedral
- LV7: View from Dartmouth Park Hill to St. Paul's Cathedral
- LV8: View from Pentonville Road to St. Pancras Chambers and Station

8.40 The Local Views are shown on the Policies Map. Further information on protected local views, including co-ordinates, is set out in Appendix 5, and the Council may produce further supplementary guidance where necessary. Applicants must provide appropriate supporting material to verify the visual impact of the proposed development on the relevant protected views.

8.41 Islington's 18 Local Landmarks are fine historic buildings which have been protected for their contribution to local character and identity, wayfinding, and the historic environment. These buildings are key elements within Islington's townscape and help create its local distinctiveness. All Local Landmarks are listed buildings. Local Landmarks protected by this policy are set out below. As Local Landmarks are listed buildings development affecting them will require a heritage assessment in accordance with Policy DH2, Part A. Heritage assessments for development affecting Local Landmarks should identify key impacts on the townscape which could include consideration of views from different locations.

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<sup>58</sup> Only a small section of the background assessment area of this view enters the London Borough of Islington near the boundary of the City of London and the London Borough of Camden in the vicinity of Farringdon Station.

8.42 The following local landmarks<sup>59</sup> are protected under Policy DH2, and are shown on the Policies Map:

- LL1: St. Joseph's RC Church, Highgate Hill
- LL2: St. Mary's CE Church Tower and Spire, Ashley Road
- LL3: Boston Arms Dome, Junction Road/Dartmouth Park Hill
- LL4: Camden Road New Church Tower and Spire, Camden Road
- LL5: Caledonian Market Tower, Market Road
- LL6: Union Chapel, Compton Terrace
- LL7: St. Mary's Church Tower and Spire, Upper Street
- LL8: St. John's RC Church, Duncan Terrace
- LL9: Diespeker Chimney, 38 Graham Street
- LL10: Angel Corner House Dome, 1 Islington High Street
- LL11: The Cinema Tower, 7 Islington High Street
- LL12: Engine and Pump House, New River Head
- LL13: St. James' Church Tower and Spire, Clerkenwell Close
- LL14: St. Luke's Obelisk Spire, Old Street
- LL15: Leysian Mission Dome, City Road
- LL16: Lowndes House, 1 City Road
- LL17: Triton Court, Finsbury Square
- LL18: Jubilee Clock Tower, Highbury Hill and Church Path

8.43 The Council may produce management plans for the protection and enhancement of local views and views of local landmarks in a SPD.

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<sup>59</sup> St. Pancras Station and Hotel (Chambers) in Camden is also an important local landmark and views of it from Islington are protected by Local View LV8.



## Policy DH3: Building heights

### Tall buildings

- A. Buildings of more than 30 metres are considered to be tall buildings.
- B. Buildings of more than 30 metres are only acceptable in-principle:
  - (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or
  - (ii) within specific sites identified in a Spatial Strategy area.
- C. On sites identified as potentially suitable for tall buildings under this policy, development must not exceed the maximum building heights for that site, as set out in the site allocation and in Table 8.1, below.
- D. Proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part E.
- E. Tall buildings must be high quality in accordance with Policy PLAN1. The designs of tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. The following criteria must be fully satisfied:

#### Visual Impact

- (i) Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place;
- (ii) Protect or enhance strategic and local views;
- (iii) Conserve and seek to enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance (including in neighbouring boroughs where impacted);
- (iv) Be proportionate and compatible to their surroundings and the character of the area;
- (v) Promote exceptional design, through high quality design details and material, positively contribute to the skyline and to the immediate locality, and having regard to any site-specific design principles set out in the relevant site allocations and/or Spatial Strategy area policy, and other relevant design policies
- (vi) Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;
- (vii) Protect or enhance the settings of local landmarks

## Functional Impact

- (viii) Not prejudice the ongoing functionality, amenity, operation and/or development potential of sites in the local area including neighbouring boroughs, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area (all development not just tall buildings);
- (ix) Ensure that impacts on the levels of daylight and sunlight – both into and between proposed buildings and for adjoining land or properties - are fully assessed and found to be acceptable; and that unacceptable overshadowing is prevented;
- (x) Demonstrate how the building will operate and function to provide good levels of amenity for all building users, through provision of a detailed building management plan which details how the proposed building will operate in various circumstances, including emergency procedures. Plans must include information on peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services;

## Environmental impact

- (xi) Promote exceptional sustainable design standards;
- (xii) Demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site. This may require submission of detailed assessments and/or modelling work; and
- (xiii) Demonstrate that development does not have any adverse individual or cumulative impacts on biodiversity, including watercourses and water bodies and their hydrology.

## Building heights

- F. Buildings that do not meet the tall building criteria in Part A but which are still considered prominent in their surrounding context, for example twice the contextual reference height, must respond appropriately to local contextual building heights and be compatible to their surroundings and the character of the area consistent with other relevant policies.

8.44 Islington has relatively little available land for development – given the size and built-up nature of the borough - but faces intense pressure for development, particularly for residential and office uses. There are significant opportunities to optimise development while providing a form of development at a human scale which is responsive to the surrounding contextual heights across much of the borough.

8.45 Tall buildings can significantly change the skyline; they are often seen as an option to optimise development potential on a site. However, due to their scale and visibility, they can have a significant impact on a place, and as such must be subject to detailed scrutiny. They are not uniformly appropriate across the borough.

8.46 For the purposes of this policy, tall buildings are more than 30 metres in height.

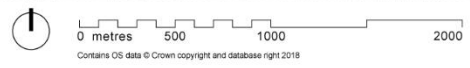
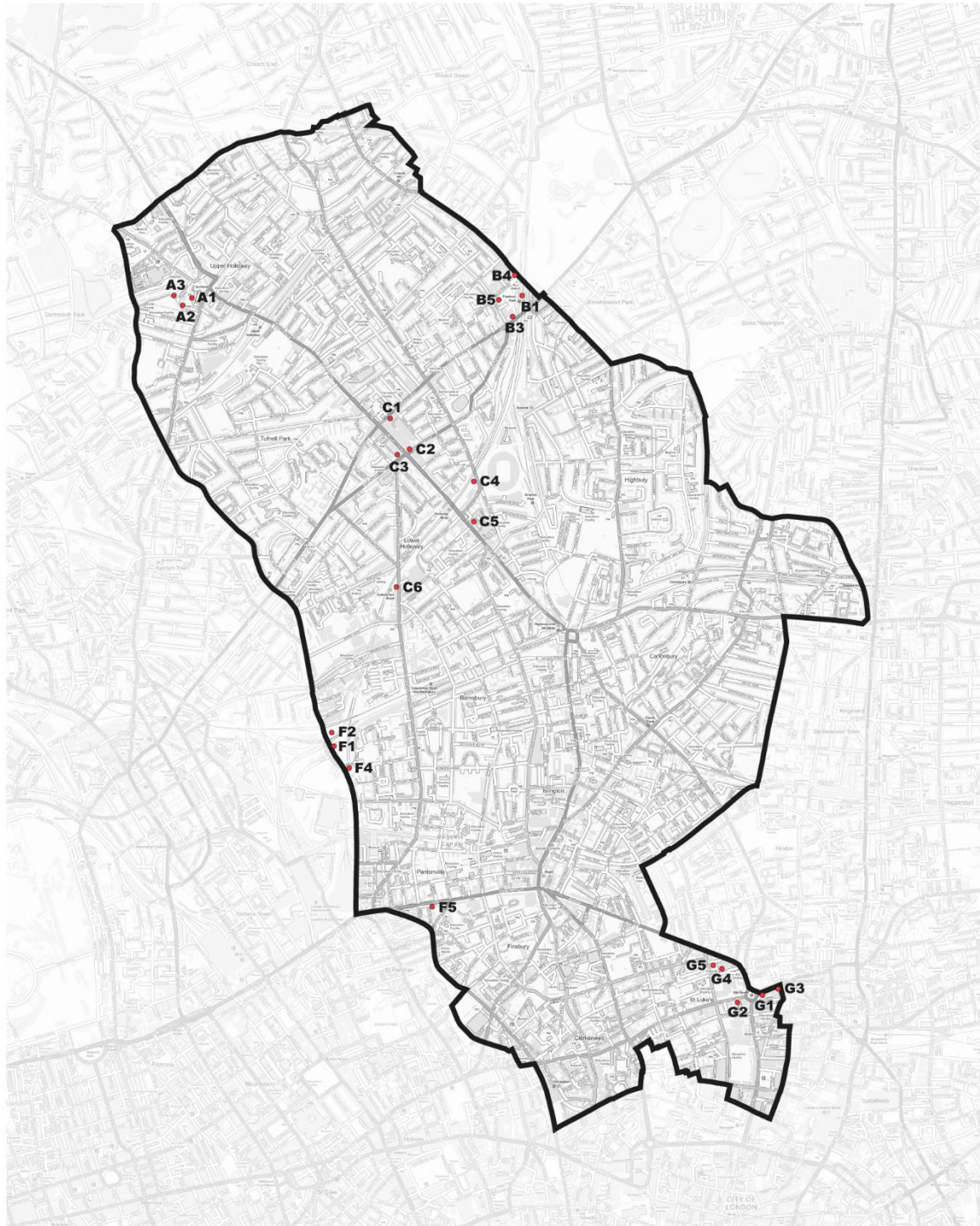
8.47 Buildings of more than 30 metres in height may be suitable:

- On sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or
- Within specific sites identified in relevant Spatial Strategy policies

8.48 These sites have been informed by a detailed local urban design assessment which took into account a variety of considerations including public transport accessibility, topography, conservation areas, listed buildings, protected vistas and strategic views, to sieve out areas unsuitable for buildings of more than 30 metres in height.

8.49 Figure 8.3 shows all locations which are suitable, in-principle, for buildings of more than 30 metres.

Figure 8.3: Locations suitable (in principle) for tall buildings over 30m



8.50 Maximum permissible heights for each location, as well as some site specific design principles, including guidance on siting of height within the context of the site/area boundary (where relevant), are set out in the relevant site allocation and/or Spatial Strategy policy<sup>60</sup>. They are repeated in Table 8.1 below, for reference:

**Table 8.1: Tall building site information**

Spatial Strategy Area	Ref	Location	Maximum Height
<b>Archway</b>	A1	Hill House	Up to 52m
	A2	Vorley Road Bus Station	40-46m
	A3	Southern end Macdonald Road	Up to 37m
<b>Finsbury Park</b>	B1	Finsbury Park Station	Up to 76m
	B3	221-233 Seven Sisters Road, corner with Fonthill Road	40-46m
	B4	Wells Terrace East, Morris Place East, Yellow Car Wash site	40-46m
	B5	113-119 Fonthill Road and land to rear	Up to 37m
<b>Nag's Head and Holloway</b>	C1	8-32 Seven Sisters Road and backland on Hertslet Road	40-46m
	C2	372-376 Holloway Road at corner with Tollington Road (Argos)	40-46m
	C3	379 – 391 Camden Road and 341 – 345 Holloway	Up to 37m
	C4	45 Hornsey Road	Up to 37m
	C5	London Metropolitan University Tower on Holloway Road	Up to 76m
<b>N/A</b>	C6	Former railway sidings adjacent and potentially including Caledonian Road Station	Up to 37m
<b>Kings Cross and Pentonville Road</b>	F1	Railway land and Sub Station on York Way opposite student housing tower	Up to 61m
	F2	Railway land between Overground and HS1 tracks, east of York Way	40-46m
	F4	176-178 York Way, car wash site	Up to 37m

<sup>60</sup> The Islington Tall Buildings Study (2018) sets out maximum potential heights in metres and storeys (residential or commercial). The development considerations of relevant site allocations, or the relevant Spatial Strategy policies and supporting text, also refer to heights in metres and storeys. For avoidance of doubt, the maximum height in metres takes precedence over the height indicated in storeys.

	F5	Penton Rise Estate, corner Weston Rise with Pentonville Road	Up to 37m
<b>City Fringe Opportunity Area</b>	G1	Southeast corner Old Street City Road junction - Inmarsat House	Up to 106m
	G2	Shell Station site on Old Street	Up to 46m
	G3	Albert House on Old Street	Up to 46m
		Moorfields Eye Hospital/UCL Site:	
	G4	Peerless Street, north of the junction with Baldwin Street	Up to 70m
	G5	North West corner of the site, corner of Cayton Street /Bath Street	Up to 50m

8.51 Proposals that do not meet the definition of tall buildings under this policy must still be of an appropriate scale for their context, and will be assessed against all relevant policies including PLAN1, DH1, DH2, and DH3 part F. Proposals will be considered in relation to their impacts and should not undermine the quality of existing development and streetscape. Part F of DH3 is important in this regard to ensure such proposals are considered in and appropriately respond to their context to create a human scale and massing consistent with DH1.

8.52 Where Policy DH3 Part F refers to the surrounding context height, this is not informed solely by the highest existing height in the surrounding built environment. Surrounding context height will be determined on a case-by-case basis which includes consideration of the broad surrounding heights evident in an area.

8.53 The Islington Tall Buildings study (2018) has identified locations potentially suitable for buildings over 30m from a broader urban design perspective. The remit of the study did not include assessment of all the potential impacts of a tall building on the neighbouring uses, such as sunlight and daylight impacts, heritage impacts, etc. Building heights of 30m or more are not automatically acceptable on the identified sites in Table 8.1; this will be subject to all relevant assessments being undertaken and impacts being found to be acceptable.

8.54 All proposals for tall buildings must consider the individual and cumulative visual, functional and environmental impact of the proposal:

- Visual impact – robust assessment of the visual impact of a tall building is essential to ensure that the proposal is appropriate for local area. This includes consideration of strategic and local views and heritage constraints, which will require submission of relevant information including 3D modelling. Location, form, proportion, height and expression of architecture are some of the other contributing factors that are imperative in creating tall buildings that perform a positive landmark role within the townscape. By ensuring all collective factors are met, tall buildings will be able to enhance the legibility of an area and contribute positively to its character and sense of place.

- Functional impact – tall buildings must operate efficiently in and of themselves, but also must fit seamlessly within the function of the local area and must not impact the ongoing functionality and operation of sites or uses in the local area. Protection of amenity is also important. All tall buildings must not result in unacceptable amenity impacts for nearby occupiers/uses, including overlooking; Policy PLAN1 provides further details of specific amenity considerations. The impact of potential development sites must also be fully considered, so that the development of tall buildings does not introduce constraints which would preclude such sites from coming forward. Full assessment of individual and cumulative impacts is essential to ascertain the true picture of functionality, thereby ensuring that adverse impacts are prevented. Functionality will be the most tangible day-to-day issue for the future operation of a tall building, and issues can be hard to rectify in future; therefore, it is vitally important that this is dealt with prior to permission being granted. Policy DH5 will be an important consideration in this regard.
- Environmental impact – due to their scale, tall buildings can cause adverse impacts on various elements of the local environment. They can create their own microclimate, with impacts from wind (and associated wind noise) being a common issue, and can cause localised (street-level) air pollution issues, especially where there are clusters of tall buildings which preclude dispersal of pollutants. Reflected solar glare, night-time light pollution and overheating are some of the other issues associated with tall buildings that require further consideration.

8.55 Applicants will be required to provide sufficient information to enable the impact and planning merits of the tall building proposals to be properly assessed, including sufficient information on the detailed form and finishes of the building in order to properly assess its impact and design quality; and assessments to identify specific environmental/micro-climatic impacts, such as wind tunnel testing, sun path studies, overshadowing, heat island and glare studies.

8.56 For the avoidance of doubt, the potential appropriateness for tall building locations and maximum heights stipulated for each location (denoted in Table 8.1 and in relevant site allocations and Spatial Strategy areas) does not in any way replace the requirement for a tall building application on identified sites to fully justify its approach towards height and built form. All proposals for tall buildings must evaluate the benefits and justification for a tall building in relation to the surrounding context, views and how it will enhance the local townscape.

8.57 Applicants seeking planning permission for tall buildings in the Borough must submit full planning applications for their proposals. Outline planning applications for tall buildings are not accepted, as detailed issues must be considered together with the principle of what height is considered suitable – such considerations cannot be detached and considered later.

## Policy DH4: Basement development

- A. All basement development must be proportionate to its site and context.
- B. The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause an unacceptable degree of harm to:
  - (i) the structural stability of the existing building, nearby buildings, trees and any infrastructure;
  - (ii) the structural, ground, or water conditions of the area;
  - (iii) the architectural character of the building;
  - (iv) the character and amenity of the area; or
  - (v) the significance of heritage assets including conservation areas and listed buildings.
- C. Applicants proposing basement development must provide evidence of the impact of basement development in the form of a Structural Method Statement (SMS), which satisfies the criteria in Part B.
- D. For residential basement development (including extensions):
  - (i) a basement must cumulatively occupy less than 50% of the original garden and/or unbuilt area; or the area of a basement which is outside the footprint of the host building must total no more than 50% of the area of the footprint of the host building, whichever is the lesser;
  - (ii) a basement must not involve excavation of more than one (1) storey below the lowest original habitable floor level;
  - (iii) the height of a basement must not exceed 3m floor to ceiling height;
  - (iv) where considered appropriate in the local context, lightwells and other external manifestations must be modest in size, discreetly located, and designed to protect and enhance the character and appearance of the area;
  - (v) basements must be designed to preserve existing gardens, and must reinforce the visual relief that soft landscaping between buildings provides; and
  - (vi) basement development must not significantly alter the prevailing garden level.

8.58 Basement development includes any excavation to form new or additional floorspace under the ground level (subterranean) of an existing property or within its curtilage and under its garden. It also includes basements which are part of new build development.

8.59 Basement development and other development that involves excavation changes the ground and water conditions of the area and can potentially lead to ground instability or flooding. Basement development can also have significant construction impacts due



to the need to remove spoil and the complexities of excavation. The Council recognises the need to protect the environment and adjoining neighbours' properties and buildings from these impacts.

- 8.60 Most basement developments will require planning permission but there may be certain circumstances where basement development may be permitted development under the General Permitted Development Order.
- 8.61 Islington has seen an increase in basement development caused by high land values coupled with limited opportunities for extensions above ground. In response to this development pressure the Council has produced the Basement Development SPD which provides further guidance on the implementation of Policy DH4.
- 8.62 Above ground development traditionally has minimal impact on ground conditions and, when removed, enables the site to be restored to its (near) pre-development state; however, subterranean basements, particularly when greater than one storey in depth, can permanently and irreversibly alter ground conditions.
- 8.63 Basements must be designed to safeguard the structural stability of the existing building, nearby buildings, trees, and any infrastructure. For all basement development applicants must submit a SMS that has been prepared in accordance with the SMS requirements set out in the Islington Basement Development SPD. The SMS must be signed and endorsed by a Chartered Civil Engineer or Chartered Structural Engineer with relevant experience, appointed by the applicant.
- 8.64 The Council may choose to consult (at the expense of the applicant) an independent suitably qualified person to undertake an independent assessment for specific cases where substantive conflicting information has been presented to the Council, or where there are any particularly sensitive buildings, trees, or other structures within proximity of the site.
- 8.65 The design and size of basement development must be proportionate and respond to the scale, function and character of the site and its surrounds, including the above ground portion of the building. Where large basement extensions are proposed, the resulting intensity of basement use may be out of keeping with the domestic scale, function, and character of its context. Basement development must not unduly intensify the use of a site, or cause significant environmental harm. Whilst modest basement extensions can in some circumstances be an effective way of creating additional floorspace, the development of private open space to achieve additional floor area can give rise to a number of adverse impacts unless designed sensitively, including increased surface water flood risk, impacts on the borough's biodiversity and adaptation to climate change.
- 8.66 Basement development must cumulatively occupy less than 50% of the original garden or unbuilt area; or the area of a basement which is outside the footprint of the host building must total no more than 50% of the footprint of the host building, whichever is the lesser. The maximum extent will be measured separately for each garden or unbuilt area within the site, e.g. front, back, or side. The remaining area must be designed to maximise garden amenity and functionality. The siting of the basements must maximise the connectivity of neighbouring gardens and green spaces in the wider area to support green corridors and biodiversity, and enable surface water drainage and lateral ground water movement to occur between sites.
- 8.67 The depth of a basement can increase the impacts associated with basement construction including longer construction times, more excavation waste, greater

potential to cause ground movement and ground water, as well as resulting in spaces with less natural light and ventilation. Basements must therefore not exceed 1 storey in depth, and not exceed 3m floor to ceiling height. A basement extension below an existing basement or lower ground floor (that is not an original feature of the building) that would result in a two storey basement and will be resisted.

- 8.68 For infill residential development, the scale and extent of basement within a site must respond to the site context and the prevailing scale of development in the area. Basements must be proportionate, subordinate to the above ground building element, and reflect the character of its surrounds. The proportion of the site that is built upon/under to the proportion unbuilt upon when compared with surrounding buildings is of particular importance to achieving a compatible scale of development on infill sites.
- 8.69 The siting of buildings and any associated basements must protect and enhance existing landscaped areas within the site, particularly where they contribute to the character of an area. The Council will require the inclusion of generous deep soil landscape and drainage margins that can support mature soft landscaping and sustainable drainage.
- 8.70 On commercial and mixed use redevelopment schemes with proposed basements, the extent of basement development must be commensurate to the site context and building design. Sites within commercial areas such as the CAZ often contain buildings built to the boundary. Any basement component of the scheme must be designed to avoid adverse impacts to sensitive sites, building, trees and other structures that may be affected by the construction of the proposed development.
- 8.71 Proposals must provide satisfactory landscaping, maximise permeability, biodiversity value and sustainable drainage through the provision of soft landscaping and permeable surfacing, and appropriate planting.
- 8.72 Where the basement comes within proximity to existing trees on the site or adjoining sites, trees must be retained and the basement must be designed to avoid any adverse impacts upon those trees. An Arboricultural Report must be submitted in accordance with BS5837:2012 for any such application.
- 8.73 Trees proposed on a site must be provided with sufficient rooting volumes and access to deep soil areas to ensure their long term survival and ability to reach maturity.
- 8.74 Unless within 3m of the original rear wall, any basement extending beyond the original footprint of a building must incorporate a minimum of 1m of soil plus 200mm drainage above the top cover of the basement. For particularly constrained sites, or where large trees are proposed, soil depth of up to 1.5m must be provided.
- 8.75 Lightwells and other external manifestations must be modest in size, discreetly located, and designed to protect and enhance the character and appearance of the area. Basements must be designed to preserve existing gardens. In conservation areas, lightwells and other visible external manifestations of basement development in front gardens or the front of properties may fail to preserve or enhance the character or appearance of the conservation area, and therefore may need to be confined to the rear of properties.
- 8.76 Where rooflights are proposed, they must be kept flush with the ground level, be close to the building, proportionately small, and sympathetic with the host building. Rooflights that are located away from the building line such as in the middle of private

gardens can be visually harmful and when illuminated from below can result in light spillage and are generally unacceptable.

- 8.77 Other associated external manifestations of basements such as stairs, retaining structures and railings must be sensitively designed and discreetly sited so as to minimise the fragmentation of spaces, not contribute to visual clutter, or detract from the prevailing streetscape or garden pattern.
- 8.78 The demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basements. Many basement schemes are constructed in residential areas in close proximity to people's homes, with the construction works often involving significant disturbance (including removing significant quantities of soil) extending for many months.
- 8.79 Basement development must minimise construction impacts such as noise, vibration, and dust for the duration of the works. The Council will seek to minimise the disruption caused by basement development and will require Construction Management Plans to be submitted with applications.

### **Policy DH5: Agent-of-change, noise and vibration**

- A. Proposals for any new development – new build, extensions and conversions – in proximity to an existing use(s) which may be adversely impacted by the new use must follow the agent-of-change principle.
- B. Any potential adverse impacts which may arise due to new development being located close to sensitive uses must be fully prevented via the design/layout of a scheme and/or the incorporation of other appropriate measures to limit the impact.
- C. If adverse impacts cannot be fully prevented, then proposals will normally be refused, unless non-physical measures - such as a Deed of Easement - are put in place which, in the Council's view, would ensure there is no residual threat to the future operation of the existing use.

