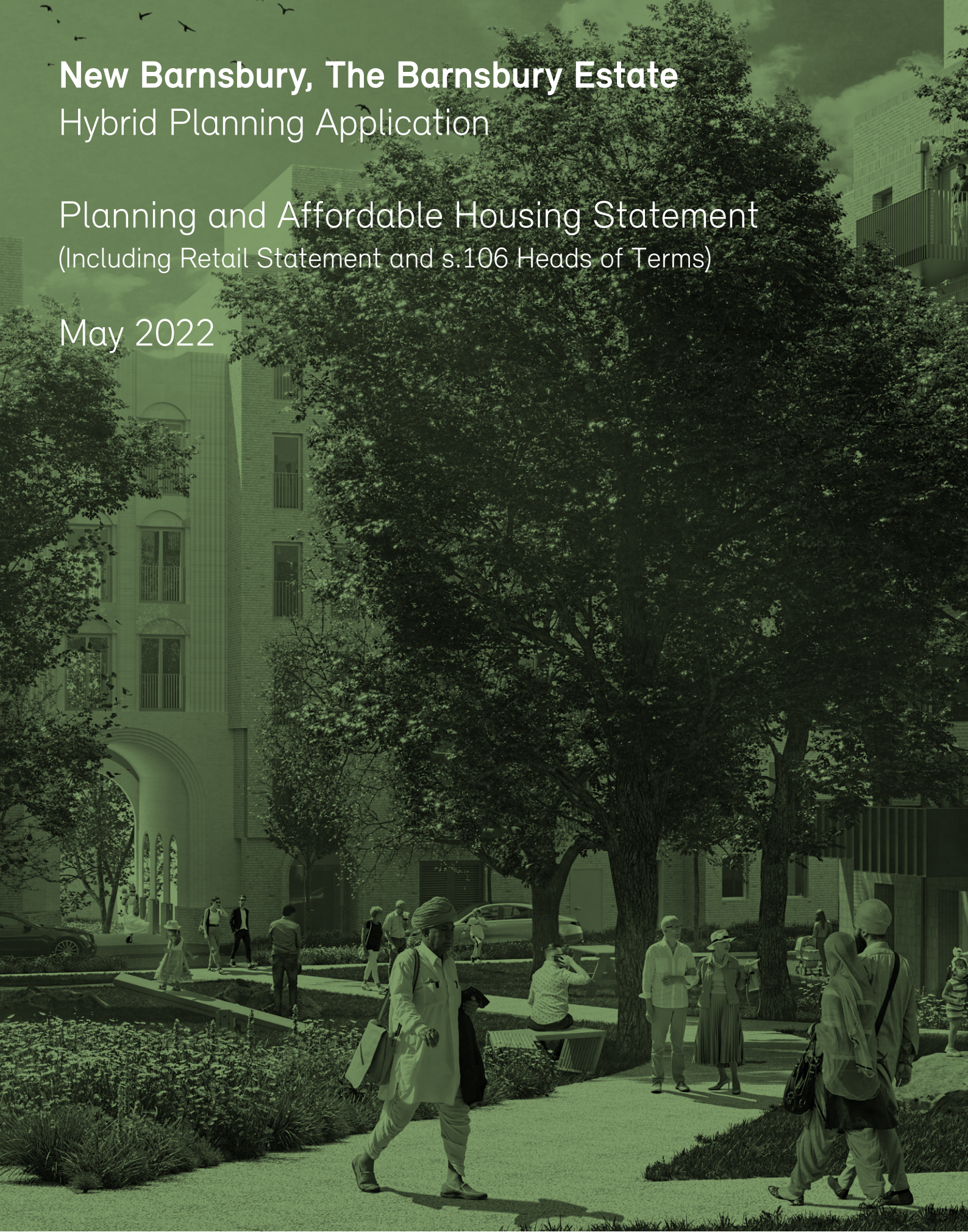


New Barnsbury, The Barnsbury Estate

Hybrid Planning Application

Planning and Affordable Housing Statement
(Including Retail Statement and s.106 Heads of Terms)

