

Appendix 1:

Evidence to support the making of Article 4 Directions to remove the Class MA permitted development right in Angel, Nag's Head, Finsbury Park and Archway Town Centres

Part 1: Introduction and context

- 1 The London Borough of Islington intends to use an Article 4 Direction to remove permitted development rights (PDR) for the change of use from Class E to residential use (Class MA) in Angel, Nag's Head, Finsbury Park and Archway Town Centres.
- 2 As set out below and in the attached Directions, the A4D would apply to specific sites within the Town Centres where valuable Class E floorspace would be vulnerable to permitted development (PD) change of use. These sites have been identified by a detailed mapping process and area surveys. The contribution sites make to meeting the borough's social, cultural, environmental and/or economic needs has been carefully considered. Where the loss of premises in Class E use would result in a wholly unacceptable adverse impact on the vitality and vibrancy of the town centre and the benefits the town centre brings to the borough and its residents, they have been included in the proposed Direction area.

The importance of town centres

- 3 Islington's four town centres – Angel, Nag's Head, Finsbury Park and Archway - are a focal point for the borough's commercial, cultural and civic activity¹. 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. Whilst acknowledging that some residential use will be appropriate in town centres, the council considers that unrestricted Class MA permitted development rights (PDR) will result in a loss of Class E uses, diminishing the role of town centres and their ability to meet the retail and service needs of the community. In a borough where the average price of a flat was

¹ London Borough of Islington (LBI) (2023). Islington Local Plan: Strategic and Development Management Policies, available from: [Islington Council Local Plan: Strategic and Development Management Policies](#)

£579,546 in January 2024² the financial incentive to pursue a change of use through Class MA legislation at the expense of the vitality and viability of Islington's town centres is clear. Rather than supporting the vibrancy of the borough's town centres, Class MA has the potential to stifle their economic success.

- 4 Islington's planning policy promotes a suitable mix of uses in town centres, including housing, in accordance with paragraph 90 of the NPPF. Although there are benefits associated with appropriate residential development in town centres, with residents bringing activity to areas and supporting local businesses, there is also a concern that unrestricted residential uses throughout town centres can have a negative impact on their commercial function.
- 5 Higher value residential uses may price out commercial uses and create harmful breaks in the continuity of shopfronts, resulting in reduced footfall and patronage. Analysis of the office to residential PDR introduced in 2013 suggests that the residential amenity of town centre dwellings resulting from PDR can be poor due to noise disturbance, an inability to sustain any sense of community given the ad-hoc nature of conversions, and the potential for the delivery of small, sub-standard units³.
- 6 Given the potential for residential uses to conflict with main town centre uses such as retail, leisure and entertainment uses, it is important for the vibrancy and vitality of the borough's town centres for the local planning authority (LPA) to be able to fully assess applications for changes of use from Class E to residential where they relate to key sites and locations.

Town centre policies

- 7 The National Planning Policy Framework (NPPF) requires planning policies and decisions to 'support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation'. Planning policies are required to define a network and hierarchy of town centres and promote their long-term vitality and viability; define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations; retain and enhance existing markets, and where appropriate, re-introduce or create new ones; allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed; and recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites (paragraph 90).
- 8 The London Plan requires local planning authorities (LPAs) to 'promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners'. It explains that

² Land Registry (2024). UK House Price Index, prices in Islington from February 2023 to February 2024, available from: [UK House Price Index \(data.gov.uk\)](https://data.gov.uk)

³ London Borough of Islington Retail and Leisure Study (2017), available from: [London borough of Islington retail and leisure study - 2017](#)

alongside the Central Activities Zone (CAZ), town centres are the primary locations for commercial activity in the capital. They are complex parts of London, with a wide mix of uses and unique local character. They have social value, providing access to a range of shops and services, employment opportunities, social contact, and information and support. The agglomeration of town centres gives rise to formal and informal networks of businesses, supply chains, customers, employees, institutions and volunteers that can provide mutual support, advice and economic benefit.

- 9 The London Plan advises that to continue to thrive, town centres will need to evolve and diversify in response to economic trends and consumer behaviours. Many town centres will be appropriate locations for residential-led intensification or mixed-use development as bringing new residents into town centres can enhance their commercial role, and increase footfall which supports convenience retail, leisure uses and the evening and night-time economy.

Islington's town centre policies

- 10 As detailed in Policy R1 Part A of Islington's Local Plan Strategic and Development Management Policies (SDMP), there are four town centres in Islington: Angel; Nag's Head; Finsbury Park; and Archway. Each town centre has its own character and serves different functions, which must be maintained and enhanced. The Major Town Centres at Angel and Nag's Head are at the top of the borough's retail hierarchy, followed by the District Town Centres at Archway and Finsbury Park.
- 11 Each town centre is covered by a specific Spatial Strategy in the Local Plan, which sets out policies relevant to its unique role in the borough. Part B of Policy R1 states that the council will seek to ensure 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.
- 12 Islington's town centres all include a Primary Shopping Area designation, as highlighted in yellow on Figures 1 to 4. The Primary Shopping Area (PSA) is located in the core of each town centre with the intention that the PSA remains the focal point for retail, as detailed in SDMP Policy R1 Part C. 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. Part F of the policy suggests residential uses may be acceptable on upper floors in town centres where they contribute to the vitality and viability of the designated retail area and reflect existing character.
- 13 SDMP Policy R2 also relates to the borough's PSAs. Part A of the Policy sets out that in order to meet retail needs and support a retail function within the 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. Part B of the Policy says 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. Part C requires proposals for Class E uses which do not contribute to the retail function at the ground floor within the PSA to: 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; provide an active main town centre use frontage at ground floor level, particularly where fronting main transport/pedestrian route(s); and ensure there is no harmful break in the continuity of the active frontage.

Figure 1: Angel Town Centre boundary (including Primary Shopping Area)



Figure 2: Nags Head Town Centre boundary (including Primary Shopping Area)



Figure 3: Finsbury Park Town Centre boundary (including Primary Shopping Area)



Figure 4: Archway Town Centre boundary (including Primary Shopping Area)



- 14 Parts D to F of Policy R2 set out marketing requirements for changes of use. Part F relates to changes to residential use at ground floor level in the PSA and requires the applicant to demonstrate that premises have been vacant for a continuous period of at least two years and provide marketing evidence for this period to demonstrate that there is no reasonable prospect of the unit being used for retail, Class E or other appropriate main town centre uses.
- 15 Policy R3 Part A seeks to maintain and enhance the retail, service and leisure function of Islington's four town centres and Part B says 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. Part C of the Policy requires any development proposed within a designated town centre to: ensure

adverse impacts on vibrancy, vitality, viability and character of the centre are fully mitigated; provide a frontage which engages positively with local character and the street scene. Where historic shopfronts and features are present, these must be retained; provide a high-quality design including meeting policies related to accessibility and sustainability; 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.

- 16 Part F of the Policy relates to residential use and states that 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: follow the 'agent-of-change' principle; ensure that the proposed residential use does not affect the operation of any continued main Town Centre use floorspace; and 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. Part H adds that 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.

Spatial Strategy area policies

Angel

- 17 SDMP Policy SP4 relates to the Angel and Upper Street Spatial Strategy area, shown on Figure 5. Part B of the Policy details that the Town Centre 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'. Part F of the Policy sets out that 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'. Part G says that 'night-time economy uses must be directed to the Town Centre, and demonstrate that there is no significant adverse effect on local amenity'.
- 18 Part I of the Policy relates to business use, which 'is a priority land use in Angel Town Centre ... 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'. Part Q of the Policy states that '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'.

Figure 5: Angel and Upper Street Spatial Strategy diagram⁴



Nag's Head

- 19 SDMP Policy SP5 relates to the Nag's Head and Holloway Spatial Strategy area, illustrated on Figure 6. Part A of the Policy states that 'Nag's Head Town Centre is an important retail area. Retail uses will be maintained and enhanced within the Town Centre'. Part B of the Policy encourages 'increased night-time economy and leisure uses' in the Town Centre. Part F of the Policy identifies the Morrison's supermarket site as the key opportunity site for the retention and enhancement of retail provision in the Town Centre alongside the potential to deliver a significant amount of office and residential floorspace on upper floors. Part G of the Policy encourages markets within the Spatial Strategy area, whilst Part H encourages new office floorspace to support diversity in the local economy.
- 20 Part I of the Policy sets out that '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'. Part N of the Policy says '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'.

⁴ LBI (2023). Islington Local Plan: Strategic and Development Management Policies, available from: [Islington Council Local Plan: Strategic and Development Management Policies](#)

Figure 6: Nag's Head and Holloway Spatial Strategy diagram

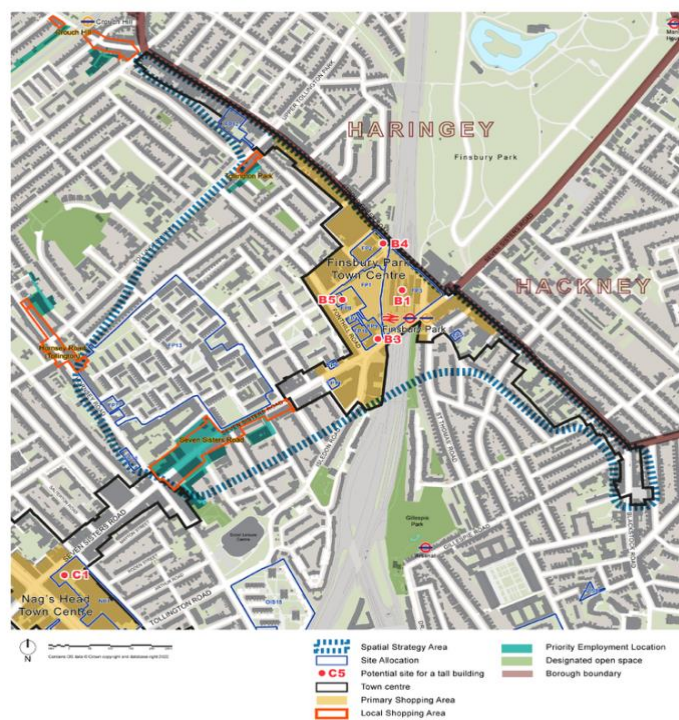


Finsbury Park

- 21 Policy SP6 of the SDMP relates to the Finsbury Park Spatial Strategy area, shown on Figure 7. Part A of the Policy sets out that ‘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’. Part B says ‘Development in the Town Centre must maintain the predominant commercial role of the area, with specific focus on retail and services on ground floors’.
- 22 Part D of the Policy explains that ‘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’.

23 Part E of the Policy details that ‘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’. Part G says ‘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’. Part H of the Policy sets out that ‘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’. Added to this, Part I says ‘music venues are synonymous with the character of the area. Existing venues will be strongly protected and development of new music venues is supported’.

Figure 7: Finsbury Park Spatial Strategy diagram

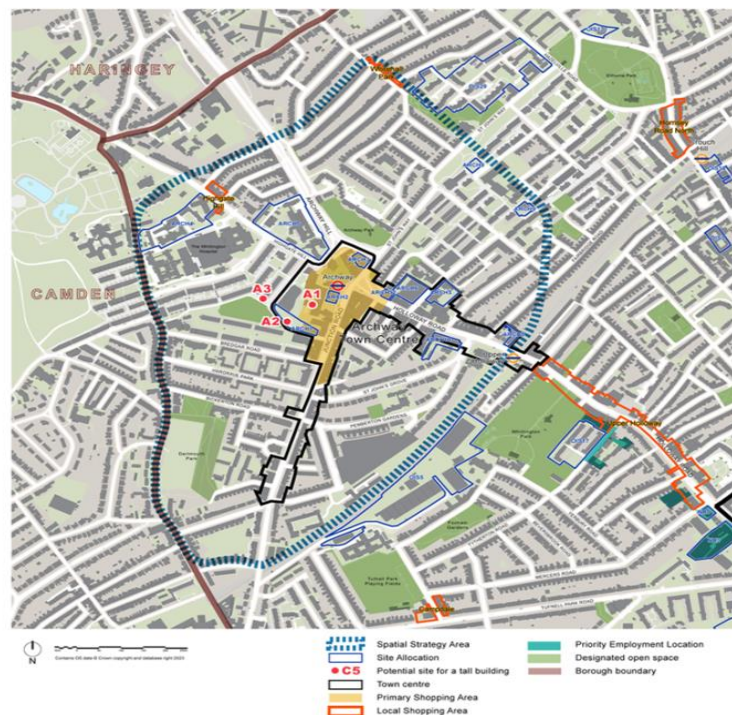


Archway

24 The Spatial Strategy Policy for Archway, Policy SP7 states that ‘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’.

- 25 Part B of the Policy supports the continued operation of Archway market, and expansion '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'. Part C says that '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'. Part D sets out that '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'.
- 26 Part E of the Policy relates to business floorspace which '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 area's cultural offer or other local institutions such as the Whittington Hospital, will be encouraged'. Part H states that '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'.

Figure 8: Archway Spatial Strategy area



Site allocations

- 27 There are a series of site allocations supporting the Spatial Strategy area policies for each of the town centres and anticipating significant levels of residential, business and retail and leisure growth over the Plan period. Unrestricted Class MA could jeopardise the delivery of this plan-led approach to the growth of Islington's town centres.

Angel

28 There are 16 site allocations in the Angel and Upper Street Spatial Strategy area, of which 15 sit within the town centre boundary. Together the site allocations are anticipated to provide 27,000sqm of office floorspace, 8,000sqm of retail and leisure floorspace, 1,500sqm of floorspace for social infrastructure uses and 40 new homes. The emphasis on the provision of office floorspace accords with the priority given in the Local Plan to the delivery of business floorspace in the CAZ and CAZ fringe Spatial Strategy areas of Angel and Upper Street and Kings Cross and Pentonville Road, and the GLA's categorisation of Angel as a Strategically Significant Town Centre Office Location⁵. Angel's combination of accessibility, growth potential and existing critical mass make it an area of significant employment concentration on the London level⁶.

Nag's Head

29 There are 14 site allocations in the Nag's Head and Holloway Spatial Strategy area, four of which are either wholly or partially within the primary shopping area (PSA) of the town centre. The allocations for the Spatial Strategy areas as a whole envision the delivery of 30,900sqm of office floorspace, 3,600sqm of retail and leisure floorspace and 10,000sqm of floorspace for social infrastructure uses alongside the provision of 1,370 new homes. On their own, the four allocations within the town centre are expected to deliver 356 new homes and 16,528sqm of offices, alongside the reprovision and improvement of existing retail floorspace at the Morrison's supermarket (allocation reference NH1), former Argos store (NH2) and 379-391 Camden Road and 341-345 Holloway Road (NH12) sites.

Finsbury Park

30 There are 14 site allocations in the Finsbury Park Spatial Strategy area, with 11 sitting within the town centre boundary and 9 of those being located in the PSA. The allocations include the City North site (allocation reference FP1) which has now been developed and has contributed a significant amount of housing (355 dwellings), offices and retail and leisure floorspace to the town centre. Excluding the City North site, capacity estimates for the Finsbury Park allocations expect the delivery of 290 new homes, 20,200sqm of offices and over 4,000sqm of retail and office floorspace over the Plan period.

Archway

31 There are 11 site allocations in the Archway Spatial Strategy area, with eight falling either entirely or partially within the town centre boundary and four within the PSA. Capacity estimates for the Spatial Strategy area predict the delivery of 510 new homes, 8,300sqm of offices, 500sqm of retail and leisure floorspace and 3,600sqm of social infrastructure uses.

⁵ Figure 4.2 of "Strategic Evidence to support London borough Article 4 Directions (commercial to residential)" published by Greater London Authority July 2021, p. 42. Available from: [Strategic evidence to support commercial to residential Article 4s in London July 2021](#)

⁶ Islington Council (2022). Article 4 Directions: Notification to withdraw Permitted Development Right for Change of Use from Class E to Dwellinghouses (Class MA). Available from: [SB signed A4D Report.pdf \(islington.gov.uk\)](#)

The most significant development opportunity is the Archway Campus site which is just outside the town centre and is allocated for residential-led development with commercial, community and social infrastructure uses. All of the eight site allocations within the town centre anticipate the delivery of some business floorspace, amounting to approximately 8,000sqm, and should help to restore some of the area's commercial function following the really significant loss of office floorspace in Archway to the Class O PD right⁷.

The need for retail floorspace and the role of Islington's town centres

- 32 Islington has a robust and thriving retail, 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 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 necessary 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'⁸.
- 33 Town centres are also places which encourage social interaction and play an important part in cohesive communities. The retail policies set out in Islington's recently adopted Local Plan and detailed above aim to protect the diverse retail and leisure offer that meets the needs of local communities and makes the borough's town centres attractive to a wider audience, contributing to the success of London's economy. This will be harder to achieve within a context of unrestricted Class MA PDR.
- 34 The surveying work carried out to support the proposed Town Centre Article 4 Directions indicates that in general, Islington's town centres have successfully weathered the significant challenge posed by the COVID-19 pandemic. The pandemic accelerated the use of online retailing following the closure of non-food shops as part of lockdown measures, but the vacancy information set out in Table 1 suggests that this has not had a particular effect on Islington's town centres and each town centre has a vacancy level comfortably below the national average of 13.8%⁹.

⁷ A total of 25,974 sqm of office floorspace was lost to the Class O PDR from the borough's town centres in the period 2015/16 to 2017/18, of which 21,388sqm (82%) was from Archway Town Centre: [20191030annualmonitoringreport20162018.pdf \(islington.gov.uk\)](https://www.islington.gov.uk/20191030annualmonitoringreport20162018.pdf)

⁸ London Borough of Islington (LBI) (2023). Islington Local Plan: Strategic and Development Management Policies, available from: [Islington Council Local Plan: Strategic and Development Management Policies](#)

⁹ Savills (2023). Spotlight: Shopping Centre and High Street – Q3 2023. Available from: [Savills | Spotlight: Shopping Centre and High Street – Q3 2023](#)

Table 1: Town Centre vacancy

Town Centre	2010 ¹⁰	2016 ¹¹	2023
Angel	8.4%	6.4%	3.4% ¹²
Nag's Head	5.8%	8.6%	9.2% ¹³
Finsbury Park	7.2%	8.5%	8.1% ¹⁴
Archway	11.3%	10.6%	6.2% ¹⁵

35 This may be due in part to Islington's small shop character, with the average town centre unit across all main town centre uses being 175sqm with many shops under 100sqm. Whilst some larger retailers have withdrawn from the high street and focused their activities online it has been noted that independent retailers 'quickly adapted and in many cases thrived' when faced with the sudden and unexpected change presented by the pandemic¹⁶. They may have been helped by the fact that Islington has the second highest population density of any local authority area in the country¹⁷, meaning that there is a large residential population living in close proximity to each town centre. The pandemic led to increased levels of working from home and encouraged people to shop locally, a change in shopping habit that is considered likely to continue long-term¹⁸.

Retail need in the borough

36 Islington's Retail and Leisure Study (RLS) (2017) assessed the need for new (convenience and comparison goods) retail floorspace over the Local Plan period, which it states should be located in town centres, which are the most sustainable and sequentially preferable

¹⁰ Data from Islington's 2010 Retail Study

¹¹ London Borough of Islington Retail and Leisure Study (2017), available from: [London borough of Islington retail and leisure study - 2017](#)

¹² 2023 survey to support Article 4 Direction work – relates specifically to the part of Angel Town Centre outside of the CAZ.

¹³ 2023 survey to support Article 4 Direction work, based on 314 units surveyed. See the Nag's Head Town Centre assessment template in Part 3 of this Appendix for additional detail.

¹⁴ 2023 survey to support Article 4 Direction work, based on 394 properties surveyed.

¹⁵ 2023 survey to support Article 4 Direction work, based on 226 properties surveyed.

¹⁶ Retail Gazette (2021) The state of UK retail one year after the first lockdown. Available from: [The state of UK retail one year after the first lockdown - Retail Gazette](#)

¹⁷ ONS (2023). Population density by Lower Tier Local Authorities, available from: [TS006-2021-4.xlsx \(live.com\)](#)

¹⁸ Retail Gazette (2021) The state of UK retail one year after the first lockdown. Available from: [The state of UK retail one year after the first lockdown - Retail Gazette](#)

locations. It found a borough-wide forecast capacity for 6,341sqm net of new ‘superstore format’ convenience goods floorspace over the long term to 2036. The majority of convenience goods capacity is focussed on Angel (2,658 sqm) and Nag’s Head (3,264 sqm) and could be achieved through the provision of a new superstore; the extension of existing stores; or through the provision of a number of smaller format convenience stores.

37 The RLS also found a capacity for 12,247 sqm of comparison goods across the borough by 2036, with Angel and Nag’s Head town centres again accounting for most of the need for new comparison goods floorspace as set out in Table 2¹⁹. This reflects the strength of the retail offer in Angel and Nag’s Head and their strong market share of comparison goods expenditure.

38 The RLS also assessed the need for new commercial leisure uses as a good provision and choice of leisure facilities can make a significant contribution to a town centre’s vitality and viability by helping to increase dwell times, footfall and turnover with benefits for both the daytime and night-time economies. The assessment found that there is a relatively good level of leisure facilities, for example cinema and food and drink, although there is scope to improve the range and quality of this provision. The participation rate for certain leisure uses is particularly high – specifically restaurants and cinemas, which offers the potential to enhance the overall offer subject to market demand, bringing benefits to other shops, businesses and facilities.

Table 2: Comparison goods capacity forecast by 2036

Town Centre	Capacity for comparison goods by 2036 (sqm)
Angel	6,271
Nag’s Head	8,056
Finsbury Park	-273
Archway	218
Total	12,247

39 The RLS refers to the Odeon in Nag’s Head helping to underpin the night-time economy in the town centre. There are two cinemas in Angel, the Vue in Angel Central and the Everyman ‘Screen on the Green’. Since the RLS was conducted the Picturehouse Cinema

¹⁹ London Borough of Islington Retail and Leisure Study (2017), available from: [London borough of Islington retail and leisure study - 2017](#)

has opened in Finsbury Park, which has added to the leisure and night-time economy offer in Finsbury Park Town Centre.

- 40 Islington benefits from a diverse range of arts and historic attractions, the majority of which are located within the town centres. These contribute significantly to the visitor economy of the area and need to be maintained and promoted. The council could benefit from a wider range of family activities, such as a multi-use venue, which should be directed to a town centre location.