#### **Noise and vibration**

- D. All development proposals which have the potential to cause or exacerbate unacceptable noise and vibration impacts on land uses and occupiers in the locality must fully assess such impacts, with reference to relevant noise thresholds set out in Appendix 2. All proposals must:
- (i) in the first instance, aim to prevent noise and vibration impacts occurring by siting uses which could cause or exacerbate impacts away from potentially affected uses; or, vice versa, siting sensitive uses away from uses which could cause noise and vibration impacts. An Acoustic Design Statement, in line with Appendix 2, must be provided to demonstrate satisfactory solutions; or
  - (ii) where this is not possible, provide a detailed assessment of noise and vibration impacts in line with Appendix 2. Where noise and/or vibration impacts are identified suitable mitigation measures must be put in place to reduce these

impacts, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. Impacts will need to be suitably mitigated for planning permission to be granted.

- E. A Noise Management Plan will be required where mitigation of noise from behavioural sources is necessary.

- 8.80 Proposals for new development in proximity to an existing use(s) which may be adversely impacted by the new use must follow the 'agent-of-change' principle, which requires the person or organisation responsible for change to manage the impact of that change. Proximity is not specifically defined but would generally be any distance where vibration, noise (including airborne noise) and/or the operation of a use (such as regular ingress/egress routes and plant noise, or waste disposal) could cause amenity impacts on a proposed use. Proximity includes both external and internal impacts. Internal building impacts could be where conversion of existing floorspace within a mixed use building may need to consider an existing noise generating use in another part of the building. This is to ensure that any potential adverse impacts which would arise due to being located in the vicinity of noise generating use(s) are fully prevented via the design/layout of a scheme and/or the incorporation of appropriate measures to limit effects of noise, vibration and other adverse impacts.
- 8.81 Where impacts are identified, they must be fully mitigated, for example through good acoustic design measures such as proposed layout /design of a scheme, and through use of appropriate and effective materials (for example, in walls and floors) which dampen noise and vibration between and within dwellings, and between dwellings and public and/or communal areas. Layout in particular can be effective in mitigating impacts arising from mixed-use developments.
- 8.82 If the adverse impacts cannot be fully prevented, then proposals will normally be refused, unless non-physical measures - such as a Deed of Easement - are put in place which, in the Council's view, would ensure there is no residual threat to the future operation of the cultural facilities(s).
- 8.83 Specific clusters of night-time economy uses may contribute more significantly to the night-time economy, particularly within the night-time economy clusters identified in the London Plan and the Cultural Quarters identified in Policy R10. Therefore, the introduction of sensitive uses may threaten the effective operation of night-time uses more acutely in these areas. Considering the potential growth of cultural uses, particularly in Cultural Quarters, must be considered when impacts are identified, in order to manage change in a sensitive way that reflects the function of an area. Details of how potential impacts could change or increase in future will be expected as part of relevant assessments, to ensure that future growth – for example in culture and night-time economy uses - is not jeopardised.
- 8.84 Islington has a 24-hour economy which, coupled with the densely developed nature of the borough can lead to adverse impacts from uses which otherwise can co-exist. For example, office uses which operate through the night can impact on nearby residential uses through light spill, mechanical plant operation and the operation of any ancillary functions such as bars or smoking terraces. In addressing Policy DH5, proposals must put in place measures to address potential impacts, such as limits on the scale and hours of use of any ancillary functions, or a building management plan with proposed measures such as automated lighting and blinds to limit impacts of light spill

(especially on adjacent residential properties). Measures proposed to mitigate adverse impacts will be secured as part of any planning permission.

- 8.85 The impact of noise sensitive development in proximity to cultural, night-time economy and other uses is one of the biggest threats which these uses face, as the introduction of sensitive uses may threaten the effective operation of these existing uses. The Council will require a Noise Impact Assessment and Acoustic Design Statement as part of all major residential developments; any other developments which give rise to potential noise and vibration impacts; or any other application where agent-of-change is considered relevant.
- 8.86 Consideration and assessment of noise and vibration impacts as part of Policy DH5 must be commensurate to the existing level of noise generation and the level of sensitivity of the use being introduced; for example, a residential use proposed next to an industrial use is likely to have significant impacts on the continued operation of the industrial use, as the operation would often entail frequent vehicle movements and noisy processes; therefore, the consideration and assessment provided must fully demonstrate that all potential adverse impacts have been fully considered and mitigated. The Council encourage applicants to involve occupiers of sites which may be affected in any assessment of impacts.
- 8.87 Where significant adverse impacts are identified as a result of the assessment, an application is likely to be refused. Other adverse effects must be mitigated and minimised as far as possible. Any assessment must be produced by a relevant competent person(s); further detail is set out in Appendix 2.
- 8.88 Noise and vibration impacts can make dwellings uninhabitable. It is therefore vitally important that noise and vibration impacts are robustly assessed for all planning applications involving residential use, at the earliest possible stage of the development. Noise is one factor which can affect amenity and amenity is an important consideration when determining the quality of housing. The design of housing is intrinsically linked to amenity; poor design often means a poor standard of amenity for future occupiers. Amenity can be affected by various factors, either individual factors or a combination of factors, including noise, levels of daylight and sunlight and the general level of comfort.
- 8.89 Development must use good acoustic design to achieve internal sound standards, rather than relying entirely on achieving relevant standards through the building envelope. The management of noise and vibration must be an integral part of development proposals and considered as early as possible. Addressing noise and vibration issues through good acoustic design at the initial design stage is important to avoid costly late stage alterations and potential non-policy compliance. Good acoustic design must consider the following:
- Location of buildings on the site to minimise noise exposure (this will include maximising separation of noise sources and sensitive receptors and use of buildings or topography to screen noise);
  - Layout of habitable rooms within buildings to reduce noise exposure to more noise-sensitive rooms;
  - Ensuring dwellings exposed to high noise levels are dual aspect to provide each unit with access to a relatively quiet façade where possible;
  - Access to relatively quiet external amenity space; and
  - Measures to reduce noise at source and/or on the transmission path where possible.

- 8.90 Human response to vibration varies with the magnitude, the frequency and duration of exposure. Significant vibration within the borough (apart from temporary construction works) is most likely to be generated by railways, for example London Underground services, Overground trains and freight movements. Appendix 2 identifies when a Vibration Assessment will be required.
- 8.91 In cases where ongoing noise management and control is considered particularly important, a noise management plan (detailing controls and mitigations) will be required.
- 8.92 Noise management measures can be crucial for mitigating behavioural noise sources, which can include noise from gathering points and ingress/egress points for commercial uses. It is not always possible to specify sufficiently enforceable or precise noise management measures to form the basis of a reasonable planning condition. In such cases, refusal of permission may be necessary depending on the scale of the impacts. Where it is judged that specific, precise, reasonable and enforceable noise management measures can be detailed, a Noise Management Plan will be secured by condition.

## **Policy DH6: Advertisements**

- A. Advertisements must:
- (i) be high quality in terms of visual appearance, and must not have flashing internal or external illumination;
  - (ii) be sited to prevent visual intrusion by virtue of light pollution into adjoining sensitive land uses, including residential properties and wildlife habitats;
  - (iii) not restrict pedestrian movements;
  - (iv) contribute to a safe and attractive environment;
  - (v) not contribute to proliferation/clutter of signage in the vicinity; and
  - (vi) respect local context, including listed buildings and conservation areas.
- B. Temporary shroud advertisements which cover buildings being redeveloped or which are undergoing refurbishment may be acceptable where:
- (i) they are in place only for the duration of the building works, or a period of 12 months (whichever is shorter);
  - (ii) there have been no shroud advertisements on the specific building for the preceding 12 months; and
  - (iii) the dimensions of the shroud advertisement are no greater than that of the building.

- C. The repurposing of phone boxes for predominantly advertising use will not be acceptable, particularly in conservation areas and in proximity to other heritage assets including listed buildings.
- D. The Council will seek the removal of deemed consent rights for the display of estate agents' boards where they are damaging the character and appearance of an area.

- 8.93 The term "advertisement" covers a very wide range of advertisements and signs, including hoardings, illumination of hoardings, illuminated fascia signs, free-standing display panels, and estate agent boards. Some advertisements are not regulated by the Council and others benefit from "deemed consent", which means permission is not needed; this will depend on the size, position and illumination of the advert. Other advertisements will always need consent.
- 8.94 When deciding applications for advertisements, the Council can have regard to considerations of amenity and public safety, as well as the Control of Advertisements Regulations. Policy DH6 sets the criteria by which amenity and public safety will be assessed in Islington in relation to advertisements.
- 8.95 The luminance of advertisements/signs – particularly the maximum level of luminance proposed - must accord with best practice and relevant guidance, such as Institute of Lighting Professionals 'Professional Lighting Guidance for the Brightness of Illuminated Advertisements (PLG05)', in order to avoid amenity impacts for residents living nearby. Conditions will be attached to ensure appropriate luminance levels are adhered to.
- 8.96 Temporary shroud advertisements may be acceptable on buildings being redeveloped/refurbished. This only relates to a shroud covering the building itself and not any separate hoarding or other structure used for advertising purposes.
- 8.97 Estate agents' boards have deemed consent rights for their display and thus do not need approval from the Council to be displayed for a limited time period. The dense urban nature of Islington and the high frequency of sales and lettings can lead to a proliferation of estate agents' boards, which are not always removed within the required timescale. This results in a build-up of boards, both legal and illegal, detracting from building façades and causing an untidy and cluttered street scene. In such situations the Council will seek the removal of deemed consent rights from the Secretary of State for this type of advertising.

## **Policy DH7: Shopfronts**

- A. New or refurbished shopfront design must:
  - (i) respect the local street scene, the building as a whole and its design detail;
  - (ii) be accessible and inclusive; and

(iii) enhance natural surveillance and activate the frontage

- B. Shops that are converted to residential uses (including through permitted development) must retain the shopfront fenestration and natural surveillance of the street.

8.98 The design of new shopfronts and alterations to existing shopfronts is important to the appearance of the individual property, to the character and appearance of shopping areas, and provides visual connections between ground floor shops and the street.

8.99 New shopfronts must be inclusive, adopting the guidance provided in the Inclusive Design and Streetbook SPDs and BS8300:2018-2 in terms of the relationship between the shopfront and the adjacent footway.

8.100 The Islington Urban Design Guide SPD provides further detail on shopfronts and will be used to assess proposals concerning shopfronts and shop signs. Sufficient information regarding shopfront proposals must be provided at planning application stage to enable assessment of the proposal.

8.101 Where shops or other uses with an active frontage are converted to residential use, the shopfront fenestration must be retained, to avoid negative impacts on the streetscene.

## **Policy DH8: Public art**

A. Provision of high quality public art is encouraged as part of new development, where this does not constrain other higher priority Local Plan policies and objectives.

B. All new public art must:

- (i) be developed in consultation with the community in which it is located;
- (ii) protect and enhance local character;
- (iii) ensure that it does not compromise the delivery of sustainability or inclusive design policy objectives;
- (iv) be site specific in terms of the design and concept;
- (v) be visible and able to be enjoyed from a publicly accessible location; and
- (vi) require minimal maintenance and (where necessary) decommissioning works.

8.102 Public art can add distinctive character to places and spaces, creating visual interest, influencing the use of a space and providing a focal or meeting point. Public art can



take many forms from more traditional sculpture to an artwork conceived as a garden, the façade of a building or a lighting installation.

8.103 However, provision of public art must not come at the cost of meeting other more important Local Plan priorities that have a more meaningful impact on the day-to-day lives of local residents and businesses. Priority will be gauged on a case-by-case basis, but most other policies, particularly those relating to affordable housing, affordable workspace, sustainability, green infrastructure and inclusive design will, in all cases, be a higher priority than public art provision.

8.104 Where public art projects are proposed as part of a new development, guidance must be sought from the Council at the earliest possible opportunity to ensure the highest quality art provision. This will include:

- the extent that the proposed public art is freely accessible to the public;
- the impact on the local area and its character;
- the quality of the artwork
- the relationship between the proposed public art and the site;
- the level of community consultation undertaken;
- artist selection;
- the provision of appropriate budgets and briefs for the project team; and
- details of maintenance and any decommissioning works required, including availability of funding for such works.

8.105 The siting of public art must not compromise the delivery of sustainability or inclusive design policy objectives, for example by obstructing the public realm, affecting the legibility of routes or affecting sustainability measures such as SUDS.

# 9 Strategic infrastructure

## Policy ST1: Infrastructure Planning and Smarter City Approach

- A. The Council will identify and deliver the infrastructure required to support development growth over the plan period and enable effective delivery of the Local Plan objectives, through:
  - (i) utilising an Infrastructure Delivery Plan and working with relevant providers to ensure necessary infrastructure is provided; and
  - (ii) requiring contributions from development to ensure that the infrastructure needs associated with development will be provided for, and to mitigate the impact of development.
- B. The Council will utilise its planning function to put in place measures to develop the Smart Cities approach in Islington, by:
  - (i) working with infrastructure providers to ensure world-class connectivity and ensuring developers provide in-building infrastructure capable of significantly exceeding minimum building control standards;
  - (ii) considering use and interoperability of data, and digital innovation as part of the planning application process; and
  - (iii) considering how the Council can promote use of technology to help people to live better lives.

- 9.1 Infrastructure needs and requirements change over time in response to the development and growth of Islington as well as changing objectives and priorities for both the Council and its partners. Key public sector partners include police, health service, and local universities.
- 9.2 Infrastructure<sup>61</sup> includes the roads<sup>62</sup>, transport, public utilities, buildings or facilities and the services provided by them which are used both by residents and those who come to work, study in, or visit the borough. The Local Plan is informed by the Infrastructure Delivery Plan (updated 2019) which provides a benchmark of infrastructure and future infrastructure requirements.

<sup>61</sup> Social and community infrastructure and green infrastructure are forms of infrastructure which fall within this term, but they are covered by other Local Plan policies.

<sup>62</sup> Relevant road infrastructure includes roads within Islington and also those roads outside of the borough which may be affected by development in Islington. This includes the strategic road network (SRN) managed by Highways England, particularly the M1 which lies to the north-west of the borough.

- 9.3 Utilities providers will be consulted with regards to relevant infrastructure and maintaining security of supply.
- 9.4 Infrastructure requirements may be funded through both planning obligations and the CIL. Planning obligations are specific requirements to be fulfilled by developers to ensure that impacts arising from a new development are addressed. Planning obligations may be contained in a S106 agreement or in a unilateral undertaking. Planning obligations are always drawn up and negotiated based on the characteristics of the individual site and development proposed. Obligations can include either direct provision of a service or facility, contributions towards a provision made by the Council, or both. Further guidance on where planning obligations will be required is set out in the Planning Obligations (Section 106) SPD.
- 9.5 The CIL is a non-negotiable charge used to fund local infrastructure that will support future development. CIL is charged on new developments involving the creation of one or more new dwellings, or 100sqm or more of new gross internal floorspace. The Islington CIL Charging Schedule was adopted in September 2014 and finances both strategic and local infrastructure projects in the borough. The Islington CIL is used to fund the provision, improvement or replacement of community infrastructure that supports the development of the borough. The Mayor of London can also introduce a CIL charge. The Mayor adopted the second mayoral CIL charge (MCIL2) in February 2019. MCIL2 will be used to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2.
- 9.6 In most cases, the Islington CIL has replaced the use of planning obligations to secure contributions towards infrastructure from development. S106 agreements are used to secure affordable housing; to mitigate site-specific issues; and/or to address other policy requirements that cannot be dealt with through CIL. The Council is required by regulations to produce an Infrastructure Funding Statement annually which outlines developer contributions collected by LBI through the Community Infrastructure Levy (CIL) and Section 106 Agreements. The Infrastructure Funding Statement is available on the Council's website. Should future demand for school places exceed supply, infrastructure costs will be sought through CIL.
- 9.7 Smart Cities goes beyond the role of planning. The rapid growth of mobile internet applications, the internet-of-things, cloud computing and open data are all part of this digital age and whilst they offer new business opportunities, they must also enhance quality of life for people living and working in Islington. Digital connectivity can also help the collection, analysis and sharing of data on the performance of the built and natural environment, including for example water and energy consumption, air quality, noise and congestion. Enabling the development of Smart Cities has the potential to greatly improve the implementation of key Local Plan objectives, such as monitoring the energy efficiency performance of buildings.
- 9.8 Planning can assist with the development of Smart Cities, particularly through the development of necessary infrastructure to allow for the future development/expansion of Smart Cities. This could include encouraging smart sensors which help to monitor the performance of buildings as part of the planning consent; and enabling the expansion of key technological networks such as 5G and superfast broadband, which often require infrastructure/assets on buildings and within the public realm. Use of data and interoperability of data can better support building management, management of space including public realm to benefit residents and people who work in the borough, for example through the implementation of BIM.
- 9.9 Ensuring world class connectivity in new development will help residents and businesses take advantage of digital opportunities. The standards set out in Building

Regulations part R1 are unlikely to be sufficient to allow the advancement of Smart Cities. Therefore, higher standards must be provided where appropriate/feasible. The Council may provide further supplementary guidance to help implement the Smart Cities approach, where necessary.

## Policy ST2: Waste

- A. Development proposals must provide waste and recycling facilities which:
  - (i) fit current and future collection practices and targets;
  - (ii) are accessible to all;
  - (iii) are designed to provide convenient access for all people, helping to support people to recycle; and
  - (iv) provide high quality storage and collection systems in line with Council guidance.
- B. The Council will continue to work with the seven North London boroughs on the North London Waste Plan to provide sufficient land to meet waste management needs across the seven North London boroughs. The policies in the North London Waste Plan will be used to consider proposals for waste management facilities across the seven North London boroughs.
- C. The Hornsey Street Re-use and Recycling Centre will be safeguarded in order for Islington to continue to contribute to meeting aggregated waste planning requirements. The safeguarded Hornsey Street Re-use and Recycling Centre is identified on the Policies Map. Where development is proposed within close proximity to this facility, it must ensure that the ability of the Hornsey Street facility to operate effectively is not threatened, via the design/layout of a scheme and/or the incorporation of appropriate measures to limit effects of sound, vehicle movements and other effects, in line with the 'agent-of-change' principle.

9.10 Sustainable waste management means dealing with more waste higher up the waste hierarchy to reduce waste creation, increase re-use and recycling and utilise waste as an energy source. A key part of this is ensuring that residents and businesses have sufficiently convenient facilities and storage to maximise re-use and recycling. Further details on how development proposals are expected to consider this are set out in Policies H4 and B2. The Council promotes a circular economy approach to design and construction to keep products and materials in use for as long as possible and to minimise construction waste. Further detail is set out in Policy S10.

9.11 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Boroughs) have worked together to produce the North London Waste Plan which was adopted in 2022 and forms part of the statutory Development Plan for these areas. The purpose of the NLWP is to provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to

meet their waste management needs throughout the plan period. The plan will also provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance. In line with the plan the safeguarded Hornsey Street Re-use and Recycling Centre is identified on the Policies Map.

### **Policy ST3: Telecommunications, communications and utilities equipment**

- A. Telecommunications, communications and utilities equipment, including masts, boxes and satellite dishes will only be permitted where:
- (i) they are sited and designed to minimise their visual impact;
  - (ii) they do not include advertising or lighting that would cause a distraction/danger to motorists, cyclists or pedestrians;
  - (iii) they do not have a detrimental effect upon the character or appearance of the building or area;
  - (iv) they do not compromise meeting other policy requirements including the delivery of sustainable design measures;
  - (v) innovative design and technological solutions have been explored to minimise visual impact, and
  - (vi) there is no reasonable possibility of sharing facilities.
- B. All digital infrastructure must provide self-certification to the effect that a mobile phone base station, when operational, will meet the International Commission on Non-Ionising Radiation Protection (ICNRP) guidelines.
- C. Applications for mobile phone network development must demonstrate that they have followed and are in accordance with the Code of Best Practice on Mobile Network Development in England or subsequent similar guidance, and the latest TfL Streets toolkit guidance.

9.12 In general, it is not acceptable to locate satellite dishes and other telecommunications and utilities equipment on the front of buildings and other locations where they are visible from the public realm. On-street location of telecommunications boxes and other utilities equipment should be avoided. Where this is not possible, equipment must be designed and located to prevent street clutter and conflict with pedestrian and cycle movement, and street furniture.

9.13 The operation of equipment must not lead to any adverse impacts for residents or businesses, for example, noise arising from the running of equipment. Policy DH5 will apply to relevant applications for new telecommunications, communications and utilities equipment.

## Policy ST4: Water and wastewater infrastructure

- A. Adequate water and wastewater infrastructure must be provided to serve all new developments. Applicants are encouraged to engage with relevant water/wastewater companies at the earliest possible opportunity, ideally at pre-application stage, to establish any potential water and wastewater network reinforcement requirements.
- B. Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:
  - (i) sufficient capacity already exists; or
  - (ii) extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.
- C. When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds the appropriate improvements to cater for the development. Any improvements must be completed prior to occupation of the relevant phase of development; this will be secured by planning condition.

- 9.14 The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers are required to demonstrate that there is adequate capacity both on and off the site to serve the development and that the development would not lead to problems for existing users and the impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.
- 9.15 Applicants are encouraged to engage with relevant water/wastewater companies at the earliest possible opportunity, ideally at pre-application stage, to establish any potential water and wastewater network reinforcement requirements. For example, Thames Water offer a free pre-planning service which can enable developers to determine at an early stage whether there will be sufficient water and/or wastewater network capacity to serve their development. This service can also advise on appropriate solutions if there is not sufficient capacity.
- 9.16 In some circumstances it may be necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity constraint and no improvements are programmed by the water company, it would be expected that the developer pays a fair and reasonable contribution towards the appropriate infrastructure. The infrastructure must be completed prior to occupation of the development.

# 10 Monitoring

- 10.1 Monitoring of Local Plan policies is essential to determine the extent to which those policies are delivering the Local Plan vision and objectives.
- 10.2 The Authorities Monitoring Report (AMR) is the principal mechanism for monitoring the Local Plan. The AMR will report at least annually on a broad range of quantitative and qualitative indicators to enable a full assessment of how successfully the Local Plan is being implemented.
- 10.3 The AMR indicators are not fixed and may change over different iterations of the AMR. However, each AMR will include baseline quantitative indicators to identify completions across various use classes. This completion data will be assessed spatially with reference to relevant Local Plan policies and designations, including the Spatial Strategy areas; this could include development located within or in proximity to a specific designation.
- 10.4 Further qualitative indicators will be set out where necessary; this may include indicators to monitor trends at a local, regional and/or national level which have the potential to impact on the delivery of the Local Plan.
- 10.5 The AMR will set out the up-to-date housing trajectory which identifies past housing completion figures and sets out Islington's five-year housing supply. The AMR will also set out an up-to-date pipeline for business floorspace, particularly offices.
- 10.6 The Council are required to review the Local Plan every five years from the date of adoption, to determine whether the Local Plan needs to be updated, e.g. in light of changing circumstances. The AMR will be a key consideration as part of any Local Plan review. Data and trends identified in the AMR may (individually or combined with other considerations) trigger a need for a partial or full update to the Local Plan.
- 10.7 In line with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), the AMR will also provide information on neighbourhood planning, what acts of co-operation and engagement have been carried out under the Duty to Co-operate, and CIL receipts and expenditure.
- 10.8 Whilst the AMR will report on a broad range of indicators that will be updated over time and reflect on new and changing sources of data, some of the key indicators that cover a range of policies within the plan and that will be used to help with monitoring are set out below. Further information on monitoring is also set out in the Site Allocations document and Bunhill and Clerkenwell Area Action Plan.