May 2022



Celebrating
60
years

New Barnsbury, The Barnsbury Estate Planning and Affordable Housing Statement

**(Including Retail Statement and s.106 Heads of
Terms)**

Newlon Housing Trust and Mount Anvil Limited

May 2022

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

**Celebrating 60 years
of innovation in planning.**

lichfields.uk

Contents

1.0	Introduction	1
	Scope of Application	2
	Report Structure	4
2.0	Site and Surroundings	6
	The Barnsbury Estate	6
	New Barnsbury	7
3.0	Consultation and Engagement	12
	Consultation Summary	12
	Residents' Ballot	13
	Public Consultation	14
	Pre-Application Consultation	15
	Summary	16
4.0	Proposed Development	18
	Description of Development	18
	Demolition, Phasing & Resident Rehousing Strategy	20
	Residential Mix and Density	23
	Affordable Housing	24
	Building Heights	25
	Architecture & Materiality	26
	Landscape, Public Realm and Amenity Space	27
	Play Space	27
	Access, Servicing and Parking	28
	Energy and Sustainability	28
	Relationship between New Barnsbury and Old Barnsbury	29
5.0	Planning Policy Context	30
	Development Plan	30
	Emerging Planning Policy	33
	Material Considerations	35

6.0	Planning Assessment	37
7.0	Principle of Development	39
	Site Allocation and Residents’ Ballot	39
	Residential Use	40
	Commercial Use	40
	Community Use	43
8.0	Housing Mix, Optimisation and Residential Quality	46
	Housing Mix	46
	Optimisation	48
	Residential Quality	49
9.0	Proposed Affordable Homes	50
	Policy Framework	51
10.0	Design: Architecture and Landscape	54
	Architectural Approach	54
	Landscape, Public Realm and Open Space	55
	Playspace	56
	Urban Greening Factor and Biodiversity Net Gain	58
	Accessibility and Inclusive Design	59
	Fire Safety	59
11.0	Tall Buildings, Townscape and Heritage	61
	Tall Buildings	61
	Townscape	67
	Heritage Effects	67
12.0	Daylight, Sunlight & Overshadowing	70
	Policy Context	70
	Proposed Development: Natural Light Conditions	70
	Surrounding Properties: Natural Light Conditions	73
13.0	Sustainable Transport	75
	Car Parking	75

	Car Club	76
	Cycle Parking	77
	Access	77
	Delivery, Servicing and Refuse Collection	78
14.0	Energy and Sustainability	79
	Energy	79
	Overheating	79
	Sustainability and Whole Life Carbon	80
15.0	Other Environmental Considerations	82
	Ecology	82
	Trees	82
	Flood Risk and Drainage	84
	Land Contamination	84
	Air Quality	85
	Noise and Vibration	85
	Wind Microclimate	85
16.0	Section 106 and CIL Matters	87
	Section 106	87
	Community Infrastructure Levy	87
17.0	Scheme Benefits and Conclusion	89

Figures

Figure 2.1	The Barnsbury Estate	6
Figure 2.2	LBI Policies Map	9
Figure 2.3	LBI Emerging Policies Map (Subsequent 2021 Modifications include allocation of the Barnsbury Estate)	10
Figure 2.4	LBI Local Flood Risk Zone	10
Figure 2.5	TPO Map	11
Figure 4.1	Demolition Plan	20
Figure 4.2	Phasing and Development Programme	22
Figure 4.3	Building Typologies	26
Figure 10.1	Building typologies	55