The potential impacts of Class MA on town centres

- 41 The Class MA legislation allows applications for prior approval to be assessed against criteria relating to transport risks; contamination risks; flooding risks; impacts of noise from commercial premises on the intended occupiers of the development; the impact of the change of use on the character or sustainability of the conservation area where the proposal is located within a conservation area and involves the change of use of the whole or part of the ground floor; the provision of adequate natural light in all habitable rooms; the impact on intended occupiers if the proposal is in an area considered important for heavy industry, waste management, storage and distribution, or a mix of such uses; and the impact on local provision where the proposal would involve the loss of services provided by a registered nursery or health centre.
- 42 Recent changes have removed two of the constraints the legislation had previously placed on developers – the requirement for a building to be vacant for a continuous period of at least 3 months prior to the date of the application for prior approval; and the requirement for sites to be less than 1,500 square metres.
- 43 It is considered that unrestricted Class MA PDR has the potential to negatively affect each of the borough's town centres by:
- Reducing the diversity and range of goods and services available to the local and wider community. Islington is densely populated and has low levels of car ownership, meaning that there are large numbers of people who rely on being able to access essential goods and services locally.
 - Reducing retail and service employment opportunities, including apprenticeships, in a borough that experiences significant deprivation.
 - Reducing agglomeration benefits for local businesses.
 - Introducing conflicts between main town centre uses and new residents, as residential development and commercial uses do not always mix well. In Islington higher value residential uses may price out commercial uses and create harmful breaks in the continuity of shopfronts, resulting in reduced footfall and patronage that undermines the vitality and viability of our town centres.

- 44 The specific impacts of unrestricted Class MA PDR on the individual town centres, and the extent to which the Class MA criteria may help to prevent such harmful impacts, has been assessed further in Parts 2 and 3 of this Appendix.

The proposed Town Centre Article 4 Directions

- 45 As set out in the London Plan, being able to access convenience retail, specialist shops and services is important for supporting the daily lives of Londoners and for creating and sustaining strong and inclusive communities. Town centres provide significant employment opportunities - both for the borough's residents and for people travelling into the borough to work - and play an important role in Islington's economy. Islington's mapping and survey work has identified the Class E sites both inside PSAs and within the wider town centre areas whose loss would cause a wholly unacceptable impact on the vitality and viability of the borough's town centres. This is in line with SDMP Policy R1 Part C which sets out that 'a range of main town centre uses [are] considered suitable outside the PSA in order to promote and encourage diverse shopping and leisure destinations'. It also fits in with the wider imperative identified in the Local Plan for the borough's town centres to diversify and become places to be rather than solely places to buy.
- 46 As described in more detail in Parts 2 and 3 of this Appendix, the Article 4 Direction for each town centre has been proposed following a site-by-site assessment which took into consideration matters such as use class, relevant policy designations and value to the community. Each Direction covers the smallest geographical area considered possible whilst still serving to protect the vitality and viability of the town centres.

Part 2: Summary of the individual town centre assessments

Angel Town Centre

Context and evidence

- 47 Located in the centre of the borough, Angel is Islington's largest town centre and one of the most important areas for employment and economic growth in the borough.
- 48 As detailed above, Angel is subject to an Area Spatial Strategy, Policy SP4, in Islington's Local Plan. The overarching aim of Policy SP4 is to ensure Angel builds on its significance, vibrancy and vitality, offering a unique mix of shops, services, cultural activities and other Town Centre uses alongside employment opportunities and an accessible, pedestrian-friendly environment. Sixteen sites in the Spatial Strategy area are allocated in the Local Plan. Most of these are for intensification of business uses, including office intensification, alongside continued provision of retail, cultural and residential uses as part of a distinctive and attractive mix. In terms of retail and leisure use, the site allocations across the Angel and Upper Street spatial strategy area expect the delivery of approximately 7,943sqm net additional floorspace.
- 49 The majority of the town centre sits within the Central Activities Zone (CAZ) and is subject to an existing Article 4 Direction removing Class MA PDR. The section of the town centre outside of the CAZ is clustered around Upper Street, Cross Street and Essex Road. Angel Town Centre enjoys a high level of accessibility with a strong PTAL rating due to 17 bus routes running through the area into the CAZ and the presence of Angel Station (London Underground) which is on the Northern Line. It is an attractive location for employment and a range of other town centre uses.
- 50 The town centre has a strong and varied convenience offer, as well as high quality comparison goods provision with a large number of independent retailers complementing the high street shops and helping to diversify the comparison offer. Angel also has very strong service provision, with leisure services represented by a significant number of cafes, restaurants and bars/pubs which complement the retail offer and encourage a strong night-time economy. The area has a strong historic character, with large sections of the town centre sitting within the Upper Street (North); Cross Street; and Angel Conservation Areas.
- 51 Angel Town Centre (outside of the CAZ) includes a significant stretch of Upper Street, which the RLS identifies as the borough's prime retail area with a diverse range of retail and service units including a large concentration of national multiples and a particular concentration of leisure operators close to Islington Green. This part of the Town Centre also includes Cross Street and a large part of Essex Road. In contrast to Upper Street, Essex Road comprises mostly independent retail and leisure operators, whilst Cross Street has a mixture of independent and national multiple stores.

- 52 The Town Centre has low vacancy and a thriving night-time economy, with a proportion of leisure services significantly above the national average. Angel is designated an NT2 night-time economy in the London Plan, which denotes regional influence. It is also designated as a Cultural Quarter in Islington's Local Plan. Unrestricted Class MA PDR has the potential to unacceptably jeopardise the realisation of these designations, not least through the inability to require adherence to the agent-of-change principle set out in SDMP Policy DH5.
- 53 As well as its important role in London's evening and night-time economy, Angel has seen significant 'overspill' in recent times from the traditional core markets in the City and West End as they have expanded. The area therefore serves an important purpose in supporting London's strategic business role. Angel's role as a centre with the capacity, demand and viability to accommodate new office development has led to its categorisation as a Strategically Significant Town Centre Office Location by the GLA²⁰. This role is discussed in more detail in the council's evidence supporting the Article 4 Direction withdrawing the Class MA PDR from parts of the CAZ and CAZ Fringe²¹.
- 54 There is a large residential population within and surrounding the Town Centre, including a number of housing estates. This includes Cumming Estate, St Mary's Path Estate, Devonshire House, and Providence Court. The Town Centre provides a focal point for the surrounding residential community by supplying retail and services, transport connections, cultural and night-time uses, community centres, places of worship, and medical uses. In addition, as a Major Town Centre Angel attracts visitors from a wider area to experience its extensive retail and leisure offer and enjoy its night-time economy uses. At the same time, Angel experiences relatively high levels of deprivation which underlines the importance of securing a diverse retail offer that serves all members of the community and offers employment opportunities in retail and services.
- 55 The part of Angel Town Centre proposed to be protected in tranche 2 has a number of specialist clusters:
- **Cultural venues:** Little Angel Theatre; Kings Head Pub and Theatre; Collins Theatre; Screen on the Green.
 - **Furniture and interior design:** Rothschild & Bickers; Tribe Rugs; Little Greene; Dar Leone; Farrow & Ball; Living Space and Partners; Tiles etc.; Fired Earth; Aria One Six Eight; Twentytwentyone; Adventures in Furnitureland; Sara Leonor Studio; Coexistence.
 - **Production companies:** Angel Studios (recording studio); Cross Street Studio (TV and Film Studio); Fulwell 73 (production company).

²⁰ Figure 4.2 of "Strategic Evidence to support London borough Article 4 Directions (commercial to residential)" published by Greater London Authority July 2021, p. 42. Available from: [Strategic evidence to support commercial to residential Article 4s in London July 2021](#)

²¹ Islington Council (2022). Article 4 Directions: Notification to withdraw Permitted Development Right for Change of Use from Class E to Dwellinghouses (Class MA). Available from: [SB signed A4D Report.pdf \(islington.gov.uk\)](#)

Heritage value

56 A significant part of Angel Town Centre is located within the Upper Street (North) Conservation Area (USNCA). The USNCA Design Guidelines set out that Upper Street's 'slightly winding form, wealth of old buildings and stepped pavements ... create a unique and special environment for residents, shoppers and visitors. Upper Street and the Angel are lively commercial areas with mainly retail and service uses'. The Design Guidelines are clear that 'the Council will seek to maintain the lively retail nature of the area'. Despite the intentions of the Conservation Area Design Guidelines (CADG), it is considered they are more effective at protecting the physical appearance of shopfronts than the land use. Without protection the business and commercial elements of the units which contribute to the character of the area are at risk of conversion under Class MA, which is likely to cause a wholly unacceptable impact. Therefore, Class E units sitting within Angel's conservation areas have not been excluded from the proposed designation unless there is another compelling reason for exclusion.

The potential impacts of unrestricted Class MA on Angel Town Centre (outside of the CAZ)

57 Although part of Angel Town Centre is subject to an Article 4 Direction removing Class MA PDR, the proposed additional designation for the area outside of the CAZ is considered necessary as it provides support to the core of the town centre and Angel's role as a strategically important business location, and also has an important role in serving local residents by providing essential goods and services. The town centre as a whole meets the needs of local residents and visitors from further afield through its provision of convenience and comparison goods and its cultural and leisure offer, including its night-time economy offer of regional importance.

58 The likely impacts of unrestricted Class MA on Angel are:

- The loss of viable businesses to higher value residential uses, resulting in gaps in retail frontages that damage the vibrancy and vitality of the Town Centre and may lead to its eventual decline. Angel has a range of key services that are necessary for day-to-day community life. This includes banks, post offices, grocery shops etc. The town centre's restaurants and cafes serve local residents and those from further afield, contributing to its prosperity. The town centre supports a range of employment opportunities and the loss of businesses to unrestricted Class MA PDR represents a wholly unacceptable loss of wellbeing and amenity to the people who rely on them for work and to meet their retail and/or service needs. The existing lack of vacancy in the town centre as shown on Table 1 demonstrates that the Class MA PD right is not required in this location as there is sufficient flexibility and demand within the E use class to ensure the ongoing success of the Town Centre.
- The loss of office floorspace to residential use in a location recognised as providing 'overspill' space for businesses as the traditional core office markets in the City and West End have expanded.

- Damage to the character of a part of the borough with significant heritage value, through the change of use of commercial premises that are identified in Islington's Conservation Area Design Guidelines as contributing to the lively retail nature of the area. This has implications for the sustainability of the relevant conservation areas, particularly the Upper Street (North) Conservation Area as set out in more detail in paragraph 56 above.
- Angel Town Centre has a number of significant cultural venues, in keeping with its Cultural Quarter designation and its role as Islington's principal cultural destination. Development in close proximity to cultural uses is arguably the biggest threat they face, given their function can generate noise and significant pedestrian movements. Unrestricted Class MA use could hinder the future expansion or even continued operation of cultural uses, as Local Plan policies aimed at mitigating or preventing adverse impacts on the amenity and operation of cultural uses in line with the 'agent-of-change' principle cannot be applied to Class MA development.
- Angel is classified as an NT2 night-time economy in the London Plan, providing a range of employment uses and making a significant contribution to the Islington, and wider London, economy. The Local Plan recognises that 'the introduction of sensitive uses may threaten the effective operation of night-time uses more acutely' within the night-time economy clusters identified in the London Plan, such as Angel. Unfettered Class MA PDR therefore has the potential to undermine Angel's regionally significant night-time economy, introducing residential uses into the town centre that may conflict with night-time economy uses without having to adhere to agent-of-change principles.
- As set out above, the site allocations for Angel expect the delivery of approximately 7,943sqm net additional floorspace for retail and leisure uses. Unrestricted Class MA changes of use could prevent the realisation of the council's strategic objectives for this part of the borough.

The proposed Angel Town Centre Article 4 Direction

- 59 The Article 4 Direction for Angel Town Centre as shown on Figure 9 is necessary to protect one of the borough's most important areas for employment and economic growth. The section of Angel Town Centre that sits within the CAZ, which includes the PSA, is already subject to an Article 4 Direction limiting the operation of Class MA PD rights.
- 60 The part of the town centre the borough is now proposing to designate is important to support the wider town centre. Whilst outside the PSA, it has multiple important functions that contribute to Angel's status as a strategically important business location. With the Direction, Angel Town Centre will be able to retain a range of functions, including convenience and comparison retail opportunities, which are of acknowledged high quality. It will also retain the ability to provide retail, financial and leisure services which contribute to

the diverse range of goods and services on offer. This is in keeping with the Plan-led approach to safeguarding the status of the centre as a Regional Centre at the London level.

- 61 To protect the vitality and viability of the town centre the designation will cover a number of Class E units that are considered particularly vulnerable to conversion. This includes Class E units within the Upper Street (North) Conservation Area (USNCA) as it is considered that the commercial use of the units contributes to the character and sustainability of the conservation area as much as their physical appearance. The commercial units in Angel are generally in period buildings with residential units above and would take limited time, investment and expertise to convert to residential use.

Smallest possible geographical area

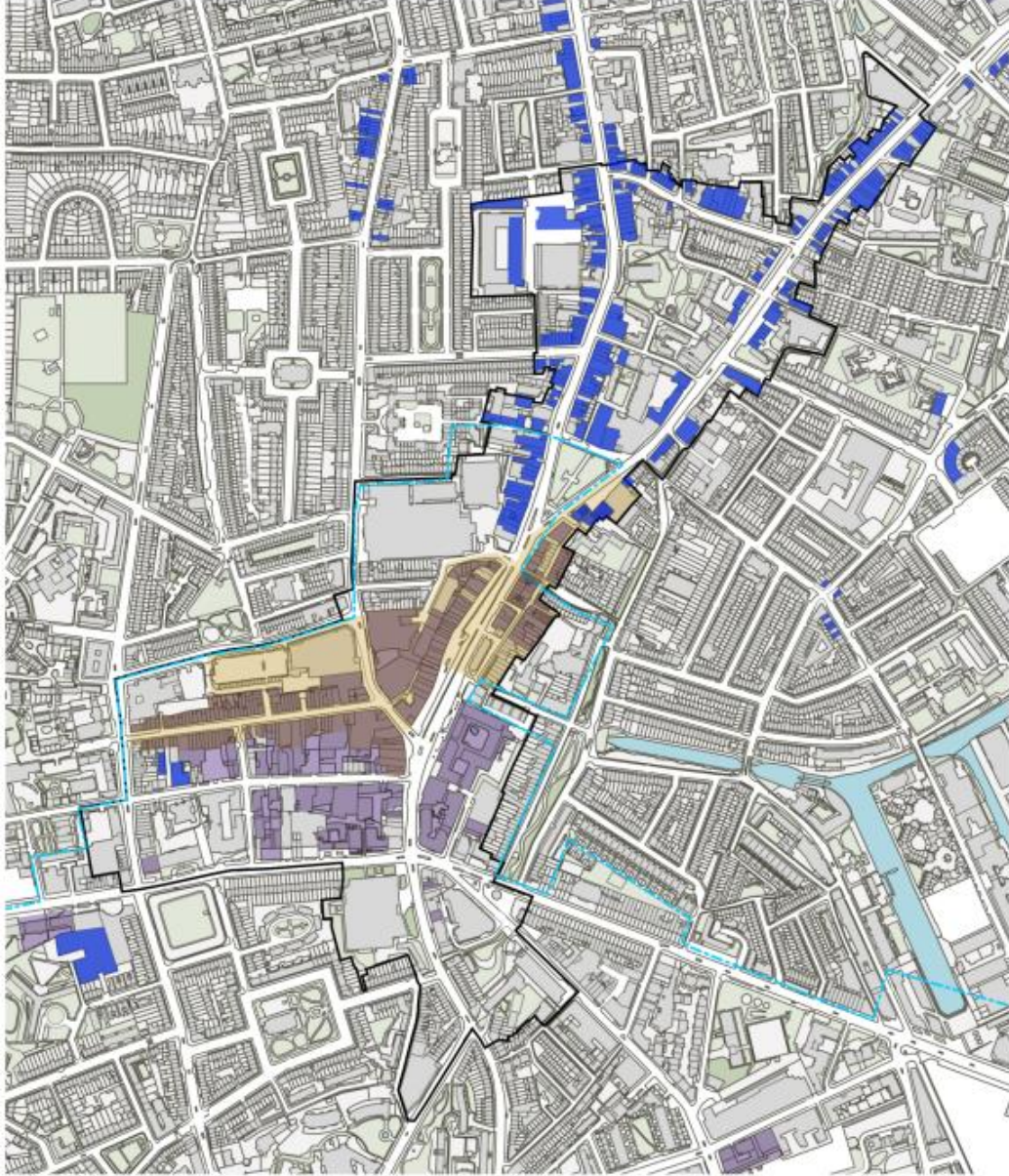
- 62 The Council is not proposing a blanket approach to designation and has assessed the town centre on a unit-by-unit basis to ensure that the designation applies to the smallest geographical area possible in accordance with paragraph 53 of the NPPF whilst still being comprehensive enough to protect the vitality and viability of the town centre. As a result, all buildings outside of Class E use have been identified and excluded, as have listed buildings within the town centre. In addition, a number of buildings in Class E use have been excluded from the proposed designation on the basis that they are not considered as vulnerable to conversion given their layout and design. A more comprehensive list of the buildings excluded from the designation is provided in Part 3 of this Appendix.

Avoiding wholly unacceptable adverse impacts

- 63 The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Angel Town Centre from Class MA changes of use. As set out above these include:
- The loss of premises from the town centre that provide key services necessary for day-to-day community life. This includes banks, post offices and grocery shops.
 - The loss of office floorspace in a location that supports London's strategic business role.
 - The loss of cultural uses that contribute to the vibrancy and diversity of the town centre, providing employment, attracting visitors to Angel and contributing to the borough's economic growth.
 - The potential loss of businesses that support the borough's night-time economy and have helped make the town centre an area of regional significance, attracting visitors from across and beyond London.
 - Restricting the council's ability to achieve its strategic objectives for the area through the potential change of use of sites allocated for retail and leisure uses in the Local Plan.

Figure 9: Proposed Angel Town Centre Article 4 Direction

Angel Town Centre proposed Tranche 2 article 4 direction



Key for Article 4 Direction Town Centres

- Tranche 2 (proposed) Article 4 area
- Tranche 1 (confirmed) Article 4 area
- Town Centres
- Primary Shopping Areas
- CAZ
- Islington Borough Boundary

Nag's Head Town Centre

Context and evidence

- 64 Nag's Head is a Major Town Centre with a wide range of independent and national retailers, and a strong convenience retail offer which provides for the essential needs of local residents. The centre accounts for nearly 20% of the convenience goods sold in the borough, a greater percentage than Angel, suggesting that the supermarkets of Nag's Head meet more than local needs. The Town Centre also has a relatively strong comparison goods offer, with the majority of national multiples being located along Holloway Road. A key anchor of the town centre is Selby's, a three-storey independent department store, which sells a range of quality comparison goods. Visitors are also attracted to the centre from further afield by its range of specialist shops and services.
- 65 As detailed in Part 1 of this Appendix, Nag's Head is subject to an Area Spatial Strategy, Policy SP5, in Islington's Local Plan. The overarching aim of Policy SP5 is to protect Nag's Head as an important retail area by maintaining and enhancing retail uses in the town centre whilst encouraging increased night-time economy and leisure uses and an uplift in office floorspace as a means of diversifying the local economy. Public realm and environmental improvements are strongly encouraged to make the town centre a more welcoming space for pedestrians.
- 66 Nag's Head Town Centre is largely linear in form, running along Holloway Road from the junction with Manor Gardens in the north to the junction with Hornsey Street and Hornsey Road in the south. The Town Centre also includes part of Seven Sisters Road, Tollington Road, Parkhurst Road and Camden Road. Due to the close proximity of London Metropolitan University, the Town Centre has a relatively large student population.
- 67 The primary shopping area (PSA) of the town centre includes the supermarkets Waitrose, Morrisons, Iceland and Lidl, Selby's department store and national multiples such as Boots, Sports Direct, Argos and JD Sports. The PSA also includes cafes, restaurants and public houses that support the area's night-time economy. Outside of the PSA, the shops on Holloway Road provide everyday services for local people in the form of hairdressers, smaller convenience shops, dry cleaners, banks and gyms but also include shops and services – such as cake shops, a solicitors' office and a vintage clothes store – that are likely to attract shoppers from further afield. The part of Seven Sisters Road that sits within the town centre boundary but outside of the PSA also provides services such as a grocers', a fishmonger, butchers', pharmacies and a post office that cater to the everyday needs of residents. More information on the uses contained within the town centre is provided in Part 3 of this Appendix.
- 68 The town centre is well served by public transport, with Holloway Road underground station (served by the Piccadilly line) sitting within the town centre boundary and frequent bus routes running through the centre, particularly along Holloway Road, connecting Nag's Head to other centres within the borough and beyond. However, the tube station is a relatively long walk from retail uses to the north of the centre, and pedestrian movement across the

east and west sides of Holloway Road is restrained by heavy traffic. As a result, different catchment areas for convenience shopping are likely to exist within the town centre.

- 69 Holloway Road station is the arrival point for many visitors to the borough attending football matches at the nearby Emirates Stadium. The stadium is an important cultural and leisure draw which helps to support the wider town centre economy.
- 70 Nag's Head Indoor Market is open seven days a week and offers a diverse range of goods, with its variety of food stalls considered a particular asset in the RLS. It is one of the main draws of the town centre, and enhancements to the market are encouraged by Policy SP5 Part F.
- 71 As detailed in Table 1 above, vacancy in the town centre is around 9.2% as compared to the national average of approximately 13.8%. The town centre is successful but as noted in Islington's Local Plan contains a concentration of pawnbrokers, betting shops, money lenders and adult gaming centres, particularly along Seven Sisters Road, that provide services considered less desirable by the council. As these are uses outside of Class E, it makes the protection of Class E uses particularly important to support the vitality, viability, mix and balance of uses in the town centre. The Spatial Strategy for the area, as summarised above, and the site allocations for the town centre seek to enhance and diversify the area's retail and leisure offer whilst also resisting further over concentration of uses that may damage its vitality.
- 72 Four sites within the Town Centre are allocated for a mix of uses including retail, office and residential. The site allocations anticipate the delivery of significant growth in the town centre in the form of approximately 1,500 new homes, 22,000sqm of office floorspace and 3,600sqm net additional floorspace for retail and leisure use. Given the level of growth planned for the centre it is important for the council to retain control over the development of key sites and locations within the Spatial Strategy area.
- 73 Three of the allocated sites – Morrison's supermarket (site allocation reference NH1)²²; 368-376 Holloway Road (site allocation NH2); and 379-391 Camden Road and 341-345 Holloway Road (site allocation NH12) - have a mix of owners and would require some site assembly to realise the borough's aspirations for their delivery. Unfettered Class MA changes of use could make future site assembly and comprehensive redevelopment of these sites impossible, achieving what could be a minimal uplift in residential use at the expense of the council's long-term strategy for the residential and commercial growth of these key sites.
- 74 There is a large residential population living within and around Nag's Head, including a number of council estates adjacent to the town centre such as Pollard Close Estate, Loraine

²² The proposed Article 4 Direction does not include the entirety of the NH1 site boundary but would protect smaller retail units on the site's Holloway Road frontage from changes of use that could hinder the redevelopment of this key opportunity site.