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
SDM1	Number of homes and amount of business and retail floorspace completed in spatial		Policies SP1 to SP8

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
	strategy areas (cumulative totals)		
SDM2	Housing completions and net change	Progress in meeting the 10 year housing target set out in the London Plan (775 per year and 7750 overall)	Policy H2: New and existing conventional housing
SDM3	Mix of dwelling sizes in completed developments	Development to be in line with housing mix priorities set out in table 3.2	
SDM4	1. Gross and net affordable housing completions for major developments	1. 50% of total net additional homes to be genuinely affordable over the plan period.	Policy H3: Genuinely affordable housing
SDM5	2. Affordable housing contributions secured for minor schemes (permitted)	2. Contributions secured in the monitoring year.	
SDM6	Non-self-contained units completed by type: (i) within sites identified for student accommodation development; and (ii) outside sites identified for student accommodation	New purpose built student accommodation should be developed in line with Policy H6 Part A	Policy H6: Purpose-built Student Accommodation
SDM7	Progress in meeting identified needs for Gypsy and Traveller Accommodation	Written update to provide annually on progress against policy objectives.	Policy H12: Gypsy & Traveller Accommodation
SDM8	Business floorspace completed (and net change) in major developments within  (i) CAZ and Bunhill and Clerkenwell AAP  (ii) CAZ fringe Spatial Strategy areas – Angel and Upper Street; and		Policy B1: Delivering business floorspace



Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
	King's Cross and Pentonville Road  (iii) Priority Employment Locations (PELs)		
SDM9	Town centre uses completed within Town Centres, and within the Bunhill and Clerkenwell AAP area		Policy R1: Retail, leisure and services, culture and visitor accommodation
SDM10	Proportion of units within each Town Centre that are:  <ul style="list-style-type: none"> <li>• Vacant</li> <li>• In retail use in Primary Shopping Areas</li> <li>• In retail use in Specialist Shopping Areas</li> </ul>	Trend in vacant units over time  Retail in Primary Shopping Areas:  <ul style="list-style-type: none"> <li>• 60% Angel and Nag's Head</li> <li>• 55% Finsbury Park</li> <li>• 50% Archway</li> </ul> 75% retail in Specialist Shopping Areas	Policy R3: Islington's Retail Hierarchy
SDM11	Proportion of units within each Local Shopping Area that:  (i) are in class E use;  (ii) are vacant;  (iii) have changed to C3 use within the monitoring year.	(i) Percentage change from previous year  (ii) No target  (iii) Zero	Policy R4: Local Shopping Areas
SDM12	Public houses gained and lost (completions)		Policy R11: Public Houses
SDM13	Visitor accommodation change (completions) in schemes and bed spaces in identified locations and		Policy R12: Visitor accommodation

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
	outside of identified locations		
SDM14	Proportion of completed new hotel rooms that are wheelchair accessible		Policy R12: Visitor accommodation
SDM15	Open space gains and losses (sqm) (completions) <ul style="list-style-type: none"> <li>Designated public open space (identified on the Policies Map)</li> <li>Significant private open space</li> </ul>	<ul style="list-style-type: none"> <li>Designated public open space (identified on the Policies Map) - no loss</li> <li>Significant private open space - no loss</li> </ul>	Policy G2: Protecting open space
SDM16	On-site carbon reduction achieved for major development	To achieve minimum target for on-site reduction on average.	Policy S4: Minimising greenhouse gas emissions
SDM17	Offsetting contributions from completed new developments	Overall amount of offset contributions in a monitoring year.	Policy S4: Minimising greenhouse gas emissions
SDM18	Major developments (completions) that have: <ol style="list-style-type: none"> <li>Connected to a heat network.</li> <li>Where there is a Commitment to connect to a future network</li> </ol>		Policy S5: Energy infrastructure
SDM19	Annual mean air pollution levels for nitrogen dioxide and PM10	Reduction	Policy S7: Improving Air Quality
SDM20	Circular Economy Statements for referable applications (permissions)	Performance against metrics and targets set out in GLA circular economy statement guidance.	Policy S10: Circular Economy and Adaptive Design
SDM21	Change in mode share	Increase in mode share of sustainable	Policy T1: Enhancing the

Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy
		transport modes over time.	public realm and sustainable transport
SDM22	S106 contributions for accessible parking bays		Policy T3: Car-free development
SDM23	Additions and removals from the Historic England Buildings at Risk Register	No target	Policy DH2: Heritage assets
SDM24	Tall buildings completed in identified locations and outside of identified locations	All new tall buildings to developed in locations identified in DH3	Policy DH3: Building heights
SDM25	Review the Infrastructure Delivery Plan on a regular basis		Policy ST1: Infrastructure Planning and Smarter City Approach

# 11 Appendices

## Appendix 1: Marketing and vacancy criteria

1. Table A1.1 summarises the marketing and vacancy requirements in policies that require marketing and/ or vacancy for a change of use. Information and explanation provided in policies and their supporting text should be viewed in conjunction with Table A1.1 and the other requirements in Appendix 1. Table A1.1 should be read using the 'existing use' as the starting point and then the relevant 'proposed use' identifies the marketing and/or vacancy requirements for that change of use.

**Table A1.1 Marketing and Vacancy requirements summary**

Policy	Designation/Applicability	Existing use	Proposed use	Marketing period	Vacancy
R2	Primary Shopping Area	Conditioned retail E use	Other E use	6 months	N/A
		E use	Non E main town centre use	12 months	12 months
		E use	Residential	24 months	24 months
R4	Local Shopping Area	Conditioned retail E use	Other E use	N/A	N/A
		E use	Non E main town centre use	6 months	6 months
		All main town centre uses	Residential	24 months	24 months
R5	Dispersed location (edge/out of centre)	Retail or Café/ Restaurant Class E use	Other E use	N/A	N/A
			Non E main town centre use	12 months	12 months
			Residential	12 months	12 months

Policy	Designation/Applicability	Existing use	Proposed use	Marketing period	Vacancy
R7	Specialist Shopping Area	Conditioned retail E use	Other E use	6 months	N/A
		E use	Non E main town centre use	24 months	24 months
		All main town centre uses	Residential	24 months	24 months
R10	Borough wide	Cultural use	Non cultural E use	24 months	24 months
			Non cultural main town centre use	24 months	24 months
			Residential	24 months	24 months
R11	Public Houses	Public house  (sui generis)	E use	24 months	24 months
			Non E main town centre use	24 months	24 months
			Residential	24 months	24 months
B3	Borough wide	Conditioned business E use	Other E use	6 months	N/A
		Non-conditioned business E use	Non-business use	24 months	Demonstrated to be vacant at time of application
			Residential	24 months	24 months
SC1	Borough wide	Social and community infrastructure use	Non-social and community infrastructure use	12 months	12 months

			Residential	12 months	12 months
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2. Where policies require marketing information to be submitted, the following details will be used to assess the acceptability, or otherwise, of the information submitted and any marketing undertaken.
3. Marketing evidence requires demonstration of an active marketing campaign for a continuous period, which has been shown to be unsuccessful. Where vacancy is also required by policy, marketing must take place whilst the premises are vacant unless otherwise stated.
4. The minimum period of vacancy/marketing is identified within relevant policies and summarised in the table above. It must be shown to the Council's satisfaction that marketing has been unsuccessful for all relevant floorspace.
5. Marketing and vacancy criteria will be kept under review and may need to be changed over time – this will be done through guidance.
6. Additional considerations in relation to Class E:
  - For proposals that are marketed within Class E it will be important that the existing use plus all uses within Class E are specified in order to robustly demonstrate there is no demand for the floorspace. A log should be provided evidencing the range of uses advertised, prices advertised and all offers received, this should be accompanied by a signed declaration. Where specific Class E uses are not marketed or are excluded from marketing due to site specific or local circumstances this should be robustly justified.
  - Where a property is vacant and is being marketed, if a new occupier is found the council encourages properties to be brought back into commercial use as soon as possible to avoid unnecessary vacancy.
  - Where a specific use or uses is conditioned within Class E and a proposal seeks to change to another Class E use(s), six months of marketing for the specific use will be required to demonstrate that there is no longer demand for the use(s) it was secured for in line with relevant policies. In this instance there is no requirement for the premises to be vacant.
7. A detailed marketing report must be submitted to the Council and must include appropriate evidence of all of the following. Examples of the type of evidence that could be used to demonstrate that each criterion has been met is also set out below. The examples provided are not an exhaustive list.
  - a) Registration of the property with at least one reputable local or national commercial property agent - this could be evidenced through submission of appropriate correspondence from the property agent setting out marketing has commenced/is underway.
  - b) The length of marketing and vacancy periods, including dates. Marketing must be continuous and from the point when the advertisement board was erected or the online ad was posted (not from the point at which the property agent was appointed).

The length of the vacancy period must be clearly evidenced e.g. through the submission of correspondence from the property agent.

- c) Erection of an advertising board in a prominent location on-site (subject to advertising consent, if required) for the duration of the marketing period – this could be evidenced with photographs of the board in place.
- d) Publication of property details/particulars online on popular commercial property letting/selling websites – this could be evidenced with screenshots of the webpages of where the space is advertised.
- e) Advertisements must include the following basic information: location, size, site description, lawful land use, property type, specification and costs (including rent and service charges) – this could be evidenced through providing the marketing particulars.
- f) Property details/particulars available to inquirers on request – this could be evidenced through particulars and advertising board setting out contact details.
- g) Property marketed for the appropriate use or uses as defined by the relevant planning policy – this could be evidenced through marketing particulars and advertisement board setting out appropriate uses.
- h) Property marketed at a reasonable price that genuinely reflects the market value, including in relation to appropriate use or uses, condition, quality and location of floorspace, including independent professional valuation from at least three agents to confirm the price is reasonable – this could be evidenced with statements from independent property agents/valuers. Where existing floorspace is in poor condition, marketing should include options for both renting the floorspace as is (i.e. the occupier takes responsibility for any refurbishment) and in a refurbished state. The rental values sought for un-refurbished or refurbished floorspace must be aligned with comparable values for similar quality properties in the area. Any submitted marketing at values which are not comparable to similar properties in the area will not be counted toward the continuous marketing requirement.
- i) Detailed commentary on any enquiries received. The number of enquiries must be set out. Information on who the enquiry was from i.e. the name and type of business/organisation, and the type of space/use they required must be provided. Details on outcome of any enquiry and in particular why any enquiry was not successful must also be set out – this could be evidenced within a table and/or email correspondence from enquirers.
- j) Detailed commentary on any viewings undertaken, setting out the number viewings undertaken, who viewed the space i.e. the name and type of business/organisation, reasons why those viewing the space did not wish to make an offer - this could be evidenced within a table and/or email correspondence from enquirers.
- k) Detailed commentary on the number, type, and value of offers received. Information on who made the offer, i.e. the name and type of business/organisation, and the type of space/use they required must be provided. Where offers were received but not accepted, reasons for refusal must be provided - this could be evidenced within a table and/or email correspondence from enquirers.

## Appendix 2: Noise and vibration

1. The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, Islington's thresholds for noise and vibration evaluate noise impact in terms of various 'effect levels' as commonly used within dose/response relationships and referred to in the National Planning Policy Framework and Planning Practice Guidance:
  - **NOEL:** No Observed Effect Level - This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.
  - **LOAEL:** Lowest Observed Adverse Effect Level - This is the level above which adverse effects on health and quality of life can be detected.
  - **SOAEL:** Significant Observed Adverse Effect Level - This is the level above which significant adverse effects on health and quality of life occur.
2. Three basic design criteria have been set for proposed developments, these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application. The design criteria outlined below are defined in the corresponding noise tables. The values will vary depending on the context, type of noise and sensitivity of the receptor:
  - **Green** – where noise is considered to be at an acceptable level.
  - **Amber** – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development.
  - **Red** – where noise is observed to have a significant adverse effect.
3. Special consideration will need to be given to noise sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise likely to have an adverse effect, in line with the agent-of-change principle.
4. A noise assessment must be carried out and must cover a period sufficient to be representative of the prevailing noise climate. In most cases this will require assessment covering midweek and weekends. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

### Assessment/Statement Information requirements

5. The Acoustic Design Statement must include details of proposed impacts and proposed mitigation through acoustic design. Full details on building construction and composite façade calculations to predict the internal noise level in habitable rooms must be included. The Acoustics Ventilation and Overheating Guide (AVO Guide) produced by the Association of Noise Consultants must be followed. When designing ventilation to mitigate noise, due consideration must be given to the impact of local air quality.



6. Use of good acoustic design to achieve internal sound standards is preferable to sole reliance on the building envelope. The following must be demonstrated:
  - Location of buildings on the site to minimise noise exposure (this will include maximising separation of noise sources and sensitive receptors and use of buildings or topography to screen noise).
  - Layout of habitable rooms within buildings to reduce noise exposure to more noise-sensitive rooms.
  - Ensuring dwellings exposed to high noise levels are dual aspect to provide each unit with access to a relatively quiet façade when possible.
  - Measures to reduce noise at source and/or on the transmission path where possible.
7. The layout of adjacent dwellings and the location of plant equipment, lifts and circulation spaces is required to limit the transmission of sound to noise sensitive rooms within dwellings. Applications which cannot demonstrate effective mitigation for all proposed residential units will be refused. Residential conversions in particular can commonly lead to adverse amenity impacts including from noise and vibration; proactive consideration of layouts and other issues can help mitigate or prevent these impacts.
8. All Noise Impact Assessments and Acoustic Design Statements must be carried out by a relevant competent person. Most suitably qualified consultants will be full Members of the Institute of Acoustics and/or the Association of Noise Consultants in addition to holding relevant technical qualifications such as a Degree and/or Post Graduate Diploma in Acoustics or related engineering fields. Noise assessments must clearly state the level of uncertainty attached to their conclusions.
9. Noise management plans may be required for mitigating behavioural noise sources.

### **Noise standards for residential use**

10. This section sets out specific criteria and guidance residential development. Where day and night periods are referenced, day periods are defined as 0700-2300, and night periods are defined as 2300-0700.
11. Table A2.1 below sets out effect level values for proposed residential developments affected by transportation noise:

**Table A2.1: Noise levels applicable to noise sensitive residential development proposed in areas of existing transportation noise (road/rail/mixed)**

Assessment Location	Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
1m from a noise sensitive façade	Day	<50dBA L <sub>Aeq</sub> 16 hour	50-72dBA L <sub>Aeq</sub> 16 hour	>72dBA L <sub>Aeq</sub> 16 hour
	Night	<40dBA L <sub>Aeq</sub> 16 hour	40-72dBA L <sub>Aeq</sub> 8 hour <82dBA L <sub>AFmax</sub>	>72dBA L <sub>Aeq</sub> 8 hour >82dBA L <sub>AFmax</sub>
Inside a resting room (e.g. living room)	Day	<35dBA L <sub>Aeq</sub> 16 hour	35-45dBA L <sub>Aeq</sub> 16 hour	>45dBA L <sub>Aeq</sub> 16 hour
Inside a sleeping room (e.g. bedroom)	Day	<35dBA L <sub>Aeq</sub> 16 hour	35-45dBA L <sub>Aeq</sub> 16 hour	>45dBA L <sub>Aeq</sub> 16 hour
	Night	<30dBA L <sub>Aeq</sub> 8 hour <42dBA L <sub>AFmax</sub>	30-40dBA L <sub>Aeq</sub> 8 hour	>40dBA L <sub>Aeq</sub> 8 hour
Inside a dining room	Day	<40dBA L <sub>Aeq</sub> 16 hour	40-45dBA L <sub>Aeq</sub> 16 hour	>45dBA L <sub>Aeq</sub> 16 hour
Outdoor living space (free field)	Day	<50dBA L <sub>Aeq</sub> 16 hour	50-55dBA L <sub>Aeq</sub> 16 hour	>55dBA L <sub>Aeq</sub> 16 hour

Note: Day periods are defined as 0700-2300; night periods are defined as 2300-0700.

12. For all new residential developments, the following internal design targets should be achieved:

**Table A2.2: internal design targets for sound insulation in dwellings**

Room type	Noise level
Bedrooms	35dBA L <sub>Aeq</sub> 16 hour <sup>†</sup> , 30 dBA L <sub>Aeq</sub> 8 hour <sup>*</sup> , 45dBA L <sub>AFmax</sub> <sup>*</sup>
Living rooms	35dBA L <sub>Aeq</sub> 16 hour <sup>†</sup>
Dining rooms	40dBA L <sub>Aeq</sub> 16 hour <sup>†</sup>

\* - Night-time between 23:00-07:00; † - Daytime between 07:00-23:00.

13. The 10th highest individual L<sub>AFmax</sub> event in any night should be determined and the noise level from this event will be used to inform the above mitigation design target.

14. Where there is any concern over the efficacy of measures submitted to comply with these standards, post-completion verification testing will be required in a sample of the most affected rooms. Where it is unavoidable to rely on closed windows to achieve the above internal design targets there must be a suitable alternative means of ventilation provided which is sufficient to ventilate the premises and to adequately control excess heat in the summer months. Any alternative means must be consistent with Policy S6.

## Industrial and Commercial Noise Sources

15. For industrial and commercial development, it is necessary to submit a noise assessment for any development which could result in a change in noise impact on any sensitive receptor. A sensitive receptor is any receptor that may be adversely impacted by noise, typically residential dwellings, schools, hospitals, etc. New development can involve installing new noise-generating plant, new work processes or equipment or making changes to buildings or structures that affect sound transmission. When a sensitive receptor is proposed near to an existing commercial noise source this will also require a noise assessment in line with the agent-of-change principle.

16. To assess industrial and commercial noise sources, BS4142:2014 'Methods for rating and assessing industrial and commercial sound' must be used. The following criteria will apply:

*"The design and installation of new items of fixed plant shall be such that when operating the cumulative noise level  $L_{Aeq Tr}$  arising from the proposed plant, measured or predicted at 1m from the facade of the nearest noise sensitive premises, shall be a rating level of at least 5dB(A) below the background noise level  $L_{AF90 Tbg}$ . The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS4142:2014."*

17. Where installations of mechanical plant are proposed, a noise assessment with valid predictions must be submitted as part of the application. The background sound level will be defined as the typical minimum value. Any assessment should include a valid assessment of the acoustic features. Where data is not available for plant, site measurement to verify this will be required. As per BS4142:2014, any assumptions made for character will need to be justified and may need further analysis to validation. It is advised that a post installation verification report is carried out, with noise measurements of the plant, to demonstrate compliance with the design criterion.

18. The Council will take into account the hours of operation of the plant where this is set and controlled by timer switch. There are certain smaller pieces of equipment on commercial premises, such as extract ventilation, air conditioning units and condensers, where achievement of the rating levels (ordinarily determined by a BS4142:2014 assessment) may not afford the necessary protection. In these cases, the Council will generally also require a NR curve specification of NR25 or below, dependant on the room (based upon measured or predicted  $L_{eq,5mins}$  noise levels in octave bands) 1 metre from the façade of affected premises, where the noise sensitive premise is located in a quiet background area.

19. Standby and emergency plant noise is a growing noise issue with the Borough. With emergency or standby plant, the same criteria will apply.

## Cultural Uses and the Night-time economy

20. Assessments for noise from proposed new or intensified cultural and/or night-time economy uses must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. The criteria in Table A2.3 must be used to measure and assess the noise impact including  $L_{Aeq}$  and  $L_{AFmax}$  metrics and appropriate frequencies. Where it is not possible to achieve suitable and sufficient internal noise levels for proposed noise sensitive receptors despite appropriate mitigation proposals, due to the totality of noise from existing entertainment venues, then

planning permission will not be granted. When a sensitive receptor is proposed near to an existing commercial noise source this will also require a noise assessment in line with the agent-of-change principle.

**Table A2.3: Noise limits for entertainment noise**

Position	Time	Criteria
External	0900-2300	$L_{Aeq,5min}$ EN minus $L_{Aeq,5min}$ or $L_{A90,5min}$ WEN = 0 to +5 dBA
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = 0 to +5 dBC
	2300-0900	$L_{Aeq,5min}$ EN minus $L_{Aeq,5min}$ or $L_{A90,5min}$ WEN = -5 to +3 dBA
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to +3 dBC
Internal	0900-2300	EN = Noise Rating NR25-35 Leq,5mins
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to +5 dBC
	2300-0900	EN = Noise Rating NR15-25 Leq,5mins
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to 0 dBC
EN = Representative, or predicted, entertainment noise level WEN = Representative noise level without the entertainment noise, measured or predicted 1 m from the facade of noise-sensitive premises.		

21. Internal measurements must be undertaken at a representative position and where necessary be the same for both the EN and WEN assessments. The height of the measuring microphone must be between 1.2 to 1.5 m above the floor and 1 m away from any sound reflecting or absorbing surfaces.

### Sound insulation and mixed use buildings

22. Any development which includes residential floorspace adjacent to non-residential uses must submit an assessment of the internal sound transfer, including for any development which may increase noise impacts in existing multi-use buildings. Some examples of where an assessment would be required are:

- a new development incorporating a bar (Sui Generis) on the ground floor and residential flats above;
- conversion of an existing ground floor premises to a restaurant where there is an existing residential flat above; or
- conversion of an office sharing a party wall with a light industrial use into a residential dwelling
- conversion of an existing ground floor shop to a gym or nursery where there is an existing residential flat above.

23. In some cases, an airborne sound insulation standard will be specified rather than requiring compliance with a noise rating criterion.

24. Party walls, floors and ceilings between the non-residential premises and residential floorspace should be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:

- For drinking establishments, Sui Generis/F.2 premises such as places of worship, concert halls, community space for hire or B2/B8 industrial premises, standards will be judged on a case by case basis depending on the exact nature of the use. Greater than 60dB DnT,w + Ctr is likely to be necessary.

- For cafes and restaurants or take away premises or large shops and supermarkets: At least 55dB DnT,w + Ctr.
- For small A1 cafés or shops: At least 50dB DnT,w + Ctr.

25. Where non-residential uses are placed above residential floorspace or high impact generating uses such as gyms are placed on the ground floor and residential above there are likely to be impact noise issues. An impact sound insulation limit will be specified. These will be determined on a case by case basis and in such cases specialist advice and assessment will be necessary.

## Vibration

26. A vibration assessment will generally be required where railways, either surface or underground, are within 30m of a proposed development site. The need for a vibration assessment at other sites will be assessed on a case by case basis. Table A2.4 notes vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted. Values are derived from BS6472-1-2008 and are only a SOAEL (red) value - developments must be designed to minimise the effect of vibration wherever possible.

**Table A2.4: unacceptable vibration levels for specific uses**

Vibration description and location of measurement	Period	Time	Vibration level (VDV in $ms^{-1.75}$ )
Inside critical areas i.e. operating theatre, precision laboratory	Day, evening and night	00:00-24:00	0.1
Inside residential dwellings	Day and evening	07:00-23:00	0.2 - 0.4
Inside residential dwellings	Night	23:00-07:00	0.13
Inside offices	Day, evening and night	00:00-24:00	0.4
Inside workshops	Day, evening and night	00:00-24:00	0.8

27. Ground borne noise, as a result of vibration from adjacent railways and other sources, should not exceed 35 dB LASmax within habitable residential rooms. Where it is predicted that noise from this source will exceed 35dB LASmax, proposals to mitigate re-radiated noise to acceptable levels must be submitted to and approved in writing by the LPA. However, due to the high cost of mitigating vibration effects, this must be subject to early discussion with the Council.

## Appendix 3: Transport Assessments and Travel Plans

1. Developments which meet the thresholds set out in Table A3.1 will be required to produce a Transport Assessment and a Full Travel Plan.

