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Sent: 24 May 2024 15:48
To: Planning Policy Consultations
Cc: Carless, Michael; Jonathan.Gibb2; planningpolicy
Subject: London Borough of Islington response to Draft City Plan 2040 Regulation 19
Attachments: LBI Response to City Plan 2040 Reg 19 Consultation 24052024.pdf

Categories: CONFIRMED

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Dear Development Plans Team,

Thank you for the opportunity to respond to the Draft City Plan 2040 Regulation 19 consultation.
Please find attached a letter setting out Islington's response.

Kind regards

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24 May 2024

London Borough of Islington response to Draft City Plan 2040 Regulation 19 Consultation

Thank you for providing us with the opportunity to comment on the City Plan 2040 Regulation 19 Consultation. We welcome ongoing engagement on planning matters with the City. For the majority of policy areas, the approach proposed in the Draft City Plan 2040 aligns with Islington's approach and is supported. We have provided some specific comments below on certain elements of the Draft City Plan 2040.

Tall buildings

Islington's approach to tall buildings is a plan-led approach where specific sites are identified as appropriate in-principle for development of tall buildings through a thorough urban design analysis, as reflected in our new Local Plan adopted in 2023.

We note the approach in the Draft City Plan 2040 Policy S12: Tall buildings is to identify two areas where tall buildings may be appropriate and set out indicative heights for the two clusters. While no specific sites are identified, the two areas, City Cluster and Fleet Valley, have been subject to thorough assessments and modelling. The evidence base, including the Tall Buildings Topic Paper does not indicate specific adverse impacts on Islington.

We also note criterion '7. Applicants will be required to ensure that any cross-boundary impacts of proposed schemes are fully addressed', which is supported.

Hotels

As raised in our previous consultation response, Islington has limited capacity for new hotels beyond those identified in the development pipeline. Islington's new Local Plan only supports development of new visitor accommodation on allocated sites and on sites with existing visitor accommodation where business uses are not feasible.

We note the evidence base included in the City of London Visitor Accommodation Needs Study assesses an overall need for 4,012 hotel bedrooms by 2037, which consists of the forecast pipeline of hotel rooms up to 2030, with additional projected demand of an average of 350 rooms per year beyond that point. We also note that the study recommends the creation of hospitality clusters where possible, with indicative locations at the proposed redevelopment of Smithfield Market and near Aldgate and Tower. However, the policy does not identify appropriate locations nor does the evidence base provide an indication of the capacity for visitor accommodation in these areas.

In light of the approach and to ensure that visitor accommodation demand can be met within the City of London (and avoid potential impacts this could have on adjacent areas including Islington), the policy should be robustly monitored over the Plan period.

Smithfield and Barbican Key Area of Change

As previously mentioned, it will be important to ensure that plans for the Smithfield and Barbican area and Farringdon, Historic Clerkenwell and Central Finsbury in Islington's Bunhill and Clerkenwell AAP are mutually complementary and lead to cross-boundary benefits.

The Bunhill and Clerkenwell Area Action Plan sets out the priorities for the Spatial Strategy Areas adjoining Smithfield Market. In the Farringdon Spatial Strategy Area, the focus for development is on office and business uses, as well as cultural and night-time economy uses. In the Historic Clerkenwell Spatial Strategy Area the focus is on business, creative industries, and cultural uses. The key aim for the Central Finsbury Spatial Strategy area is to balance protection of its mixed-use character including housing estates, commercial, business, leisure and education uses, with high quality new development. The areas are part of the Clerkenwell/Farringdon Cultural Quarter and development is expected to complement this function.

In addition to the point made above in relation to visitor accommodation, we wish to make a number of further comments on policies that are relevant to ensure the success of these areas.

Pedestrian permeability, connectivity and public realm

Proposed walking improvements in the Smithfield and Barbican area are supported, and there is potential for cross-boundary benefits, with the spatial strategy for the Farringdon Station area requiring development to provide an improved public realm which promotes pedestrian circulation, and which results in a series of integrated, linked and high-quality public spaces.

We note and welcome the proposed pedestrian route improvements along Goswell Road and Golden Lane, as well as the proposed Healthy Street Plan Area for Bunhill, Barbican and Golden Lane. It will be important that there is joint working to deliver these improvements effectively given the cross-boundary overlap. It would be helpful to include additional wording in the supporting text:

'10.7.4 Healthy Streets Plans will be developed by the City Corporation, ***working jointly with neighbouring boroughs where appropriate***, to cover the following areas: City Cluster; Fleet Street; Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank and Cheapside; and Riverside.'

Evening and night-time economy

As mentioned in our previous consultation response, there may be cross-boundary impacts arising from night-time economy uses in this area, such as noise and anti-social behaviour. To ensure these impacts are taken into account and prevented, we suggest the addition of the following text:

'S24: Smithfield: 6. Managing the particular challenges which result from the late evening, 7 day a week character of the area', ***including, where relevant, the mitigation of cross-boundary impacts on neighbouring boroughs.***

Housing

The Smithfield and Barbican area includes the majority of City's existing residential sites. Among the adjacent areas in Islington, Central Finsbury Spatial Strategy includes a focus on residential use through the protection and enhancement of its existing housing estates. Islington Council is undertaking an ambitious programme of Council house-building across the borough, including in the AAP area.

Policy HS1: Location of New Housing states that new housing will be encouraged on suitable sites in or near identified residential areas. Policy S3: Housing states that: 'b. Within identified residential areas, prioritising the delivery of affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing, while recognising that for sale market housing would be likely in some instances to have a role to play in making housing development viable;'

The policy should be robustly monitored over the Plan period, to ensure the homes to meet the City's housing targets are delivered.

Energy networks

Islington's Local Plan supports the extension of existing heat networks and the delivery of new heat network infrastructure. We are supportive of the policies below in the Draft City Plan and we welcome future cross-borough working on the implementation of these policies.

- 'S23: Smithfield and Barbican 9. Supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;'
- 'DE1: Sustainable Design - g Prioritise the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments.'

I hope that the above comments are helpful. If you have any questions regarding any matters raised in this letter, please do not hesitate to contact me.

Yours sincerely,

Ilinca Diaconescu
Planning Policy Officer
Islington Council