Estate, Holbrooke Court Estate, Hood Court and Bennett Court Estate. The Town Centre is an important resource for the surrounding residential community as it meets essential retail and services needs alongside the provision of transport connections, cultural and night-time uses, community centres, places of worship, and medical uses.

- 75 Five of Islington's wards converge on Nag's Head town centre: Finsbury Park, Tollington, Tufnell Park, Arsenal and Holloway. All five wards have above the Islington average levels of households suffering from multiple deprivation, with income and employment deprivation being a particular issue. Retail is the second²³ and third²⁴ largest employment sector in Finsbury Park and Holloway wards respectively. Within this context, the employment opportunities offered by retail and service uses in the Town Centre are of significant importance for the local community and the potential loss of employment uses to Class MA changes of use represents a wholly unacceptable and adverse impact on the borough's residents.

Heritage value

- 76 The north end of the town centre, which includes the Grade II listed Odeon Cinema building and locally listed buildings at 490-492 Holloway Road and 504 Holloway Road, is within the Mercers Road and Tavistock Terrace Conservation Area. The Mercers Road/Tavistock Terrace CADG note that 'there are shopping and commercial frontages on Holloway Road which provide local services and are an important contribution to the character of the area'. A small part of the town centre is also within the Hillmarton Conservation Area, whose CADG state that commercial uses are 'important to the area's character and appearance' and 'often the best use for a building is that which it was designed for and will seek to retain public houses, shops and workshops in appropriate uses'.
- 77 The council considers that it is the use as much as the aesthetics of a building that contributes to the character of the conservation area. Despite the intentions of the Conservation Area Design Guidelines (CADG), it is considered they are more effective at protecting the physical appearance of shopfronts than the land use. Therefore, whilst statutorily listed buildings have been excluded from the proposed Article 4 Direction, Class E premises that are considered to make an important contribution to the character and sustainability of the conservation area have not been excluded from the proposed designation. Applications to change the use of these premises should be considered against Local Plan policies rather than the more limited criteria in the Class MA legislation.

²³ Local Insight / Oxford Consultants for Social Inclusion (OCSI) (2021). Local Insight profile for 'Finsbury Park' area, available from: [Local Insight profile for 'Finsbury Park' area LI - Islington Council](#)

²⁴ Local Insight/OCSI (2021). Local Insight profile for 'Holloway' area (2021), available from: [Local Insight profile for 'Holloway' area LI - Islington Council](#)

The potential impacts of unrestricted Class MA on Nag's Head Town Centre

78 The council has assessed the sites within Nag's Head town centre against the criteria set out in the Class MA legislation, and the requirements of NPPF paragraph 53. All buildings outside of Class E use have been identified and excluded, as have listed buildings within the town centre. In addition, a number of buildings in Class E use have been excluded from the proposed designation as they are not considered as vulnerable to conversion given their layout and design. In this way the proposed designation has been kept to the smallest possible geographical area.

79 However, the town centre assessment, as provided in Part 3 of this Appendix, found that unrestricted Class MA changes of use would have wholly unacceptable adverse impacts on the vitality and viability of the town centre. The impacts of the Class MA PDR on Nag's Head Town Centre are considered to be:

- The widespread loss of premises in town centre use in the primary shopping area (PSA) – the core shopping area - of the town centre would result in a loss of economic value and an erosion of the status of the town centre where the majority of units are occupied by major national retailers.
- The gaps in retail frontages created by changes of use to residential could damage the vibrancy and vitality of the town centre, reducing footfall and contributing to its decline. As illustrated in Table 5.1, vacancy in the town centre is well below the national average, suggesting that there is sufficient flexibility within the 'E' use class to support the ongoing role of the town centre.
- Nag's Head Town Centre provides a range of convenience retail and service uses both within the PSA and the wider town centre area that are necessary for day to day community life. The loss of premises from the town centre that provide essential services, including banks, post offices and grocery shops would have a wholly unacceptable and adverse impact on the everyday lives of residents in an area of above average deprivation and where a significant percentage of households do not have a car.
- The town centre supports a range of employment opportunities and the loss of businesses to unrestricted Class MA PDR represents a wholly unacceptable loss of wellbeing and amenity to the people who rely on them for work, particularly given the importance of retail employment to residents of Finsbury Park and Holloway Wards.
- As identified above, there are challenges in the town centre in the form of concentrations of less desirable leisure uses such as betting shops and adult gaming centres. The Spatial Strategy and site allocations for the town centre are aiming to deliver significant retail, business and residential growth over the life of the Local Plan. It is important that the strategic plan to improve and develop Nag's Head is not hindered by unrestricted Class MA changes of use that may result in a

relatively small uplift in new dwellings at the expense of the site assembly necessary to deliver some of the council's aspirations for the area.

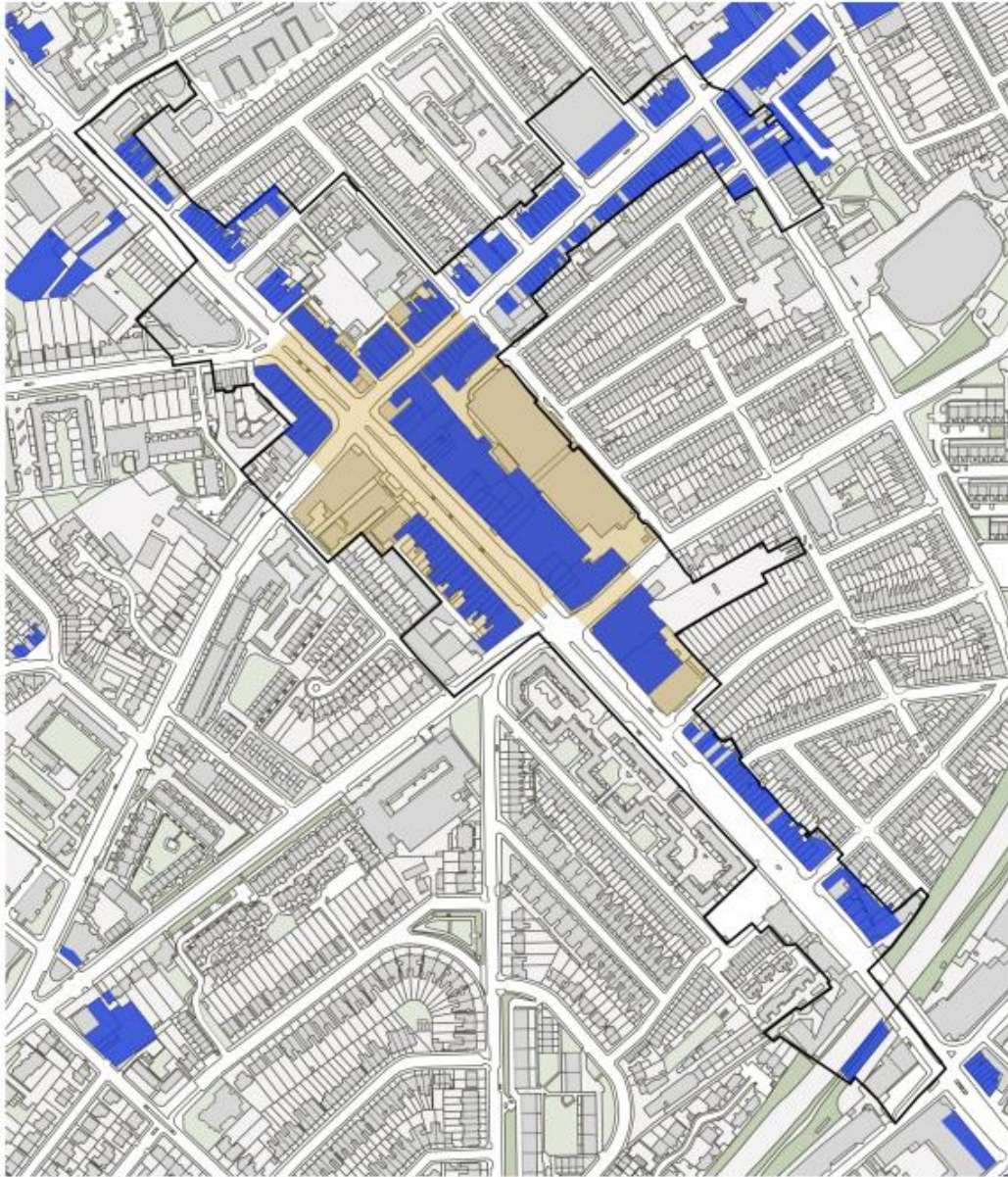
The proposed Nag's Head Town Centre Article 4 Direction

80 The proposed Article 4 Direction for Nag's Head Town Centre is illustrated on Figure 10.

81 To protect the vitality and viability of the town centre and ensure it can continue to meet the retail and service needs of the local community it is proposed to designate a number of Class E units that are considered particularly vulnerable to conversion. The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Nag's Head Town Centre from Class MA changes of use. The Council is not proposing a blanket approach to designation and has assessed the town centre on a unit-by-unit basis to ensure that the designation applies to the smallest geographical area possible.

Figure 10: Proposed Nag's Head Town Centre Article 4 Direction

Nags Head Town Centre proposed Tranche 2 article 4 direction



Key for Article 4 Direction Town Centres

-  Tranche 2 (proposed) Article 4 area
-  Tranche 1 (confirmed) Article 4 area
-  Town Centres
-  Primary Shopping Areas
-  CAZ
-  Islington Borough Boundary

Smallest possible geographical area

82 As set out above, the council has assessed the sites within the town centre individually and excluded sites from the proposed designation which are considered less vulnerable to conversion under Class MA due to their design and layout. Listed buildings have also been excluded from the designation, as have buildings outside of Class E use. Details of the premises excluded from the proposed Direction are provided in Part 3 of this Appendix. In this way the proposed designation has been kept to the smallest possible geographical area in accordance with paragraph 53 of the NPPF whilst still being comprehensive enough to protect the vitality and viability of the town centre.

Avoiding wholly unacceptable adverse impacts

83 The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Nag's Head Town Centre from Class MA changes of use. As set out above these include:

- The loss of premises in main town centre uses in the PSA that help to draw people into the centre, resulting in a loss of economic value and the erosion of the status of the town centre where the majority of units are occupied by major national retailers and nearly 20% of the borough's convenience goods are purchased. This impact is recognised in NPPF paragraph 53 which suggests the loss of the essential core of a PSA 'would seriously undermine its vitality and viability'.
- The loss of premises outside of the PSA that provide key services necessary for day-to-day community life, such as the butcher shops, fishmongers and grocery shops on Holloway Road and Seven Sisters Road. The town centre serves a diverse population, with sub areas that meet the everyday needs of local residents and provide opportunities to meet and socialise for different groups in the community. Outside the PSA the particular streets have their own identity and role in the wider town centre's function. On Seven Sisters Road there is a concentration of shops selling fresh produce that meets a diverse range of local needs, this concentration is exclusive to Nag's Head in the borough. Similarly, Holloway Road has a constantly evolving selection of food and beverage units which take advantage of the slightly larger unit sizes. The cafés are interspersed with a number of more specialist and independent retailers taking advantage of the prominent location and accessible locations on this busy road.
- The loss of premises both within and outside the PSA that are important for retaining and maintaining the vitality and viability of the town centre given the concentration of less desirable uses identified in paragraph 5.41 above. Protecting Class E units in the centre will help to ensure that the town centre can offer a mix of goods and services that encourage people to visit and spend time there, and act against further over concentration of uses such as betting shops and adult gaming centres which can have a negative impact on the centre and local communities.

- The loss of premises providing employment opportunities in an area where income and employment deprivation is a significant issue, and the retail sector is a major employer.
- Restricting the council's ability to achieve its strategic objectives for the development and improvement of the area through the potential change of use of sites allocated for retail, business and residential uses in the Local Plan.

Finsbury Park Town Centre

Context and evidence

- 84 Finsbury Park is a District Town Centre, clustered around Seven Sisters Road, Stroud Green Road and Blackstock Road. The wider area falls within the administrative boundaries of the London boroughs of Islington, Hackney and Haringey. Hackney Council have included the whole of their part of Finsbury Park District Town Centre in an Article 4 Direction removing Class MA PDR. The Article 4 Direction was confirmed in April 2023. Finsbury Park Town Centre contains the Fonthill Road Specialist Shopping Area (SSA), which is already the subject of an Article 4 Direction removing PDR under Class MA.
- 85 As detailed in Part 1 of this Appendix, Finsbury Park is subject to an Area Spatial Strategy, Policy SP6, in Islington's Local Plan. The overarching aim of Policy SP6 is to maintain the predominant commercial role of the area, with specific focus on retail and services on ground floors. The Local Plan stresses that it is important to maintain a diverse range of shops within the area so that the needs of different sections of the community can continue to be met.
- 86 Finsbury Park is a busy, multi-cultural area providing a wide range of town centre uses: Stroud Green Road has a large café and restaurant offering; Seven Sisters Road offers a variety of uses including convenience retail, professional and financial services and cafes; and Blackstock Road has a large food offering through cafes and small-scale convenience retail, alongside some comparison retail stores. The area also has a rich community and cultural offer through the presence of third sector organisations including the Muslim Welfare House, Jones Art Building and Park Theatre. However, there is little comparison goods provision in the town centre and although leisure provision is good, there is limited night-time economy activity.
- 87 The area is a key transport interchange and one of the most accessible locations in Islington, with an overall PTAL rating of 6 - the highest level of public transport accessibility. Finsbury Park Station comprises a National Rail and London Underground station and is the busiest transport interchange in London outside of Zone 1. There are two bus stations adjacent to the train station providing regular services across London. These excellent transport links, added to its relatively low rents, give the town centre significant potential to develop as an important location for additional business use to supplement the provision in

the CAZ. However, the dominance of transport infrastructure in the town centre means it appears disjointed, with dispersed shopping frontages and no clear centre. Work is needed to redevelop the area immediately surrounding the station to improve permeability and legibility, and make access to the existing commercial areas, such as Fonthill Road, safer and more inclusive.

- 88 There are eight site allocations within Finsbury Park Town Centre anticipated to deliver approximately 14,000sqm retail floorspace, 16,500sqm office floorspace and 414 new homes. At least three of these allocated sites have a mix of owners and would require potentially complex site assembly to realise the borough's aspirations for their delivery. Unfettered Class MA changes of use could make future site assembly and comprehensive redevelopment impossible, achieving what could be a minimal uplift in residential use at the expense of the council's long-term strategy for the development of the area.
- 89 The majority of Finsbury Park Town Centre is located within Finsbury Park ward, although the northernmost part of the town centre on Stroud Green Road sits within Tollington ward and the southernmost part of the town centre on Blackstock Road falls between the recently created Arsenal and Highbury wards. Finsbury Park ward is the most deprived area in Islington - 56% of the ward's residents are living in areas ranked amongst the most deprived 20% of neighbourhoods in England based on the Index of Multiple Deprivation (IMD) 2019²⁵.
- 90 A large proportion of Finsbury Park ward's residents (69.2% of households) do not have a car. Retail is the second largest employer for Finsbury Park residents and the retail industry is the second largest employment sector in the area (after health). Losing parts of the town centre to residential use via Class MA would risk its viability and vitality, limiting employment opportunities and removing convenience shopping opportunities for the local community in an area already experiencing deprivation.
- 91 The average Class E unit in the town centre is 199m², located in largely ground floor retail units with residential uses at upper floors. These types of units are considered particularly susceptible to permitted development rights, due to the existing mix of commercial and residential floorspace and the limited time, expertise and investment it would take to convert them to residential use. These units have been included in the designation, as vacancy rates in all parts of the town centre are low and retail units have a high turnover rate. This demonstrates a continual demand for these types of units and suggests that there is enough demand and flexibility within the 'E' Use Class to support the ongoing vitality and vibrancy of the area.
- 92 Finsbury Park is the longest town centre in Islington (measuring 1,680m north to south). Stroud Green Road and Blackstock Road are both over one mile long, which means some pedestrians may have difficulty walking their length. As a result, different catchment areas for convenience shopping exist within the town centre. For example, for residents near the

²⁵ Local Insight / Oxford Consultants for Social Inclusion (OCSI) (2021). Local Insight profile for 'Finsbury Park' area, available from: [Local Insight profile for 'Finsbury Park' area LI - Islington Council](#)

south of Blackstock Road or north of Stroud Green Road, the Finsbury Park, Nags Head and Angel PSAs are all a considerable distance away. These parts of the town centre outside of the PSA contain a number of key services including convenience shops, butchers, pharmacies and opticians. The loss of these units would have a significant impact on the local community. This is particularly pertinent considering that 18% of people in Finsbury Park ward have a limiting long-term illness and 69% of households do not have a car. Not everyone has the ability to travel to meet their convenience shopping needs so protecting existing retail provision in the borough is very important, especially bearing in mind Islington's significant population density.

Heritage value

93 Conservation Area coverage of Finsbury Park Town Centre is limited to a small section of Stroud Green Road. Numbers 117 to 181 Stroud Green Road are within the Stroud Green Conservation Area. The Stroud Green CADG state that 'often the best use for a building is that which it was designated for and retaining the variety of uses is very important to the area. Public houses, shops and workshops should be kept in appropriate uses which will not diminish their special interest'. The council considers that retaining the use of commercial premises can be as key to preserving the character of a conservation area as protecting the appearance of the premises. However, it is felt that the CADG on their own may not provide sufficient justification to protect the use of important Class E premises. As such, Class E premises sitting within the Stroud Green Road Conservation Area are included in the proposed designation.

The potential impacts of Class MA on Finsbury Park Town Centre

94 The council has assessed the sites within the town centre individually against the criteria in the Class MA legislation and the requirements of NPPF paragraph 53. Listed buildings have been excluded from the designation, as have premises that are not in Class E use and premises in Class E use which are not considered as vulnerable to conversion under Class MA due to their layout or design. In this way the proposed designation has been kept to the smallest possible geographical area in accordance with paragraph 53 of the NPPF.

95 However, the detailed town centre assessment, as provided in Part 3 of this Appendix, found that unrestricted Class MA changes of use would have wholly unacceptable adverse impacts on the vitality and viability of the town centre. The likely impacts of unrestricted Class MA permitted development rights on Finsbury Park Town Centre are:

- The widespread loss of premises in town centre use in the PSA – the core shopping area of the town centre - would result in a loss of economic value and an erosion of the status of the Town Centre, creating a wholly unacceptable adverse impact. This is recognised in NPPF paragraph 53 which suggests the loss of the essential core of a PSA 'would seriously undermine its vitality and viability'.

- Due to its size, there are distinct catchment areas for convenience shopping within Finsbury Park town centre outside of the PSA that provide retail and service opportunities essential to the wellbeing and amenity of residents such as local convenience shops, pharmacies and opticians. The loss of these premises resulting in a reduction in the range of goods and services available for members of the local and wider community may particularly affect some of the area's least well-off residents in the borough's most deprived ward. This is particularly concerning given the low level of car ownership amongst residents - not everyone is able to travel freely to meet their everyday shopping needs.
- Nearly 42% of Finsbury Park's residents were born outside of the UK. The cultural diversity of the area's population is reflected in its businesses. For example, the Local Plan refers to Finsbury Park's distinct food scene 'including a wealth of restaurants catering for North African and East African cuisine'. The availability of space for socialising and sharing cultures is important. Unrestricted Class MA PD rights could result in the loss of businesses that meet the needs of the local community.
- The loss of retail and service floorspace would cause a wholly unacceptable impact on the wellbeing of the area, particularly given the reliance on retail employment in the local resident population.
- Vacancy rates in all parts of the town centre are low and retail units have a high turnover rate, demonstrating a continual demand for these types of units. This lack of vacancy, as illustrated in Table 1, demonstrates that the Class MA PD right is not required in this location as there is sufficient flexibility and demand within the E Use Class to ensure the ongoing success of the town centre.
- The potential for piecemeal development of sites allocated by the borough for comprehensive redevelopment and the delivery of significant amounts of retail, business and residential floorspace, removing the council's ability to achieve its long-term aspirations for the growth of the area.

The proposed Finsbury Park Town Centre Article 4 Direction

96 The proposed Article 4 Direction for Finsbury Park Town Centre is illustrated on Figure 11. To protect the vitality and viability of the town centre and ensure it can continue to meet the retail and service needs of the local community it is proposed to designate a number of Class E units that are considered particularly vulnerable to conversion. The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Finsbury Park Town Centre from Class MA changes of use.

Smallest possible geographical area

97 The Council is not proposing a blanket approach to designation and has assessed the sites within the town centre individually. Listed buildings have been excluded from the designation, as have premises not in Class E use and some premises in Class E use which

are not considered as vulnerable to conversion under Class MA due to their layout, design or location. Details of the premises excluded from the proposed Direction are provided in Part 3 of this Appendix. In this way the proposed designation has been kept to the smallest possible geographical area in accordance with paragraph 53 of the NPPF whilst still being comprehensive enough to protect the vitality and viability of the town centre.