**Table A3.1: Thresholds for Transport Assessments and Full Travel Plans**

Use	Threshold
E(a) Retail	Equal or more than 1,000sqm
E(c)i (Financial Services)	Equal or more than 1,000sqm
E(b)/ Sui Generis hot food takeaway	Equal or more than 750sqm
B2/B8/ E(c)/ E(g)	Equal or more than 2,500sqm
C1 Hotels	Equal or more than 50 beds
C3 Residential	Equal or more than 50 residents
E(e) Hospitals/medical centres*	Equal or more than 50 staff
F1(a) Schools	All developments to have a school travel plan
F1(a) Higher and further education	Equal or more than 2,500sqm
F1(c) and F1(e) Museum/gallery	Equal or more than 100,000 visitors annually
F1(f) Places of worship	Equal or more than 200 members/regular attendees
E(d), F(c-d) and Sui Generis Assembly and Leisure	Equal or more than 1,000sqm
General Class E (unspecified activity)	Equal or more than 750sqm
<i>*It is mandatory for NHS trusts to have travel plans, required by separate Department of Health and Social Care guidance.</i>	

2. All major developments that fall below the thresholds in the table above will be required to produce a Transport Statement and a Local Level Travel Plan.
3. The Council may still require that a Transport Assessment and a Full Travel Plan accompany applications for new developments that do not meet these thresholds, where a transport impact is expected from the development, or a cumulative impact is expected from different uses within a development or from a number of developments in the vicinity. Worst case scenarios in terms of transport impacts (for example, peak hours) must be demonstrated in the relevant document.
4. Unspecified Class E activities need a transport assessment for premises larger than 750sqm. This new threshold is designed to ensure that the flexibility of Class E does not

result in unintended negative transport impacts. When Class E activities are specified, specific thresholds apply.

## **Transport Assessments/Transport Statements**

5. Transport Assessments are required to assess the impact of proposals on all relevant transport infrastructure, including the capacity of roads, public transport and walking and cycling infrastructure, and to detail action to manage this impact. They are required to present qualitative and quantitative information about the anticipated transport and related environmental impacts before, during and after implementation of the proposed development, including details of the accessibility of the site by all transport modes and all users, including disabled people, and the likely modal split of journeys to and from the site.
6. Where the Council does not consider the preparation of a full Transport Assessment necessary, a less detailed assessment in the form of a Transport Statement will be required.
7. Developers are required to demonstrate that the Transport Assessment/Transport Statement has informed the final design of the proposed development and the Full Travel Plan/Local Level Travel Plan. Development proposals must meet the identified needs and address anticipated impacts of the development through the design of the scheme, effective management, including through the Travel Plan and mitigating any impacts of the scheme (including through planning obligations where appropriate).
8. Up-to-date TfL online guidance<sup>63</sup> must be used to determine what is required in a Transport Assessment.

## **Full Travel Plans/Local Level Travel Plans**

9. Full Travel Plans/Local Level Travel Plans are the key management tool for implementing any transport solutions highlighted by the Transport Assessment/Statement, and are one of the primary tools for mitigating negative transport impacts of development proposals. Full Travel Plans/ Local Level Travel Plans are required to detail the developer's response to the Transport Assessment/Statement and deliver sustainable transport objectives with a package of measures to promote sustainable transport, including measures to achieve a shift to the most sustainable forms of transport: walking and cycling.
10. The Full Travel Plan/Local Level Travel Plan is required to set out the on-going management arrangements for the development, which should normally include the appointment of a Travel Plan co-ordinator and a steering group, management company or community trust. A monitoring schedule and outline of the approach to monitoring is required within a Full Travel Plan; a monitoring period of at least 5 years will apply. Enforcement actions are required to be agreed prior to any grant of planning permission, to plan for any unimplemented or failed measures.
11. Where a Full Travel Plan is required, the documents set out in Table A3.2 must be submitted during the planning application process:

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<sup>63</sup> [TfL online guidance](#)

**Table A3.2: Full Travel Plan documents required**

Timescale Document	Timescale Document
Submission of planning application	Full Travel Plan Template
Prior to occupation	Draft Full Travel Plan
6 months after first occupation	Full Travel Plan

12. The Council will require travel plans to be carried out in compliance with relevant guidance, including guidance produced by TfL. All full travel plans must use TRICS compliant monitoring surveys. All other travel plans and travel plan statements must have iTRACE compliant surveys<sup>64</sup> Travel plans must reflect Policy T1 Part B by prioritising sustainable transport modes, namely walking, cycling and public transport.
13. For Local Level Travel Plans, a template will be required to be submitted alongside an application. This template must use the following headings:
- **Context:** general information on development, e.g. use, size, location and general timescales for development;
  - **Policy:** specific focus on identifying Islington’s transport targets and other relevant targets;
  - **Site Assessments:** general overview as to what facilities are present;
  - **Travel Survey/Trip Generation:** mode split based on trip generation software, census or other relevant and robust prediction methods;
  - **Objectives:** based on comparisons between policy and trip generation, development objectives and targets;
  - **Targets:** as per objectives;
  - **Travel Plan Management:** a main point of contact for a development with regards to Travel Plan issues; and
  - **Measures:** design; post-occupation measures, action plan, securing and enforcing the plan, monitoring.
14. This list is not exhaustive, and the Council may require further information depending on the circumstances of the development.

<sup>64</sup> Available from [the TfL website](#).



## Appendix 4: Cycle parking standards

1. Policy T2 states that all new developments must provide cycle parking, and associated circulation space for ease of use of cycle parking, in accordance with the minimum standards and guidance set out in this Appendix. Table A4.1 below sets out the minimum long-stay (i.e. for residents or employees) and short-stay (i.e. for visitors and customers) cycle parking standards for different types of development which must be provided; this does not include provision of circulation space, which is discussed in paragraph 12 below. Resident/staff parking must be provided on-site.
2. The minimum floorspace requirement provides the opportunity for innovation and flexibility in the design of cycle parking facilities, with the aim to encourage increased use of cycle storage through improvements to overall quality and usability of cycle storage. This is in contrast to standards which prescribe a specified number of spaces, which can lead to prioritisation of quantity over quality, and result in wasted, underused cycle parking facilities.
3. The table below describes minimum cycle parking standards. The nature and amount of cycle parking required varies by use. For instance, within Class E, the needs for long or short stay cycle parking, as well as the amount will vary depending on whether a development caters for an office or a retail use. An office would be expected to provide more long stay parking, while retail should provide more short stay cycle parking.
4. These differing requirements within Class E or Class F mean that cycle parking needs to be delivered in a way which can easily be adapted to respond to the different activities within the same land use category. The Council therefore expects provision of cycle parking to be mainly located at ground floor, in a way that provides flexibility between short and long stay, and support the flexibility of activities sought by Class E.
5. Where unspecified Class E activities are proposed developers should provide cycle parking in line with the requirement below and in a way which facilitates switching from long stay to short stay cycle parking based on changing activity needs. Flexibility is essential to ensure different uses can be adequately provided for and to adapt to different uses over time.

**Table A4.1: Minimum cycle parking standards (excluding circulation space)**

Use class	Description	Spaces per member of staff or resident (GEA) of which 20% accessible	Spaces per visitors or customers (GEA) of which 20% accessible	Spatial equivalent – standard cycle	Spatial equivalent – accessible cycle
E(a)/ E(b)	Retail - food	developments above 100sqm:	developments above 100sqm:	1sqm	2sqm

		<ul style="list-style-type: none"> <li>• 1 per 175sqm</li> </ul>	<ul style="list-style-type: none"> <li>• first 750sqm: 1 space per 20sqm</li> <li>• thereafter: 1 space per 150sqm</li> </ul>		
	Retail – non food	developments above 100sqm <ul style="list-style-type: none"> <li>• first 1000sqm: 1 per 250sqm</li> <li>• thereafter: 1 space per 100sqm</li> </ul>	developments above 100sqm <ul style="list-style-type: none"> <li>• first 1000sqm: 1 space per 60sqm</li> <li>• thereafter: 1 space per 500sqm</li> </ul>	1sqm	2sqm
E(c)	Financial and professional services	developments above 100sqm: 1 per 175sqm	development above 100sqm: 1 space per 20sqm	1sqm	2sqm
E(b)	Restaurants and cafés	1 per 175sqm	developments above 100sqm: 1 space per 20sqm	1sqm	2sqm
Sui Generis	Drinking establishments	1 per 175sqm	developments above 100sqm: 1 space per 20sqm	1sqm	2sqm
Sui Generis	Hot food takeaways	1 per 175sqm	developments above 100sqm: 1 space per 20sqm	1sqm	2sqm
E(c)/E(g)	Offices	1 per 75sqm	<ul style="list-style-type: none"> <li>• First 5000sqm: 1 space per 500sqm</li> <li>• thereafter: 1 space per 5000sqm</li> </ul>	1sqm	2sqm
E(c)/E(g)	Other	1 per 250sqm	1 space per 1000sqm	1sqm	2sqm

B2	General industry	1 per 500sqm	1 space per 1000sqm	1sqm	2sqm
B8	Storage and distribution	1 per 500sqm	1 space per 1000sqm	1sqm	2sqm
C1	Hotels	1 per 20 bedrooms	1 space per 50 bedrooms	1sqm	2sqm
C2	Hospitals	1 space per 5 FTE staff	1 space per 30 FTE staff	1sqm	2sqm
C2	Care homes/ secure accommodation	1 per 5 FTE staff	1 space per 20 bedrooms	1sqm	2sqm
C3-C4	Housing	<ul style="list-style-type: none"> <li>• 1 per studio or 1 person dwelling</li> <li>• 1.5 per 2 person 1 bedroom dwelling</li> <li>• 2 spaces per all other dwellings</li> </ul>	<ul style="list-style-type: none"> <li>• 5 spaces per 40 dwellings:</li> <li>• thereafter: 1 space per 40 dwellings</li> </ul>	1sqm	2sqm
	Specialist older people housing	1 per 10 bedrooms	1 space per 40 bedrooms	1sqm	2sqm
	Student accommodation	0.75 spaces per bedroom	1 space per 40 bedrooms	1sqm	2sqm
E(e-f)/F1	Nurseries	1 space per 8 staff and 1 per 8 pupils	X	1sqm	2sqm
	Schools	1 per 8 staff plus 1 per 8 students	1 space per 100 students	1sqm	2sqm
	Higher education	1 per 4 staff plus 1 per 20 peak time students	1 space per 7 students	1sqm	2sqm
	Libraries or churches (for	1 per 8 staff	1 space per 100sqm	1sqm	2sqm

	staff and visitors)				
	Health facilities/clinics (for staff and visitors)	1 per 5 staff	1 space per 3 staff	1sqm	2sqm
	Community centres (for staff and visitors)	1 per 3 staff	1 space per 100sqm	1sqm	2sqm
E(d)/ F(c-d)	Theatres and cinemas	1 per 8 staff	1 space per 30 seats	1sqm	2sqm
	Leisure and sports	1 per 8 staff	1 space per 100sqm	1sqm	2sqm
General Class E	Unspecified activity	<ul style="list-style-type: none"> <li>• Provision to be delivered at ground floor to ensure flexibility.</li> </ul>		1sqm	2sqm
		<ul style="list-style-type: none"> <li>• first 1,000sqm: 1 space per 20sqm</li> <li>• thereafter: 1 space per 65sqm</li> </ul>			
Sui Generis	As per most relevant other standard.				

Stations	To be considered on a case by case basis in liaison with TfL.
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## Applying the minimum long-stay cycle parking standards

6. The first stage in applying the standards in Table A4.1 is to calculate the number of spaces required by the London Plan; these requirements are repeated in the table for ease of reference. 20% accessible cycle parking spaces must be provided, of which 25% must be designated for non-standard cycles and 75% for ambulant disabled cyclists using regular cycles.
7. When the required number of spaces is established, the spatial equivalent of the spaces must be calculated. Each parking space for standard cycles requires 1sqm of space. Non-standard and accessible spaces each require 2sqm of space.
8. There is a range of cycle parking provision which can be provided; however, the Council will prioritise cycle parking that is practically useful for the majority of people, which is secure and allows convenient ease of access and avoids the risk of personal injury when manoeuvring a bicycle; Sheffield stands in particular are supported. The needs of all users must be considered when determining the type of cycle parking; it is noted that some types of cycle storage equipment (such as vertical racks) can deter or exclude potential users, while others can be positioned so as to undermine ease of access. Applicants must have regard to relevant evidence, guidance and/or best practice, particularly any documents produced by the Council, when determining the type of cycle storage intended to be provided.
9. In development proposals involving refurbishment/retrofitting of existing buildings, where there is no significant element of redevelopment or additional floorspace, there may be circumstances where the full spatial requirement is not practical to deliver, for example due to constraints of the existing building layout and access. In these exceptional circumstances, the total spatial requirement for cycle parking must be maximised, informed by Table A4.1 and taking into account demonstrable site-specific design constraints. Any identified space must prioritise accessible parking in the first instance, mindful of the requirements of the Local Plan to promote and incentivise cycling for a range of users. Where a policy compliant level of accessible parking and circulation space can be provided (based on the full spatial requirement as per Table A4.1 and the further guidance on provision of circulation space in this Appendix), but the total space for cycle parking (including standard parking) remains below the minimum level which would normally have been required, any remaining proposed space must maximise the number of parking spaces; maximisation could include the use of racks which take up less space which may otherwise have been a lesser priority. This approach ensures that on constrained sites where the full requirement cannot be provided, there is a balance between quality and quantity of spaces.
10. Where development proposals provide a policy compliant level of cycle parking (in total and across specific types, e.g. accessible), and also provide additional cycle parking in excess of this policy compliant level, there is no prescriptive requirement to provide certain types of cycle parking or storage for the amount of cycle parking provided in excess of the policy compliant level; however, the Council would encourage provision of additional accessible spaces as part of this excess amount. Any excess cycle parking must not affect cycle parking provided to meet the requirements of Policy T2, particularly in terms of access to this cycle parking and impacts on use of its circulation space. Applicants must also be mindful of other Local Plan priorities in terms of optimising sites to meet development needs, and whether provision of additional cycle parking would constitute the best use of a site.

11. Where accessible cycle parking spaces are provided, their use must be safeguarded for accessible cycles. All accessible cycle parking spaces must be clearly marked and reserved for the priority use of disabled cyclists. Clear and appropriate contact detail signage must be provided for the manager of the facility so cycle users are able to raise queries regarding the use of accessible spaces. As part of the travel plan, applicants are expected to set out how use of accessible spaces will be managed to ensure priority use for accessible cycles.

### **Circulation space**

12. In addition to the space required for parked cycles set out in Table A4.1, applicants must demonstrate that there is sufficient circulation space to allow people using the standard, non-standard and accessible cycle parking spaces to easily use and access the facilities. Circulation space must enable ease of movement and manoeuvring for all users and types of cycle, so that they can enter the facility, reverse and navigate as required. The amount of circulation space required will be determined on a case-by-case basis, although in principle it must be a quantum which facilitates the delivery of high quality cycle parking which is easy to use for all cyclists. In arriving at an appropriate amount of circulation space for a particular development, applicants must have regard to the design of the development as a whole; the layout of (and approach to) the area/room where the cycle parking is located; and/or the type of racks proposed, as well as other relevant Local Plan policies, particularly Policy PLAN1.

### **Visitor/short-stay parking**

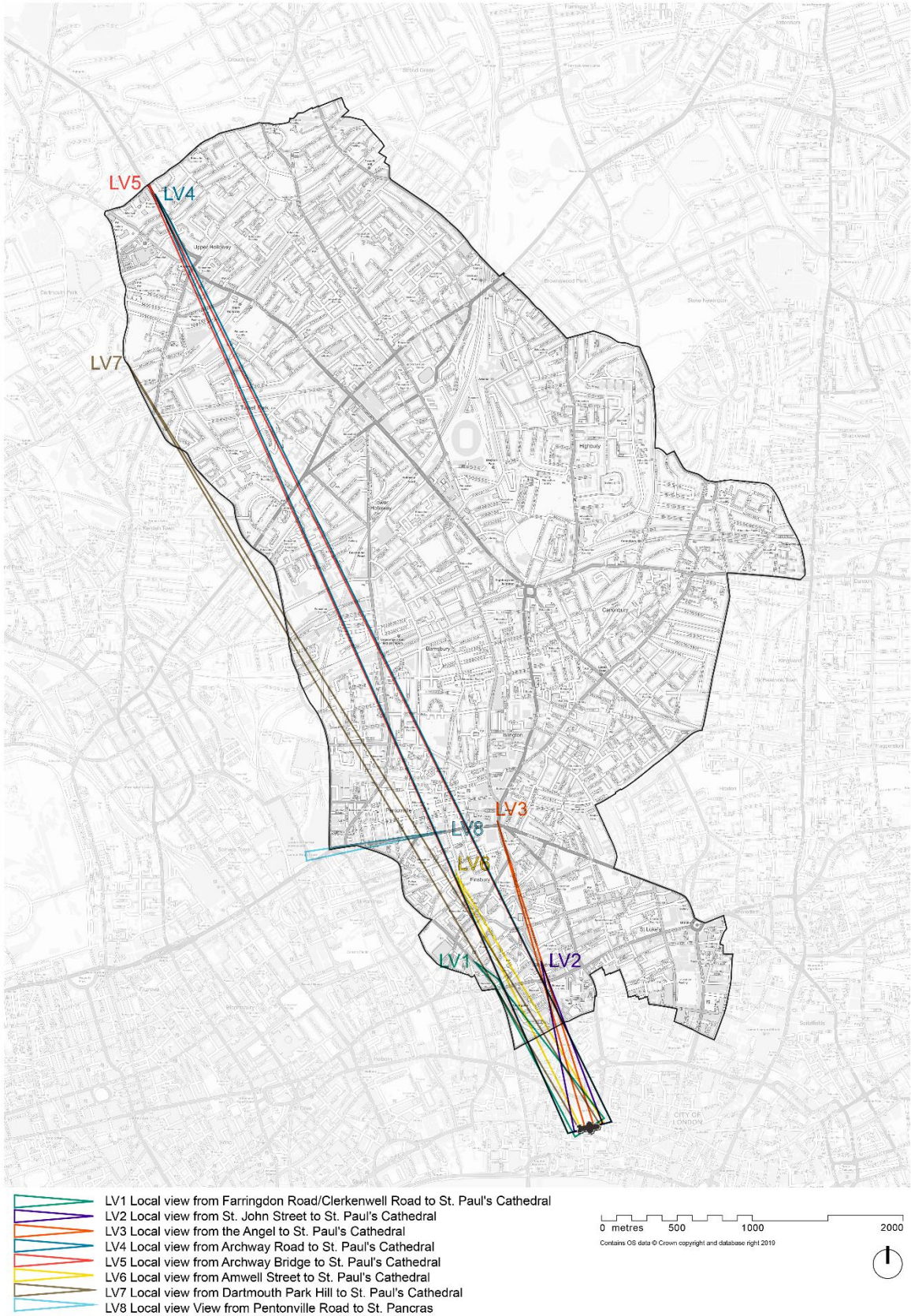
13. Visitor/short-stay parking must be provided in line with the London Plan minimum short-stay cycle parking standards. These are set out in Table A4.1 for reference:
14. Visitor/short-stay cycle parking must be provided off the public highway. Where this is not possible, it may be appropriate within the public realm, where relevant Local Plan policies are addressed, particularly policies PLAN1 and T4. In exceptional circumstances, where it has been demonstrated to the satisfaction of the Council that visitor/short-stay parking cannot be physically provided, a financial contribution will be sought to fund the installation of an equivalent off-site parking in the public realm. Locations will be sought in proximity to the proposed development in the first instance.
15. Visitor/short-stay cycle parking must be easy to find and located close to a main access road(s) and building entry/exit points. It must not be sited where it will obstruct passing pedestrians or vehicles. Facilities must be accessible and easy to use, with no inconvenient detours, steep slopes or narrow access ways. The facilities must be step-free and convenient for visitors of any age or mobility, without the need to lift or drag the cycle. Sheffield stands are the priority type of cycle parking provision for visitor/short-stay cycle parking.

## Appendix 5: Local views

1. Protected local views LV1 to LV7 are all towards St. Paul's Cathedral. Protected local view LV8 is towards St. Pancras Chambers and Station. The origin of each protected local view is as follows:
  - LV1: View from Farringdon Lane/Farringdon Road/Clerkenwell Road
  - LV2: View from St. John Street
  - LV3: View from the Angel
  - LV4: View from Archway Road
  - LV5: View from Archway Bridge
  - LV6: View from Amwell Street
  - LV7: View from Dartmouth Park Hill
  - LV8: View from Pentonville Road
  
2. Figure A5.1 shows the extent of Local Views LV1 to LV8:



**Figure A5.1: Local views**



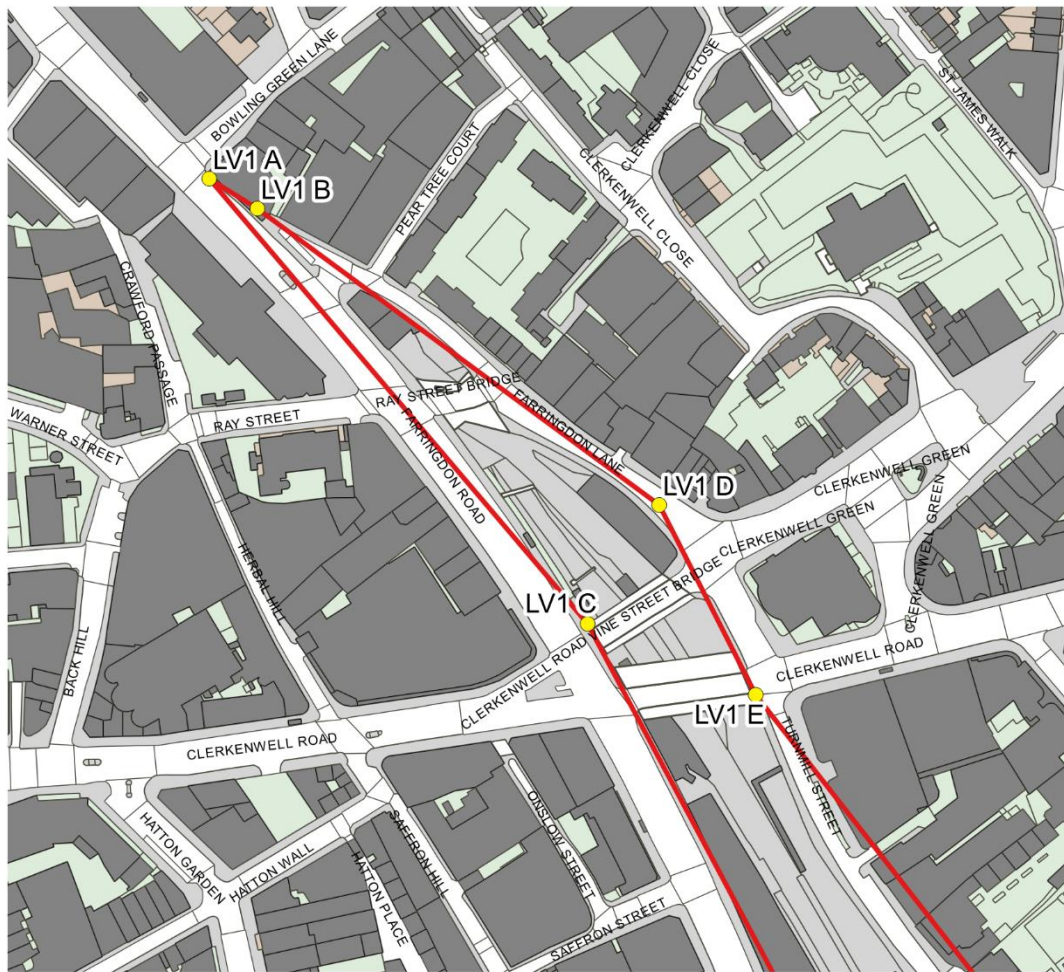
## Overview

3. The views from Farringdon, St. John Street and Amwell Street of St. Paul's Cathedral form part of the original views protected in the 1930s by the City of London's St. Paul's Heights. Islington has maintained these original views and added to them over time. Protection across the whole of the local view needs to be maintained, requiring policy co-ordination between the City of London and Islington. It should be noted that there is a slight difference in height between the view the City protects and that Islington's policy protects for these three views. The height difference is to enable greater control of the development in the foreground of these views, allowing a larger viewing area and enhancing the appreciation of this important and attractive landmark. However, consistent with the City of London's St. Paul's Heights, these three views terminate at 58.1m Above Ordnance Datum (AOD) (the height of the base of the cathedral's peristyle). The remaining local protected views terminate at 52.1m AOD (the height of the base of the cathedral's drum), as per the Mayor's strategic protected views of the cathedral. See also the City of London's Protected Views SPD.
4. The viewpoints for each local view are illustrated on the Figures A5.2 to A5.9. The view co-ordinates (origin and termination points) are identified in Tables A5.1 to A5.8. The protected viewing corridors are also shown in full on the Policies Map.

