

# THE ISLINGTON SOCIETY

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## Response to Consultation on Islington Local Plan Strategic and Development Policies

November 2018

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0. We welcome the comprehensive revisions to the Local Plan and support the policies and guidance with the provisos below.

### 1. Locally Listed Buildings

We are committed to the protection of the environment of Islington and its heritage, and to enhancing the quality of design in the borough.

We are especially aware of the wealth of locally listed heritage assets (in addition to the statutory listed ones), thanks to the current review of the local list. In this respect, the sub-reference to locally listed buildings and shopfronts in policies DH1 Part E & DH2 Part D is welcome. We would like to see this strengthened by a wider reference to and definition of “local listed buildings and shopfronts and other non-designated assets” in the second point in the Site Appraisal and Design Process core statements in Para 1.59 [incidentally, there is a typographical erroring that section : it should read “non-designated” not “non-undesigned”]

However, we are also aware from the local list review of the large number of locally listed shopfronts, especially those outside conservation areas, that have been lost. We would like to see a statement in Policy DH2 Part D noting that the council will be vigilant in preventing unauthorised loss of listed buildings and non-designated assets, including locally listed shopfronts,

Recommendation:

- a. Change “non-undesigned (*sic*) heritage assets” to “non-designated heritage assets (including locally listed buildings and shopfronts)” in Para 1.59.
- b. Add “The council will be vigilant in preventing unauthorised loss of listed buildings and non-designated assets, including locally listed shopfronts” to Policy DH2 Part D.
- c. Add “C. Locally Listed Shopfronts will be protected and the council will be vigilant in preventing unauthorised loss of locally listed shopfronts” to Policy DH7.

### 2. Sustainable Buildings 1 : Building Life expectancy

We note that Policy H11 Part B iv refers to “the lifetime of the building” as “generally not less than 50 Years”. The general residential building stock in Islington is more than 125 years and looks set to survive and be revived into the foreseeable future. From this perspective, a suggested lifetime of not less than 50 seems modest.

A statement of the expected longevity of the residential building stock should be included in Section 6 : Sustainable Design. Policy S3 Sustainable Design Standards would be a suitable location. We suggest a life of greater than 75 years

Recommendation:

Add Section I to Policy S3, "All Residential and non-residential building should be capable of an expected life of greater than 75 years"

### 3. Sustainable Buildings 2 : Zero Carbon

Policy S1 Part B is ambiguous. It refers variously in the text to "design", "development" and "construction". This implies that the policy is specifically applicable to new-build construction. In this respect, therefore, it cannot be inferred that "all buildings in Islington" will be zero carbon. An aspiration to apply zero-carbon status to the existing building stock by any deadline date is laudable but unrealistic.

In that case, the stated deadline for design, development and new construction is too long and should be changed to 2025.

Recommendation:

Change "all buildings in Islington will be zero carbon by 2050 "to "all new buildings in Islington will be zero carbon by 2025"

### 4. Buy-to-Leave

The phenomenon of buying residential property and leaving it vacant for investment purposes has become-all-too familiar. It is wholly unwelcome and militates against Thriving Communities. The Local Plan should make it clear that this is entirely unacceptable.

Recommendation:

Add: "The council will take action to prevent leaving residential premises vacant (so-called Buy to Leave)" to policy H1.

### 5. Basements

The Islington Society is sensitive to the significant adverse impacts that basement development has on neighbouring properties and the wider area. Whilst we recognise and support the statement in Policy DH1 Part H that "any development involving basements will be strictly controlled", the Islington Society's position is that basement developments should not be permitted.

Recommendation;

That the Local Plan reflects a presumption that basement developments should not be permitted. Thus:

- a. Take out Part A and insert it as new item (i) to Part D. Renumber part D items (i) to (vii), renumber Parts to A to C.
- b. Change current Part B introduction from "The Council will only permit basement development where it is demonstrated ...." to "The Council will not permit basement development unless it can be demonstrated ...."

### 6. Tall Buildings

The Islington Society regrets and does not support the continued proliferation of tall buildings across the borough because of their adverse effect on the character and environment of Islington.

We want is to retain para 3.1.5 of the 2011 Plan: