

Appendix 5: Local Plan Context

1 Introduction

- 1.1 Appendices 1-4 set out policies in relation to the specific topic areas and these are the main reference for the policies in those individual areas. This appendix provides further context and background in relation to other elements of the Local Plan.

2 Local Plan

- 2.1 The Council's Local Plan, adopted in September 2023, is up to date and based on recent evidence. It has been subjected to examination by Independent Planning Inspectors appointed by the Secretary of State as well as extensive public consultation.
- 2.2 As planning authority for the borough, the Council is under a statutory duty set out in the Planning and Compulsory Purchase Act 2004 to plan for the development and use of land in its area by preparing a development plan.¹
- 2.3 The National Planning Policy Framework (NPPF) sits within this structure and states: "The planning system should be genuinely plan-led... Plans should provide ... a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings".²
- 2.4 The NPPF requires local planning authorities (LPAs) to adopt strategic priorities and policies to promote the long-term vitality and viability of town centres and retail areas (para. 90). In relation to residential uses in town centres, this should be encouraged on "appropriate sites" (para. 90f). LPAs are required to adopt priorities and policies to help businesses invest, expand and adapt, and significant weight should be placed on the need "*to support economic growth and productivity, taking into consideration both local business needs and wider opportunities for development*" (para. 85). With regard to planning for social infrastructure need "*Planning policies and decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services*" (para. 97e).

¹ The 2004 Planning and Compulsory Purchase Act sets out how each LPA needs to address the requirement to plan for development and use of land in its area and states, for example, that the development plan documents must include measures for mitigating climate change (s.19(1A)) and that each LPA must identify strategic priorities for development and land use and have policies to address these (s.19(1B)(1C)).

² National Planning Policy Framework Dec 2023 paragraph 5.

2.5 Islington's Local Plan responds to the above requirements by identifying the strategic challenges the Borough is facing and includes policies to address these challenges. It also contains site allocations, eight spatial strategies and an area action plan for the Bunhill and Clerkenwell wards at the south of the borough.

2.6 In terms of the challenges, Islington is a high density, densely developed and compact Inner London borough. There has been significant housing delivery in the past 15 years and a consequent reduction in developable land. In spite of these challenges the new Local Plan meets the borough's identified housing need and has a demonstrable five-year housing land supply. Paragraph 1.26 of the Local Plan states:

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

2.7 As a small borough with a limited supply of land, the Local Plan has to carefully balance different uses and priorities to make the most efficient use of land in a way that is consistent with the council's broader priorities. In light of the borough's significant development constraints, para. 1.32 states:

"Each and every development in the borough, from small roof extensions and street furniture to major mixed-use housing and employment sites, should contribute to the delivery of the Council's objectives. Any development proposal which does not proactively engage with and address these objectives will not be acceptable."

Local Plan Vision

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

Local Plan Objectives

2.9 To deal with the above challenges and to translate the Vision of the Plan, the Council has identified seven key objectives that guided the drafting of all policies, allocations and spatial strategies in the Plan. These objectives are set out below with a commentary on the challenge the Council would face in delivering these objectives in the context of unrestricted Class MA. The commentary is not intended as a critique of Class MA, rather we have sought to place unrestricted Class MA in the context of the objectives of the Local Plan

and explain why the proposed Article 4 Directions are necessary. Appendices 1-4 discuss this in further detail.

Objective 1 “Delivering decent and genuinely affordable homes for all”.