## Local View LV1

5. LV1 operates differently from the other protected views. It consolidates the views policies of the City of London and Islington to establish a strong local view, safeguarding the special heritage of Farringdon, the Fleet Valley and the views to St. Paul's Cathedral from this space. LV1 provides an opportunity for views of St. Paul's Cathedral from a large space and, unlike other views, it must be considered as a viewing area rather than in terms of separate viewpoints. The grid references for LV1 identified in Table A6.1 therefore describe the extent of the viewing area rather than separate viewpoints. Views to St. Paul's cathedral will be protected from all parts of this viewing area.
6. The view aligns with the western extent of St. Paul's Heights and centres on St. Paul's Cathedral with a width that mirrors its western extent to the east. The height of the view (AOD) at St. Paul's Cathedral is proposed to be fixed at 58.1m which is the base of the peristyle and the height St. Paul's Heights protects from this view.
7. At the other end, the view is defined by a line parallel to the line established by the cathedral and set out from the corner of Turnmill Street and Clerkenwell Road bridge at a height that ensures clear views from this public thoroughfare and from within the Fleet Valley north of this.
8. The height of this line is fixed at 14.9m AOD which is the height at which the cathedral is visible if one is seated in this public space. The protected view area continues north along Farringdon Lane and Farringdon Road to a point at the junction of Farringdon Road and Bowling Green Lane, to protect this part of the valley space.

**Figure A5.2: LV1 viewpoint**



**Table A5.1: LV1 co-ordinates (origin and termination points)**

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	531297	182235	14.9m (see Appendix 5, paragraphs 5-8)
B	531313	182225	
C	531424	182086	
D	531448	182126	
E	531480	182062	
<b>Termination</b>			
Y	531957	181080	58.1m
Z	532150	181203	

## Local View LV2

Figure A5.3: LV2 viewpoint



Table A5.2: LV2 co-ordinates (origin and termination points)

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	531730	182246	19.6m (18m ground level + 1.6m camera height)
<b>Termination</b>			
Y	531953	181113	58.1m
Z	532140	181167	

## Local View LV3

Figure A5.4: LV3 viewpoint

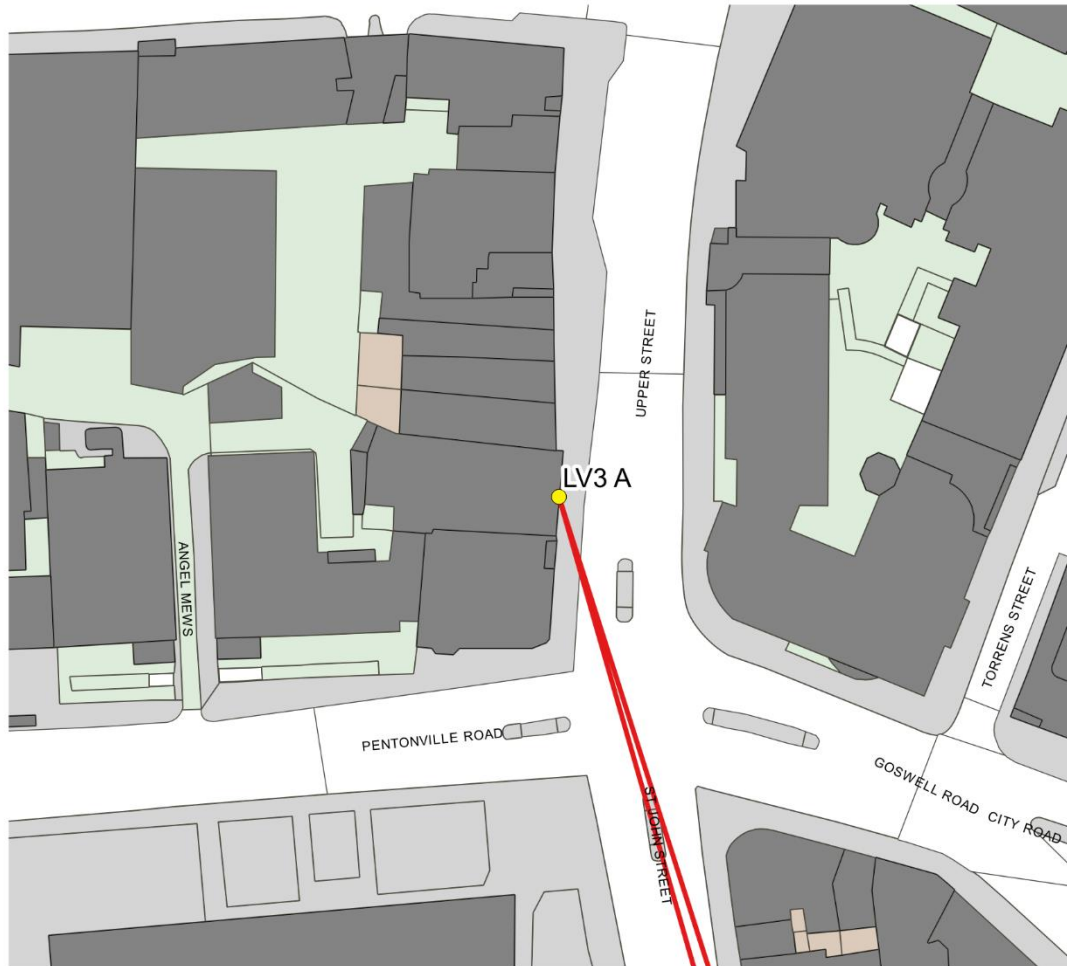


Table A5.3: LV3 co-ordinates (origin and termination points)

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	531441	183174	35m (33.4m ground level +1.6m camera height)
<b>Termination</b>			
Y	532025	181134	52.1m
Z	532083	181151	

## Local View LV4

Figure A5.5: LV4 viewpoint

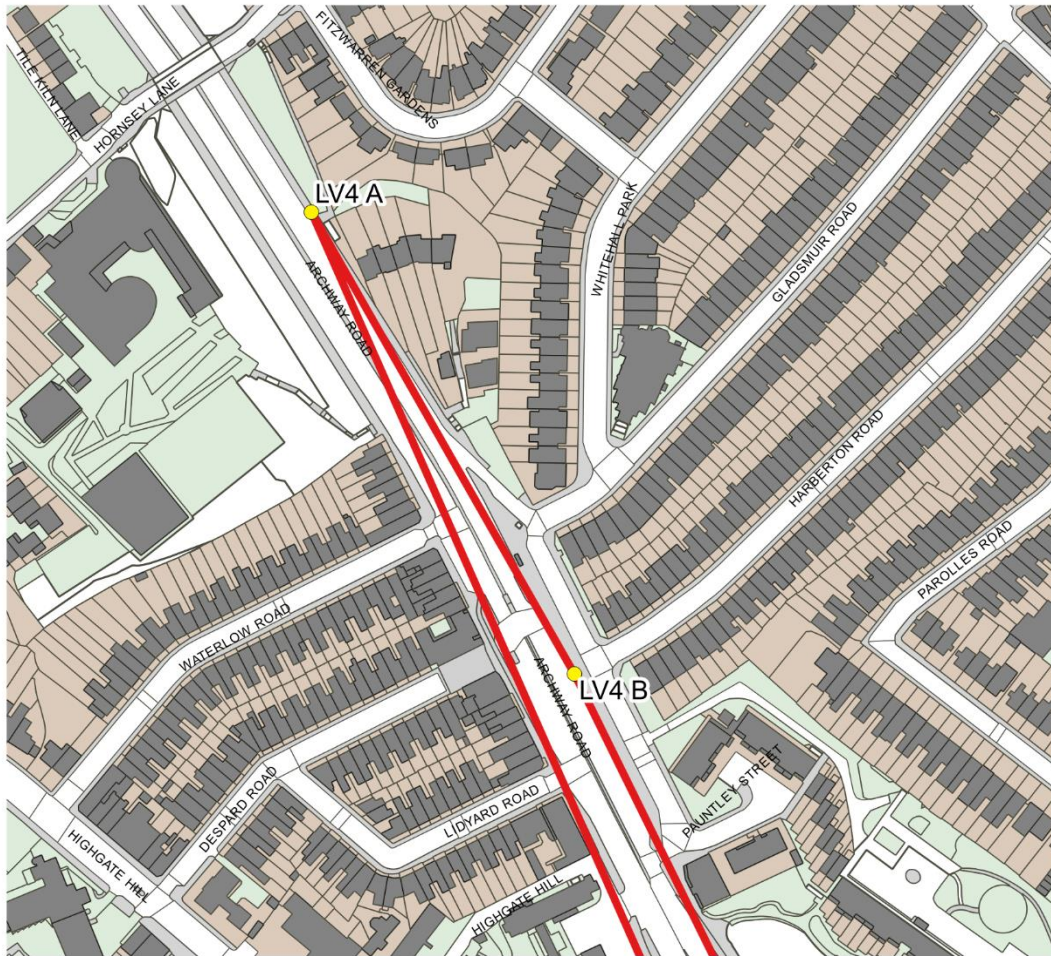


Table A5.4: LV4 co-ordinates (origin and termination points)

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	529167	187334	75.6m (74m ground level at point B +1.6m camera height)
B	529274	187146	
<b>Termination</b>			
Y	531909	181104	52.1m
Z	532200	181180	

## Local View LV5

Figure A5.6: LV5 viewpoint



Table A5.5: LV5 co-ordinates (origin and termination points)

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	529124	187389	101.9m (100.3m +1.6m camera height)
B	529131	187393	
<b>Termination</b>			
Y	531909	181104	52.1m
Z	532200	181180	

## Local View LV6

Figure A5.7: LV6 viewpoint



Table A5.6: LV6 co-ordinates (origin and termination points)

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	531172	182815	33.6m (32m ground level + 1.6m camera height)
B	531195	182745	
<b>Termination</b>			
Y	532004	181123	58.1m
Z	532143	181180	



## Local View LV7

Figure A5.8: LV7 viewpoint

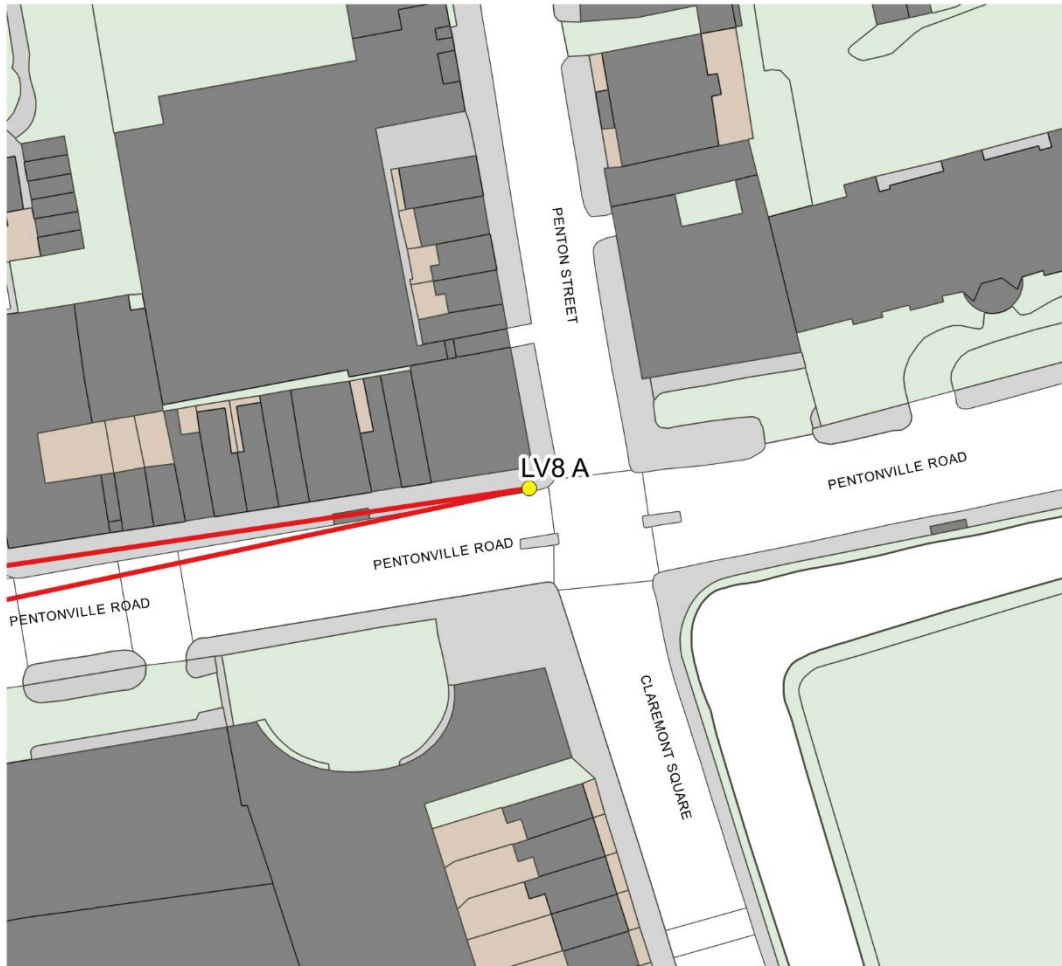


Table A5.7: LV7 co-ordinates (origin and termination points)

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	528981	186216	67.6m (66m ground level + 1.6m camera height)
<b>Termination</b>			
Y	531995	181112	52.1m
Z	532115	181173	

**Local View LV8**

**Figure A5.9: LV8 viewpoint**

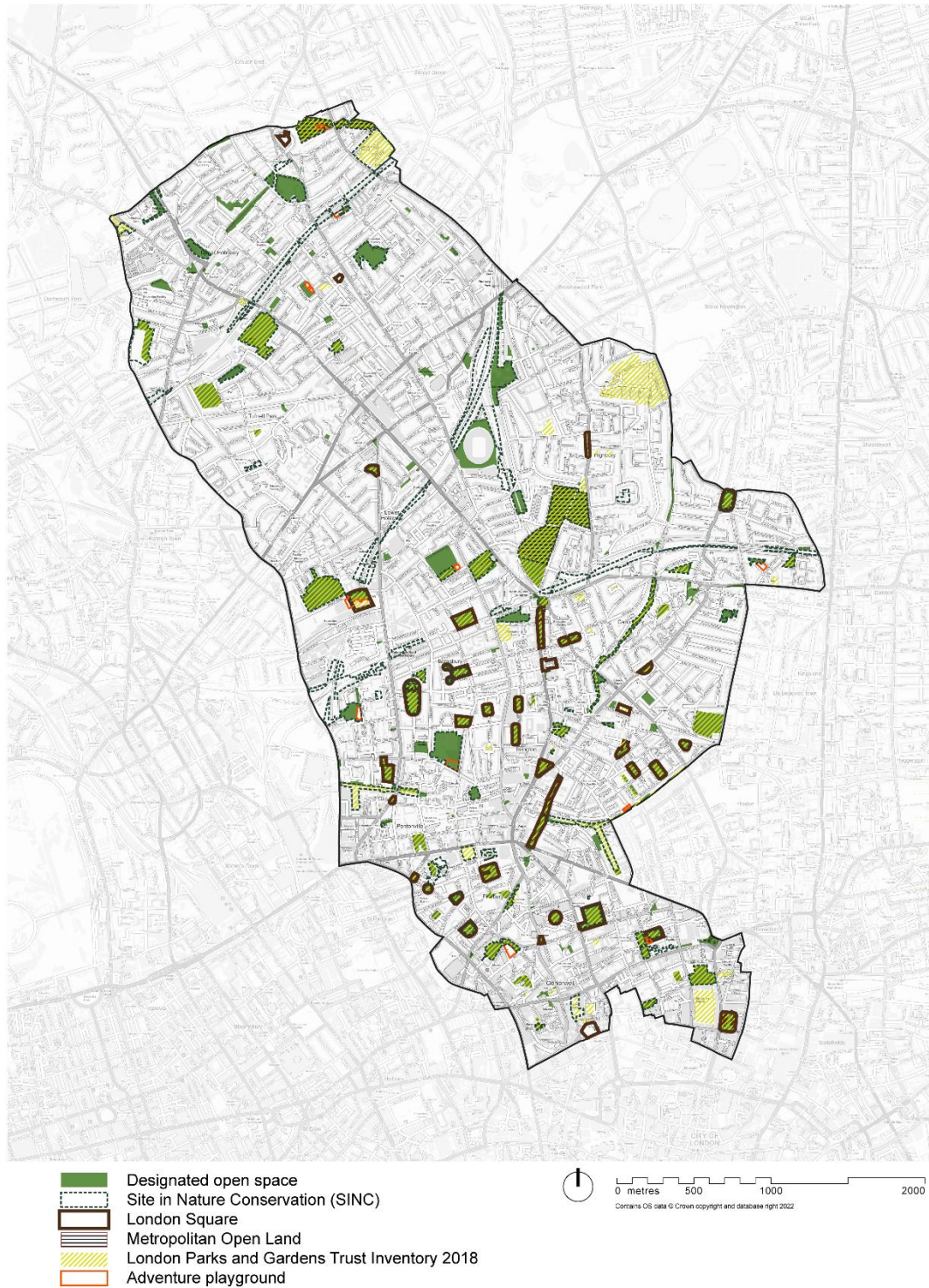


**Table A5.8: LV8 co-ordinates (origin and termination points)**

	Easting	Northing	Height (AOD)
<b>Origin</b>			
A	531098	183108	N/A
<b>Termination</b>			
Y	530166	182970	N/A
Z	530176	182911	

## Appendix 6: Public open spaces; SINCs, historic green spaces and adventure playgrounds

Figure A6.1: Location of public open spaces; SINCs, historic green spaces and adventure playgrounds



**Table A6.1: Designated Public Open Spaces**

Reference	Public Open Space
OS 1	Agdon Street Island
OS 2	All Saints
OS 3	Andersons Square Gardens
OS 4	Angel Clocktower
OS 5	Annette Crescent
OS 6	Archway Corner
OS 7	Archway Park
OS 8	Archway Road Cutting
OS 9	Arlington Square
OS 10	Arsenal Podium
OS 11	Arundel Square
OS 12	Arvon Road Allotments
OS 13	Arvon Road Community Garden
OS 14	Astey's Row Playground
OS 15	Astey's Row Rock Garden
OS 16	Balls Pond Road Verge
OS 17	Baring Street Open Space
OS 18	Barnard Park
OS 19	Barnsbury Square Garden
OS 20	Barnsbury Wood
OS 21	Basire Street Gardens
OS 22	Battishill Street Garden
OS 23	Biddestone Road Open Space
OS 24	Bingfield Park
OS 25	Bunhill Fields Burial Ground
OS 26	Business Design Centre forecourt
OS 27	Caledonian Park
OS 28	Caledonian Road/Stanmore Street
OS 29	Caledonian Road Enclosure
OS 30	Camden Road Church Site
OS 31	Canonbury Garden
OS 32	Canonbury Square East
OS 33	Canonbury Square West
OS 34	Canonbury Station Forecourt
OS 35	Carfree Open Space
OS 36	Carleton Rd/Dalmeny Ave
OS 37	Chambers Road Open Space
OS 38	City Road Basin
OS 39	Clerkenwell Green
OS 40	Colebrooke Row
OS 41	Compton Park

OS 42	Compton Terrace
OS 43	Cornwallis Park
OS 44	Cottage Road
OS 45	Culpeper Street Community Garden
OS 46	Culpeper Street Open Space
OS 47	Dagmar Terrace
OS 48	Dalmeny Park
OS 49	Dartmouth Park
OS 50	Davenant Road Open Space
OS 51	Dibden Street Triangle
OS 52	Docwra Wood
OS 53	Duncan Terrace Gardens
OS 54	Edward Square
OS 55	Elthorne Park
OS 56	Elthorne Park Peace Garden
OS 57	Evershot Road Garden
OS 58	Evershot Road Allotments
OS 59	Eversleigh Street Open Space
OS 60	Exmouth Market
OS 61	Featherstone Street Garden
OS 62	Fieldway Crescent
OS 63	Finsbury Square
OS 64	Fortune Street Gardens
OS 65	Foxham Gardens
OS 66	Frederica Street
OS 67	Freightliners Farm
OS 68	Gibson Square
OS 69	Giesbach Road Open Space
OS 70	Gillespie Park Local Nature Reserve
OS 71	Girdlestone Park
OS 72	Graham Street Open Space
OS 73	Granville Square
OS 74	Grenville Road Open Space
OS 75	Hatchard Road
OS 76	Highbury Fields
OS 77	Highbury Grove Clock Tower
OS 78	Highbury Island
OS 79	Highbury New Park Island
OS 80	Highbury Quadrant Island
OS 81	Hillside Park
OS 82	Holford Gardens
OS 83	Hornsey Lane Open Space
OS 84	Isledon Road Gardens
OS 85	Islington Green

OS 86	Islington Green Triangle
OS 87	Islington Town Hall Forecourt
OS 88	Jewish Burial Ground
OS 89	Joseph Grimaldi Park
OS 90	Killick Street Open Space
OS 91	King Henry's Walk
OS 92	King Square
OS 93	Kinloch Street Open Space
OS 94	Lady Margaret Open Space
OS 95	Landseer Gardens
OS 96	Laycock Street Open Space
OS 97	Lever Street Garden
OS 98	Lloyd Square
OS 99	Lonsdale Square
OS 100	Malta Street
OS 101	Market Road
OS 102	Milner Square
OS 103	Mitchison & Baxter Open Space
OS 104	Monsell Road Allotments
OS 105	Mora Street/Gambier House
OS 106	Morton Road Playground
OS 107	Mountford Crescent
OS 108	Mountford Terrace Open Space
OS 109	Muriel Street Garden
OS 110	Myddelton Square
OS 111	N1 Centre Open Space
OS 112	New River Head
OS 113	New River Walk
OS 114	Newington Green Gardens
OS 115	Nightingale Park
OS 116	Northampton Park Triangle
OS 117	Northampton Square
OS 118	Old Street Promenade of Light
OS 119	Old Street Verge
OS 120	Olden Gardens
OS 121	Owens Fields
OS 122	Packington Estate Open Space
OS 123	Packington Square Gardens
OS 124	Paradise Park
OS 125	Parkland Walk
OS 126	Pemberton Gardens
OS 127	Pemberton Triangle
OS 128	Penn Road Garden
OS 129	Percy Gardens

OS 130	Petherton Green
OS 131	Pilgrams Way Garden
OS 132	Piper Close Open Space
OS 133	Pleasant Place
OS 134	Pollard Close
OS 135	Pollard Close Allotments
OS 136	Prebend Street Corner
OS 137	Quaker Garden
OS 138	Quill Street Allotments
OS 139	Radnor Street
OS 140	Regent's Canal
OS 141	Regents Canal Garden
OS 142	Rosebery Avenue Triangle
OS 143	Rosemary Gardens
OS 144	Royal Northern Gardens
OS 145	Salterton Road Open Space
OS 146	Scholefield Road Open Space
OS 147	Spa Fields and Extension
OS 148	Spa Green Garden
OS 149	Spencer Street Open Space
OS 150	St George's Open Space
OS 151	St George's Road Island
OS 152	St James Park
OS 153	St John's Church Garden
OS 154	St John's Gardens
OS 155	St John's Square
OS 156	St John's Way Verge
OS 157	St Jude Street Open Space
OS 158	St Luke's Church Gardens
OS 159	St Mary Magdalene Garden
OS 160	St Mary's Church Gardens
OS 161	St Paul's Park
OS 162	St Paul's Road Enclosure
OS 163	St Paul's Roadside Garden
OS 164	St Paul's Shrubbery
OS 165	St Silas Church Gardens
OS 166	Sunnyside Gardens
OS 167	Sussex Way Gardens
OS 168	Thornhill Bridge Community Garden
OS 169	Thornhill Crescent
OS 170	Thornhill Road Garden
OS 171	Thornhill Square
OS 172	Tibby Place
OS 173	Tiber Gardens