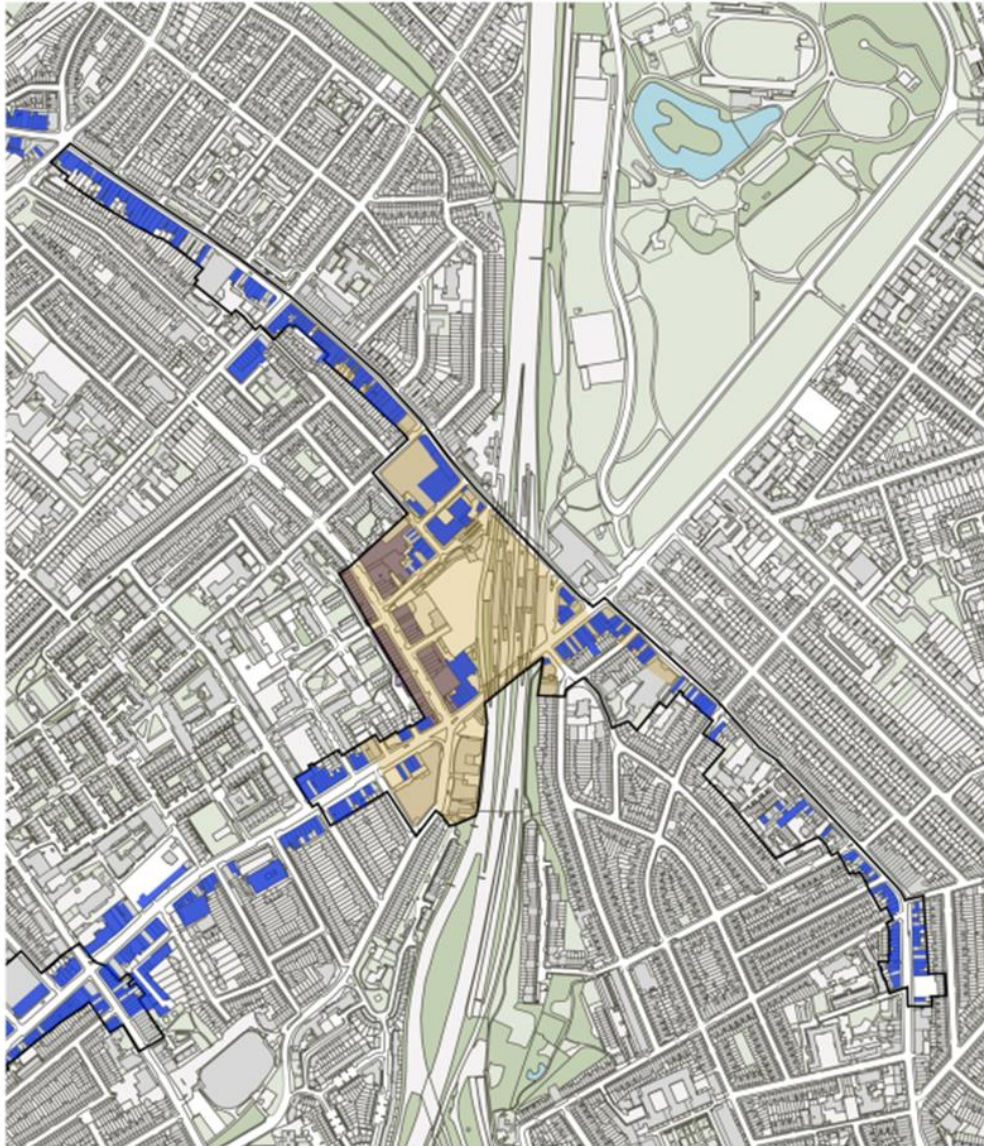
Wholly unacceptable adverse impacts

98 The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Finsbury Park Town Centre from Class MA changes of use. As set out above these include:


- The loss of premises within the PSA – the essential core of the shopping area - seriously undermining the vitality and viability of the town centre as recognised in paragraph 53 of the NPPF.
- The loss of premises outside the PSA in a town centre that serves distinct catchment areas, both due to its length – the northern end of the town centre on Stroud Green Road is a long way from its southern limit on Blackstock Road - and the diversity of its community. Outside of the PSA the town centre contains key services including convenience shops, butchers, pharmacies and opticians. The loss of these uses would have a significant impact on the local community, particularly bearing in mind the prevalence of limiting long-term illness amongst residents of Finsbury Park ward (18%) and the fact that 69% of households do not have a car.
- The loss of premises providing employment opportunities in the most deprived area of Islington where income and employment deprivation is a significant issue, and the retail sector is the second largest employer.
- The loss of premises used for socialising and sharing cultures in a location where nearly 42% of residents were born outside of the UK, and businesses have grown up to reflect the area's cultural diversity. Class MA PD rights could result in the loss of businesses that meet the cultural needs of the local community.
- Class MA could deliver a relatively small amount of new housing at the expense of the council's ability to achieve its strategic objectives for the economic growth and development of Finsbury Park. The area is extremely well connected with the potential to support the strategic economic role of the CAZ, but some site assembly will be needed to meet the Local Plan's aspirations for the delivery of approximately 14,000sqm retail floorspace, 16,500sqm office floorspace and 414 new homes.

Figure 11: Proposed Finsbury Park Town Centre Article 4 Direction

Finsbury Park Town Centre proposed Tranche 2 article 4 direction



Key for Article 4 Direction Town Centres

-  Tranche 2 (proposed) Article 4 area
-  Tranche 1 (confirmed) Article 4 area
-  Town Centres
-  Primary Shopping Areas
-  CAZ
-  Islington Borough Boundary

Archway Town Centre

Context and evidence

- 99 In the north-west of Islington, Archway is a District Town Centre located at the intersection of five roads: Holloway Road, Highgate Hill, Junction Road, Archway Road and St. John's Way. The heart of the town centre focuses on Archway Underground Station and Navigator Square, a new public open space made possible by the removal of the Archway gyratory in 2017. The Town Centre has strong convenience retail and retail services provision for a centre of its size, although there is a limited comparison goods offer, particularly in terms of national multiple stores and the night-time economy offer could be improved.
- 100 As detailed in Part 1 of this Appendix, Archway is subject to an Area Spatial Strategy, Policy SP7, in Islington's Local Plan. The overarching aim of Policy SP7 is to support the commercial function of the area, particularly the retail function of 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 the expansion of night-time economy uses, dependent on mitigation of any adverse impacts, particularly noise and disturbance for residents and businesses.
- 101 Archway Town Centre's main retail frontages are located on Junction Road, between Archway Underground Station and Monnery Road; and Holloway Road, between Archway London Underground Station and Upper Holloway London Overground Station. The town centre has a good level of accessibility by public transport – as well as the tube and overground stations it is well served by buses.
- 102 Eight sites in Archway Town Centre are allocated in the Local Plan and anticipated to provide 7,876sqm of office floorspace, 482sqm of retail floorspace and 138 additional homes over the lifetime of the plan²⁶.
- 103 As with all parts of the borough, Archway is densely populated and there are a number of council estates in close proximity to the town centre including Girdlestone Estate, Tremlett Grove Estate, Hargrave Park Estate, Bovington Close Estate and Miranda Estate. The Town Centre provides a focal point for the surrounding residential community given the provision of retail and services, transport connections, night-time economy uses, places of worship and a leisure centre with a swimming pool.
- 104 There are a number of Eastern Mediterranean businesses including bakeries, barbers, grocery shops and cafes within the town centre but outside of the PSA. The Junction Road non-PSA frontages includes estate agents, accountants, dry cleaners and other essential services; along Holloway Road they include vape shops, beauty salons, estate agents, cafes, and shops for carpets and interior design. These fine grain frontages and

²⁶ LBI (2023). Islington Local Plan: Site Allocations, available from: [Islington Council Local Plan: Site Allocations](#)

the uses within them contribute strongly to the variety and critical mass of the Town Centre. They benefit from the proximity to Archway Station, experience limited vacancy and provide a palpable sense of vibrancy to the Town Centre as a whole. The wide range of services they provide for the local community, including employment opportunities and places to socialise, would be impacted by unrestricted Class MA.

- 105 The majority of Archway Town Centre sits within Junction ward, with a small section from 710-722 Holloway Road falling within Tollington ward. Junction ward has a higher percentage of pensioner households than the Islington average (13.2% compared to 10.3%) as well as a higher percentage of residents with a limiting long-term illness (16.8% compared to the Islington average of 15.7%)²⁷. This suggests that there is a large number of older residents and residents with disabilities in the ward for whom travelling further to access everyday essential items and services may represent a significant challenge. The potential diminution of convenience retail and service opportunities resulting from the unrestricted operation of the Class MA PD right would have a wholly unacceptable adverse impact on the amenity and well-being of these residents in conflict with the intentions of NPPF paragraph 53(b).
- 106 A significant amount of office space in Archway Town Centre was converted to residential use under Class O PD rights, with a particular impact being felt in the area immediately surrounding Archway Underground Station. In this area the former offices of Hill House (a 13-storey building) and Archway Tower (a 17-storey building) were converted to residential use resulting in the loss of 8,256sqm and 5,900sqm of office floorspace respectively. To underline the significance of the losses, a total of 25,974 sqm of office floorspace was lost from the borough's town centres in the period 2015/16 to 2017/18, of which 21,388sqm (82%) was from Archway Town Centre²⁸. This has reduced the critical mass of the commercial centre, threatening its economic vibrancy. The Local Plan Spatial Strategy and site allocations for Archway set out the Council's approach to addressing this damage, delivering commercial development at scale and securing the future of the Town Centre so it can continue to meet the needs of the local community. The unfettered application of Class MA PD Rights threatens the strategic plan for the area.
- 107 In July 2023 Archway was designated a Creative Enterprise Zone (CEZ) by the Mayor of London. The CEZ initiative seeks to help creative businesses start-up and grow as London's creative industries contribute £52 billion per year to the UK economy and provide 1 in 6 jobs across the city²⁹. CEZ designation means the town centre will receive funding and support to make its creative economy more resilient and sustainable through affordable workspaces, work experience opportunities and practical training for creatives. The area already contains over 100 creative businesses and operators and the council

²⁷ Local Insight / Oxford Consultants for Social Inclusion (OCSI) (2021). Local Insight profile for 'Junction' area, available from: [Community Insight profile report \(islington.gov.uk\)](https://www.islington.gov.uk/~/media/2021/06/Community-Insight-profile-report-islington.gov.uk)

²⁸ Islington Council (2021), Annual Monitoring Report 2016-2018, available from: [20191030annualmonitoringreport20162018.pdf \(islington.gov.uk\)](https://www.islington.gov.uk/~/media/2019/10/30/annualmonitoringreport20162018.pdf)

²⁹ London Councils (2020). Creative Enterprise Zones. Accessed on 03/05/2024 from: [Creative-enterprise-zones.pdf \(londoncouncils.gov.uk\)](https://www.londoncouncils.gov.uk/~/media/2020/03/creative-enterprise-zones.pdf)

plans to use the funding it receives from the Mayor to support the development of 1,200sqm of new creative affordable workspaces; encourage a 15% increase in the amount of creative businesses in the area; and assist 300 young people to access opportunities in creative careers³⁰.

- 108 Archway is home to a wide range of independent grassroots venues and maker spaces, five community centres and a busy community library. As a CEZ the council's focus will be on protecting and growing Archway's cultural sector in a sustainable and planned way, with the aim of creating permanent spaces for creative organisations. The need for permanent space has been identified to provide security for local arts organisations to operate and expand within a context of rising rents, with several groups such as Kogan's Academy, Bomb Arts Factory and Ambitious Academy requesting permanent space to be able to stay in Archway. The Mayor of London has a Culture and Community Resources at Risk Register which includes six organisations within the Archway CEZ; the need for permanent artist studio space is a key issue for many. Unrestricted Class MA PDR could undermine the council's work to secure the 1,200sqm of affordable workspace that will give creative businesses more security and enable them to support work placements and skills training for young people.

Heritage value

- 109 The St John's Grove Conservation Area covers Archway Close and most of Junction Road. The CADG states 'there are shopping and commercial frontages on both sides of Junction Road and the Archway Island site which provide local services and are an important contribution to the character of the area. Generally, the Council recognises that often the best use for a building is that which it was designed for and will seek to retain public houses, shops and workshops in appropriate uses which will not diminish their special interest'. It is considered that this wording is not strong enough to resist the loss of Class E units under the Class MA legislation on the basis of land use and impacts on activity and vibrancy but may be more effective in protecting physical appearance. Therefore, Class E units sitting with the St. John's Grove Conservation Area have not been excluded from the proposed designation unless there was another reason for exclusion.

The potential impacts of Class MA on Archway Town Centre

- 110 The Council has assessed the sites within the town centre on a site-by-site basis against the criterion set out in the Class MA legislation and in relation to the requirements of NPPF paragraph 53. Listed buildings have been excluded from the designation as have premises not in Class E use and some Class E uses which are not considered as vulnerable to conversion under Class MA due to their layout or design. In this way the proposed

³⁰ Islington Council (2023). Archway made a Creative Enterprise Zone to boost the local economy. Accessed on 03/05/24 from: [Archway made a Creative Enterprise Zone to boost the local economy \(islington.media\)](https://www.islington.gov.uk/news/2023/03/archway-made-a-creative-enterprise-zone-to-boost-the-local-economy)

designation has been kept to the smallest possible geographical area in accordance with paragraph 53 of the NPPF.

111 Nevertheless, it is considered that the unrestricted operation of Class MA PDR would have a wholly unacceptable adverse impact on the vitality and viability of the town centre. The likely impacts on Archway Town Centre are:

- A significant amount of office space in Archway Town Centre was converted to residential use under Class O PD rights. This has reduced the critical mass of the commercial centre, threatening its economic vibrancy. The council has developed a Spatial Strategy for the area which intends to support its commercial function through the development of 7,800sqm of office floorspace and 482sqm of retail floorspace, and deliver significant residential growth in the form of 138 new homes. By introducing residential units in an unplanned way, Class MA could seriously harm the council's ability to deliver its strategic objectives for the town centre.
- The widespread loss of premises in town centre use in the PSA – the core shopping area of the town centre - would result in a loss of economic value and an erosion of the status of the Town Centre, creating a wholly unacceptable adverse impact. This is recognised in NPPF paragraph 53 which suggests the loss of the essential core of a PSA 'would seriously undermine its vitality and viability'.
- Premises outside of the PSA have a fine grain pattern and are occupied by small businesses, providing social and economic value as well as character and distinctiveness. These premises are generally in period buildings and would take limited time, expertise and investment to convert to residential use resulting in the loss of units that respond to local needs, as opposed to the chains catering to general needs in the PSA. These units are generally cheaper to rent which facilitates small businesses in their start-up phase and provides space for premises which support the transfer of skills e.g., hairdressing or cooking. The number of businesses catering to the Eastern Mediterranean community in the town centre is likely to represent an important cultural and social resource to members of that community, as well as contributing to the vibrancy and vitality of the centre. The loss of these units would represent a wholly unacceptable adverse impact to the local community.
- Archway town centre is almost entirely located within Junction ward, which has a percentage of pensioner households and residents living with a limiting long-term illness above the borough averages. It is considered that the unrestricted operation of Class MA PDR could lead to the loss of essential convenience shops and services that would have an unacceptable impact on the well-being and amenity of members of the community who may not easily be able to travel to meet their needs elsewhere.

- Archway's CEZ designation relates to the whole of the town centre, not just the PSA, and underlines its role as a burgeoning creative quarter. The council is putting significant funding of its own into the town centre to ensure that the funding and support secured from the Mayor of London helps it to achieve its goals of delivering affordable creative workspace; increasing the number of creative organisations in the CEZ by 15%; and providing work opportunities in the creative industries for 300 young people. The loss of premises to Class MA PDR that could otherwise have helped the council to achieve these goals and support an industry that is of such value to London and the UK represents a wholly unacceptable adverse impact.

The proposed Archway Town Centre Article 4 Direction

112 The proposed Article 4 Direction for Archway Town Centre is shown on Figure 12. The designation is necessary to avoid wholly unacceptable adverse impacts to Archway Town Centre from Class MA changes of use.

Smallest possible geographical area

113 As with the other town centres, the council is not proposing a blanket approach to designation and has assessed Archway Town Centre on a unit-by-unit basis. Listed buildings; all uses outside of Class E; infrastructure that is not within Class E; and buildings that would require operational development to be used for residential purposes have all been excluded from the proposed designation. In this way the council has ensured that the designation applies to the smallest geographical area possible whilst still being appropriate to protect the vitality and viability of the area. This more detailed assessment is provided in Part 3 of this Appendix.

Wholly unacceptable adverse impacts

114 The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Archway Town Centre from Class MA changes of use. As set out above these include:

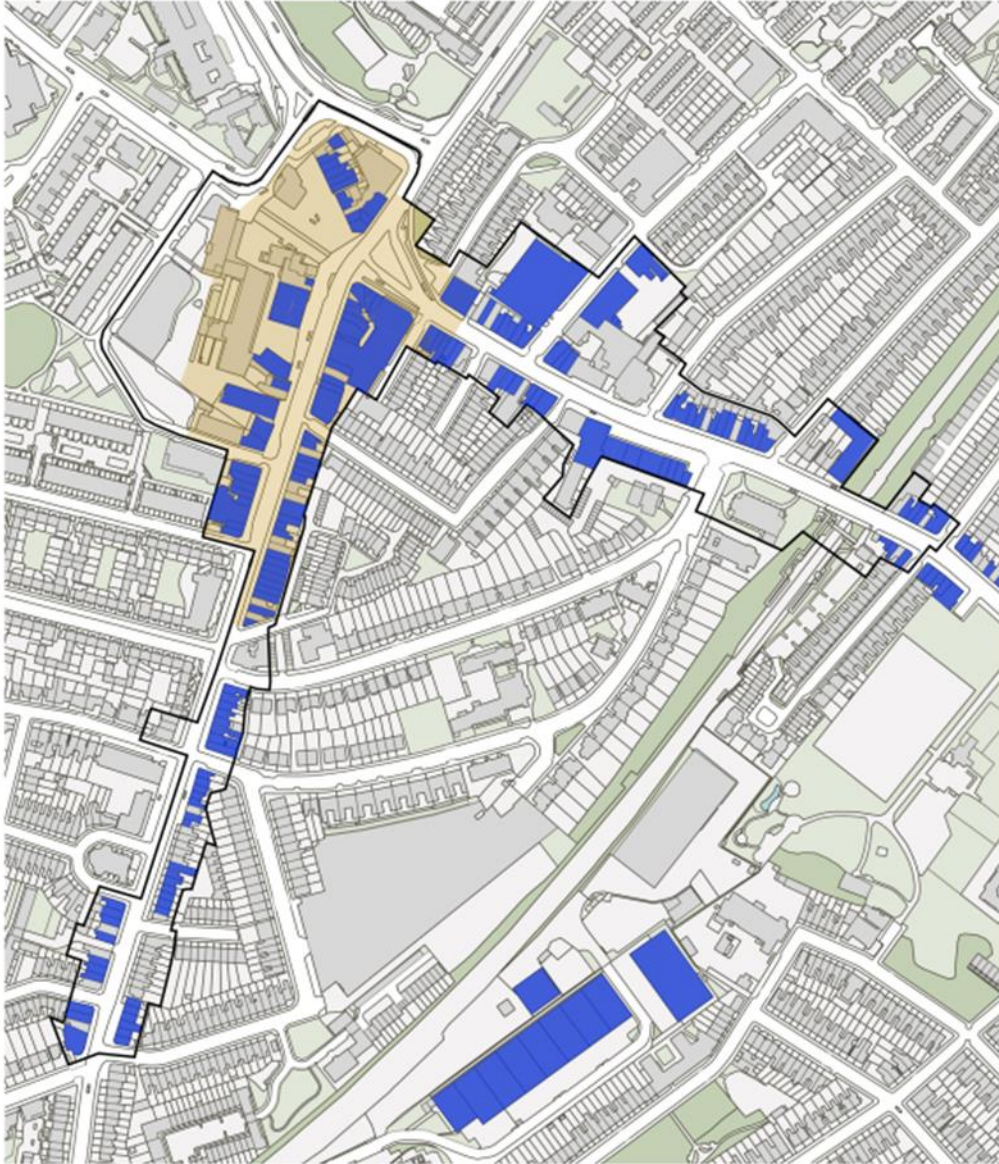
- The further loss of office floorspace from the town centre, in the context of already very significant losses over the last 10 years through Class O PDR, in opposition to the council's plans to protect and enhance its commercial function, as articulated through the Local Plan policies for the Spatial Strategy area and the site allocations committed to delivering a significant increase in office, retail and leisure and residential uses in Archway.
- The loss of premises within the PSA – the essential core of the shopping area - seriously undermining the vitality and viability of the town centre as recognised in paragraph 53 of the NPPF.
- The loss of premises outside of the PSA that provide key services necessary for day-to-day community life, including banks, post offices and grocery shops. The town

centre has two quite distinct shopping areas – Junction Road and Holloway Road – that serve different catchment areas and meet the needs of different members of the community.

- The loss of premises outside of the PSA that provide space for small businesses such as hairdressers and cafes to develop and enable skills such as hairdressing and cooking to be passed on. The number of businesses catering to the Eastern Mediterranean community in the town centre is likely to represent an important cultural and social resource to members of that community, as well as contributing to the vibrancy and vitality of the centre. The loss of these units would represent a wholly unacceptable adverse impact to the local community.
- The loss of premises that cater to the cultural and social needs of the surrounding community.
- The potential for Class MA to stymie attempts to capitalise on Archway's CEZ designation and deliver an increase in affordable workspace that will support existing creative businesses and encourage new businesses to locate in the area, bringing employment opportunities and vitality to the area.

Figure 12: Proposed Archway Town Centre Article 4 Direction

Archway Town Centre proposed Tranche 2 article 4 direction



Key for Article 4 Direction Town Centres

- Tranche 2 (proposed) Article 4 area
- Tranche 1 (confirmed) Article 4 area
- Town Centres
- Primary Shopping Areas
- CAZ
- Islington Borough Boundary

Conclusion

115 The NPPF states that 'planning policies and decisions should support the role that town centres play at the heart of local communities' (paragraph 90). The proposed Town Centre Article 4 Directions have been informed by local evidence and knowledge following an extensive surveying and mapping process. They are considered necessary to support the continuing role of Islington's town centres at the heart of their communities and avoid wholly unacceptable adverse impacts on the borough's residents, workers and businesses.

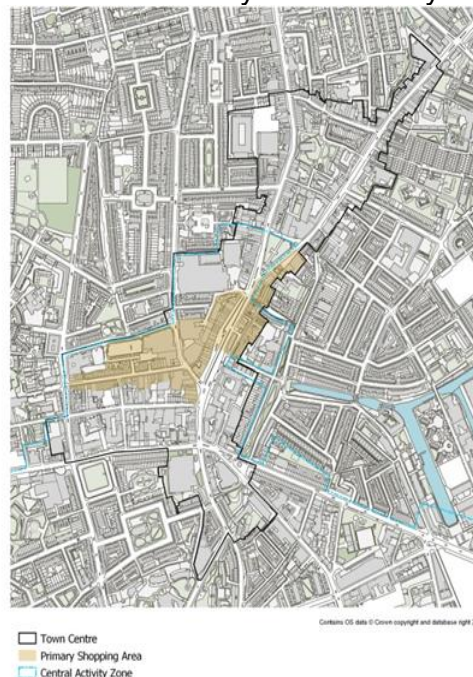
Part 3: The detailed assessment templates for each town centre

116 The four detailed Area Assessment templates provided below set out the different economic and employment, social, heritage and Class MA considerations for each of the town centres. Specific analysis of the wholly unacceptable impacts of the Class MA PD right and consideration against the NPPF requirements for Article 4 Directions are expanded upon and demonstrate the need for an Article 4 Direction in each case. The Area Assessments have been used as a tool in the evidence gathering process by identifying the uses, specific businesses, listed buildings and conservation areas that have contributed to the extent of the Article 4 Direction.