Tables

Table 2.1	Existing Housing Mix	7
Table 4.1	Summary of Detailed and Outline Elements of Hybrid Planning Application	19
Table 4.2	Proposed Residential Units Mix for Detailed Element of Scheme	23
Table 4.3	Proposed Residential Unit Mix Range for Outline Element of Scheme	23
Table 4.4	Tenure Split for Detailed Element of Scheme	24
Table 4.5	Tenure Split for Outline Element of Scheme	24
Table 4.6	Overall Tenure Split (Detailed and Outline)	24
Table 4.7	Proposed Building Heights (Storeys and AOD)	25
Table 4.8	Play Space Requirements	27
Table 4.9	Proposed Play Space	28
Table 7.1	Existing Commercial Premises on Caledonian Road	41
Table 8.1	Housing Size Mix and Priorities for Each Housing Tenure	46
Table 8.2	Proposed Dwelling Mix - Detailed Element	46
Table 8.3	Proposed Dwelling Mix - Outline Element	47
Table 9.1	Tenure Split for Detailed Element of Scheme	50

Table 9.2	Table 4 Tenure Split for Outline Element of Scheme	50
Table 9.3	Overall Tenure Split (Detailed and Outline illustrative scheme)	51
Table 10.1	Existing Play Space	57
Table 10.2	Play Space Requirements	57
Table 10.3	Proposed Play Space	58
Table 13.1	Non-residential cycle parking provision	77
Table 15.1	Trees/small groups to be retained and removed (on site)	83
Table 15.2	Trees protected by TPS to be retained and removed	83
Table 15.3	Tree retention/removal/planting	83

Appendices

Appendix 1 Heritage Assessment by Montagu Evans LLP (13 May 2022)

1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of Newlon Housing Trust and Mount Anvil Limited (“The Applicant”), to accompany a Hybrid Planning Application for the comprehensive phased redevelopment of ‘New Barnsbury’ within the Barnsbury Estate, London, N1. The Local Planning Authority is the London Borough of Islington (‘LBI’) and the planning application is referable to the Mayor of London.

1.2 The Hybrid Planning Application seeks planning permission for the following development (‘the Proposed Development’):

“Outline planning application for the phased redevelopment of the site comprising:

- 1 *Phased site-wide demolition of all existing buildings and structures, site preparation and enabling works (including excavation) (No Matters Reserved for future approval);*
- 2 *Phased construction of buildings (including basements) comprising residential units (Use Class C3); Hard and soft landscaping works including public open space access and highway alterations, car and cycle parking provision, and; All other associated ancillary works (No Matters Reserved for future approval (the “detailed element”)); and*
- 3 *Phased construction of buildings (including basements) comprising residential units (Use Class C3) and flexible commercial, business and service floorspace (Use Class E) and local community floorspace (Use Class F2); Hard and soft landscaping works including public open space, access and highway alterations, car and cycle parking provision, and; All other associated ancillary works (All Matters Reserved for future approval (the “outline element”))*

(Being a hybrid application)”

1.3 In summary, the proposals at New Barnsbury comprise:

- 1 Up to 950 residential dwellings, in buildings ranging from 3-13 storeys;
- 2 Up to 494 affordable homes (of which 291 constitute reprovision of existing housing stock and 203 are new affordable homes);
- 3 Up to 52% affordable homes overall (calculated by unit), of which up to 88% are Social Rent and up to 12% Intermediate Housing);
- 4 Up to 2,775sqm of flexible commercial floorspace and community uses including new community centre and nursery (Use Class E and F2); and,
- 5 Over 16,210sqm of open space including over 5,000sqm of play space.

1.4 This Planning Statement assesses the Proposed Development against relevant planning policies in the National Planning Policy Framework (NPPF) and the Development Plan, whilst also having regard to other relevant material planning considerations.

Scope of Application

1.5 The Hybrid Planning Application comprises the following documents:

1.6 For Approval (Detailed Element):

- 1 Planning Application Form and Certificates (also applicable to Outline Element), prepared by Lichfields;
- 2 Planning Application Drawings, prepared by PTE (drawing schedule appended to Cover Letter);
- 3 Landscape Plans, prepared by Farrer Huxley (drawing schedule appended to Cover Letter).

1.7 For Approval (Outline Element):

- 1 Development Specification for Outline Element of Scheme, prepared by Lichfields;
- 2 Parameter Plans, prepared by PTE (drawing schedule appended to Cover Letter);
- 3 Design Code, prepared by PTE and Farrer Huxley.