OS 174	Treaty Street
OS 175	Tufnell Park
OS 176	Union Square
OS 177	Vernon Square
OS 178	Vincent Terrace
OS 179	Whitehall Community Garden
OS 180	Whittington Park
OS 181	Wilmington Square
OS 182	Wilton Square Gardens
OS 183	Woodfall Road Open Space
OS 184	Wray Crescent
OS 185	York Way Garden
OS 186	Zoffany Park
OS 187	Navigator Square
OS 188	Old Street Roundabout



**Table A6.2: Designated Sites of Importance for Nature Conservation (SINCs)**

Reference	SINC name	SINC grade
SINC 1	Gillespie Park and Sidings	Metropolitan
SINC 2	Parkland Walk	Metropolitan
SINC 3	Regent's Canal (East)	Metropolitan
SINC 4	Regent's Canal (West)	Metropolitan
SINC 5	Archway Road Cutting	Borough Grade 1
SINC 6	Barnsbury Wood	Borough Grade 1
SINC 7	Caledonian Park	Borough Grade 1
SINC 8	Copenhagen Junction	Borough Grade 1
SINC 9	Dartmouth Park Hill Reservoir	Borough Grade 1
SINC 10	Drayton Park/Olden Garden	Borough Grade 1
SINC 11	Holloway Road to Caledonian Road Railsides	Borough Grade 1
SINC 12	Isledon Road	Borough Grade 1
SINC 13	Junction Road Cutting	Borough Grade 1
SINC 14	New River Walk	Borough Grade 1
SINC 15	North London Line - east	Borough Grade 1
SINC 16	North London Line - west	Borough Grade 1
SINC 17	Upper Holloway Railway Cutting	Borough Grade 1
SINC 18	Bunhill Fields Burial Ground	Borough Grade 2
SINC 19	Charterhouse	Borough Grade 2
SINC 20	Claremont Close Lawns	Borough Grade 2
SINC 21	Claremont Square Reservoir	Borough Grade 2
SINC 22	Culpeper Community Garden	Borough Grade 2
SINC 23	Dowcras Buildings Wood	Borough Grade 2
SINC 24	Elthorne Park and Sunnyside Gardens	Borough Grade 2
SINC 25	Freightliners Farm	Borough Grade 2
SINC 26	Holly Park Estate	Borough Grade 2
SINC 27	Jewish Burial Ground	Borough Grade 2
SINC 28	Laycock Street Open Space	Borough Grade 2
SINC 29	Market Road Garden	Borough Grade 2
SINC 30	St Joseph's Social Centre	Borough Grade 2
SINC 31	St Mary's Church - Garden	Borough Grade 2
SINC 32	Whittington Park	Borough Grade 2
SINC 33	351 Caledonian Road	Local
SINC 34	Andersons Square Gardens	Local
SINC 35	Archway Park	Local
SINC 36	Barnard Park	Local
SINC 37	Barnsbury Square	Local
SINC 38	Baxter Road Open Space	Local
SINC 39	Bemerton Estate - Garden	Local
SINC 40	Bevin Court and Holford Gardens	Local
SINC 41	Bingfield Park	Local

SINC 42	Dibden Street Open Space	Local
SINC 43	Fortune Street Garden	Local
SINC 44	Foxham Gardens	Local
SINC 45	Grenville Road Gardens	Local
SINC 46	Hatchard Road	Local
SINC 47	Highbury Fields	Local
SINC 48	King Square Gardens	Local
SINC 49	Lloyd Square	Local
SINC 50	Margaret MacMillan Nursery School	Local
SINC 51	Moreland School - Garden	Local
SINC 52	Newcombe Estate	Local
SINC 53	Newington Green Gardens	Local
SINC 54	Radnor Street Open Space	Local
SINC 55	Redbrick Estate	Local
SINC 56	Royal Northern Hospital	Local
SINC 57	Spa Fields Gardens and Skinner Street Open Space	Local
SINC 58	Spa Green Gardens	Local
SINC 59	St John's Gardens	Local
SINC 60	St Luke's Churchyard	Local
SINC 61	St Mary Magdalene Gardens	Local
SINC 62	St Mary's School	Local
SINC 63	St Paul's Shrubbery	Local
SINC 64	Thornhill Square	Local
SINC 65	Tufnell Park Primary School - Garden	Local
SINC 66	Wilmington Square	Local
SINC 67	Winton School - Garden	Local
SINC 68	Wray Crescent	Local

**Table A6.3: Historic green spaces**

Reference	Historic Green Space name	London Square	London Parks and Gardens Trust's Inventory of Historic Green Spaces (2018)	Registered Parks and Gardens
HGS 1	Bunhill Fields Burial Ground		✓	✓
HGS 2	Prebend Street Corner	✓	✓	
HGS 3	Union Square	✓	✓	
HGS 4	Arlington Square	✓	✓	
HGS 5	Newington Green Gardens	✓	✓	
HGS 6	Duncan Terrace Gardens	✓	✓	
HGS 7	Penn Road Garden	✓	✓	
HGS 8	Thornhill Road Garden	✓	✓	
HGS 9	Lonsdale Square	✓	✓	
HGS 10	King Square	✓	✓	
HGS 11	Milner Square	✓	✓	
HGS 12	Bartholomew Square	✓	✓	
HGS 13	Finsbury Square	✓	✓	
HGS 14	Compton Terrace	✓	✓	
HGS 15	Thornhill Crescent	✓	✓	
HGS 16	Thornhill Square	✓	✓	
HGS 17	Percy Gardens	✓	✓	
HGS 18	Islington Green	✓	✓	
HGS 19	Lloyd Square	✓	✓	
HGS 20	Edward Square	✓	✓	
HGS 21	Highbury Park	✓	✓	
HGS 22	Market Road Gardens	✓	✓	
HGS 23	Mountford Crescent	✓	✓	
HGS 24	Mountford Terrace	✓	✓	
HGS 25	Myddelton Square	✓	✓	
HGS 26	Northampton Square	✓	✓	
HGS 27	Tibberton Square	✓	✓	
HGS 28	Vernon Square	✓	✓	
HGS 29	Wilmington Square	✓	✓	
HGS 30	Wilton Square	✓	✓	
HGS 31	Arundel Square	✓	✓	
HGS 32	Barnsbury Square Garden	✓	✓	
HGS 33	Canonbury Square	✓	✓	

HGS 34	Islington Green Triangle	✓	✓	
HGS 35	Colebrook Row	✓	✓	
HGS 36	Caledonian Road Enclosure	✓	✓	
HGS 37	Agdon Street Island	✓	✓	
HGS 38	Annette Crescent	✓	✓	
HGS 39	Gibson Square	✓	✓	
HGS 40	Charterhouse Square	✓		
HGS 41	Hornsey Rise Enclosure	✓		
HGS 42	Kingsdown Road	✓		
HGS 43	Tynedale Place	✓		
HGS 44	Alwyne Square		✓	
HGS 45	Andersons Square		✓	
HGS 46	Artillery Garden		✓	
HGS 47	Aubert Court		✓	
HGS 48	Barnsbury Wood		✓	
HGS 49	Battishill Street Garden		✓	
HGS 50	Caledonian Park		✓	
HGS 51	Canonbury Tower Garden		✓	
HGS 52	Charterhouse Precincts		✓	
HGS 53	Christ Church Highbury with St. John and St. Saviour		✓	
HGS 54	Claremont Close		✓	
HGS 55	Claremont Square Reservoir		✓	
HGS 56	Clerkenwell Green		✓	
HGS 57	Cloister Garden, Priory Church of the Order of St. John of Jerusalem		✓	
HGS 58	Cloudesley Square		✓	
HGS 59	Crouch Hill Park		✓	
HGS 60	Steward Street Playground		✓	
HGS 61	Dalmeny Park		✓	
HGS 62	Dartmouth Park		✓	
HGS 63	Highbury Fields		✓	
HGS 64	Whittington Park		✓	
HGS 65	Wesley's Chapel And Leysian Mission		✓	
HGS 66	Tufnell Park		✓	
HGS 67	Sussex Close		✓	

HGS 68	Spa Green Gardens		✓	
HGS 69	Spa Fields		✓	
HGS 70	Samuel Lewis Trust Dwellings		✓	
HGS 71	St Silas Church Gardens		✓	
HGS 72	St Paul's Shrubbery		✓	
HGS 73	St Mary's Church Garden		✓	
HGS 74	St Mary Magdalene Church Garden		✓	
HGS 75	St Luke's Church Gardens		✓	
HGS 76	St Joseph's Church and Retreat Gardens		✓	
HGS 77	St John's Garden		✓	
HGS 78	St John's Church		✓	
HGS 79	St John's Churchyard		✓	
HGS 80	St James Close and Clothworkers Almshouses		✓	
HGS 81	St James Clerkenwell Church Garden		✓	
HGS 82	Fortune Street Park		✓	
HGS 83	Freightliners Farm		✓	
HGS 84	Granville Square		✓	
HGS 85	Highbury Quadrant Congregational Church		✓	
HGS 86	Highbury Quadrant Estate		✓	
HGS 87	Highbury Roundabout		✓	
HGS 88	Holford Gardens		✓	
HGS 89	Holly Park		✓	
HGS 90	Jewish Burial Ground		✓	
HGS 91	John Spencer Square		✓	
HGS 92	Joseph Grimaldi Park		✓	
HGS 93	Nightingdale Park		✓	
HGS 94	Metropolitan Benefit Societies Almshouses		✓	
HGS 95	New River Head		✓	
HGS 96	New River Walk		✓	

HGS 97	Astey's Row Playground		✓	
HGS 98	Astey's Row Rock Garden		✓	
HGS 99	Packington Square		✓	
HGS 100	Packington Square Gardens		✓	
HGS 101	Canalside Square		✓	
HGS 102	Parkland Walk		✓	
HGS 103	Peckett Square		✓	
HGS 104	Taverner Square		✓	
HGS 105	Quaker Gardens		✓	
HGS 106	Regent's Canal and City Road Basin		✓	
HGS 107	Regent's Canal and Battle Bridge Basin		✓	
HGS 108	Rosemary Gardens		✓	
HGS 109	Royal Northern Gardens		✓	
✓ denotes source of historic green spaces; some spaces have multiple sources.				

**Table A6.4: Designated Adventure Playgrounds**

Reference	Adventure Playground
AP 1	Barnard Park
AP 2	Cape Play and Youth Project
AP 3	Cornwallis
AP 4	Crumbles Castle
AP 5	Hayward
AP 6	King Henry's Walk
AP 7	Lumpy Hill
AP 8	Martin Luther King
AP 9	Three Corners
AP 10	Timbuktu
AP 11	Toffee Park
AP 12	Waterside Play and Youth Project

## Appendix 7: Policies superseded by Local Plan – Strategic and Development Management Policies DPD

1. Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.
2. The Local Plan – Strategic and Development Management Policies DPD wholly supersedes the Islington Core Strategy (adopted February 2011) and the Development Management Policies DPD (adopted June 2013). Table A8.1 identifies the full list of policies in these documents which will be superseded.

**Table A7.1: Policies superseded by Local Plan – Strategic and Development Management Policies DPD**

Policy document	Policy name
Core Strategy (February 2011)	CS1: Archway
Core Strategy (February 2011)	CS2: Finsbury Park
Core Strategy (February 2011)	CS3: Nag's Head and Upper Holloway Road
Core Strategy (February 2011)	CS4: Highbury Corner and Holloway Road
Core Strategy (February 2011)	CS5: Angel and Upper Street
Core Strategy (February 2011)	CS6: King's Cross
Core Strategy (February 2011)	CS7: Bunhill and Clerkenwell
Core Strategy (February 2011)	CS8: Enhancing Islington's character
Core Strategy (February 2011)	CS9: Protecting and enhancing Islington's built and historic environment
Core Strategy (February 2011)	CS10: Sustainable design
Core Strategy (February 2011)	CS11: Waste
Core Strategy (February 2011)	CS12: Meeting the housing challenge
Core Strategy (February 2011)	CS13: Employment spaces
Core Strategy (February 2011)	CS14: Retail and services
Core Strategy (February 2011)	CS15: Open space and green infrastructure
Core Strategy (February 2011)	CS16: Play space



Core Strategy (February 2011)	CS17: Sports and recreation provision
Core Strategy (February 2011)	CS18: Delivery and infrastructure
Core Strategy (February 2011)	CS19: Health Impact Assessments
Core Strategy (February 2011)	CS20: Partnership working
Development Management Policies (June 2013)	DM2.1: Design
Development Management Policies (June 2013)	DM2.2: Inclusive Design
Development Management Policies (June 2013)	DM2.3: Heritage
Development Management Policies (June 2013)	DM2.4: Protected views
Development Management Policies (June 2013)	DM2.5: Landmarks
Development Management Policies (June 2013)	DM2.6: Advertisements
Development Management Policies (June 2013)	DM2.7: Telecommunications and utilities
Development Management Policies (June 2013)	DM3.1: Mix of housing sizes
Development Management Policies (June 2013)	DM3.2: Existing housing
Development Management Policies (June 2013)	DM3.3: Residential conversions and extensions
Development Management Policies (June 2013)	DM3.4: Housing standards
Development Management Policies (June 2013)	DM3.5: Private outdoor space
Development Management Policies (June 2013)	DM3.6: Play space
Development Management Policies (June 2013)	DM3.7: Noise and vibration (residential uses)
Development Management Policies (June 2013)	DM3.8: Sheltered housing and care homes

Development Management Policies (June 2013)	DM3.9: Houses in Multiple Occupation, hostels and student accommodation
Development Management Policies (June 2013)	DM4.1: Maintaining and promoting small and independent shops
Development Management Policies (June 2013)	DM4.10: Public Houses
Development Management Policies (June 2013)	DM4.11: Hotels and visitor accommodation
Development Management Policies (June 2013)	DM4.12: Social and strategic infrastructure and cultural facilities
Development Management Policies (June 2013)	DM4.2: Entertainment and the night-time economy
Development Management Policies (June 2013)	DM4.3: Location and concentration of uses
Development Management Policies (June 2013)	DM4.4: Promoting Islington's Town Centres
Development Management Policies (June 2013)	DM4.5: Primary and Secondary Frontages
Development Management Policies (June 2013)	DM4.6: Local Shopping Areas
Development Management Policies (June 2013)	DM4.7: Dispersed shops
Development Management Policies (June 2013)	DM4.8: Shopfronts
Development Management Policies (June 2013)	DM4.9: Markets and specialist shopping areas
Development Management Policies (June 2013)	DM5.1: New business floorspace
Development Management Policies (June 2013)	DM5.2: Loss of existing business floorspace
Development Management Policies (June 2013)	DM5.3: Vale Royal/Brewery Road Locally Significant Industrial
Development Management Policies (June 2013)	DM5.4: Size and affordability of workspace
Development Management Policies (June 2013)	DM6.1: Healthy development

Development Management Policies (June 2013)	DM6.2: New and improved public open spaces
Development Management Policies (June 2013)	DM6.3: Protecting open space
Development Management Policies (June 2013)	DM6.4: Sport and recreation
Development Management Policies (June 2013)	DM6.5: Landscaping, trees and biodiversity
Development Management Policies (June 2013)	DM6.6: Flood prevention
Development Management Policies (June 2013)	DM7.1: Sustainable design and construction
Development Management Policies (June 2013)	DM7.2: Energy efficiency and carbon reduction in minor schemes
Development Management Policies (June 2013)	DM7.3: Decentralised Energy Networks
Development Management Policies (June 2013)	DM7.4: Sustainable design standards
Development Management Policies (June 2013)	DM7.5: Heating and cooling
Development Management Policies (June 2013)	DM8.1: Movement hierarchy
Development Management Policies (June 2013)	DM8.2: Managing transport impacts
Development Management Policies (June 2013)	DM8.3: Public transport
Development Management Policies (June 2013)	DM8.4: Walking and cycling
Development Management Policies (June 2013)	DM8.5: Vehicle parking
Development Management Policies (June 2013)	DM8.6: Delivery and servicing for new developments
Development Management Policies (June 2013)	DM9.1: Infrastructure
Development Management Policies (June 2013)	DM9.2: Planning obligations

<b>Development Management Policies</b> (June 2013)	DM9.3: Implementation
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## Appendix 8: Glossary and abbreviations

### Glossary

Term	Definition
Active frontages	A building accommodating uses on the ground floor which generate passing trade and provide a shop-type window display providing visual interest for pedestrians.
Adaptable	Premises that, whilst not immediately accessible or inclusive, have the capacity to be adapted to deliver an accessible facility; that adaptation should be quick, easy and low cost, it will not involve the relocation of partitions or services but may mean the installation of grab-rails or other fixtures/fittings.
AECB Building Standard	The Association for Environment Conscious Building (AECB) Building Standard (previously known as Silver Standard) is a recognised and successful fabric first approach based on performance metrics and a more accurate energy demand assessment. The AECB Building Standard enables the construction of high-performance buildings using widely available technology to reduce overall CO2 emissions. The standard is comparable but less ambitious than Passivhaus.
Affordable Private Rent	Intermediate rented housing provided within Purpose Built Private Rented Sector development.
Affordable Rent/London Affordable Rent	Housing let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable). London Affordable Rent is a type of AR product introduced by the Mayor of London, with rents based on social rent levels.
Affordable retail space	A retail unit (generally a small retail unit) with a rental value below the market rate (dependent on the sector and location). Market stalls or street booths could constitute affordable retail space where they meet these parameters.

Affordable workspace	Business floorspace/workspace which is leased to the Council at a peppercorn rent for a specified period and managed by a Council approved operator, including the Council itself. Affordable workspace should be let to end occupiers at rents significantly below the prevailing market rent for the specific sector and/or location. Actual rental values will be considered on a case-by-case basis through the Council's Affordable Workspace Commissioning Process.
Agent-of-change	The principle that the person or organisation responsible for change – e.g. a planning applicant who proposes new residential units near an existing cultural use – is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting.
Air Quality Assessment/preliminary Air Quality Assessment	Documents which assess the impacts of existing air quality on development, and the impacts that the development itself may potentially cause. The assessments should include details of relevant mitigation measures.
Air Quality Focus Area	Locations that exceed the EU annual mean limit value for Nitrogen Dioxide emissions and which have a high human exposure. Currently planned measures to reduce air pollution in these areas may not fully resolve poor air quality issues.
Air Quality Management Area	Specified area where national air quality objectives are not likely to be achieved. This area could be just one or two streets, or it could be much bigger. Where an area has been identified, the local authority will put together a plan to improve the air quality - a Local Air Quality Action Plan.
Air Quality Neutral	A development is considered to be Air Quality Neutral if it does not lead to the deterioration of existing air quality i.e. the operational emissions from a finished development are no greater than the pre-development emissions. The Air Quality Neutral standard is assessed with respect to all emissions associated with air pollution from a development site, including Nitrogen Dioxide NO <sub>2</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> .
Air source heat pump	An air source heat pump (ASHP) is a system which transfers heat from outside to inside a building, or vice versa. Heat absorbed from the outside air can be used to heat radiators, underfloor heating systems, or warm air convectors and hot water. Under the principles of vapour

	compression refrigeration, an ASHP uses a refrigerant system involving a compressor and a condenser to absorb heat at one place and release it at another.
Albedo	The surface reflectivity of the sun's radiation.
All London Green Grid	The All London Green Grid is a policy framework to promote the design and delivery of green infrastructure across London.
Ambulant disabled cyclist	A mobility impaired person who is able to walk short distances but who may find cycling an easier/better option than walking or public transport.
Amenity	Amenity is a qualitative measure that relates to the character, sense of wellbeing and enjoyment of an area. It can be influenced by a number of factors, both individually and cumulatively.
Ancillary use	An ancillary use supports or is closely associated with the primary use/function of a building/unit/land. A use would only be considered ancillary if its scale and/or function does not detract from the primary purpose of the building/unit/land.
Apart-hotels	Serviced, self-contained, self-catering apartments, usually on short-term lets of no more than 90 days. The use class may be C1 or C3, depending on the characteristics of the particular development.
Archaeological priority areas	Areas suspected to contain archaeological remains and for which a survey is required.
Area Action Plan	A Development Plan Document that provides a planning framework for an area of significant change and/or conservation.
Article 4 Direction	A statutory mechanism to remove some or all permitted development rights that apply to a particular site or area.
Biodiversity	The diversity or variety of plants, animals and other living things in a particular area.
Bio-solar roof	Roof combining a green roof and photovoltaic renewable energy. PV panels are installed on top of green roof substrate. Biosolar roofs bring together the energy-generating capability of solar PV arrays with the sustainable drainage, cooling and biodiversity benefits of green roof systems.
Blue infrastructure	Water-related infrastructure/assets such as rivers, canals and ponds, which have a multi-functional role.
Blue roof	Attenuation tank(s) at roof or podium level.

Brownfield land/previously developed land	As defined in the NPPF, land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Building Information Management	A process for creating and managing information on a construction project across the project lifecycle. One of the key outputs of this process is the Building Information Model, the digital description of every aspect of the built asset. This model draws on information assembled collaboratively and updated at key stages of a project.
Building Regulations	Minimum standards for design, construction and alterations of buildings, supported by Approved Documents which set out detailed practical guidance on compliance with the regulations. Building regulations approval is different from planning permission. Approved Documents L (known as Part L) and M (known as Part M) are particularly relevant for planning, with regard to sustainable design and accessibility respectively.
Building Research Establishment Environmental Assessment Methodology	A sustainability assessment method used to assess, rate and certify the sustainability of buildings.
Business floorspace/buildings/development/uses	Office, research and development and light industrial activities as well as industrial uses B2 general industrial and B8 storage and distribution, and Sui Generis industrial uses. Sui 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.
Business Improvement District	An area where businesses agree to pay additional rates to fund improvements to the local general environment, with the aim of encouraging local economic development.