Area Assessment: Angel Town Centre (outside of the CAZ)

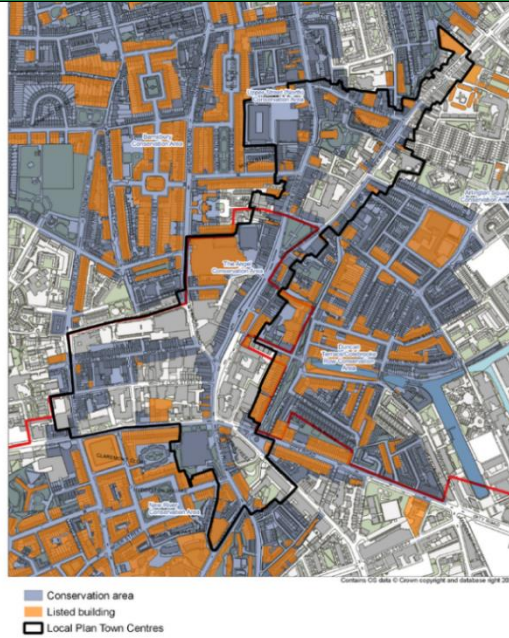
Area Assessment: Angel Town Centre (outside of the CAZ)

Map 1: Angel Town Centre boundary with Primary Shopping Area (PSA)

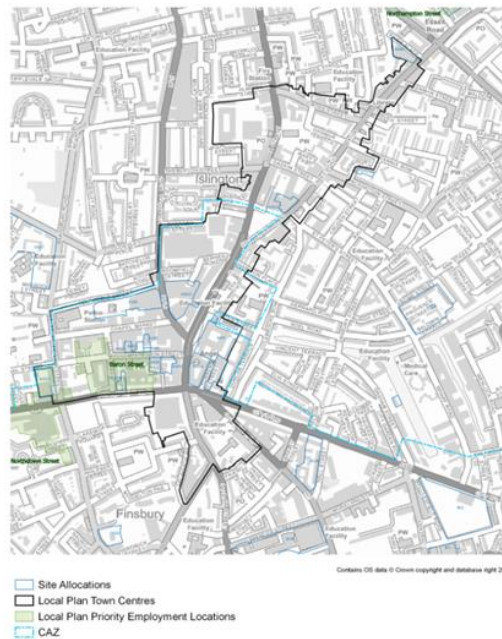


Map 2: Heritage context

Area Assessment: Angel Town Centre (outside of the CAZ)

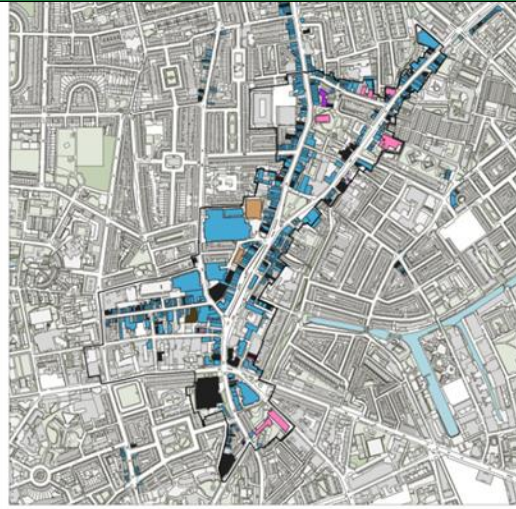


Map 3: Site allocations and Priority Employment Locations (PELs)



Map 4: Retail Survey 2023

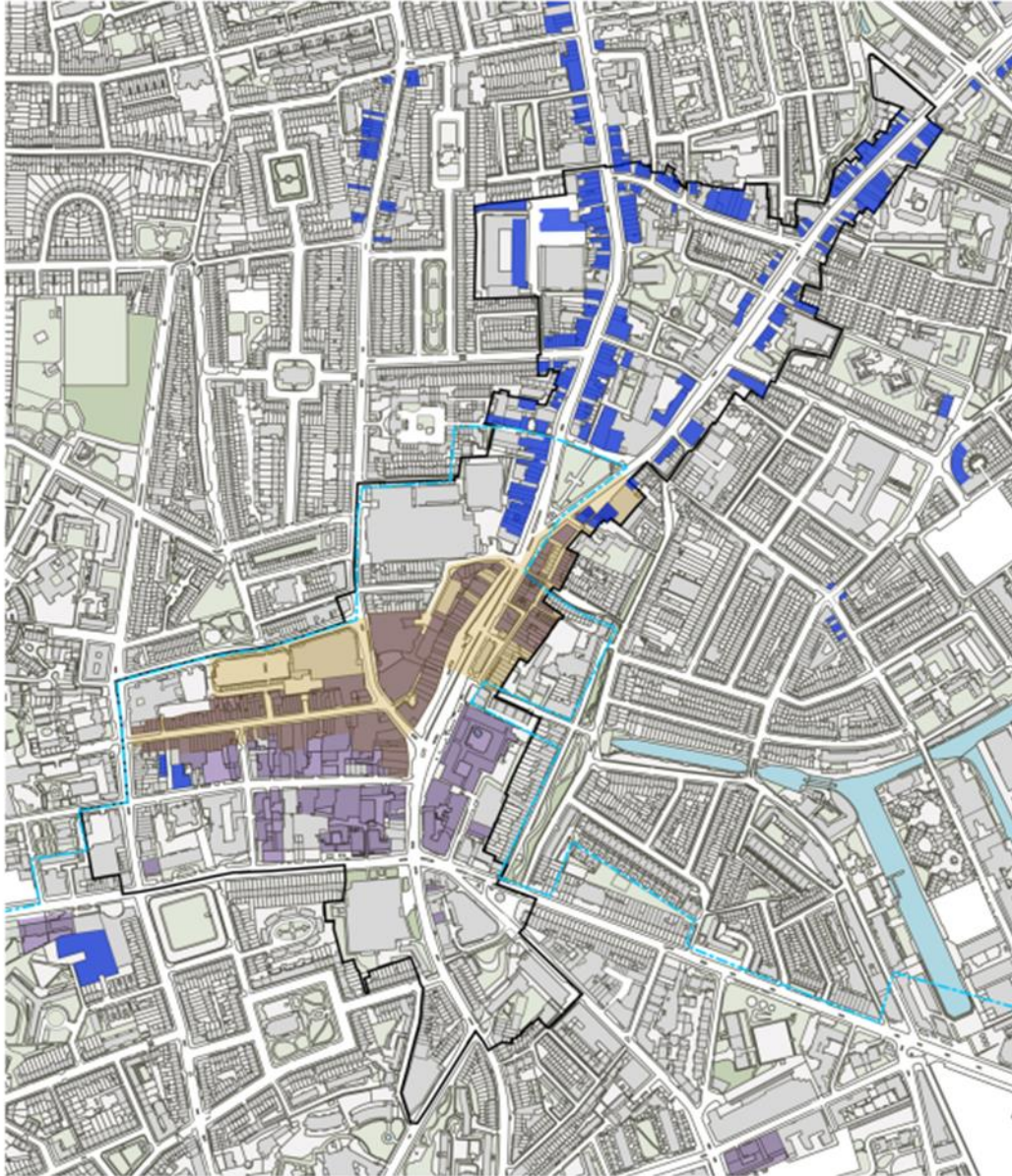
Area Assessment: Angel Town Centre (outside of the CAZ)



- RetailSurvey2023
- B8
 - C1
 - E(a),E(b),E(c),E(d),E(e),E(f),E(g)
 - F1(b),F1(d),F1(e),F1(f),F1(a)
 - SG
 - Local Plan Town Centres

Map 5: Proposed Angel (outside of the CAZ) Article 4 Direction Area

Area Assessment: Angel Town Centre (outside of the CAZ)



Key for Article 4 Direction Town Centres

- Tranche 2 (proposed) Article 4 area
- Tranche 1 (confirmed) Article 4 area
- Town Centres
- Primary Shopping Areas
- CAZ
- Islington Borough Boundary

Area Assessment: Angel Town Centre (outside of the CAZ)

Description and context of centre:

Angel is Islington's largest town centre. It is located in the centre of the borough. The majority of the town centre is located within the Central Activities Zone (CAZ). The section outside of the CAZ is clustered around Upper Street, Cross Street and Essex Road. The predominant uses of the area are retail, leisure, office and residential uses. The shop units are located in a range of buildings from the Victorian era onwards. Many shops have flats, and some have offices, on their upper floors. The surrounding area is largely residential with a mix of retail, leisure and office uses in the rest of Angel town centre and the Upper Street LSA.

The area of Angel town centre (outside of the CAZ) is located north of Angel Underground station, and Upper Street is well served by bus routes. Pedestrian access to the surrounding residential areas is good.

Upper Street and Cross Street have high quality public realms with relatively wide pavements, street trees and cycle storage dispersed throughout. Essex Road has a lower quality public realm. The main open green space is St Mary's Church Gardens which has seating and provides a space to socialise and meet. There is also seating outside of a number of businesses on Essex Road and Upper Street. For example, 84-86 Essex Road (The Alpaca), 305-307 Upper Street (GAIL's) and 1 Islington Green (Fox on the Green).

Economic considerations:

- Angel is the most diverse of Islington's town centres and has multiple functions.
- Angel has seen significant 'overspill' in recent times from the traditional core markets in the City and West End as they have expanded. The area serves an important purpose in supporting London's strategic business role.
- Offers essential town centre retail and services to local and wider communities, including: newsagents, barbers/ hairdressers, butchers, fishmongers, dentists, chemists and opticians. Also provides comparison goods retail, a strong cultural offer supported by a strong food and drink offer, a cluster of furniture and interior design businesses, and a smaller cluster of production studios.
- Specialist clusters:
 - Furniture and Interior Design: Rothschild & Bickers; Tribe Rugs; Little Greene; Dar Leone; Farrow & Ball; Living Space and Partners; Tiles etc; Fired Earth; Aria One Six Eight; Twentytwentyone; Adventures in Furnitureland; Sara Leonor Studio; Coexistence.
 - Cultural Venues: Little Angel Theatre; Kings Head Pub and Theatre; Collins Theatre; Screen on the Green.
 - Production Studios: Angel Studios (Recording studio); Cross Street Studio (TV and Film studio); Fulwell 73 (Production company).
- Majority of Class E units are in retail use (55%) and café/ restaurant use (21%). Most Class E units are independent businesses. Range of businesses including: local convenience; comparison goods; cafes; restaurants; delis; estate agents.
- There are some chains, the majority of which are concentrated on Upper Street, with some dispersed throughout Cross Street and Essex Road, including: Nando's, Sainsbury's, Waterstones, Planet Organic, Sweaty Betty, Whistles, F45 Training, and Savills.
- Local Plan recognises Angel's success as a major town centre; supports additional employment growth in retail and other service industries; protects business floorspace from change of use; resists any significant introduction of residential uses within the town centre; protects and encourages arts and entertainment uses.
- The 2017 Retail and Leisure Study describes Angel as having a strong and varied convenience offer, as well as a high quality comparison goods provision, with a large number of independent stores which complement the high street shops and help to diversify the comparison offer. The RLS also states that Angel has a very strong service provision. Leisure services are the best represented, with a large proportion of

Area Assessment: Angel Town Centre (outside of the CAZ)

cafes, restaurants and bars/pubs which complement the retail offer and encourage a strong night-time economy.

- Local Plan spatial policies are aimed at supporting commercial function of the area, particularly its retail function.
- Cultural uses are also a priority of the spatial strategy.
- Local Plan states that residential development is acceptable on specifically allocated sites and on upper floors where it does not detract from commercial function of centre;
- Local Plan says that proposals for business floorspace should be directed to suitable locations in the town centre (directed to upper floors). Net loss of business floorspace will be resisted. Vacancy is low in the town centre: 2005 - 10%; 2010 - 8.4%; 2016 – 6.4%; 2023 – 3.4% (most recent vacancy figure relates specifically to the part of Angel Town Centre outside of the CAZ).

Area Assessment: Angel Town Centre (outside of the CAZ)

Social considerations:

- Relatively high levels of deprivation; Angel town centre (outside of the CAZ) is split between two wards - St Mary's and St Peter's; the indices of multiple deprivation (2019) place the area between the country's 30% and 40% most deprived neighbourhoods;
- A number of housing estates are located within the town centre including Cumming Estate, St Mary's Path Estate, Devonshire House, and Providence Court;
- Designated a Major Town Centre and an NT2 night-time economy in the London Plan. Designated a Cultural Quarter in the Local Plan.
- Town centre provides focal point for the surrounding residential community with retail and services, transport connections, cultural and night-time uses, community centres, places of worship, and medical uses;
- Unrestricted Class MA would reduce the following:
 - range of goods and services for members of the local and wider community;
 - retail and service employment opportunities, including apprenticeships;
 - agglomeration benefits for local businesses.

Key sites and allocations:

Two site allocations in the Local Plan:

- 1) 161-169 Essex Road: in Sui Generis use (events venue for religious services and other events), allocated for a mix of retail, culture, assembly and leisure, and/or place of worship use with some residential use (AUS8).
- 2) Proposed Collins Theatre, 13-17 Islington Green: currently vacant (site developed for residential, retail and theatre use - not yet operational), allocated to bring the permitted theatre into use (AUS11).

Both allocations are relatively specific, enabling retail, culture, assembly and leisure, and possibly place of worship use, with some elements of residential floorspace. The Local Plan is supportive of retail, culture and residential uses in town centres, with the need to carefully balance the needs of competing land uses to produce successful and sustainable town centres.

Heritage designations:

- The majority of the town centre (outside of the CAZ) sits within the Upper Street (North) Conservation Area, Cross Street Conservation Area, and a small part of the Angel Conservation Area.
- The most notable listed building One Grade II* listed building (161-169 Essex Road) and a number of Grade II listed buildings are dispersed throughout the town centre (outside of the CAZ) including:
 - 7-35 Cross Street [odd];
 - 115 Essex Road;
 - 311 Upper Street;
 - 92 Upper Street.
- Most of the Class E units are in CA. Some of their shopfronts are of heritage value, however others are not. Impact on use/ activity would be main harm.
- Upper Street (North) CA Design Guide states: “The predominant uses of the area are retail and related uses, with residential on upper floors... The Council will seek to maintain the lively retail nature of the area and will not normally grant permission for scheme which harm this established mixed use character.”
- A number of shopfronts, including 135-136 Upper Street (Whistles), 324 Upper Street (Nando's) and 16 Essex Road (Jolene), are identified as “Shopfronts to be retained – shopfronts in the area provide a visual focus and interest and are an important factor in creating the character of the area” (para. 18.24). Schedule 18.3 of the CA Design Guide lists all protected shopfronts.
- Cross Street CA Design Guide also seeks to retain a number of shopfronts, including 34 Cross Street (Fired Earth), 88 Essex Road (Steve Hatt Fishmongers) and 96 Essex Road (James Elliott Butchers). Para. 13.4 lists all protected shopfronts.
- 51 Cross Street is an example of a shopfront which is protected by the CA Design Guide, but has already been converted to residential use. This demonstrates that the CA guide is more effective in protecting physical appearance than land use. The generic wording above is not considered to be strong enough to resist loss of Class E on basis of activity/ vibrancy alone. Wording in the “shopfronts to be retained” section highlights quality of the physical works but does not link the shopfront to the use of the unit.
- Although the majority of Angel town centre (outside of the CAZ) is located within conservation areas, the CA Design Guide is more effective than protecting the physical appearance of shopfronts than the land use. It is considered that the generic wording of the CA Design Guides is not strong enough to resist loss of Class E. Without

Area Assessment: Angel Town Centre (outside of the CAZ)

protection, the business and commercial elements are at risk of conversion under Class MA, which is likely to cause a wholly unacceptable impact.

Area Assessment: Angel Town Centre (outside of the CAZ)

How is it the smallest geographical area possible?

All buildings outside of Class E have been identified and excluded, including:

- Pubs and bars - including The Bull; Fox on the Green; The Kings; The Brougham; Wenlock and Essex; Old Queen's Head; The Alpaca; The Green Man; Slim Jim's Liquor Store; The Bar With No Name; Homeboy;
- Beauty salons - Pre-; Enhance Within Beauty; Premier Beauty Academy; EverySkin; Nail and Brow Bar; Essex Nails and Beauty; Islington Nails;
- Community centres - St Mary's Community Centre; Chabad-Lubavitch of Islington (Jewish Synagogue and Community Centre);
- Theatres - Little Angels Theatre; Kings Head Pub and Theatre;
- Churches - St Mary's Church; Cross Street Baptist Church.

All listed buildings have been identified and excluded including:

- 311-312 Upper Street;
- 161-169 Essex Road;
- 22, 24, 26 & 28 Cross Street.

Open spaces - such as St Mary's Church Gardens - have been identified and excluded.

In addition, buildings in Class E have been excluded from the Direction. These include:

- Block D & Block B of Islington Square. Excluded because it has been determined that they could not be easily subdivided into residential units. Ground floor units have been designed specifically for commercial use. Floor to ceiling windows mean the units could not be easily converted to residential use under PDR.
- Tesco, 25 Islington Green. Excluded because it has been determined that the site could not easily be converted and subdivided into residential units. The building features inbuilt air-conditioning, refrigerators and a fully glazed shopfront, which would limit the opportunity to convert to residential under PDR.

The Direction Area has been reduced to the smallest geographical area possible in accordance with NPPF paragraph 53.

Area Assessment: Angel Town Centre (outside of the CAZ)

How is it necessary to avoid wholly unacceptable adverse impacts?

- Types of premises are largely ground floor retail units with office and residential uses at upper floors. These types of units are particularly susceptible to permitted development rights, due to the existing mix of business, commercial and residential floorspace.
- The area's offices have taken the 'overspill' from the traditional core of the City and West End in recent years, serving an important purpose in supporting London's strategic business role which could be undermined by Class MA.
- The area is a designated Cultural Quarter in the Local Plan and NT2 night-time economy in the London Plan. Class MA could lead to the loss of uses that attract visitors to the town centre and contribute to its vitality and viability to the benefit of both the local and wider London economies.
- Class E units are generally in period buildings and do not have inbuilt air-conditioning, lighting or fully glazed shopfronts. Limited investment/ expertise/ time required to convert.
- Vacancy rates are low and retail units have a high turnover rate, demonstrating a continual demand for these types of units in Angel town centre.
- Town centre contains a number of key services including local convenience, fishmongers, butchers, pharmacies, chemists and opticians, as well as a mental health rehab day centre. The loss of these units would have a significant impact on the local community.
- Clusters of interior design businesses and production studios which may be undermined if units are converted.
- Piecemeal conversion of sites including sites allocated in the Local Plan could restrict the council's ability to deliver its strategic objectives for the area to the detriment of residents, businesses and the borough as a whole.
- Unrestricted Class MA would therefore result in wholly unacceptable harmful impacts and a targeted A4D is necessary to mitigate these impacts.

Area Assessment: Angel Town Centre (outside of the CAZ)

Recommendation:

The recommendation is for partial designation of the town centre. The majority of the town centre should be protected with the exception of the Class E units listed above.

The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Angel Town Centre from Class MA changes of use, as detailed above.

Area Assessment: Nag's Head Town Centre

Area Assessment: Nag's Head Town Centre

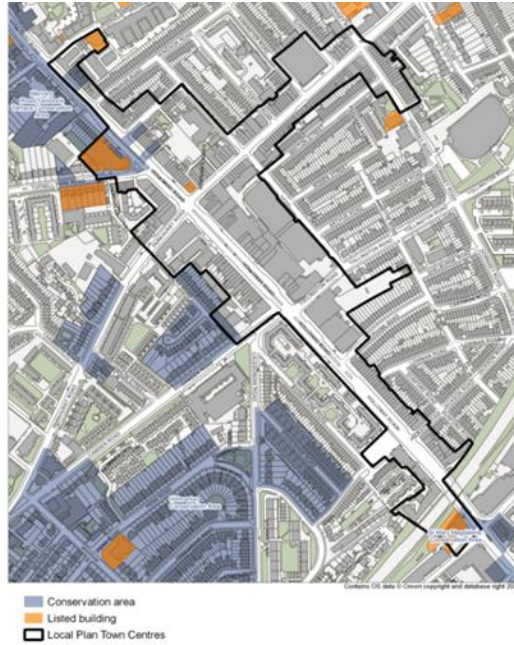
Map 1: Nag's Head Town Centre boundary with Primary Shopping Area (PSA)



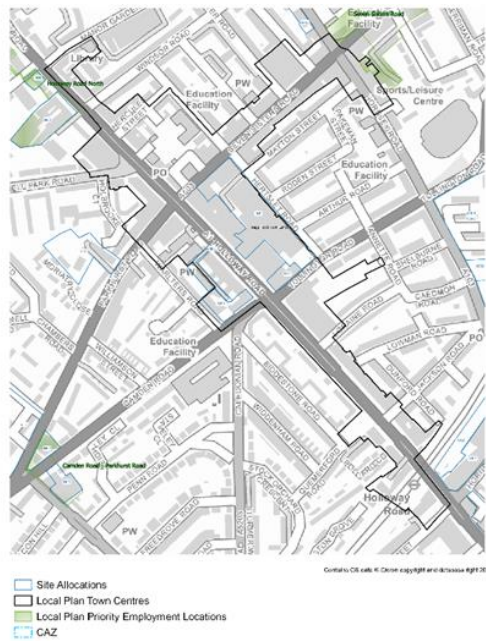
□ Town Centre
■ Primary Shopping Area

Area Assessment: Nag's Head Town Centre

Map 2: Heritage context

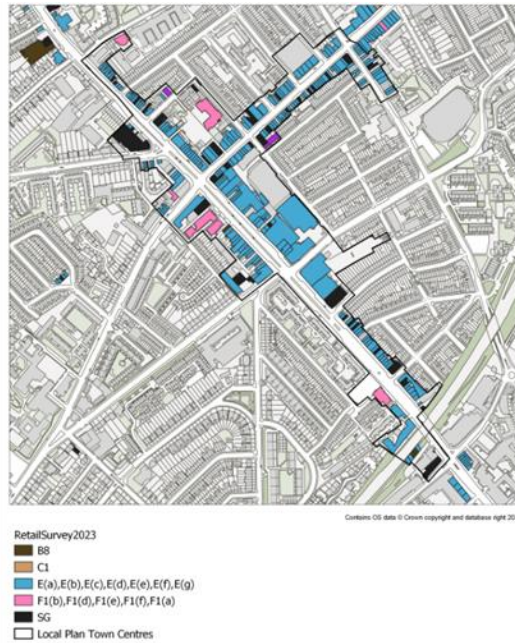


Map 3: Site allocations and Priority Employment Locations (PELs)