1.8 Accompanying Documentation:

- 1 CIL Additional Information Form, prepared by Lichfields;
- 2 Design and Access Statement, prepared by PTE, including the following:
 - a Photographs and photomontages of existing site;
 - b Phasing Overview and commentary on Rehousing Strategy for Phases 1a/1b;
 - c Contextual Drawings and Images;
 - d Layout plans of external areas showing arrangements for servicing, cycle storage, substations, refuse and recycling collection;
 - e Wheelchair Unit Plans - to demonstrate how each dwelling-type will accommodate private outdoor space and built-in storage requirements, standard-sized furniture and access needs related to the proposed level of occupancy;
 - f Landscape Strategy, prepared by Farrer Huxley, including the following:
 - i Open Space and Recreation Assessment;
 - ii Play Space;
 - iii Urban Greening Factor;
- 3 Planning Statement, prepared by Lichfields (this document), including:
 - a Affordable Housing Statement
 - b Retail Statement
 - c S.106 Heads of Terms
- 4 Arboricultural Impact Assessment and Method Statement, prepared by Sharon Hosegood Associates, including:

a Tree Survey and Protection Measures

- 5 Archaeology (Buried Heritage) Assessment, prepared by RPS;
- 6 Basement Impact Assessment, prepared by Stantec;
- 7 Biodiversity Impact Assessment (Net Gain), prepared by Greengage;
- 8 BREEAM 2018 New Construction Report (Ecology), prepared by Greengage;
- 9 Circular Economy Statement, prepared by AECOM;
- 10 Energy Statement and Modelling, prepared by AECOM;
- 11 Equality Impact Assessment, prepared by Quod;
- 12 Financial Viability Assessment, prepared by DS2;
- 13 Fire Statement & Gateway One Form, prepared by Affinity Fire;
- 14 Flood Risk Assessment and Drainage Report, prepared by Stantec;
- 15 Ground Conditions Assessment, prepared by Stantec;
- 16 Green Performance Plan, prepared by AECOM;
- 17 Health Impact Assessment, prepared by Quod;
- 18 Internal Daylight & Sunlight Assessment, prepared by Point 2 Surveyors;
- 19 Outline Construction Management Plan, prepared by Stantec;
- 20 Outline Lighting Assessment, prepared by Light Follows Behaviour;
- 21 Overheating Report, prepared by AECOM;
- 22 Schedule of Accommodation, prepared by PTE;
- 23 Site Waste Management Plan, prepared by Stantec;
- 24 Statement of Community Involvement, prepared by London Communications Agency;
- 25 Sustainable Design & Construction Statement including BREEAM Assessment, prepared by AECOM;
- 26 Transport Assessment, prepared by Stantec, including:
 - a Outline Constructions Logistics Plan
 - b Outline Delivery and Servicing Strategy
 - c Parking Design and Outline Car Park Management Plan
 - d Framework Travel Plan
 - e Plans of blue badge parking spaces;
- 27 Unexploded Ordnance Report, prepared by Stantec;
- 28 Utilities and Foul Drainage Assessment, prepared by Stantec; and
- 29 Whole Life Carbon Report, prepared by AECOM.

- 1.9 An Environmental Statement (ES), coordinated by Trium Consulting, has also been prepared to comply with relevant legislation. The ES comprises the following:

Non-Technical Summary

ES Volume 1 - Main Report:

- i Chapter 1: Introduction;
- ii Chapter 2: EIA Methodology;
- iii Chapter 3: Alternatives and Design Evolution;
- iv Chapter 4: The Proposed Development;
- v Chapter 5: Demolition and Construction;
- vi Chapter 6: Socio-Economics;
- vii Chapter 7: Traffic and Transport;
- viii Chapter 8: Air Quality;
- ix Chapter 9: Noise and Vibration;
- x Chapter 10: Daylight, Sunlight, and Overshadowing;
- xi Chapter 11: Wind Microclimate;
- xii Chapter 12: Climate Change;
- xiii Chapter 13: Effect Interactions;
- xiv Chapter 14: Likely Significant Effects;
- xv Chapter 15: Mitigation and Monitoring; and,
- xvi Glossary and Abbreviations.