- 2.10 To realise this objective, the Housing section of the Plan includes policies to encourage new housing that meets the needs of the borough and its residents over the longer term with a strong emphasis on the efficient use of land and design quality, both of which are essential to deliver high density developments and make the most of the constrained land supply.
- 2.11 The borough’s capacity to deliver housing was assessed in the 2017 Strategic Housing Land Availability Assessment. This London-wide assessment identified that, following significant past delivery, Islington has a reduced housing capacity. An annual housing target of 775 new homes is set out in policy H2. This amounts to an overall minimum housing target of 13,175 homes for the overall plan period 2020/21 to 2036/37.
- 2.12 In the housing trajectory, site allocations are expected to deliver new housing at scale. Windfall sites and the Council’s own housebuilding programme are expected to supplement the development pipeline.
- 2.13 In recent government consultations and announcements there has been emphasis on brownfield development, particularly as a location for housing development. The only way to unlock the full potential of brownfield development in Islington’s context is to make the most efficient use of the limited land available. In Islington, all of our recent developments have been high density as there is a severe shortage of land available for development, and we work closely with developers to ensure each proposal makes the most efficient use of land. Unrestricted Class MA can also hinder site assembly.

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

- 2.14 Local employment is provided principally in Locally Significant Industrial Sites (LSIS), Priority Employment Locations (PEL) and Town Centres. There are four town centres in the borough and their development over time was influenced by employment opportunities in the local area. Local employment gives opportunities to residents and young people for business ownership and apprenticeships. Money earned in these businesses supports retail, the nighttime economy and local services in a mutually beneficial way. The location of jobs near where people live reduces their need to travel.
- 2.15 Employment policies and allocations are aimed at retaining local employment but unrestricted Class MA could result in uncontrolled loss of Class E uses as the Class MA criteria are limited and do not allow decision makers to consider the potential future operation of the premises or their attractiveness to prospective users. Loss of important local Class E employment space would have extremely serious impacts on the borough and its residents. The spaces outside the CAZ typically provide for a different type of employment offer and whilst small individually they add to the character and economic vitality of the

Borough and without them the centre and north of the borough would become residential dormitories.

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

- 2.16 High density mixed-use development that makes efficient use of land generates footfall and commercial activity that adds to passive surveillance and improves community safety. Unrestricted Class MA in many locations in Islington risks hindering such development and creating blank frontages at ground floor where active uses previously faced the street. In addition, improvements in the public realm such as improved lighting are frequently secured as planning benefits from large scale development. Community safety is not part of the Class MA qualifying criteria or conditions. The delivery of this objective would be challenging in the context of unrestricted Class MA.

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

- 2.17 The erosion of LSAs and town centres with loss of retail, hospitality and other Class E uses would take away a range of local opportunities from children such as indoor sport and recreation and would be likely to make the borough more car-dependent. This would reduce the autonomy of children and deprive them of access to a range of activities with impacts on physical health and life opportunities.

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

- 2.18 The rich variety of uses located in LSAs, town centres and employment land adds strongly to the character of Islington and contributes to the vibrancy and attractiveness of the Borough. Unrestricted Class MA would cause vacancy, blank frontages and blighted sites that either cannot be developed or not at an appropriate scale. The loss of business clusters and shops close to where people live would mean people would need to travel further to access basic needs, and it is possible that many of these trips would be by car rather than walking, cycling or public transport.

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

- 2.19 Unrestricted Class MA could lead to loss of health uses such as opticians and pharmacies, and retail uses close to where people live, all of which fall within Class E use. To access such services residents may need to travel by car or taxi, reducing their independence and adding a cost barrier which would disadvantage households under financial stress particularly those with children and older members.

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

- 2.20 Unrestricted Class MA would hinder development at scale reducing the amount of major applications received.

- 2.21 Unlocking the benefits of development at scale helps the Council deliver services to support local communities and make a difference whilst also delivering housing, employment and services to meet identified needs. Cumulatively, if there is significant piecemeal utilisation of Class MA the ability to secure planning benefits to support services and communities would be reduced, stretching the Council's reduced resources even more.

Conclusion

- 2.22 The above objectives would be challenging to achieve in the context of unrestricted Class MA and in some cases, the failure to achieve these objectives could result in wholly unacceptable adverse impacts. It is important that Article 4 Directions covering the smallest possible geographic are considered in order to prevent such harm, to comply with the NPPF and to plan the Tranche 2 area.