

THE ISLINGTON SOCIETY

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to:

The Ministry of Housing, communities and Local Government
2 Marsham Street
London SW1P 4DF

15 December 2020

The Islington Society response to the consultation on 'Supporting housing delivery and public service infrastructure'

The Islington Society has the following comments on the proposed 'measures to support housing delivery, economic recovery and public service infrastructure' by the Ministry of Housing Communities and Local Government.

These comments refer specifically to Section 1. of the proposal concerning a new permitted development right for the change of use from Commercial, business and Service use (Class E) to Residential (Class C3).

We do not agree that this will significantly improve housing delivery but assert that it will instead have a damaging impact on the community at large.

Comment

The proposed right :

The Islington society considers the proposed Permitted Development Right to change from Use Class E to Class C3 without hindrance to be entirely misguided and damaging to the viability of our high streets and local centres.

Our High streets and our neighbourhood centres provide a variety of community activities on which so much of the vitality of the areas where we live, work, eat and shop depend.

The premise upon which this proposal is based is false. It is patently untrue that the change of use from Class E use to Class C3 use will "attract ... additional footfall that new residents will bring" (para.13). The footfall that residents provoke is both considerably smaller than business uses and occurs outside the hours that contribute to any commercial success of high street uses.

Furthermore, the number of premises affected are negligible compared to the housing need and the statement that "this will support housing delivery" (para 13) is clearly disingenuous.

Matters for local consideration through prior approval :

It is notable that all of the safeguards provided by the proposed prior approval clauses are formulated to protect the applicant / proposed resident, eg. is there a danger of flooding, noise, heavy industry or waste management activities affecting the intended occupiers?

There is NO provision for prior approval to take into account safeguards for the existing occupiers/businesses/users or to consider the impact on the environment, the character, the economic well-being or the vitality of the location.

We consider that it is essential that the factors to be taken into account during prior approval consultations includes safeguarding existing user as well as intended new users.

Notes on the Consultation

Please note that the Islington Society considers that this consultation is fundamentally flawed in two respects.

Firstly, there is no facility in the Consultation Questionnaire to challenge the principles or the objective of the proposal. Questions asked only address specific, limited details.

We note that the very first question is :

Q1 Do you agree that there should be no size limit on the buildings that could benefit from the new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3)?

Please give your reasons.

Whereas the first question to ask should really be :

Q1 Do you agree that a Permitted Development right to change use from Commercial, Business and Service (Class E) to residential (C3) is a good idea?

Please give your reasons.

We recommend further consultation on matters of principle in addition to consultation to non-fundamental detail.

Secondly, the current turbulent times we are experiencing occasioned by the Coronavirus (Covid 19) crisis means that we are experiencing unnatural, untypical behaviour to which normal planning considerations have no relevance.

We can only guess at the direction that future High Streets might take. We certainly know that local shops in neighbourhood centres are currently in resurgence and are likely to become more significant into the future.

This is not the time to radically re-configure high streets and local centres by sweeping changes to the Permitted right to lose critical business and community uses to small numbers of residential uses.

We recommend that this proposal is *deferred for two years* and re-consulted when we return to more normal times.

Yours etc.

David Gibson
(Chairman, the Islington Society)

This response to the 'Supporting housing delivery and public service infrastructure' consultation are made by The Islington Society, a charity established in 1960 to encourage the promotion and safeguarding of the amenities of Islington.