ES Volume 2 - (Built) Heritage, Townscape and Visual Impact Assessment;

ES Volume 3 - Technical Appendices.

- 1.10 The scope of the Hybrid Planning Application has been agreed with Planning Officers at LBI, prior to its submission.

Report Structure

- 1.11 This Planning Statement contains the following sections:
- Section 2: Description of the site and surrounding area;
 - Section 3: Background to the site and summary of planning history;
 - Section 4: Details of the proposed development;
 - Section 5: Summary the relevant planning policy and guidance;
 - Section 6: Assessment of the proposed development in planning terms;
 - Section 7: Principle of Development
 - Section 8: Housing Mix, Optimisation and Residential Quality
 - Section 9: Affordable Housing Statement
 - Section 10: Design: Architecture and Landscape

- Section 11: Tall Buildings, Townscape and Heritage
- Section 12: Daylight, Sunlight and Overshadowing
- Section 13: Sustainable Transport
- Section 14: Energy and Sustainability
- Section 15: Other Environmental Considerations
- Section 16: Section 106 and CIL
- Section 17: Summary and Conclusion

2.0 Site and Surroundings

The Barnsbury Estate

- 2.1 The Barnsbury Estate is located between Kings Cross and Angel in the LBI. It comprises two parcels of land, divided by Charlotte Terrace (as detailed at Figure 2.1 below) known as 'New Barnsbury' and 'Old Barnsbury'. This Hybrid Planning Application relates to the redevelopment of New Barnsbury only. A separate application is being progressed by Newlon Housing Trust for complementary upgrade and enhancement works at the Old Barnsbury part of the estate (discussed below).

Figure 2.1 The Barnsbury Estate



Source: PTE

- 2.2 The western part of the estate is known as 'New Barnsbury' (solid red line) and contains a series of mid-20th Century residential buildings ranging from 2-10 storeys, accommodating 371 existing homes. New Barnsbury includes a community centre and 22 commercial properties situated within the western portion of the site fronting Caledonian Road. The Tiddley Tots Nursery Daycare operates from specific rooms within the Community Centre. The Charlotte Terrace building is also used for non-residential uses, with LB Islington Parking Wardens using this as an office building.
- 2.3 To the east of Charlotte Terrace, 'Old Barnsbury' (dashed red line) is made up of a series of residential buildings and contains 275 homes. This part of the estate is proposed for enhancement and refurbishment, subject to a separate but complementary planning application. It is anticipated that both applications would be determined at the same Planning Committee.

- 2.4 New Barnsbury is well connected and accessible, with a PTAL Rating ranging between 3 and 6B (the best possible rating). It is within walking distance of Caledonian Road and Barnsbury Overground Station, Angel Underground Station and Kings Cross St Pancras International, mainline and Underground Station. Seven bus routes are accessible within 650 metres of the site.
- 2.5 The surrounding area predominantly comprises residential dwellings, commercial uses, community uses (including educational facilities), and natural and open spaces (such as Regent’s Canal and nearby parks). To the south of the site lies Regent’s Canal running in an east-west direction. A number of public areas of open space are present within the surrounding area, with Barnard Park located to the northeast, Edward Square to the west and the Thornhill Bridge Community Garden to the south-west. A Place of Worship (The Catholic Church of the Blessed Sacrament) is located to the west of the site.