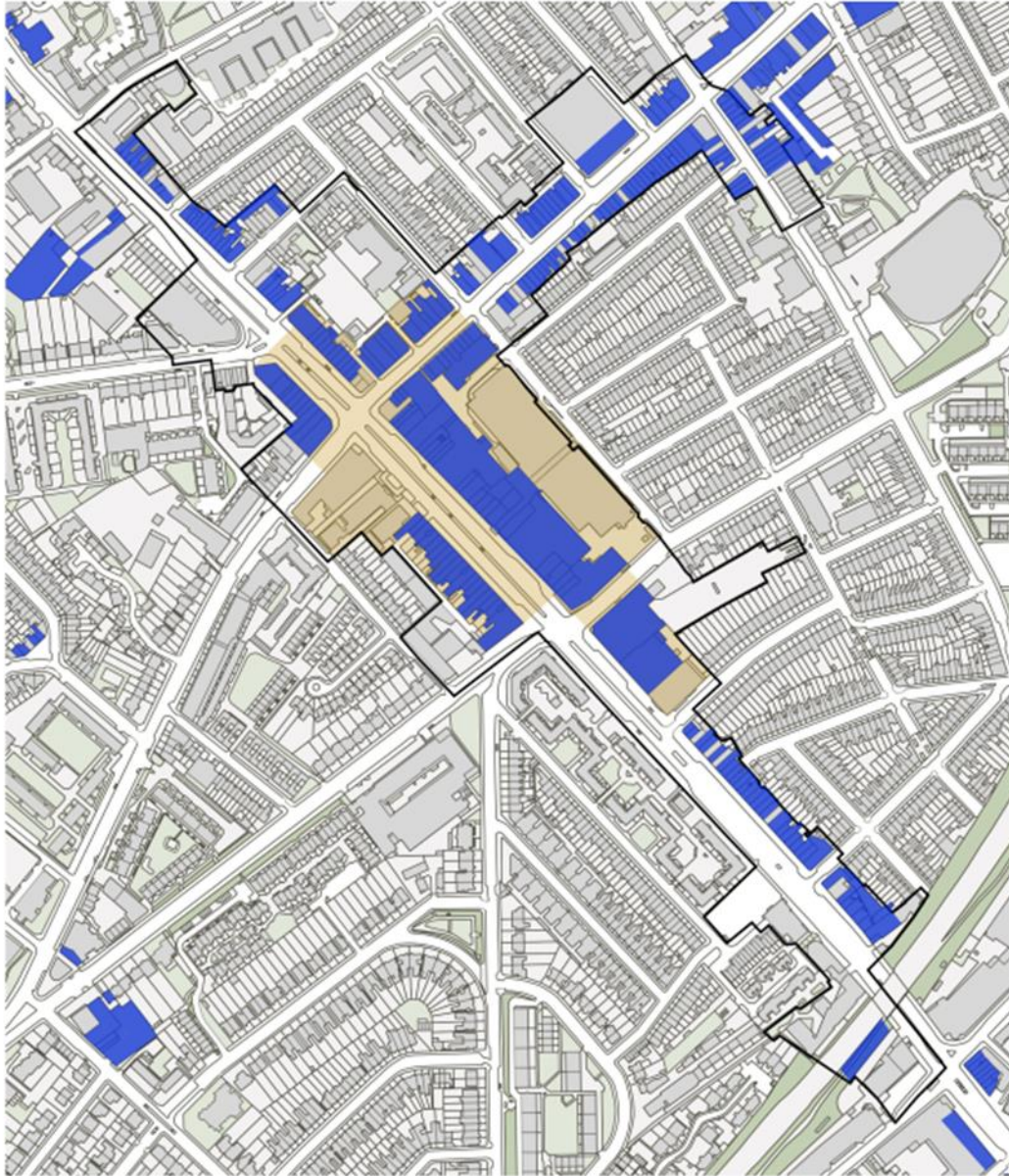
Area Assessment: Nag's Head Town Centre

Map 4: Retail Survey 2023









Map 5: Proposed Nag's Head Town Centre Article 4 Direction Area

Area Assessment: Nag's Head Town Centre



Key for Article 4 Direction Town Centres

-  Tranche 2 (proposed) Article 4 area
-  Tranche 1 (confirmed) Article 4 area
-  Town Centres
-  Primary Shopping Areas
-  CAZ
-  Islington Borough Boundary

Area Assessment: Nag's Head Town Centre

Description and context of centre:

Nag's Head is a Major Town Centre with a wide range of independent and national retailers, and a strong convenience retail offer which provides for the essential needs of local residents.

Nag's Head Town Centre is largely linear in form, running along Holloway Road from the junction with Manor Gardens in the north to the junction with Hornsey Street and Hornsey Road in the south. The Town Centre also includes part of Seven Sisters Road, Tollington Road, Parkhurst Road and Camden Road.

The town centre is well served by public transport, with Holloway Road underground station (served by the Piccadilly line) sitting within the town centre boundary and frequent bus routes running through the centre, particularly along Holloway Road, connecting Nag's Head to other centres within the borough and beyond. However, the tube station is a relatively long walk from retail uses to the north of the centre, and pedestrian movement across the east and west sides of Holloway Road is restrained by heavy traffic.

Economic considerations:

- Designated a Major Town Centre in the Local Plan, with part of the town centre designated as a Primary Shopping Area.
- The centre is a significant retail cluster with a range of unit types and sizes – including small and independent units, which predominantly occupy ground floor retail frontage; a number of large supermarkets (Morrisons and Waitrose are prominent); Selbys, a 3-storey independent department store; and a range of market stalls in the indoor Nags Head Market - another key asset.
- Limited office use occupies upper floors above retail units. Some retail use on upper floors otherwise upper floors are generally residential use.
- Uses include:
 - Retail: Supermarkets, local convenience, indoor market;
 - Food and drink: Cafés, restaurants, delis, food hall, bars, public houses;
 - Business: Offices, artist studios, creative rehearsal space;
 - Other: Large multi-screen cinema, education, gyms, community centres and snooker club.
- The retail and leisure study finds that there is a strong provision of retail goods in particular convenience and relatively strong comparison provision with a range of both multiple and independent retailers. The centre accounts for nearly 20% market share of convenience goods sold in the borough – more than Angel, also suggesting the supermarkets of Nag's Head meet more than local needs. There is also strong retail service which provide for the essential needs of local residents. The study considers leisure service provision - food and beverage is weaker with a need for branded and better quality restaurants, the study notes the importance of the Odeon cinema as a leisure asset which helps underpin the night-time economy. The study identifies Nag's Head Shopping Centre as looking dated and in need of refurbishment with under-utilised space. More generally the town centre environment was considered clean although with some untidy areas along Seven Sisters Road. Shopfronts were considered to be generally well maintained and many units would benefit from modernisation.
- The retail and leisure study identified a low level of vacancy in 2016 at 8.5%. The 2023 survey indicates that vacancy remains low at 9.2% in 2023 (as compared to the national average of 13.8%).
- Retail uses will be maintained and enhanced within the town centre particularly within the PSA (emerging Policy SP5) and retail uses are sought to be maintained at a minimum of 60% in Nag's Head Town Centre (emerging Policy R2). New office floorspace is encouraged to support diversity in the local economy and conversion of upper floors above retail units will be considered appropriate. Two PEL exists adjacent to the eastern boundary and north-western boundary of the town centre.

Area Assessment: Nag's Head Town Centre

- Designated a main town centre with significant retail, service and leisure based employment concentrations. Spatially the Local Plan recognises the importance of the town centre for retail whilst encouraging the night-time economy, leisure uses and new office floorspace as a means to diversify the local economy. Significant sites outside the town centre are recognised for their importance with the housing allocation on the Holloway Prison site and the Metropolitan University both identified in policy SP5. The Nag's Head spatial strategy is accommodating a significant number of new homes with over 1500 projected over the plan period from site allocations and 22,000m² of office floorspace;
- Two adjacent PEL are prioritised for business uses;
- The majority of units in the town centre are small supporting a range of independent businesses and SMEs.
- The Class E uses in the town centre are mainly shops (Class E(a) use), cafes and restaurants (Class E(b)) and financial and professional services such as banks, accountants, and solicitors (Class E(c)) with a few offices (E(g)(i)).
- Serves both local community with essential town centre retail and services; and attracts some visitors from further afield with a range of specialist shops and services, cultural attractions, and a night-time offer;
- Islington's Employment Land Study (ELS)³¹ identified very little office or light industrial use in the town centre identifying retail with residential above. The study also noted that student accommodation is competing with employment land. There is a significant concentration of student accommodation to the south of the area.
- The three large supermarkets, indoor Nags Head market, Selbys department store and Odeon cinema are key uses. The emerging Local Plan recognises the nearby Emirates stadium as an important cultural and leisure attraction. The boroughs largest leisure centre, the Sobell Centre is also nearby.
- There is limited upper floor Class E within the traditional Victorian terraced buildings outside the PSA. Also in the new purpose built blocks of flats to the south of the area the upper floors are in residential use. In some of the Victorian buildings the first floors are ancillary and used for retail storage. The larger purpose built commercial buildings in the PSA on the north side of Holloway Road contain more Class E uses on upper floors. For these large buildings this is generally ancillary, Selbys department store is an exception.

³¹ Ramidus Consulting (2016). LB Islington Employment Land Study, available from: [Company \(islington.gov.uk\)](http://Company.islington.gov.uk)

Area Assessment: Nag's Head Town Centre

There is a recent change of use on the upper floor of the former M&S to more flexible light industrial/office and gym. The resource centre is another example.

Area Assessment: Nag's Head Town Centre

Social considerations:

- Town Centre provides focal point for the surrounding residential community and wider population with significant quantity and variety of convenience and comparison retail and services and night-time uses;
- There are a number of wards covering Nag's Head town centre; Finsbury Park, Tollington, Tufnell Park, Arsenal and Holloway. Note some of the wards changed boundaries in 2022 with Highbury West ward now renamed Arsenal ward and other wards boundaries amended, for example some of Finsbury Park was transferred to Tollington.
- The wards represent a diverse community.
- The 2019 Indices of Multiple Deprivation highlights that Islington is the 28th most deprived local authority in England (out of 319). All five wards have above the Islington average levels of households suffering from multiple deprivation.
- Income and employment deprivation in particular issues across all five wards. The opportunity retail provides as employment for local households is important. Finsbury Park and Holloway wards show retail is the second and third largest employment sector respectively in these wards with professional, scientific and technical top which may indicate a link with the opportunity provided by the town centre. Income deprivation is a significant issue in the ward of Finsbury Park ward which covers a large part of the primary shopping area of the town centre. Communities who live in this area have double the measure of multiple deprivation

Area Assessment: Nag's Head Town Centre

Key sites and allocations:

- Three site allocations (NH1, NH2 and NH12) in the local plan within the town centre boundary – all sites allocated for mixed use residential, business use, with retention of ground floor retail. The Morrisons supermarket and adjacent car park is a key opportunity in the Town Centre in the longer term;
- Two allocations are within the PSA (NH1 - Morrison's supermarket and adjacent car park, 10 Hertslett Road and 8-32 Seven Sisters Road; and NH2 – 368-376 Holloway Road). Part of NH12 379-391 Camden Road and 341-345 Holloway Road is also in the PSA. All three are identified as sites with potential for a tall building.
- There are a number of notable buildings including the Art Deco Odeon, former Coronet cinema (now a public house), former Jones Brothers department store (now a community space) and various listed and locally listed buildings. The corner building at 458 Holloway Road/1 Seven Sisters Road is listed. Buildings also vary considerably in frontage width, with narrow frontage terraces of mixed-use buildings, and other larger format wide-frontage buildings. Similarly, building uses and ages are also mixed, ranging from 19th century mercantile buildings to 21st century apartment buildings.

Area Assessment: Nag's Head Town Centre

Heritage designations:

Conservation Areas:

- The edge of the Mercers Road/Tavistock Terrace Conservation Area includes the very north end of the town centre at the junction of Tufnell Park Road including the cinema.
- Hillmarton Conservation Area lies immediately adjacent to the west.

Listed buildings:

- Holloway Road Station, 297 Holloway Road (Grade II)
- 458 Holloway Road and 1 Seven Sisters Road (Grade II)
- Odeon Cinema, 419 Holloway Road (Grade II)
- North Branch, 19 Manor Gardens

There are also 15 locally listed buildings along the east side of Holloway Road between Seven Sisters Road and Tollington Road.

The Mercers Road/Tavistock Terrace CADG notes that 'there are shopping and commercial frontages on Holloway Road which provide local services and are an important contribution to the character of the area'. The Hillmarton CADG states that commercial uses are 'important to the area's character and appearance' and 'often the best use for a building is that which it was designed for and will seek to retain public houses, shops and workshops in appropriate uses'.

Despite the intentions of the Conservation Area Design Guidelines (CADG) to protect the character and sustainability of conservation areas, it is considered they are more effective at protecting the physical appearance of shopfronts than the land use. Therefore, whilst statutorily listed buildings have been excluded from the proposed Article 4 Direction, Class E premises that are considered to make an important contribution to the character of the conservation area have not been excluded from the proposed designation.

Area Assessment: Nag's Head Town Centre

How is it the smallest geographical area possible?

The Direction Area has been reduced to the smallest geographical area possible in accordance with NPPF paragraph 53.

The following buildings have been excluded:

Listed buildings:

- Odeon Cinema, 419-427 Holloway Road
- 458 Holloway Road and 1 Seven Sisters Road
- Holloway Road Station, 297 Holloway Road
- North Library, 19 Manor Gardens.

Premises not in Class E use including:

- Pubs and bars: Islington Sports Bar and Grill, 274 Holloway Road; The Eaglet, 124 Seven Sisters Road; Big Red, 385 Holloway Road; The Hercules, 504 Holloway Road; The Swimmer at the Grafton Arms, 13 Eburne Road; The Coronet, 338-346 Holloway Road; The Enkel Arms, 34 Seven Sisters Road.
- Education and community uses: Hercules Play Group, 7 Eburne Road; Grafton Junior School, 9 Eburne Road; The Holloway Neighbourhood Group, 84 Mayton Street; Islington Scout Centre, 319 Holloway Road; Arachne Greek Cypriot Women's Group, 13 Hercules Street
- Places of worship: Holloway Seventh Day Adventist Church, 381 Holloway Road; Al-Risaalah Mosque and Islington Islamic Centre, 91 Parkhurst Road.
- Beauty salons: London Top Nails, 542 Holloway Road; Bronze N Go, 104 Seven Sisters Road; D & R Nails, 254 Holloway Road; Queen of Hearts, 226 Hornsey Road; GL Nails, 64 Seven Sisters Road; Star Beauty Shop, 32 Seven Sisters Road
- Betting offices and adult gaming centres: William Hill, 37 Seven Sisters Road; Paddy Power, 42 Seven Sisters Road; Betfred, 12 Seven Sisters Road; Admiral Casino, 3 Seven Sisters Road; Cashino, 456 Holloway Road.
- Student accommodation: The Arcade, 385-401 Holloway Road; Chapter Highbury, 309 Holloway Road; Chapter Highbury II, 295 Holloway Road.

In addition, numerous buildings in Class E use have been excluded from the Direction. These include:

- Morrisons Supermarket, 10 Hertslet Road; units 204-216 (even numbers)
- Carpetright, 385-401 Holloway Road; Sainsbury's local, 311 Holloway Road
- Hornsey Road; units 81-87 (odd numbers)
- Parkhurst Road; units 1, 2-3, 6 and
- 7 Northview Parade, Tufnell Park Road.

Area Assessment: Nag's Head Town Centre

How is it necessary to avoid wholly unacceptable adverse impacts?

The council has assessed the sites within Nag's Head town centre against the criteria set out in the Class MA legislation, and the requirements of NPPF paragraph 53. The proposed Article 4 Direction is required to protect against wholly unacceptable adverse impacts from unrestricted Class MA changes of use. These impacts are:

- The widespread loss of premises in town centre use in the primary shopping area (PSA) – the core shopping area - of the town centre would result in a loss of economic value and an erosion of the status of the town centre where the majority of units are occupied by major national retailers.
- The gaps in retail frontages created by changes of use to residential could damage the vibrancy and vitality of the town centre, reducing footfall and contributing to its decline.
- Nag's Head Town Centre provides a range of convenience retail and service uses both within the PSA and the wider town centre area that are necessary for day to day community life. The loss of premises from the town centre that provide essential services, including banks, post offices and grocery shops would have a wholly unacceptable and adverse impact on the everyday lives of residents in an area of above average deprivation and where a significant percentage of households do not have a car.
- Outside the PSA the particular streets have their own identity and role in the wider town centres function. On Seven Sisters Road there is a concentration of shops selling fresh produce that meets a diverse range of local needs, this concentration is exclusive to Nag's Head in the borough. Similarly Holloway Road has a constantly evolving selection of food and beverage units which take advantage of the slightly larger unit sizes. The cafés are interspersed with a number of more specialist and independent retailers taking advantage of the prominent location and accessible locations on this busy road.
- The town centre supports a range of employment opportunities and the loss of businesses to unrestricted Class MA PDR represents a wholly unacceptable loss of wellbeing and amenity to the people who rely on them for work, particularly given the importance of retail employment to residents of Finsbury Park and Holloway Wards.
- There are challenges in the town centre in the form of concentrations of less desirable leisure uses such as betting shops and adult gaming centres. The Spatial Strategy and site allocations for the town centre are aiming to deliver significant retail, business and residential growth over the life of the Local Plan. It is important that the strategic plan to improve and develop Nag's Head is not hindered by unrestricted Class MA changes of use that may result in a relatively small uplift in new dwellings at the expense of the site assembly necessary to deliver some of the council's aspirations for the area.

Area Assessment: Nag's Head Town Centre

Recommendation

To protect the vitality and viability of the town centre and ensure it can continue to meet the retail and service needs of the local community it is proposed to designate a number of Class E units that are considered particularly vulnerable to conversion. The Council is not proposing a blanket approach to designation and has assessed the town centre on a unit by unit basis to ensure that the designation applies to the smallest geographical area possible.

The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Nag's Head Town Centre from Class MA changes of use, as detailed above.

Area Assessment: Finsbury Park Town Centre

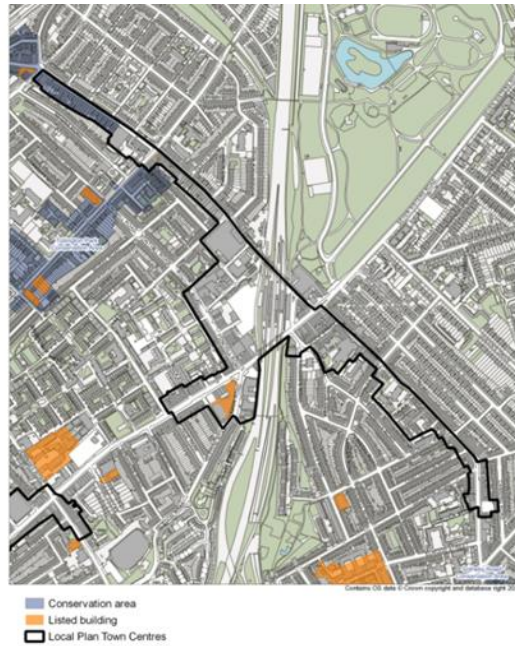
Area Assessment: Finsbury Park Town Centre

Map 1: Finsbury Park Town Centre boundary with Primary Shopping Area (PSA)

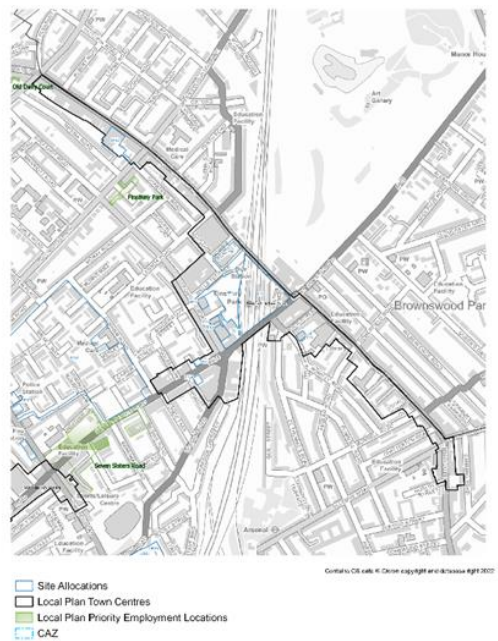


Area Assessment: Finsbury Park Town Centre

Map 2: Heritage context

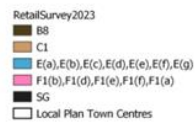
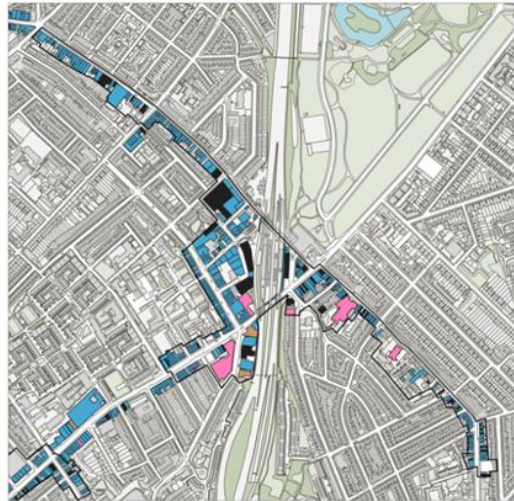


Map 3: Site allocations and Priority Employment Locations (PELs)



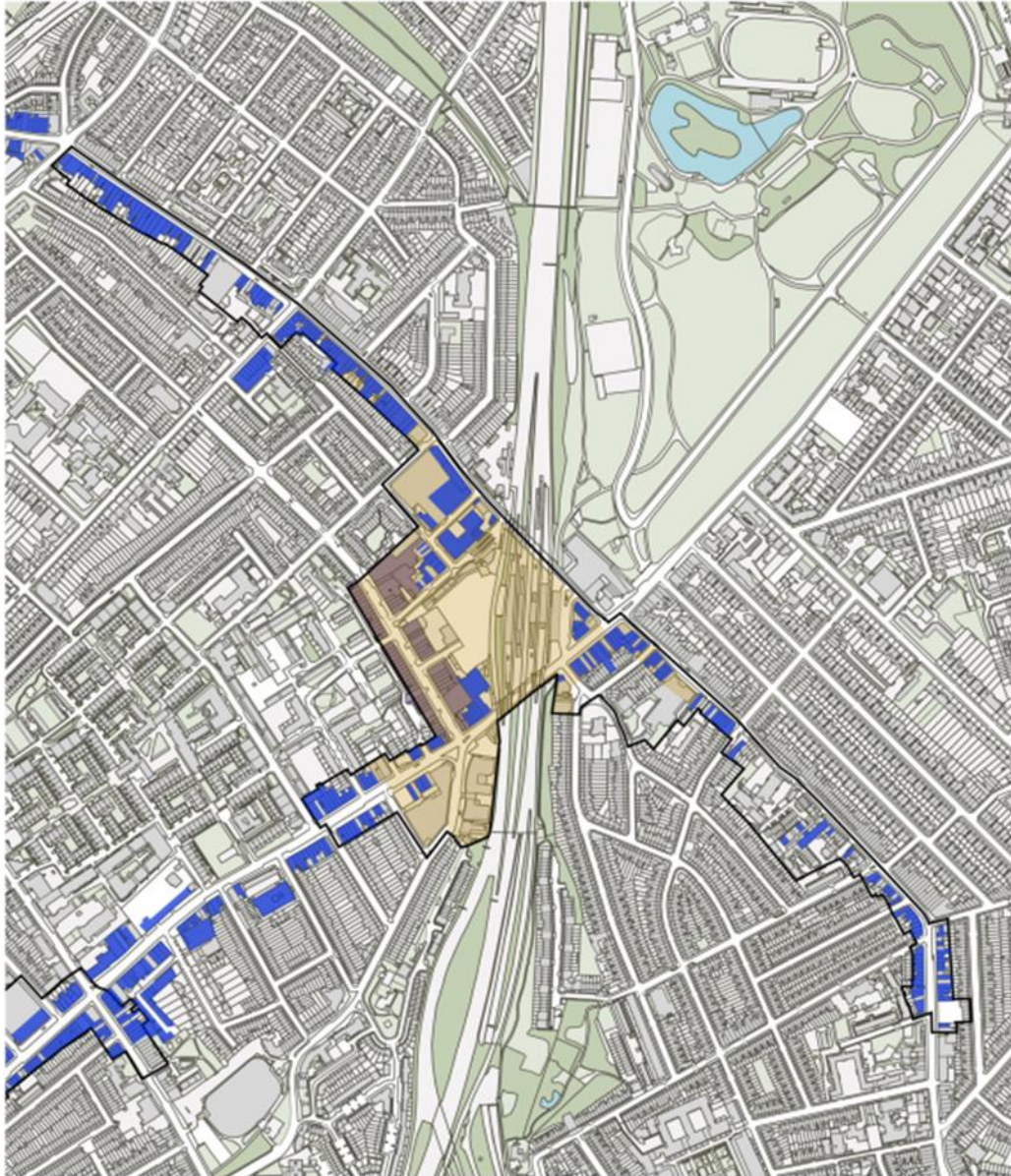
Area Assessment: Finsbury Park Town Centre

Map 4: Retail Survey 2023



Map 5: Proposed Finsbury Park Town Centre Article 4 Direction Area

Area Assessment: Finsbury Park Town Centre



Key for Article 4 Direction Town Centres

-  Tranche 2 (proposed) Article 4 area
-  Tranche 1 (confirmed) Article 4 area
-  Town Centres
-  Primary Shopping Areas
-  CAZ
-  Islington Borough Boundary

Area Assessment: Finsbury Park Town Centre

Description and context of centre:

Finsbury Park is a District Town Centre, clustered around Seven Sisters Road, Stroud Green Road and Blackstock Road. Finsbury Park Station, which is the busiest rail interchange in London outside of zone 1, is prominent within the town centre. The wider area falls within the administrative boundaries of the London boroughs of Islington, Hackney and Haringey. Hackney Council have included the whole of their part of Finsbury Park District Town Centre in an Article 4 Direction removing permitted development rights under Class MA of the Town and Country Planning (General Permitted Development) (England) Order (as amended). The Article 4 Direction was confirmed in April 2023. Haringey is not seeking an Article 4 Direction at this time. Finsbury Park town centre contains the Fonthill Road Specialist Shopping Area (SSA), which is already the subject of an Article 4 Direction removing permitted development rights under Class MA.

Finsbury Park is a busy, multi-cultural area providing a wide range of town centre uses: Stroud Green Road has a large café and restaurant offering; Seven Sisters Road offers a variety of uses including convenience retail, professional and financial services and cafes; and Blackstock Road has a large food offering through cafes and small-scale convenience retail, alongside some comparison retail stores. The area also has a rich community and cultural offer through the presence of third sector organisations including the Muslim Welfare House, Jones Art Building and Park Theatre.

The town centre is cut in two, and the historic pattern of Victorian streets fragmented, by the 'broad expanse' of railway lines serving Finsbury Park Station³² which has created a disjointed shopping area with a lack of a clear traditional centre. The Victorian core of Finsbury Park Town Centre is focussed along Seven Sisters Road, Fonthill Road and Stroud Green Road but none of these key streets takes 'on the role of the main high street'³³. Although there are many Victorian buildings within the town centre, few are notable and the streets are traffic dominated with a generally poor quality of public realm. The majority of buildings in the area are between three and five storeys in height, although the City North development adjacent to the train station includes two 23-storey towers.

Finsbury Park ward is the most deprived area in Islington. 56% of the ward's residents are living in areas ranked amongst the most deprived 20% of neighbourhoods in England based on the Index of Multiple Deprivation (IMD) 2019³⁴. 22.6% of children in the ward are in relative low-income families with 19% being in absolute low income families (against borough averages of 18.8% and 14.6% respectively).

³² Islington Tall Building Study (2018), available from: [Islington Tall Buildings Study Part 2 November 2018](#)

³³ LBI Retail and Leisure Study (2017), available from: [London borough of Islington retail and leisure study - 2017](#)

³⁴ Local Insight profile for Finsbury Park area (2021). Available here: [Local Insight profile for 'Finsbury Park' area LI - Islington Council](#)

Economic considerations:

Finsbury Park's main retail and commercial uses can be divided into the following areas:

Blackstock Road - There are retail and town centre uses distributed along both sides of the road; the western side of the road is within Islington while the eastern side is within Hackney. The northern part of the street, between the Seven Sisters Road junction and Ambler Road/Somerfield Road consists of mainly service and leisure uses, with the central section of the street dominated by residential and community uses, and retail and service uses again being concentrated between Monsell Road and Hurlock Street towards the southern part of the street. Blackstock Road is dominated by independent operators although there is a Sainsbury's Local situated to the northern part of the street. There is also a concentration of hot food takeaway operators.

Seven Sisters Road - the area around Seven Sisters Road/Blackstock Road/Stroud Green Road consists of a number of national multiple operators such as Greggs, Costa, Subway, Poundland, KFC and Tesco Express. Occupants here consist of mainly secondary service uses. To the south of the railway bridge there are a number of units occupied by mainly independent convenience retailers and services. Beyond the town centre boundary, the Seven Sisters Road Local Shopping Area bridges the gap between Finsbury Park and Nag's Head Town Centres.

The results of the household telephone interview survey (HTIS) conducted as part of Islington's Retail and Leisure Study (2017)³⁵ for 'Zone 3' (which includes the majority of Nag's Head) and 'Zone 4' (which includes the majority of Finsbury Park) show that most respondents within each zone do most shopping within their respective zones (for comparison and convenience). This suggests that, although Nag's Head and Finsbury Park are connected by a linear route, they are distinct centres in terms of consumer patronage.

Fonthill Road – the Fonthill Road SSA sits within Finsbury Park Town Centre and is the subject of an Article 4 Direction removing Class MA permitted development rights which was confirmed on 31 August 2023.

Station Place – the area surrounding the main entrance to Finsbury Park Station is a mixture of retail, cafes, bars and offices.

Clifton Terrace and Wells Terrace - the bus station on Wells Terrace means that this area acts as an entry point to the centre. The area consists of a mix of both retail and office uses although there are fewer units located here in comparison to the centre's other main streets and the council consider that Clifton House, with elevations on Wells Terrace, Clifton Terrace, Morris Place and Stroud Green Road is a significant development opportunity. It is allocated within the emerging local plan for mixed-use development and the Tall Buildings Study

Area Assessment: Finsbury Park Town Centre

suggests it could accommodate a local landmark building of up to 15 storeys to form part of a Finsbury Park cluster.

Newer developments such as Park Theatre on Clifton Terrace and the John Jones redevelopment (which consists of a mixed-use development encompassing a new building for John Jones, student accommodation and commercial units) are driving the area's reputation as a new North London cultural destination. Retailers on Clifton Terrace/Wells Terrace include Nisa Local, Starbucks and a number of independent cafes and restaurants. In addition to this, a number of chain restaurants have opened along Wells Terrace as part of the City North development, including Rosa's Thai, Tonkatsu Ramen and Honest Burger. These purpose-built units are generally larger than other commercial premises in Finsbury Park.

City North Place – resulting from the City North development, City North Place connects Wells Terrace to Goodwin Street and offers a mix of retail (Marks and Spencer), restaurant/café (Gail's Bakery, Someday Someday Pizza) and office uses (the MS Society) underneath new residential units. Of note is the new Picturehouse Cinema (Sui Generis use) adjacent to Finsbury Park Station, contributing to the area's cultural offer.

Stroud Green Road - between Wells Terrace and Tollington Park, retail uses are situated on either side of Stroud Green Road although, north of Tollington Park, retail uses are situated on only the western side (within Islington) with mostly residential uses opposite along the eastern side (in Haringey). There is a large proportion of leisure uses along the street particularly restaurants and takeaways located to the southern end of the road. The northern end of the street consists of mainly independent convenience retailers although there is a Tesco Metro store.

The Local Plan stresses that development in Finsbury Park should contribute towards creating a more inclusive local economy, which supports small and independent business, and increases job opportunities for its diverse local community wherever possible. The RLS identified a low level of vacancy in 2016 at 8.5%. Vacancy remains low at 8.1% in 2023. Retail uses will be maintained and enhanced within the town centre particularly within the PSA (Strategic and Development Management (SDMP) Policy SP6) and retail uses are sought to be maintained at a minimum of 55% in Finsbury Park Town Centre (SDMP Policy R2).

The area is a key transport interchange with a good convenience goods offer. The proportion of units in leisure use is significantly above the national average, with a large range of restaurants and cafes run by independent operators. Park Theatre and the Fonthill Road SSA

³⁵ LBI Retail and Leisure Study (2017), available from: [London borough of Islington retail and leisure study - 2017](#)

Area Assessment: Finsbury Park Town Centre

are key assets of the town centre.

There is little comparison good provision in the town centre and although leisure provision is good, there is little night-time economy activity. Attracting comparison goods retailers (which would require a range of store sizes) and night-time economy uses to the town centre could encourage a stronger economy, appeal to residents including the large student population, and make it a destination location. The dominance of transport infrastructure in the town centre means it is disjointed, with dispersed shopping frontages and no clear centre.

The Local Plan sets out that Finsbury Park should provide 20,200sqm of office floorspace. A vibrant commercial offering is needed to make the town centre an environment that businesses want to move into and invest in.

Finsbury Park is the longest town centre in Islington (measuring 1,680m north to south). Stroud Green Road and Blackstock Road are both over one mile long, which means some pedestrians may have difficulty walking their length. Therefore, different catchment areas for convenience shopping exist within the town centre. For example, for residents near the south of Blackstock Road or north of Stroud Green Road, the Finsbury Park, Nags Head and Angel PSAs are all a considerable distance away.

The proportion of units in leisure use across the town centre is significantly above the national average (56% compared with 48%). The Park Theatre and Fonthill Road are assets that attract people from outside of the borough, but the night-time economy offer is limited. An improved night-time economy would be beneficial in drawing people into the area and encouraging the relatively large student population to spend within Finsbury Park.

An increased amount of ground floor residential use as a result of Class MA PDRs would reduce the effective operation of the night-time economy. Additionally, breakages in frontages brought about by the PDR would lead to a decreasing sense of place and damage footfall and exploration of the town centre.

Islington's Employment Land Study (ELS) (2016)³⁶ considers that Finsbury Park's excellent transport links make it the borough's most viable location for encouraging non-CAZ business use employment generating development. However, it also sets out that a significant amount of business floorspace has been lost from the area, as well as from Holloway and Highbury West, contributing to an overall impression that office space is migrating to the south of the borough. With regards to industrial space, the ELS sounds a note of caution against any further loss of B8 floorspace from Finsbury Park, given the importance of the clothing trade to

³⁶ Ramidus Consulting (2016). LB Islington Employment Land Study, available from: [Company \(islington.gov.uk\)](http://Company.islington.gov.uk)

Area Assessment: Finsbury Park Town Centre

the area (although it is noted that this is with specific reference to the fashion businesses primarily located on Fonthill Road).

The ELS suggests Finsbury Park Town Centre can be broken down into three sub-areas, given the references A to C. Area A comprises the area south of Finsbury Park Station and down Blackstock Road. The area immediately surrounding the station is said to be busy and congested with secondary and convenience shops, with the upper floors generally empty or in residential use with no evidence of office use. The Seven Sisters Road end of Blackstock Road has many small local convenience-style shops, with older properties not in the best state of repair. Further along Blackstock Road, towards Highbury, there are more signs of investment with houses being refurbished and new cafes. Blackstock Mews, which is a mixed-use conversion for residential and office use, is mentioned as being exposed to development pressure. This part of the town centre is not considered to have significant potential for additional business floorspace.

The area north of the station including the City North development and Morris Place/Wells Terrace site allocation, along with Seven Sisters Road and Isledon Road make up Area B. The Fonthill Road SSA is also within this area. As with the other parts of the town centre, there is a mix of secondary and tertiary retail use at ground level with residential uses above. The City North and John Jones developments are the major contributors to business uses in this area. There is up to 4,000sqm of office floorspace at City North and the Arts Building on the John Jones site includes 5,000sqm of light industrial floorspace. Area B is seen as the part of the town centre that could accommodate significant business growth in the future.

Area C covers Stroud Green Road. The ELS states that this is a mix of secondary and tertiary retail with empty floors or residential use above, and little floorspace in business use.

Retail (E(a)) and café/restaurants (E(b)) are the most significant E uses in the town centre. There is potential for an expansion of E(g) uses but the town centre is viewed as vulnerable to residential pressure. The ELS states that positive action is needed to make the most of the town centre's potential, and take advantage of its strategic transport links, to create an office location.

Upper floor Class E use is limited in Finsbury Park Town Centre. Upper floors tend to be in residential use.

The majority of Class E sites in the town centre are small retail premises. These units are generally in period buildings and do not have inbuilt air-conditioning, lighting or fully glazed shopfronts. It would take a limited amount of investment, expertise and time to convert these to residential use.

Area Assessment: Finsbury Park Town Centre

Social considerations:

Finsbury Park is the most deprived area in Islington with 56% of residents living in neighbourhoods among the 20% most deprived in the country. 35.4% of households in Finsbury Park are overcrowded, compared to the Islington average of 29.1%. Population density (persons/hectare) is 194.4 compared to the Islington average of 160.9. All forms of housing in Finsbury Park are more expensive than the comparable average price for London (although cheaper than the average prices for Islington). Owner occupancy in Finsbury Park is lower, and the level of social rented housing is higher, than the Islington averages.

Retail is the second largest employer for Finsbury Park residents and the retail industry is the second largest employment sector in the area (after health)³⁷. Losing parts of the town centre to residential use would risk its viability and vitality, limiting employment opportunities for the local community in an area already experiencing deprivation.

Nearly 42% of Finsbury Park's residents were born outside of the UK, with Africa (9%), the Middle East and Asia (6.8%), the Americas and Caribbean (6.5%) and EU member countries (6.2%) being the most common non-UK regions of birth³⁸. The cultural diversity of the area's population is reflected in its businesses. For example, the Local Plan refers to Finsbury Park's distinct food scene 'including a wealth of restaurants catering for North African and East African cuisine'. Supporting businesses that meet the needs of the local community and provide space for socialising and sharing cultures is important.

Therefore, unrestricted Class MA could reduce:

- The range of goods and services available for members of the local and wider community, which may particularly affect the area's least well-off residents.
- Service employment opportunities in an area of deprivation where retail is a major employer.
- Places to socialise, including businesses catering to Finsbury Park's diverse community.
- Agglomeration benefits and opportunities for local businesses.

Area Assessment: Finsbury Park Town Centre

Finsbury Park has experienced a significant amount of residential growth within the spatial strategy area in recent years, particularly in relation to the John Jones student accommodation scheme and the City North development. There has been a significant increase in dwellings and residents within the town centre already and this has been, and will be, further supplemented by residential elements on mixed use sites through site allocations. Whilst residential growth is a key priority of the council, unrestricted Class E changes would undermine the plan-led approach to mixed use growth in this key spatial strategy area.

Key sites and allocations:

The site allocations within the town centre boundary (and not covered by the Fonthill Road Article 4 Direction) are:

- FP1: City North – nearing completion
- FP2: Morris Place/Wells Terrace
- FP3: Finsbury Park Station and Island
- FP5: 1 Prah Road
- FP6: Cyma Service Station
- FP9: 221-233 Seven Sisters Road
- FP12: Tesco, 103-115 Stroud Green Road
- FP14: 216-220 Seven Sisters Road

Site allocations FP2: Morris Place/Wells Terrace, FP3: Finsbury Park Station and Island and FP9: 221-233 Seven Sisters Road could yield a significant quantum of development to contribute toward the borough's need for commercial and residential floorspace in highly accessible locations. All three sites have a mix of owners and would require potentially complex site assembly to realise the borough's aspirations for their delivery. There is a need to protect these sites against piecemeal development through the Class MA PDR that would make future site assembly and comprehensive redevelopment impossible.

³⁷ Local Insight profile for Finsbury Park (2021): [Local Insight profile for 'Finsbury Park' area LI - Islington Council](#)

³⁸ Ibid.

Heritage Designations:

Conservation areas: No's 117 to 181 Stroud Green Road are within the Stroud Green Conservation Area. The Conservation Area Design Guidelines state that 'often the best use for a building is that which it was designated for and retaining the variety of uses is very important to the area. Public houses, shops and workshops should be kept in appropriate uses which will not diminish their special interest'.

Listed buildings:

- Rainbow Theatre, 232 Seven Sisters Road is Grade II listed.
- 85 Stroud Green Road is Grade II listed.
- 119, 163 and 181 Stroud Green Road are locally listed.

We are not convinced that conservation area considerations will effectively mitigate the impacts of Class MA. Although the Conservation Area Design Guidelines state that 'often the best use for a building is that which it was designated for' we are aware of appeal decisions where land use does not appear to have been given as much weight as aesthetic considerations.

Area Assessment: Finsbury Park Town Centre

How is it the smallest geographical area possible?

All buildings outside Class E have been identified and excluded, including:

- Pubs, bars and clubs – including The Woodbine, T.Bird Bar, Kings Head Pub, The Blackstock Pub, Orleans Wine Bar, Coco's Bar and Club, Night Owl Pub, Oak N4 Wine Bar, The World's End Pub, 89 Social Wine Bar, White Lion Pub.
- Education - City and Islington College, 28-42 Blackstock Rd; Ambler Primary School, Blackstock Road
- Cultural venues – Picturehouse Cinema, Park Theatre.
- Hotels – Premier Inn and Travelodge
- Student accommodation - iQ Student Accommodation Highbury, 189-219 Isledon Road; Sketch House, 36 Clifton Terrace.
- Transport infrastructure - Finsbury Park train station, bus and coach station and railway land.

In addition, listed buildings have been identified and excluded:

- Rainbow Theatre, 232 Seven Sisters Rd (Grade II* listed)
- 85 Stroud Green Road (Grade II listed)

Numerous buildings in Class E use have also been excluded from the Direction. These include:

- Stroud Green Road – the Tesco store at 109-115 Stroud Green Road has been excluded as it is considered the site would require operational development to be used for residential purposes.
- The new café, restaurant, leisure and office units on Wells Terrace, City North Place and Goodwin Street delivered as part of the City North development. The ground floor units have been designed specifically for commercial use. Floor to ceiling windows mean the units could not be easily converted to residential use under PDR.
- Station Place – the units within and adjacent to Finsbury Park station on Station Place have been excluded from the Direction. It is considered these units would require operational development to be brought into residential use.

Blackstock Road – there is a stretch of Blackstock Road, between Ambler Road and Monsell Road that is predominantly in residential use. It is proposed to exclude this section of the road from the Direction with the exception of Blackstock Mews.

How is it necessary to avoid wholly unacceptable adverse impacts?

Unrestricted Class MA changes of use would have wholly unacceptable adverse impacts on the vitality and viability of the town centre. The likely impacts of unrestricted Class MA permitted development rights on Finsbury Park Town Centre are:

- The widespread loss of premises in town centre use in the PSA – the core shopping area of the town centre - would result in a loss of economic value and an erosion of the status of the Town Centre, creating a wholly unacceptable adverse impact. This is recognised in NPPF paragraph 53 which suggests the loss of the essential core of a PSA ‘would seriously undermine its vitality and viability’.
- Due to its size, there are distinct catchment areas for convenience shopping within Finsbury Park town centre outside of the PSA that provide retail and service opportunities essential to the wellbeing and amenity of residents such as local convenience shops, pharmacies and opticians. The loss of these premises resulting in a reduction in the range of goods and services available for members of the local and wider community may particularly affect some of the area’s least well-off residents in the borough’s most deprived ward. This is particularly concerning given the low level of car ownership amongst residents - not everyone is able to travel freely to meet their everyday shopping needs.
- Nearly 42% of Finsbury Park’s residents were born outside of the UK. The cultural diversity of the area’s population is reflected in its businesses. For example, the Local Plan refers to Finsbury Park’s distinct food scene ‘including a wealth of restaurants catering for North African and East African cuisine’. The availability of space for socialising and sharing cultures is important. Class MA PD rights could result in the loss of businesses that meet the needs of the local community.
- The loss of retail and service floorspace would cause a wholly unacceptable impact on the wellbeing of the area, particularly given the reliance on retail employment in the local resident population.
- Vacancy rates in all parts of the town centre are low and retail units have a high turnover rate, demonstrating a continual demand for these types of units. This lack of vacancy, as illustrated in Figure 5.1, demonstrates that the Class MA PD right is not required in this location as there is sufficient flexibility and demand within the E Use Class to ensure the ongoing success of the town centre.
- The potential for piecemeal development of sites allocated by the borough for comprehensive redevelopment and the delivery of significant amounts of retail, business and residential floorspace, removing the council’s ability to achieve its long-term aspirations for the growth of the area.