Business-led development	Development where the majority of floorspace is for business uses.
Car clubs	Clubs where a number of people share a pool car(s) for rent or otherwise for personal use.
Carbon	Carbon is used in the Islington Local Plan as a shorthand term for carbon dioxide emissions and all other greenhouse gases. London's carbon accounting is measured in the carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.
Carbon dioxide (CO2)	The principal greenhouse gas related to climate change.
Care home	Care homes are where a number of older people live, usually in single rooms, and have access to on-site care services. Different types of care homes provide different levels of care. A home registered simply as a care home will provide personal care only - help with washing, dressing and giving medication. A home registered as a care home with nursing will provide the same personal care but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention from a nurse. Some homes, registered either for personal care or nursing care, can be registered for a specific care need, for example dementia or terminal illness.
Car-free development	Car-free development means no parking provision will be allowed on site and the occupiers will have no ability to obtain car parking permits.
CAZ Fringe spatial strategy areas	Angel and Upper Street spatial strategy area and King's Cross and Pentonville Road spatial strategy area, which are both contiguous with the CAZ.
Central Activities Zone	The Central Activities Zone is the area of central London where planning policy promotes the development of offices and a broad range of other uses such as retail and cultural uses and activities.
Change of Use	A type of development that requires planning permission if it is judged to be 'material'. However, this excludes any change between uses which are within the same Use Class as defined in the Use Classes Order. It also excludes changes of use that are Permitted Development as

	defined in the General Permitted Development Order.
Character	Individual distinctiveness created from a combination of natural and built elements with historic, socio-economic and other factors.
CIBSE TM54	An energy assessment methodology developed by the Chartered Institution of Building Services Engineers (CIBSE) to predict future operational energy performance for non-domestic buildings at the design stage. This allows designers to consider factors that impact buildings' actual operational performance at an earlier stage and enables a more accurate determination of the anticipated energy consumption and carbon emissions that can be used to verify the performance of the constructed building in operation. CIBSE TM54 can also be used to provide a more accurate energy demand assessment.
Circular economy	A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. A circular economy approach will save resources, improve resource efficiency, help to reduce carbon emissions and will also help to reduce waste production.
City Fringe Opportunity Area	Opportunity Areas are capable of accommodating substantial new jobs or homes. The City Fringe Opportunity Areas include parts of Islington, City of London, Hackney, and Tower Hamlets. It is an important area for employment growth in particular and includes the Tech City cluster of digital and creative industries.
Clawback	A legally binding agreement that determines future requirements or payments in respect of land, following a trigger event.
Climate change allowance	Allowance of 40% for an increase in rainfall intensity from climate change in accordance with Environment Agency guidance 'Flood risk assessments: climate change allowances'.
Co-living/shared living	Synonymous with large-scale HMOs. A form of non-self-contained accommodation where people, usually young professionals, have their own living space but share basic amenities such as a kitchen or bathroom. Accommodation will usually feature other non-essential communal facilities. Co-living/shared living is a lifestyle choice and

	does not address specific housing need. It is not an affordable housing product.
Combined Heat and Power	The combined production of heat and power, where the heat emitted as a by-product of energy generation is captured for useful purposes.
Commercial floorspace/buildings/development/uses	Activities or uses which involve business activities and/or the sale of good or services. For the purposes of the Local Plan, this is a broad term which encompasses business and retail uses.
Commercial storey	Floor to floor height of commercial buildings, typically in the range of 4m to 4.5m.
Commercial-led development	Development where the majority of floorspace/uses is commercial.
Community Infrastructure Levy/Mayoral Community Infrastructure Ley	A tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area. Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially liable for the levy. Rates are set by the local planning authority in line with legislation and guidance. The Mayor of London can set separate rates which also apply in London.
Community Needs Assessment	Document which assesses proposed loss/reduction/relocation of social and community infrastructure uses.
Community Use Agreement	A document outlining terms of use for the use of private facilities by local community groups.
Comparison goods retailers	Shops that sell items where some comparison is likely to be made before purchasing goods (e.g. clothing, carpets, electrical goods).
Compulsory Purchase Order	A legal function that enables public bodies to obtain land or property without the consent of the landowner.
Conservation areas	An area of special architectural or historic interest whose character or appearance is protected. Conservation area guidelines have been produced to guide development decisions in each area.
Conventional Housing	Self-contained homes from new build, conversions or changes of use.
Convenience goods retailers	Shops that sell everyday items such as food, drink and newspapers.
Co-working space	Workspace utilised by people who are self-employed or working for different employers. Co-working spaces are inclusive of costs such as internet access and often include use of facilities such as meeting

	rooms. They are occupied on an ad hoc, membership basis, including on a per desk basis.
Creative industries	Activities which have their origin in individual creativity, skill and talent, and which have their potential for wealth and job creation through the generation and exploitation of intellectual property.
Critical Drainage Area	A discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure.
Cultural Quarter	Areas where cultural provision should be expanded, and/or where there is already a broader level of cultural activity which should be retained and enhanced.
Cultural uses	Cultural uses are unique assets which add significant value to the social fabric and economy of Islington. Such uses often have distinct social and economic benefits, although cannot be specifically defined (in terms of planning use classes). Cultural facilities evident in Islington includes music and other entertainment venues, cinemas, artist studios and galleries, theatres, pubs, museums and the Emirates Stadium, working men's clubs, arts and crafts spaces, bingo halls, community centres, in addition to a number of heritage assets.
Cumulative impact	In terms of the 2003 Licensing Act, "cumulative impact" means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area.
Decentralised Energy Network	An existing or proposed district heating/electricity/cooling network to which a building or buildings can connect.
Decibel	Unit of sound level. 0dB is the threshold of hearing and 140dB is the threshold of pain. dB(A) is a measurement which broadly agrees with people's perception of loudness.
Deed of Easement	A legal document used to ensure that existing commercial occupiers are protected from impacts of new developers in close proximity. For example, where a new residential use is proposed in close proximity to a noise generating commercial use such as a public house, a deed of

	easement would be legal binding acceptance of the existing noise levels from occupiers of the proposed residential use, at the time of occupation.
Density	The amount of development proportionate to a building or site. High density development refers to a high proportion of development on site or within a building, which does not necessarily mean tall or taller buildings.
Design and access statement	A document submitted as part of a planning application which explains how a proposed development is a suitable response to the site and its setting, and demonstrates that it can be adequately accessed by prospective users. Specific requirements for design and access statements are set out in legislation.
Developer contributions	Contributions secured as part of new development to fund infrastructure, affordable housing and other mitigation measures. Developer contributions are generally secured through planning obligations or the Community Infrastructure Levy.
Development	The carrying out of building, engineering, mining or other operations in, on, over or under the land; or the making of any material change in the use of any buildings or other land, as defined in the Town and Country Planning Act 1990 as amended. Unless it is defined under the Act as 'permitted development', planning permission is required for the carrying out of any development of land.
Development Management	Development Management is a positive and proactive approach to shaping, considering, determining and delivering development proposals. It is led by the local planning authority, working closely with those proposing developments and other stakeholders. It is undertaken in the spirit of partnership and inclusiveness, and supports the delivery of key priorities and outcomes.
Development Plan	The Development Plan sets out the local planning authority's policies and proposals for the development and use of land. The Development Plan for Islington consists of the London Plan and Development Plan Documents. Planning applications are determined in accordance with the plan unless material considerations indicate otherwise
Development Plan Documents	Statutory planning documents, produced by a planning authority, that form part of the

	Development Plan. This includes the Local Plan and the London Plan.
Disabled people	People who, under the Equality Act 2010, have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to undertake normal daily activities; this will include mobility, sensory and or cognitive impairments.
Discounted Market Sales	An intermediate home ownership product that must be sold at a discount of at least 20% below local market value. It should be affordable to households which meet a specified household income cap and should remain available at a discount for future eligible households.
Drainage hierarchy	London Plan hierarchy that seeks to ensure that surface water run-off is managed as close to its source as possible, in order to reduce the rate and volume of surface water run-off.
Ecological survey	Survey which assesses the ecological importance of a site, including consideration of wildlife habitats. Ecological surveys must identify potential development impacts likely to harm the ecology of the site and recommend mitigation and enhancement measures.
Edge-of-centre	For retail purposes, a location within 300m walking distance of a Primary Shopping Area.
Embodied carbon/energy/emissions	The total life cycle carbon/energy/greenhouse gas emissions associated with the raw material extraction, collection, manufacture, transportation, assembly, maintenance, recycling and disposal of a given material or product.
Employment floorspace/development/uses	Activities or uses that generate employment.
Employment-led development	Development where the majority of floorspace is for employment uses.
Energy hierarchy	A tiered approach to maximising energy efficiency and minimising on-site greenhouse gas emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is using renewable energy (be green) and the fourth is to monitor, verify and report on energy performance (be seen)

Entertainment uses	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.
Environment Agency's Risk of Flooding from Surface Water	The Environment Agency's Risk of Flooding from Surface Water (RoFSW) dataset provides an indication of the broad areas likely to be at risk of surface water flooding (i.e. areas where surface water would be expected to flow or pond), as opposed to the susceptibility of individual properties to surface water flooding. The RoFSW provides bandings of Low (within the flood extent during a 1 in 1000 year rainfall event), Medium (within the flood extent during a 1 in 100 year rainfall event) and High (within the flood extent during a 1 in 30 year rainfall event) surface water flood risk.
Equalities Impact Assessment	An Equalities Impact Assessment (EqIA) is a way of measuring the potential impacts (both positive and negative) that a policy, function or service may have on the key protected characteristics covered by the Public Sector Equality Duty, and on Human Rights. The EqIA process supports decent decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups. The EqIA of the Local Plan is contained within the Integrated Impact Assessment.
Essential services	Certain types of shops, commonly small and independent shops, that perform an essential service and should be easily accessible to all residents. These essential services include butchers, bakers, greengrocers, grocers, fishmongers, chemists, post offices, newsagents, dry cleaners and laundrettes.
Extra-care housing	Self-contained residential accommodation and associated facilities. Domestic support and personal care are available, usually provided by on-site staff. Extra care will generally be considered to be C3 use unless they include a significant element of care.

Fabric Energy Efficiency Standard	The Fabric Energy Efficiency Standard (FEES) has been developed by the Zero Carbon Hub to ensure that zero carbon homes prioritise a holistic approach to energy efficiency that assesses both specification and form components under one metric. The FEES is available as part of the Government's Standard Assessment Procedure (SAP). The FEES targets are the proposed maximum space heating and cooling energy demand for zero carbon homes that would normally be needed to maintain comfortable internal temperatures.
Family housing	Homes appropriate for occupation by an adult, or adults, with one or more children. Units of two-bedrooms or more are considered to be family homes. A family home must also include adequate outdoor private or semi-private space suitable for play.
Flexible workspace/serviced offices	Broad terms encompassing typologies of workspace which provide a more flexible solution for occupiers in terms of lease lengths and options for occupying spaces, usually for a single flat fee which is inclusive of access to all facilities. In terms of facilities, flexible workspace/serviced offices would be akin to standard office space.
Food desert	Areas where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems.
Fuel Poverty	Fuel poverty means spending more than 10% of a household's income on simply keeping warm and providing basic hot water and lighting.
Function	In relation to a specific area, function is defined as that area's predominant role, although some areas can have supporting functions. For example, Islington's town centres all have an overtly 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.
gCO <sub>2</sub> /kWh	Grams of carbon dioxide per kilowatt hour. A kilowatt hour (kWh) is a unit of energy used to measure energy consumption. gCO <sub>2</sub> /kWh is used to measure the carbon content of heat.



Genuinely affordable housing	Genuinely affordable housing is primarily considered to be social rented accommodation. Intermediate housing, in particular London Living Rent, which is demonstrably affordable to those on low to moderate incomes such as key workers in the borough, could fall within the definition of 'genuinely affordable'. Shared ownership housing is, in the majority of circumstances, not affordable to those on low to moderate incomes and therefore in most cases would not constitute 'genuinely affordable housing'; however, it may be classed as an acceptable 'genuinely affordable' intermediate tenure on a case-by-case basis, depending on the size of units and location within the borough, and where the total monthly costs including the rental element are demonstrably affordable. In such circumstances, the rental element must be secured at an affordable level through legal agreement.
Geodiversity	The variety of rocks, fossils, minerals, landforms, soils and natural processes, such as weathering, erosion and sedimentation, that underlie and determine the character of our natural landscape and environment.
Grade A offices	New or significantly refurbished office with high specification, which attracts higher rental values. Grade A office space tends to be located in central commercial locations.
Green infrastructure	The network of green spaces, street trees, green roofs, and other assets such as natural drainage features, which together provide multiple benefits for people and wildlife.
Green Performance Plan	A plan for the operation of the building, detailing measurable outputs for the occupied building, particularly for energy consumption, CO2 emissions and water use, and setting out arrangements for monitoring the progress of the plan over the first years of occupancy.
Green roofs	Green roofs are vegetated layers that sit on top of the conventional roof surfaces of a building, which can support a wide range of plant life. Green roofs can create, or improve, biodiversity, contribute to minimising flood risk, improve thermal efficiency and improve the microclimate. There are two types of green roof: extensive green roofs, where the priority is biodiversity and greening which is virtually self-

	sustaining and requires only minimum maintenance; and intensive/semi-intensive green roofs which provide amenity space such as rooftop gardens and food growing areas in addition to planting (and therefore necessitate higher levels of design and maintenance).
Greenfield run-off rate	The greenfield run-off rate is used to assess the requirements for limiting discharge flow rates and attenuation storage for a site in order to achieve the pre-development greenfield site run-off rates. Greenfield run-off is usually calculated as the peak rate of run-off for a specific return period due to rainfall falling on a given area of vegetated land. The greenfield run-off rate in Islington has been set by the Environment Agency at 8 litres/second/hectare.
Greenhouse gas	Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures and contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.
Greening/urban greening	Greening is the improvement of the appearance, function and wildlife value of the urban environment through soft landscaping. Urban greening describes the green infrastructure elements that are most applicable in central London and London's town centres. Due to the morphology and density of the built environment in these areas, green roofs, street trees, and techniques such as soft landscaping, are often the most appropriate elements of green infrastructure.
Greywater recycling	Grey-water refers to waste water from showers, baths and washbasins (but not contaminated water from kitchen sinks and washing machines). As long as drinking quality is not required, this water can be treated and re-used, e.g. for flushing toilets, watering gardens and for washing machines.
Gross External Area	A method of measuring the area of a building which includes walls, plant rooms and outbuildings, but excludes external space such as balconies and terraces. The calculation of Gross External Area, including what parts of a building are included within the calculation, should adhere to guidance produced by the Royal Institute of Chartered Surveyors (RICS).

Gross Internal Area	A method of measuring the area of a building which refers to the entire area inside the external walls of a building and includes corridors, lifts, plant rooms, service accommodation (e.g. toilets). The calculation of Gross Internal Area, including what parts of a building are included within the calculation, should adhere to guidance produced by the Royal Institute of Chartered Surveyors (RICS).
Gyratory	A type of road junction at which traffic enters a one-way stream around a central island.
Habitable room	Any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries, hallways, or similar spaces are excluded from this definition. However, service/utility/store rooms larger than 8m <sup>2</sup> within single dwellings will normally be considered as habitable rooms.
Habitats Regulation Assessment	Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), land-use plans - including Local Plans - are subject to a Habitats Regulations Assessment (HRA). The Directive seeks to provide legal protection of habitats and species that are of European significance. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. The HRA of the Local Plan is contained within the Integrated Impact Assessment.
Health and wellbeing	Ensuring health and wellbeing means creating a healthy environment whilst not contributing to negative health outcomes and further widening health inequalities.
Health Impact Assessment	A Health Impact Assessment considers the potential impacts of planning policies and decisions on health and health inequalities. It ensures that health benefits are enhanced and any identified impacts on the wider determinants of health are mitigated, i.e. social determinants of health, well-being and inequalities. The HIA of the Local Plan is contained within the Integrated Impact Assessment.

Heat network/District Heating Network	A heat network (sometimes called a district heating network) is a distribution system of insulated pipes carrying hot water or steam, usually underground, that takes heat generated in a central source and delivers it to a number of residential and commercial buildings to meet their heating requirements. They can range from several metres to several kilometres in length. The heat source can be a facility with heat production equipment that provides a dedicated supply to the heat network, such as a combined heat and power (CHP) plant, or heat recovered from secondary heat sources. In the context of the Islington Local Plan, a heat network includes a local existing or planned area-wide network to which a building or buildings can connect.
Heritage	Inherited resources, artefacts or intangible attributes that are valued by individuals or communities for their cultural or natural characteristics.
Heritage Assets	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (e.g. listed buildings) and non-designated assets identified by the local planning authority during the process of decision-making or through the plan-making process (e.g. locally listed buildings). A heritage asset holds meaning for society over and above its functional utility. It is this heritage significance that justifies a degree of protection in planning decisions.
Heritage-led development	Development which, as a starting point, is based on the principle of conserving heritage assets (i.e. historic buildings, structures or places), but also increases their economic viability, and improves the cultural offer to both local residents and visitors.
Historic green spaces	Spaces listed on Historic England's Register of Parks and Gardens; squares protected by the London Squares Preservation Act 1931; and areas listed on the London Garden's Trust Inventory of Historic Green Spaces.

Hostels	Residential accommodation, usually not self-contained, often for a particular group of people and classified as sui generis uses where no significant element of care is provided in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments. This does not include 'youth hostels' as these are a type of visitor accommodation (C1 Use Class).
Hybrid space	The main feature of hybrid space is that it straddles different business floorspace uses. 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 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.
Inclusive design	An approach to the design and management of the built environment and open spaces that takes personal and cultural differences into account to ensure parity of experience; it goes beyond a basic requirement for physical accessibility (as required by Building Regulations) to focus on the quality of individual experience.
Independent retailer/service	Generally defined as a single retail/service outlet, or a chain of two or three stores, managed by either a sole trader or a family firm.
Industrial floorspace/buildings/development/uses/land	Activities or uses that fall within light industrial, general industry (B2) and storage and distribution (B8) uses, Sui Generis industrial uses, and some Sui Generis uses akin to industrial uses such as depots and builder's merchants.
Infrastructure	Infrastructure includes the roads, transport (including walking and cycling routes), public utilities, buildings or facilities and the

	<p>services provided by them which are used both by residents and those who come to work, study in, or visit the borough. Infrastructure can be split into two areas, strategic and social. Development of infrastructure can often be a statutory duty undertaken by government departments and other statutory bodies and similar organisations.</p>
Integrated Impact Assessment	<p>A combined assessment of the social, environmental and economic impact of planning policies, incorporating the statutory requirements of Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA); Health Impact Assessment (HIA); and Equalities Impact Assessment (EqIA). It also incorporates a Habitats Regulation Assessment (HRA) which is undertaken as a parallel process to the IIA. The IIA is an iterative process conducted throughout the plan preparation period, which considers the impacts of emerging policies and proposes policy alterations or mitigation for any adverse impacts that are identified.</p>
Intermediate housing	<p>Homes for sale and rent provided at a cost above social rent, but below market levels, subject to the criteria in the affordable housing definition. This includes shared ownership and London Living Rent but not affordable rented housing.</p>
Key shopping area	<p>A key shopping area (for the purposes of a relevant prior approval assessment) is any Town Centre or Local Shopping Area designated in the Local Plan.</p>
kWh/yr and kWh/m <sup>2</sup> /yr	<p>A kilowatt hour (kWh) is a unit of energy used to measure energy consumption. Kilowatt hours per year (kWh/yr) measures annual energy consumption. Kilowatt hours per square metre per year (kWh/m<sup>2</sup>/yr) measures annual energy consumption of a building by square metre. Predicted energy use can be declared in kWh/m<sup>2</sup>/yr and kWh/yr. The kWh/m<sup>2</sup>/yr metric is appropriate to measure heat demand as it is independent of fuel type and is used as the metric for the Fabric Energy Efficiency Standard (FEES).</p>
Landmark	<p>A building or site which is a prominent identifying feature in a landscape, usually with historical or architectural significance. This includes designated local landmarks.</p>
Lead Local Flood Authorities	<p>Lead Local Flood Authorities are responsible for developing, maintaining and</p>

	applying a strategy for local flood risk management in their areas and for maintaining a register of flood risk assets, in accordance with the Flood and Water Management Act 2010. They also have lead responsibility for managing the risk of flooding from surface water, groundwater and ordinary watercourses.
Legibility	The degree to which a place and its layout can be easily read, understood and navigated, by all people including those with sensory and or cognitive impairments.
Leisure uses	Activities or uses including 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.
LGBTQI+	A diversity of sexuality and gender identity-based cultures. This includes Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex. The 'plus' reflects all other identities.
Licensed premises	Any premises containing uses that require a license from the local authority to operate (e.g. pubs, clubs and restaurants).
Listed building	A building of special architectural or historic interest, as listed under the Planning (Listed Buildings and Conservation Areas) Act 1990. Listed Buildings are graded under the English Heritage classification to show their relative importance, with Grade I buildings being of exceptional interest, Grade II* being particularly important buildings of more than special interest, and Grade II buildings being of special interest. The setting of a listed building can also be an important consideration, dependent on the contribution it makes to the significance of the listed building or its appreciation. A development may affect the setting of a listed building where it has a visual, historic or associational relationship with the listed building.
Local Development Order	An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.
Local Flood Risk Zone	A spatial extent of predicted flooding in a single location, where discrete surface

	water flooding could affect houses, businesses or infrastructure.
Local green spaces	Green areas designated in a Local Plan or Neighbourhood Plan which are of particular importance to communities. Designation of local green spaces must be done in line with criteria in the NPPF.
Local Plan	A Development Plan Document or collection of Development Plan Documents which is used to guide future development of a local area. A Local Plan can consist of either strategic or non-strategic policies, or a combination of the two.
Local Resident (mentioned in Policy B5 part A)	A local resident means a person who lives within the administrative area of Islington Council.
Local Shopping Area	Retail areas that provide local services, particularly essential convenience retailing which caters for daily shopping needs. Some Local Shopping Areas also have a more diverse mix of commercial uses, particularly leisure uses, which can help to sustain the vibrancy of these areas. Local Shopping Areas complement the more significant retail offer in designated Town Centres.
Locally listed building	A building, structure or feature of local importance due to its architectural, historical or environmental significance. Buildings are added to the local list in recognition of their value as historic assets which contribute to the quality of the local environment by enhancing the street scene and sustaining a sense of distinctiveness. Groups of buildings that contribute significantly to the appearance of a street are also eligible for inclusion on the local list.
Locally Significant Industrial Sites	Designated areas where light industrial, general industry (B2) and storage and distribution (B8) are the priority land uses.
London Living Rent	As outlined in the London Housing Strategy, London Living Rent is an intermediate housing product with low rents that vary by ward across London. Eligibility for London Living Rent is restricted to households that are currently renting, with a maximum income of £60,000 and who are not currently able to purchase a home (including through shared ownership) in the local area. Landlords are expected to actively support London Living Rent tenants into home ownership within 10 years, with tenants having 'first dibs' on buying the



	homes they are renting through shared ownership.
London Plan	The spatial development strategy for the whole of Greater London produced by the Mayor of London. The London Plan forms part of Islington's Development Plan.
London Sustainable Drainage Proforma	A proforma required by all Lead Local Flood Authorities (LLFAs) which sets a clear standard for the information that should be provided in a Sustainable Drainage strategy for all development in London.
Low-emission CHP	In the context of the Local Plan, low-emission CHP refers to those technologies which inherently emit very low levels of Nitrogen Oxides (NOx).
Low Traffic Neighbourhoods	Low Traffic Neighbourhoods: Low Traffic Neighbourhoods restrict through traffic to create more space for pedestrians and cyclists on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area. However, Low Traffic Neighbourhoods maintain access for local residents, their visitors, the emergency services, and local shops and businesses. A reduction in through traffic will improve air quality and allow more space for local people to travel safely around their local streets on foot and by bicycle.
Lower specification office space	Office space within older premises, with a lesser standard of specification and lower rental values than Grade A offices.
Main Town Centre uses	As set out in the NPPF, main town centre uses include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000sqm or more, or a site of 1 hectare or more, or as otherwise provided

	in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Maker space	A type of workspace where individuals or organisations (especially SMEs) create or invent things, either using traditional crafts or technology. The design of maker space should be conducive to manufacture and production.
Market housing	Private housing for rent or sale where the price is set in the open market.
Metropolitan Open Land	Extensive areas of land bounded by urban development that fulfils a similar function to Green Belt and is protected from inappropriate development.
Micro enterprises	A micro enterprise is a business or organisation with no more than 10 employees (as defined by European Commission Recommendation 2003/361/EC). Micro floorspace/workspace/units would therefore be space which can accommodate micro enterprises and enable their effective operation.
Microclimate	A local atmospheric zone where the climate differs from the surrounding area.
Minor development	Development which is not a major development as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, i.e. for housing, development where between 1 to 9 will be provided, or the site has an area of less than 0.5 hectares. For non-residential development, it means additional floorspace of less than 1,000sqm or a site of less than 1 hectare, or any other development which does not meet the definition of major development set out in the legislation.
Mixed-use development	Development involving a mix of complementary uses.
Modal shift	A change in the method of transport, normally expressed as a proportion of overall trips within a defined area.
National Planning Policy Framework	A document which sets out the government's position on planning in England.
Natural Capital	Natural capital is the world's stock of natural resources, which includes geology, soils, air, water and all living organisms. Some natural capital assets provide people with free goods and services, often called ecosystem services.

Net Internal Area	A method of measuring the area of a building which includes entrance halls, kitchens and cleaners' cupboards, but excludes corridors, internal walls, stairwells, lifts, WCs and other communal areas. It is also referred to as 'net lettable' or 'usable' area for offices and retail units. The calculation of Net Internal Area, including what parts of a building are included within the calculation, should adhere to guidance produced by the Royal Institute of Chartered Surveyors (RICS).
Net zero-carbon	Net zero-carbon is achieved by balancing carbon emissions with carbon removal, including through carbon offsetting, so that the net input of emissions to the atmosphere due to human activities is zero; or by eliminating carbon emissions altogether.
Night-time economy	All economic activity taking place between the hours of 6pm and 6am. Activities associated with the night-time economy are varied and include eating, drinking, entertainment, shopping but also include cleaning, hospitality, logistics and distribution, transport and medical services which employ a large number of night-time workers.
Noise-generating uses	Uses (usually commercial and industrial) which generate noise as a result of their operation.
Noise-sensitive uses	Uses which are susceptible to adverse amenity impacts due to noise, including residential uses.
Non-standard cycle	A cycle that is designed or adapted specifically to meet the needs of disabled cyclists and or to carry a load and or accommodate child seats and trailers.
Non-motorised forms of transport	This refers to active travel and human powered transportation, including walking and cycling, and variants such as small-wheeled transport (cycle rickshaws, cargo cycles, skateboards, push scooters and hand carts, and hybrid electric cycles) and wheelchair travel. The Council also considers mobility scooters form part of that category.
Non-self-contained housing	Housing such as bedrooms in hostels or halls of residence.
Non-strategic policies	Detailed policies for specific areas, neighbourhoods or types of development.
North London Waste Plan	A Development Plan Document being produced jointly by the London Boroughs of Barnet, Camden, Enfield, Hackney,

	Haringey, Islington and Waltham Forest, which will identify sites for recycling, composting and producing energy from future waste arisings.
Office-led development	Development where the majority of floorspace/uses is office.
Open space	All space of public value (public or private), including public landscaped areas, parks and playing fields. Areas of water such as rivers, lakes and reservoirs are also classed as open space. Open spaces are predominantly undeveloped but can include buildings or structures that are ancillary to the open space use.
Operational emissions	Operational emissions are those associated with energy consumption as part of the operation of a development, including emissions from plant or equipment. The total operational emissions include regulated emissions (i.e. those covered by the Building Regulations) and unregulated emissions (i.e. those not covered by the Building Regulations, such as emissions associated with cooking and small appliances).
Out-of-centre	For retail purposes, a location which is not within a designated Town Centre, and is not in Local Shopping Area or edge-of-centre location.
Parklet	Amenity space - usually temporary - which can also provide greening and cycle parking. Parklets are commonly created through conversion of on-street vehicle parking spaces.
Particulate Matter (PM10 and PM2.5)	Particulate matter (PM), also known as particle pollution or particulates, is a complex mixture of microscopic solid or liquid particles - many of which are hazardous - suspended in the atmosphere of Earth. PM10 is particulate matter 10 micrometers or less in diameter. PM2.5 is particulate matter 2.5 micrometers or less in diameter.
Passive House Planning Package	The Passive House Planning Package (PHPP) is an energy assessment methodology and tool developed by the Passivhaus Institute to evaluate the predicted future operational energy performance for residential and low energy non-domestic buildings. This allows designers to consider factors that impact buildings' actual operational performance at an earlier stage and enables a more accurate determination of the anticipated

	energy consumption and carbon emissions that can be used to verify the performance of the constructed building in operation. PHPP can also be used to provide a more accurate energy demand assessment.
Passivhaus Standard	Passivhaus is an internationally recognised and successful energy performance standard based on performance metrics and a more accurate energy demand assessment. It is considered to be the gold standard for energy efficiency. The aim of Passivhaus is to reduce the requirement for space heating and cooling, whilst also creating a high standard of indoor comfort levels. This is primarily achieved by adopting a fabric first approach to building design by specifying high levels of insulation to the thermal envelope with exceptional levels of airtightness.
Peppercorn rent	Peppercorn rent: is considered a nominal rent at which affordable workspace is secured under the terms established in Policy B4, parts A, C and F. The peppercorn rent is generally not inclusive of business rates, service charge and/or other insurance costs. In exchange for the right to lease the affordable workspaces at a peppercorn rent, the operators will be required to provide a range of social value benefits. These social value benefits can include delivering vocational training to residents, supporting residents into work and supporting local businesses and developing local supply chains (this list is not exhaustive).
Performance gap	The disparity between the predicted/modelled energy performance of buildings at design stage and their actual operational performance. Surveys of completed buildings often reveal a substantial gap between design expectations and delivered performance, especially energy performance.
Permeability	The degree to which people can easily move through a place.
Permitted development	Development set out in the Town and Country Planning (General Permitted Development) (England) Order, which can be undertaken without needing to apply for planning permission. Some permitted development requires prior approval of certain details before work can be carried out.

Photovoltaic (PV) Solar Panels	Photovoltaics involve the direct conversion of solar radiation into electricity by the interaction of light with electrons in a semiconductor device or cell. Solar photovoltaic technology in the form of PV solar panels provides a reliable source of clean renewable electricity which is generated at or near the point of use and is increasingly cost competitive with grid electricity.
Planning brief	A document prepared by the local authority in advance of a planning application being made, which explains which planning policies will be relevant to a particular site.
Planning Obligations	Planning obligations are contributions from developers, either in the form of physical works and/or financial payments to fulfil a range of functions, including to mitigate the impact of a development and to make development acceptable in planning terms. Planning obligations may be agreed through a unilateral agreement or legal agreement, under Section 106 of the Town and Country Planning Act 1990.
Planning Practice Guidance	Web based guidance which provides further detail on national planning policy.
Policies Map	The Policies Map illustrates various policy designations identified in the Local Plan.
Primary Shopping Area	Spatial designations that contain the greatest concentration of retail within a Town Centre; are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres, ensuring their continued vibrancy, vitality and viability.
Priority species	Species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.
Private open space	Land within the curtilage of an existing property, including private gardens and amenity space. Private Open Space does not include privately-owned space that is wholly or partly publicly-accessible - this is included within the definition of public open space.
Protected species	Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).
Protected views	Protected views include strategic and local views. These views provide a view of St. Paul's and/or a unique panoramic view of Islington and other parts of London.

Public House	An establishment generally featuring a bar and/or other public rooms licensed for the sale and consumption of alcohol on the premises, which caters for a wide range of people within local communities and beyond.
Public open space	Public open space is open space which is wholly or partly publicly-accessible but can include privately-owned spaces to which the public have some level/degree of access, including un-adopted civic spaces and roads.
Public realm	The space between, around and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.
Purpose Built Private Rented Sector	A specific business model of residential development where non-owner-occupied self-contained dwellings are built with the intention of being rented out as housing, (rather than sold) from the outset. Also known as 'build to rent'.
Rainwater harvesting/recycling	Rainwater harvesting or recycling is the accumulation and storage of rainwater from hard surfaces and roofs for re-use on-site, rather than allowing it to run off. Stored rainwater can be used for irrigation of soft landscaping or it can be treated and recycled for internal use, such as toilet flushing.
Regeneration	The economic, social and environmental renewal and improvement of a site or area.
Registered Provider	Registered organisations such as local authority landlords and private registered providers (including not-for-profit housing associations and for-profit organisations) who let and manage social housing. Registration is governed through national legislation.
Renewable energy	Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy.
Residential storey	Floor to floor height of residential buildings, typically 3m.
Retail floorspace/buildings/development/uses	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.
Scheduled Monument	A scheduled monument is an historic building or site that is included in the Schedule of Monuments kept by the Secretary of State for Digital, Culture, Media and Sport. The regime is set out in the Ancient Monuments and Archaeological Areas Act 1979.
Secondary heat	Processes or activities that produce heat which is normally wasted (for example heat from the London Underground network) or from heat that exists naturally within the environment (air, ground and water). Useful energy can be recovered from these sources in the form of heat.
Section 106 Agreements	Planning obligations are legally binding agreements typically negotiated between local authorities and developers in the context of planning applications. They are a mechanism by which measures are secured to make acceptable development which would otherwise be unacceptable in planning terms.
Secured by Design	A UK Police initiative focused on designing out crime to improve the safety and security of buildings and their surroundings.
Sequential Test (flooding)	The NPPF requires that all plans apply a sequential, risk-based approach to the location of development, taking into account the current and future impacts of climate change to avoid flood risk to people and property. The aim of the sequential test is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk.
Shared Heat Network	A heat network created as part of a new development which includes the connection of neighbouring buildings.
Shared Ownership	Intermediate ownership product which allows households to purchase a share in a new home and pay rent on the remaining, unsold, share. Eligibility for shared ownership is subject to an income cap.
Shared space	An approach to street design that seeks to improve the pedestrian environment by decluttering and reducing the impact of vehicular traffic to encourage/promote walking and cycling. This includes the removal of features such as kerbs, road surface markings, designated crossing places and traffic signs.



Shop	Shop refers to the function of uses that operate as shops. However, in relation to planning applications that involve the loss or development of a 'shop' the encompassing definition of 'retail' will be used in determining applications.
Significant private open space	Larger scale open spaces (generally greater than 1000m <sup>2</sup> ) with private or limited access which make a significant contribution to open space in the borough. These spaces include Charterhouse Square, the Honourable Artillery Company Grounds and a number of churchyards in the borough. These spaces are not identified on the Policies Map and further significant private open spaces may be identified due to their size or significance in Islington. These spaces are protected from development by Policy G2 Part A.
Single surface	A type of shared space involving the removal of kerbs between the footway and carriageway to create a shared surface for pedestrians and other vehicles and cyclists. Single surface includes non-physical delineation such as tactile paving and or a tonal contrast.
Site allocation	As specified in the Town and Country Planning (Local Planning) (England) Regulations 2012, a site allocation policy is 'a policy which allocates a site for a particular use or development'. Site specific policies are set out for land and buildings on sites which are likely to be subject to development proposals during the lifetime of the plan, to help secure specific land uses, meet identified development needs and/or ensure the infrastructure required to support growth is in place.
Site of Importance for Nature Conservation	Sites of Importance for Nature Conservation (SINCs) are areas designated for their importance for wildlife, biodiversity and access to nature. SINCs are graded in terms of importance, with Metropolitan grade being the highest grade, then Borough Grade 1, Borough Grade 2 and Sites of Local Importance. Sites of Metropolitan Importance are those which contain the best examples of London's habitats and rare species that are of significance to London. Sites of Borough Importance are those identified to have an importance to Islington, and any damage would mean a significant loss to the borough. A site of Local Importance is

	identified because of its value to the nearby community, especially in areas that are deficient in wildlife sites.
Small and Medium Enterprises	Small and Medium Enterprises (SMEs) (as defined by European Commission Recommendation 2003/361/EC) are businesses/organisations with between 10 and 49 employees (small enterprise) or 51 and 250 employees (medium enterprise). SME floorspace/workspace/units would therefore be space which can accommodate SMEs and enable the effective operation of a small or medium enterprise.
Small shops/retail unit	A shop unit of around 80sqm gross internal area or less, which is particularly suitable for small and independent retailers.
Smart Cities	The use of data and technology to improve the performance of infrastructure networks and create more liveable urban areas, and enhance quality of life for people living and working in such areas.
Social and community infrastructure	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 E, F.1 or F.2, C2 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.
Social rented housing	Low cost rented homes provided to households whose needs are not met by the market, typically by councils and housing associations, with rents set within guidelines issued by the social housing regulator.

Social value	The delivery of positive social, economic and environmental impacts, arising from the actions and operations of various organisations. This includes the direct effects of interventions and the wider effects on other areas, particularly the effects on the local economy and the health and wellbeing of local residents.
Source Protection Zones	Areas of influence around groundwater sources used for public drinking which provide additional protection to safeguard drinking water quality, through constraining the close proximity of an activity that may impact upon a drinking water abstraction.
Spatial policies	These focus on a specific part of the borough.
Spatial strategy	The development strategy for a specific area.
Specialist housing	Term covering a variety of forms of housing which purports to meet the needs of specific groups of people. Suitability of specialist housing is informed by specific identified needs.
Specialist Shopping Area	Unique retail areas featuring specialist retail uses that add significant character, vitality and viability to the Town Centres and wider area in which they are located. They draw shoppers from outside the borough due to the more bespoke nature of the goods on offer.
Standard Assessment Procedure	The Standard Assessment Procedure (SAP) is the methodology used by the UK Government to assess and compare the energy and environmental performance of dwellings. Its purpose is to provide accurate and reliable assessments of dwelling energy performances that are needed to underpin energy and environmental policy initiatives.
Starter Homes	Starter Homes are similar to the Discounted Market Sale affordable product. They are covered by various statutory requirements, including an income cap (£90,000 in Greater London), price cap (£450,000 in Greater London, which includes the minimum 20% discount) and age restrictions (Starter Homes can only be purchased by qualifying first time buyers aged between 23 and 40, although limited exceptions apply). Also, Starter Homes have a set period during which the home needs to be sold at a set discount, although this discount is not recycled following the end of the discount period.

Statement of Licensing Policy	A document prepared by the local authority under the Licensing Act 2003, which sets out what considerations the local authority will take into account in making its licensing decisions.
Strategic infrastructure	Strategic infrastructure covers the areas of transport and the public realm, waste, utilities, and climate change adaptation and mitigation measures.
Strategic policies	Policies which set out an overall strategy for the pattern, scale and quality of development in the borough.
Structural Method Statement	Document required as part of applications for basement development, which ensures that the basement development can be undertaken safely and will safeguard the structural stability of the existing building and other nearby buildings.
Studio/bedsit	A residential unit which is self-contained but which has no permanent separation between sleeping and living space.
Supplementary planning documents	Supplementary planning documents (SPDs) provide further guidance on Local Plan policies. They do not form part of the Development Plan and are not subject to independent examination.
Supported housing	Supported housing can take many forms and helps to meet the needs of those people unable to live independently or those who are at risk or vulnerable. There are specific needs across a wide range of supported housing types including permanent, long term and shorter term time scales which meet temporary need. In planning use class terms, supported housing may be considered Sui Generis, C2 or C3 and would usually be considered exempt from (or be provided instead of) affordable housing requirements.
Sustainability Appraisal	Under section 19(5) of the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) must be undertaken for new or revised Development Plan Documents. The SA should include an assessment of the likely significant impacts - economic, social and environmental - of the plan. The SA of the Local Plan is contained within the Integrated Impact Assessment.
Sustainable Design and Construction Statement	Document which accompanies planning applications, detailing how the application meets all relevant sustainable design policies. It can comprise a range of specific strategies/assessments.

Sustainable development	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
Sustainable transport	Alternative modes of transport to the private car, primarily walking, cycling and public transport.
Sustainable Urban Drainage System	A means of managing surface water drainage to reduce peak run-off rates and improve water quality. They can also contribute to a higher quality, more attractive public realm by creating attractive landscape features; reduce the need for artificial watering of trees and landscaped areas; and create wildlife habitat such as small ponds.
Tall buildings	Buildings of more than 30 metres.
Tenure blind	The principle that dwellings of different tenures should be designed to be indistinguishable.
Town Centres	A defined area of predominantly retail, leisure, business and other main town centre uses. Town centres in Islington have a primary shopping area where the core retail uses are focused. Islington has both Major and District Town Centres. The hierarchy of Town Centres is designated in the London Plan and their boundaries shown on Islington's Policies Map.
Tree Preservation Order	A Tree Preservation Order is an order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity.
Ultra-low NOx gas boiler	A gas boiler which emits very low levels of Nitrogen Oxides (NOx), below a specified level.
Urban Fabric	The physical form of the built environment in towns and cities.
Urban Greening Factor	A planning tool to ensure new developments provide adequate urban greening.
Urban Heat Island Effect	The urban heat island effect is caused by extensive built up areas absorbing and retaining heat during the day and night leading to temperatures in some parts of London being several degrees warmer than the surrounding area
Use Classes	The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. It is generally the case that planning permission is required to change from one use class to another, although certain permitted

	development rights exist which allow some uses to change without planning permission.
Vacant Building Credit	A financial credit equivalent to the existing gross floorspace of relevant vacant buildings, deducted from any affordable housing contribution sought.
Vertical greening/green wall	Vertical greening, otherwise known as a green wall, is a building façade or other internal or external wall partially or completely covered with vegetation for functional and aesthetic purposes. A green wall can be attached to an existing building façade, or be a free standing structure. Planting can be rooted in soil from both ground level and roof level planters, or the green wall can be part of a vertical or modular system. Green walls provide benefits in terms of biodiversity, air quality, thermal efficiency and cooling, and they can reduce surface water run-off where they are irrigated via rainwater run-off.
Viability	Viability – in a retail sense - is a measure of the ability and capacity to grow and develop the role of a retail area and bolster economic activity. This factors in whether the area has scope to respond to changing dynamics in the retail sector. Factors that influence viability include the introduction of uses which detract from the existing mix of uses and affect any agglomeration benefits; uses which reduce footfall to particular parts of centres; and uses which affect perception of safety and occurrence of crime. Viability is intrinsically linked with vitality.
Visitable	Premises that are designed to enable a wheelchair user to approach enter, participate in an event (social/economic/cultural) use the sanitary facilities and leave safely; such premises are not necessarily wheelchair accessible throughout.
Visitor accommodation	Visitor accommodation refers to any building or place that provides temporary or short term accommodation on a commercial basis. This includes hotels, hostels, bed and breakfasts, guesthouses, some apart-hotels, youth/backpackers hostels and any other visitor accommodation model that meets this definition; this includes proposals for the short-term letting of residential units for 90 days or more per annum. Visitor accommodation generally falls within the C1

	use class but can in some instances be classed as a sui generis use.
Vitality	Vitality - in a retail sense - is the ability of a retail area to maintain economic activity in the face of potential impacts. Vitality is inherently linked with viability and is largely affected by the same factors as viability.
Whole life-cycle approach	A whole life-cycle approach captures a building's operational emissions from energy consumption (regulated and unregulated) and its embodied emissions.
Wildlife corridor	Areas of habitat connecting wildlife populations.
Windfall sites	A site that is not specifically allocated for development in a Development Plan, but which unexpectedly becomes available for development during the lifetime of a plan.
Zero-carbon	Causing or resulting in no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.
Zero-emission	Causing or resulting in no release of air pollutants, carbon dioxide or other greenhouse gases.

## Abbreviations

Abbreviation	Meaning
AAP	Area Action Plan
AMR	Annual Monitoring Report
AOD	Above Ordnance Datum
APA	Archaeological Priority Area
APR	Affordable Private Rent
AQA	Air Quality Assessment
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
ASHP	Air Source Heat Pump
BEIS	Department for Business, Energy and Industrial Strategy
BID	Business Improvement District
BIM	Building Information Management
BRE	Building Research Establishment
BREEAM	Building Research Establishment Environmental Assessment Methodology
CAZ	Central Activities Zone
CDA	Critical Drainage Area
CHP	Combined Heat and Power
CIBSE	Chartered Institute of Building Service Engineers
CIL	Community Infrastructure Levy
CLP	Construction Logistics Plan
CO2	Carbon dioxide
dB	Decibel
DEFRA	Department of the Environment, Food and Rural Affairs
DfE	Department of Education
DfT	Department for Transport
DMS	Discounted Market Sales
DPD	Development Plan Document
DUKES	Digest of UK Energy Statistics
FEES	Fabric Energy Efficiency Standard
FRA	Flood Risk Assessment
GEA	Gross External Area
GIA	Gross Internal Area
GiGL	Greenspace Information for Greater London
GLA	Greater London Authority
GPP	Green Performance Plan
HIA	Health Impact Assessment
IIA	Integrated Impact Assessment
IMD	Indices of Multiple Deprivation
LDO	Local Development Order
LFRZ	Local Flood Risk Zone
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex Plus



LIGS	Locally Important Geological Sites
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LSA	Local Shopping Area
LSIS	Locally Significant Industrial Site
MCIL2	Mayoral Community Infrastructure Levy 2
MHCLG	Ministry of Housing, Communities and Local Government
MOL	Metropolitan Open Land
MPS	Metropolitan Police Service
MUGAs	Multi-use Games Area
NIA	Net Internal Area
NLWP	North London Waste Plan
NO2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NPPF	National Planning Policy Framework
PEL	Priority Employment Location
PHPP	Passive House Planning Package
PM	Particulate Matter
POPS	Privately Owned Public Space
PPTS	Planning Policy for Traveller Sites
PRS	Private Rented Sector
PV	Photovoltaic
RoFSW	Risk of Flooding from Surface Water
SAP	Standard Assessment Procedure
SCI	Statement of Community Involvement
SDCS	Sustainable Design and Construction Statement
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SHN	Shared Heat Network
SINC	Site of Importance for Nature Conservation
SME	Small and medium sized enterprises
SMS	Structural Method Statement
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SPZ	Source Protection Zone
SUDS	Sustainable Urban Drainage Systems
SWMP	Surface Water Management Plan
TfL	Transport for London
TPO	Tree Preservation Order
TRBMP	Thames River Basin Management Plan
UGF	Urban Greening Factor
VBC	Vacant Building Credit

## Appendix 9: Housing Trajectory

	Past 5 years					Reporting year	Current year	Five year supply					Years 6-10					Year 11 onwards					
	2014/15	2015/16	2016/17	2017/18	2018/19			2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	
<b>Vacancies Returning to Use</b>																							
Projected						0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total vacancies returned to use</b>	<b>62</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Non self-contained</b>																							
Past completions (adjusted to self contained equivalent)	287	484	885	-3	192		34																
Projected completions (adjusted to self-contained equivalent)							19	0	11	0	200	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total non-self-contained</b>	<b>287</b>	<b>484</b>	<b>885</b>	<b>-3</b>	<b>192</b>	<b>0</b>	<b>19</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>80</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Conventional</b>																							
Past Completions	969	1,156	808	470	768	747	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected large sites							382	572	627	414	772	810	292	772	295	0	300	289	415	-168	183	0	0
Projected windfall large sites												64	64	64	64	64	64	64	64	64	64	64	64
Projected total large sites							382	572	627	414	772	874	356	836	359	64	364	353	479	-104	247	64	64
Projected (permitted) small sites							193	136	98	88	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected windfall small sites							0	0	0	396	484	484	484	484	484	484	484	484	484	484	484	484	484
Projected total small sites							193	136	98	484	484	484	484	484	484	484	484	484	484	484	484	484	484
Projected total <b>conventional dwellings</b>	<b>969</b>	<b>1,156</b>	<b>808</b>	<b>470</b>	<b>768</b>	<b>747</b>	<b>575</b>	<b>708</b>	<b>725</b>	<b>898</b>	<b>1,256</b>	<b>1,358</b>	<b>840</b>	<b>1,320</b>	<b>843</b>	<b>548</b>	<b>848</b>	<b>837</b>	<b>963</b>	<b>380</b>	<b>731</b>	<b>548</b>	<b>548</b>
Total Past completions	1,318	1,672	1,693	467	960	747	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Projected Completions							594	708	731	898	1,336	1,358	840	1,320	843	548	848	837	963	380	731	548	548
Cumulative total projected completions							594	1,302	2,033	2,931	4,267	5,625	6,465	7,785	8,628	9,176	10,024	10,860	11,823	12,203	12,934	13,482	14,029
Cumulative London Plan housing target (775 x 20% buffer = 930pa)							775	1,550	2,325	3,100	3,875	4,650	5,425	6,200	6,975	7,750	8,525	9,300	10,075	10,850	11,625	12,400	13,175
Annual housing target							775	775	775	775	775	775	775	775	775	775	775	775	775	775	775	775	775
<b>Total completions</b>	<b>1,318</b>	<b>1,672</b>	<b>1,693</b>	<b>467</b>	<b>960</b>	<b>747</b>	<b>594</b>	<b>708</b>	<b>731</b>	<b>898</b>	<b>1,336</b>	<b>1,358</b>	<b>840</b>	<b>1,320</b>	<b>843</b>	<b>548</b>	<b>848</b>	<b>837</b>	<b>963</b>	<b>380</b>	<b>731</b>	<b>548</b>	<b>548</b>