Area Assessment: Finsbury Park Town Centre

Recommendation:

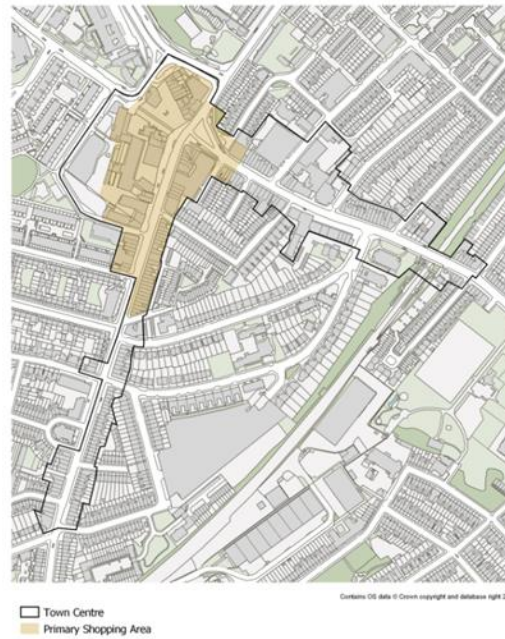
Partial designation of the town centre is proposed, including the majority of Class E units both within and outside the PSA as they are considered essential to maintain the vitality and viability of Finsbury Park Town Centre.

The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Finsbury Park Town Centre from Class MA changes of use, as detailed above.

Area Assessment: Archway Town Centre

Area Assessment: Archway Town Centre

Map 1: Archway Town Centre boundary with Primary Shopping Area (PSA)

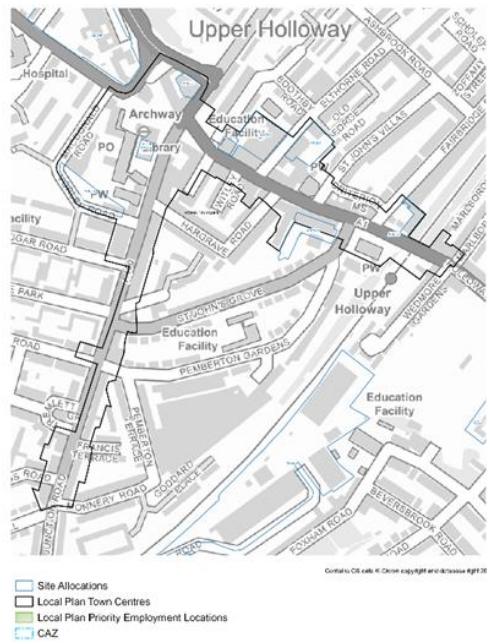


Map 2: Heritage context

Area Assessment: Archway Town Centre

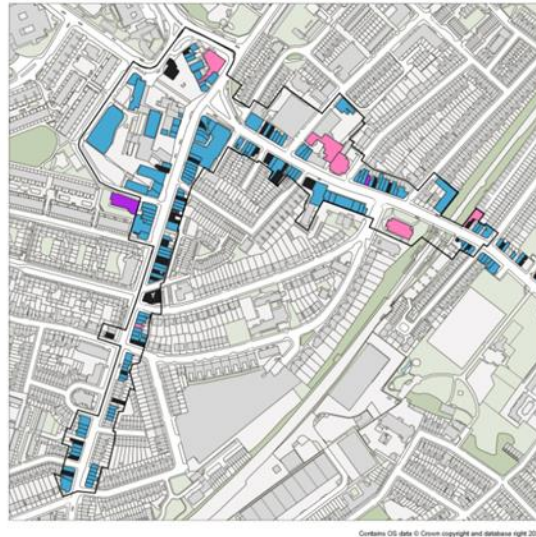


Map 3: Site allocations and Priority Employment Locations (PELs)



Area Assessment: Archway Town Centre

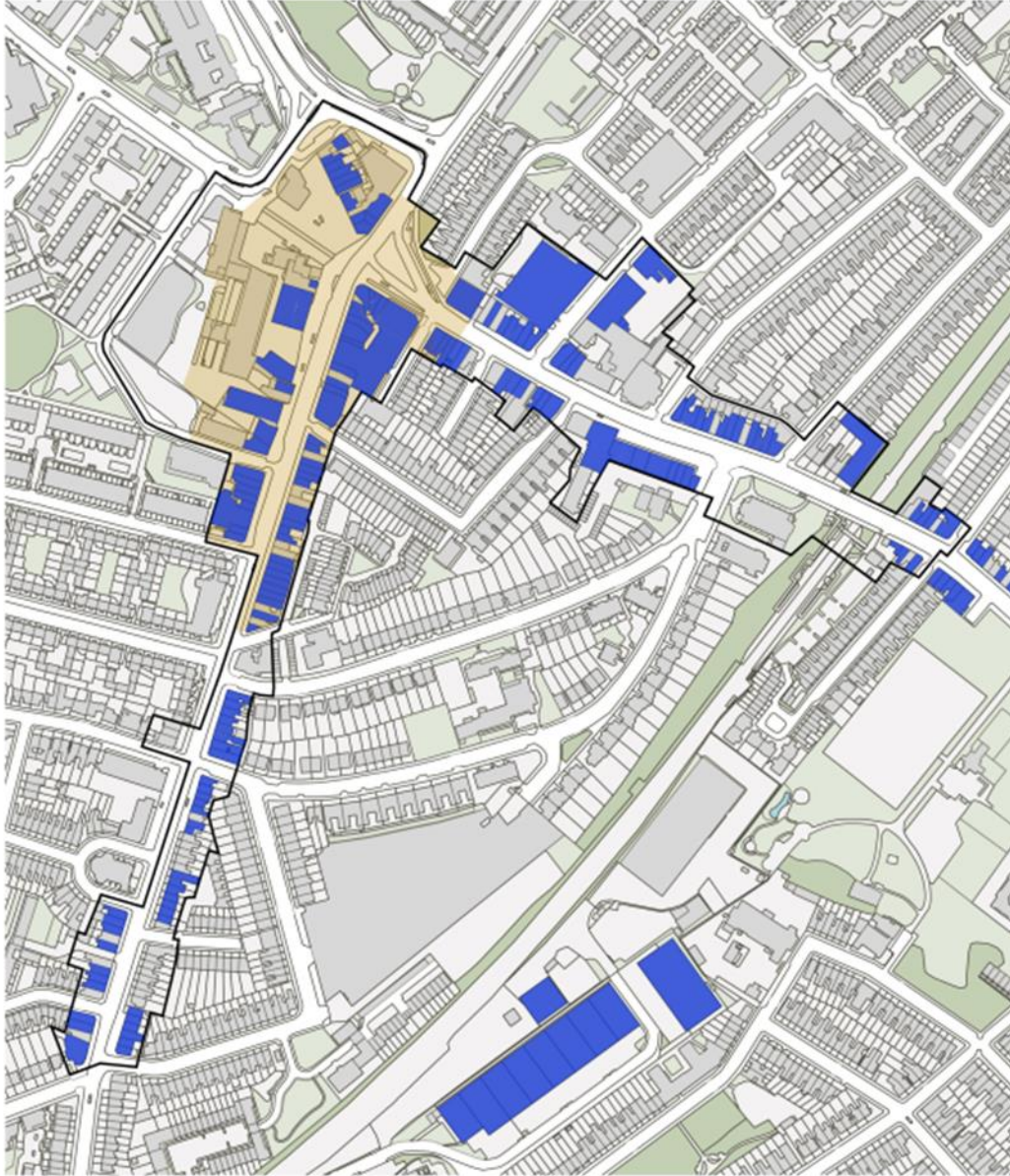
Map 4: Retail Survey 2023



RetailSurvey2023
■ B8
■ C1
■ E(a), E(b), E(c), E(d), E(e), E(f), E(g)
■ F1(b), F1(d), F1(e), F1(f), F1(a)
■ SG
□ Local Plan Town Centres

Map 5: Proposed Archway Town Centre Article 4 Direction Area

Area Assessment: Archway Town Centre



Key for Article 4 Direction Town Centres

- Tranche 2 (proposed) Article 4 area
- Tranche 1 (confirmed) Article 4 area
- Town Centres
- Primary Shopping Areas
- CAZ
- Islington Borough Boundary

Area Assessment: Archway Town Centre

Description and context of centre:

In the north-west of Islington, Archway is a District Town Centre located at the intersection of five roads: Holloway Road, Highgate Hill, Junction Road, Archway Road and St. John's Way. The heart of the town centre focuses on Archway Underground Station and Navigator Square, a new public open space made possible by the removal of the Archway gyratory in 2017. The Town Centre has strong convenience retail and retail services provision for a centre of its size, although there is a limited comparison goods offer, particularly in terms of national multiple stores and the night-time economy offer could be improved.

Archway Town Centre's main retail frontages are located on Junction Road, between Archway Underground Station and Monnery Road; and Holloway Road, between Archway London Underground Station and Upper Holloway London Overground Station. The town centre has a good level of accessibility by public transport – as well as the tube and overground stations it is well served by buses.

Economic considerations:

- Key shopping frontages accommodate chain stores: Aldi, Sainsburys, Iceland Swift, Tesco on Holloway Road; Co-Op, Marks + Spencer, Gregg's, Costa Coffee, Starbucks, Iceland on Junction Road.
- Chains outside Class E: KFC, Papa John's and Paddy Power (Holloway Rd); Ladbrokes, William Hill (Junction Rd).
- Other frontages have varied Class E offer including hospitality, hairdressing, groceries, bakeries, beauty, travel and property. They have strong character and make a significant contribution to distinctiveness/ sense of place/ social value.
- The Local Plan states that development in the central site (around the underground station) must provide new office and retail floorspace;
- The Local Plan recognises the town centre accommodates high quality independent retailers and states that the retail function of the centre "must be maintained and enhanced" (para. 2.85).
- Centre serves local communities, with numerous businesses from Turkish/ Greek/ Cypriot community. Centre also serves workers in employment sites, with cafes and convenience retail.
- Office employment was a big feature of the town centre until the Class O PDR change of several large offices to residential within the Town Centre. The former offices of Hill House (a 13-storey building) and Archway Tower (a 17-storey building) were converted to residential use resulting in the loss of 8,256sqm and 5,900sqm of office floorspace respectively. A total of 25,974 sqm of office floorspace was lost from the borough's town centres in the period 2015/16 to 2017/18, of which 21,388sqm (82%) was from Archway Town Centre³⁹. At an office floorspace density measure of approximately 12sqm per employee this could have accommodated over 2,000 jobs.
- The 2017 Retail and Leisure Study describes the centre as having a strong convenience provision for a centre of its size with smaller independent stores including fishmongers and bakers. It notes that the Centre has a number of smaller supermarkets including Tesco Express and Sainsbury's Local but no large supermarket. The RLS also notes that the centre has an "extremely limited night-time economy";
- Local Plan Spatial Strategy area policy SP7 is aimed at supporting the commercial function of the area, particularly its retail function.

Area Assessment: Archway Town Centre

- The Local Plan states that residential development will come forward on sites allocated for housing, on upper floors within the town centre as well as windfall sites within the wider area;
- The Local Plan says that proposals for new business floorspace, particularly SMEs and/or light industrial floorspace which supports the area's cultural offer or other local institutions such as the Whittington Hospital will be encouraged. Net loss of business floorspace will be resisted.
- Vacancy; 2005 - 8%; 2010 – 11.3%; 2013 – 9.1%; 2016 – 10.6%; 2023 – 6.2%⁴⁰.
- The Employment Land Study notes the area's importance for retail employment.
- The town centre is complemented by nearby Employment Growth Areas at Station Road, Wedmore Street, and Mercer's Road noted in ELS;
- Following PDR loss of large offices to residential there is limited employment space in the centre "*Given the recent changes that have taken place in Archway, particularly with respect to the loss of B1 space through PDR, the area has limited potential now to act as a draw for B-use development*" (Employment Land Study paragraph 6.3.24).
- In July 2023 Archway was designated a Creative Enterprise Zone (CEZ) by the Mayor of London. CEZ designation means the town centre will receive funding and support to make its creative economy more resilient and sustainable through affordable workspaces, work experience opportunities and practical training for creatives. The area already contains over 100 creative businesses and operators and the council plans to use the funding it receives from the Mayor to support the development of 1,200sqm of new creative affordable workspaces; encourage a 15% increase in the amount of creative businesses in the area; and assist 300 young people to access opportunities in creative careers⁴¹.
- The main sectors currently in the town centre are SMEs in clothing, media, film production and home care located in blocks on Elthorne Road. Offices of accountants and legal services are located in ground floor units on Holloway Road and Junction Road.

³⁹ Islington Council (2021), Annual Monitoring Report 2016-2018, available from: [20191030annualmonitoringreport20162018.pdf \(islington.gov.uk\)](https://www.islington.gov.uk/20191030annualmonitoringreport20162018.pdf)

⁴⁰ Based on 226 properties surveyed as part of the evidence gathering process for the proposed Article 4 Direction.

⁴¹ Islington Council (2023). Archway made a Creative Enterprise Zone to boost the local economy. Accessed on 03/05/24 from: [Archway made a Creative Enterprise Zone to boost the local economy \(islington.media\)](https://www.islington.gov.uk/news/2023/03/03/archway-made-a-creative-enterprise-zone-to-boost-the-local-economy)

Area Assessment: Archway Town Centre

- One-off office buildings: 724 Holloway Road; 1 Elthorne Road; 4-6 Elthorne Road; 681-9 Holloway Road (Archway Centre) (for users see next box);
- Both 1 Elthorne Road and 4-6 Elthorne Road allocated for business led redevelopment;
- Limited amount of office floorspace in purpose-built employment buildings, no light industrial.

Area Assessment: Archway Town Centre

Social considerations:

- Town Centre provides focal point for the surrounding residential community with retail and services, transport connections, night time uses, swimming pool, places of worship;
- Archway is home to a wide range of independent grassroots venues and maker spaces, five community centres and a busy community library. As a CEZ the council's focus will be on protecting and growing Archway's cultural sector in a sustainable and planned way, with the aim of creating permanent spaces for creative organisations. The need for permanent space has been identified to provide security for local arts organisations to operate and expand within a context of rising rents, with several groups such as Kogan's Academy, Bomb Arts Factory and Ambitious Academy requesting permanent space to be able to stay in Archway. Unrestricted Class MA PDR could undermine the council's work to secure the 1,200sqm of affordable workspace that will give creative businesses more security and enable them to support work placements and skills training for young people.
- There are a number of Eastern Mediterranean units comprising bakeries, barbers, grocery shops, hospitality uses, estate agents, cafes.
- The majority of Archway Town Centre sits within Junction ward, with a small section from 710-722 Holloway Road falling within Tollington ward. Junction ward has a higher percentage of pensioner households than the Islington average (13.2% compared to 10.3%) as well as a higher percentage of residents with a limiting long-term illness (16.8% compared to the Islington average of 15.7%). 16.3% of households in Junction are living in fuel poverty compared to the Islington average of 14.8%⁴². This suggests that there is a large number of older residents and residents with disabilities in the ward for whom travelling further to access everyday essential items and services may represent a significant challenge. The potential diminution of convenience retail and service opportunities resulting from the unrestricted operation of the Class MA PD right would have a wholly unacceptable adverse impact on these residents.

Unrestricted Class MA would reduce the following:

- The range of services available to residents.
- Service employment opportunities, including apprenticeships.
- The amount of places available to socialise for the local community, including specific groups like members of the Eastern Mediterranean community.
- Agglomeration benefits for local businesses.

⁴² Local Insight / Oxford Consultants for Social Inclusion (OCSI) (2021). Local Insight profile for 'Junction' area, available from: [Community Insight profile report \(islington.gov.uk\)](https://www.islington.gov.uk/communities/area-profiles/junction)

Area Assessment: Archway Town Centre

Key sites and allocations:

Eight town centre sites are allocated in the Local Plan for employment-led mixed use, residential-led mixed use and cultural schemes:

- ARCH1: Vorley Road/Archway Bus Station
- ARCH2: 4-10 Junction Road
- ARCH3: Archway Central Methodist Hall, Archway Close
- ARCH6: 1 Elthorne Road
- ARCH7: Brookstone House, 4-6 Elthorne Road
- ARCH8: 724 Holloway Road
- ARCH10: Dwell House, 619-639 Holloway Road
- ARCH11: 798-804 Holloway Road

These are anticipated to provide a net additional 138 housing units, 7,876sqm of office floorspace and 482sqm of retail space.

- There is significant development potential near Archway tube station on the central site bound by Junction Road, Vorley Road, Macdonald Road, Highgate Hill and Navigator Square, and at the Archway Campus site which sits just outside the town centre boundary.
- The Vorley Road/Archway Bus Station site (ARCH1) is identified in Islington's Tall Buildings Study as having potential to accommodate a local landmark building of up to 15 storeys (46m). Two other sites in Archway – Hill House and the southern end of Macdonald Road – are also identified as potentially suitable locations for tall buildings of up to 17 storeys (52m) and 12 storeys (37m) respectively.

By introducing residential units in an unplanned way, Class MA could seriously harm the council's ability to maximise development opportunities in the Spatial Strategy area and deliver strategic objectives for the town centre.

Heritage Designations

- Conservation Areas – St John’s Grove covers Archway Close and most of Junction Road,
- Listed buildings – St John the Evangelist Church Holloway Road (Grade II*).
- Locally listed buildings: 1 Junction Road (Starbucks); 710 Holloway Road (Spoke); Archway Tavern PH; 6 Archway Close (Formerly Ally’s Kitchen).
- Many of the units outside of the PSA are in CAs but their shopfronts are not of heritage value. Impact on use/activity would be main harm. The CA Design Guide states: *“There are shopping and commercial frontages on both sides of Junction Road and the Archway island site which provide local services and are an important contribution to the character of the area. Generally, the Council recognises that often the best use for a building is that which it was designed for and will seek to retain public houses, shops and workshops in appropriate uses which will not diminish their special interest.”*
- Three shopfronts 130 Junction Road (Norman’s Café) 118 Junction Road (Bikeztube) and 6 Archway Close are identified as *“Shopfronts that shall be retained - The remaining original shopfronts contribute to the visual amenity and quality of the area. New and refurbished shopfronts should reflect the design of original shopfronts to retain the character of the area”*(para. 28.10).
- It is considered that the wording of the Conservation Area Design Guide above is not specific enough to resist loss of Class E on basis of activity/ vibrancy on its own. Wording in the “shopfronts to be retained” section does not link the shopfront to the use of the unit.

Area Assessment: Archway Town Centre

How is it the smallest geographical area possible?

The Direction Area has been reduced to the smallest geographical area possible in accordance with NPPF paragraph 53.

The following sites have been excluded from the proposed designation:

- Listed buildings: St. John the Evangelist Church
- Open spaces.
- Transport infrastructure: Archway London Underground Station; Upper Holloway London Overground Station.

Premises not in Class E use including:

- Pubs/bars: The Archway Tavern, 1 Navigator Square; The Mother Red Cap, 665 Holloway Road; Siorai Bar, 114 Junction Road; St. John's Tavern, 91 Junction Road; Oak and Pastor, 86 Junction Road.
- Places of worship: Archway Methodist Church, Navigator Square; Church of the Grace of God Christian Ministry, 722 Holloway Road; St. Gabriels Church, 15 St. John's Villas.
- Education/community uses: UAL: Central St. Martins, 2 Elthorne Road; Archway Children's Centre, 2 Vorley Road; The Playroom, 99 Junction Road. Beauty salons: Skye Nails and Beauty, 742 Holloway Road; Polish My Nails and Beauty, 750 Holloway Road; Nails and Beauty at 53, 53 Junction Road.

The following Class E uses have also been excluded from the proposed designation as it is considered that amongst other things, they would require operational development to change their use to residential:

- TSB Bank, 19 Highgate Hill
- McDonalds restaurant, 23 Highgate Hill
- Marks and Spencers, 10 Archway Mall; the Co-Op supermarket, 640-650 Holloway Road; Sainsbury's, 465 Holloway Road.
- Siam House Health Centre, 110 Junction Road; Golden Health Chinese Medicine Centre, 128 Junction Road.

How is it necessary to avoid wholly unacceptable adverse impacts?

Inside the PSA: the loss of Class E units here would cause wholly unacceptable adverse impacts as identified in paragraph 53 of the NPPF; Class E units within the PSA have been included in the proposed designation.

Class E units outside of the PSA often have a fine grain pattern and are occupied by small businesses. As well as social and economic value they provide character and distinctiveness to the town centre. Unrestricted Class MA would result in:

- Loss of units responding to local community needs;
- Loss of premises that support transfer of skills e.g. hairdressing, cooking;
- Loss of opportunities to develop/ acquire business skills by running a small business;
- Loss of cheaper, peripheral units that facilitate small businesses - if successful these often relocate to primary/ secondary frontages.

The Junction Road non-PSA frontages includes estate agents, accountants, dry cleaners and other essential services; along Holloway Road they include vape shops, beauty salons, estate agents, cafes, and shops for carpets and interior design. These fine grain frontages and the uses within them contribute strongly to the variety and critical mass of the Town Centre. They benefit from the proximity to Archway Station, experience limited vacancy and provide a palpable sense of vibrancy to the Town Centre as a whole. The wide range of services they provide for the local community, including employment opportunities and places to socialise, would be impacted by unrestricted Class MA. These units are susceptible to Class MA for the following reasons:

- Ownership – likely to be small scale on unit-by-unit basis, likely to be on relatively short commercial leases;
- Form – units are generally in period buildings and do not have inbuilt air-conditioning, lighting or fully glazed shopfronts. Limited investment/ expertise/ time required to convert.

The harm to the local community and the local economy would represent wholly unacceptable adverse impacts.

A significant amount of office space in Archway Town Centre was converted to residential under Class O PD rights, in particular in the Core Site. This has reduced the critical mass of the commercial centre, threatening its economic vibrancy. The Local Plan Spatial Strategy and its allocations set out the Council's strategy to address this, to protect and enhance the office and retail functions of the town centre. By introducing residential units in an unplanned way, Class MA could seriously harm the council's ability to deliver its strategic objectives for Archway and undermine the vitality and viability of the Town Centre.

Related to attempts to improve the town centres' vibrancy, Archway's CEZ designation underlines its role as a burgeoning creative quarter. The council is putting significant funding of its own into the area to ensure that the funding and support secured from the Mayor of

Area Assessment: Archway Town Centre

London helps it to achieve its goals of delivering affordable creative workspace; increasing the number of creative organisations in the CEZ by 15%; and providing work opportunities in the creative industries for 300 young people. The loss of premises to Class MA PDR that could otherwise have helped the council to achieve these goals and support an industry that is of such value to London and the UK represents a wholly unacceptable adverse impact.

Unrestricted Class MA would therefore result in wholly unacceptable harmful impacts and a targeted A4D is necessary to mitigate these impacts.

Recommendation:

The recommendation is to designate all Class E units in the PSA and the majority of Class E units outside of the PSA apart from those listed above.

The proposed designation is necessary to avoid wholly unacceptable adverse impacts to Archway Town Centre from Class MA changes of use as detailed.