New Barnsbury

- 2.6 New Barnsbury extends to 4.38ha and is bounded by Copenhagen Street to the north, Carnegie Street to the south, Caledonian Road to the west and Charlotte Terrace to the east. There is a pronounced change in gradient from north to south.
- 2.7 The site includes 17 residential buildings ranging from 2 to 10 storeys in height providing 371 residential units (Adrian House, Aldrick House, Amory House, Blackmore House, Charlotte Terrace, Crispe House, Ewen House, Kenwrick House, Jocelin House, Mavor House, Messiter House, Molton House, Redmond House, Ritson House, Thorpe House, Thurston House and Venn House).
- 2.8 There are 22 commercial units facing Caledonian Road and a community centre (including the Tiddley Totts nursery) at the centre of the site, as well as 121 on-street car parking spaces for existing residents, 4 garages, 61 small sheds and limited cycle parking provision.
- 2.9 The site includes sections of existing roads, including Carnegie Street and Charlotte Terrace, as well as estate roads, namely Pultney Street, Jays Street, Leirum Street and Bryan Street. Areas of hardstanding and car parking (mostly on street parking spaces) are also present.
- 2.10 Amenity spaces in the form of backyards, a play area, basketball court and communal greenspaces are also present, with a number of trees located throughout the site. The site is located to the north of the Regents Canal towpath, and there is vegetation present along the bank between the towpath and the estate’s existing buildings.
- 2.11 The existing housing unit mix and tenure is detailed at Table 2.1, below.

Table 2.1 Existing Housing Mix

Unit Size	Leasehold		Social Rent		Total	
	Units	Hab Rooms	Units	Hab Rooms	Units	Hab Rooms
Studio	4	4	19	19	23	23
1 Bed	14	28	44	88	58	116
2 Bed	31	93	119	357	150	450
3 Bed	24	96	83	332	107	428
4 Bed	6	30	23	115	29	145
5 Bed	1	6	3	18	4	24
Total	80	257	291	929	371	1,186

Source: Newlon (Note: Habitable rooms estimated)

2.12 The New Barnsbury part of the estate currently contains deficient accommodation that does not meet the needs of its residents. It represents an inefficient use of land in an accessible and sustainable urban location. The system-built, post war buildings across the estate are considered to be visually unattractive and fail to address the street. They have a detrimental effect on the immediate townscape and the settings of the area's heritage assets. The quality of the existing accommodation is deficient in many areas, for example:

- 1 *Overcrowding:* 46 families on New Barnsbury are living in a home that is not adequate for the number of occupants.
- 2 *Living conditions:* a sample of homes visited demonstrates many homes on New Barnsbury do not meet modern space standards for internal or external space. Residents report the layout of their homes are cramped, impractical and compromised. Some residents report instances of damp. There are a significant number of elderly and/or disabled households at New Barnsbury, with over 100 households reporting medical needs and over 43 households with a member aged 70+. Half of the existing buildings have no lift and are stair access only, with the remainder having only one lift which is problematic in the event of a lift breakdown. The layout and size of existing homes do not lend themselves to anyone using a wheelchair or those with disabilities.
- 3 *Energy efficiency:* from a representative sample of around one third of the New Barnsbury properties, the average EPC was D.
- 4 *Sustainable Energy:* The estate's energy system is gas boilers which is an unsustainable energy source.
- 5 *Open space:* the estate's open spaces are poor quality and unwelcoming, with little planting, few recreation and play opportunities, limited surveillance and unattractive fenced enclosures. More than 40% of the existing open space on New Barnsbury can be characterised as 'non-accessible landscape buffer' and more than 20% is private gardens for the benefit of the ground floor homes only.
- 6 *Estate operations:* the streetscape is dominated by vehicles and the design of refuse facilities leaves them open to regular abuse. Residents report frustration with such issues and also crime/safety concerns.

2.13 New Barnsbury presents a significant opportunity for comprehensive phased redevelopment to deliver more dwellings, more genuinely affordable homes, better quality accommodation, enhanced landscaping, planting and open spaces, and a more attractive estate; befitting of this prominent accessible location in LBI.

Planning Designations

2.14 The existing buildings within the Estate are not listed or locally listed and the site is not located within a Conservation Area.

2.15 The adopted LBI Policies Map June 2013 (Figure 2.3) identifies the following policy designations applicable to the site:

- **Local Shopping Area (Caledonian Road):** Development Management Policy DM4.6

- **Local View from Archway Bridge (LV5):** Development Management Policy DM2.4

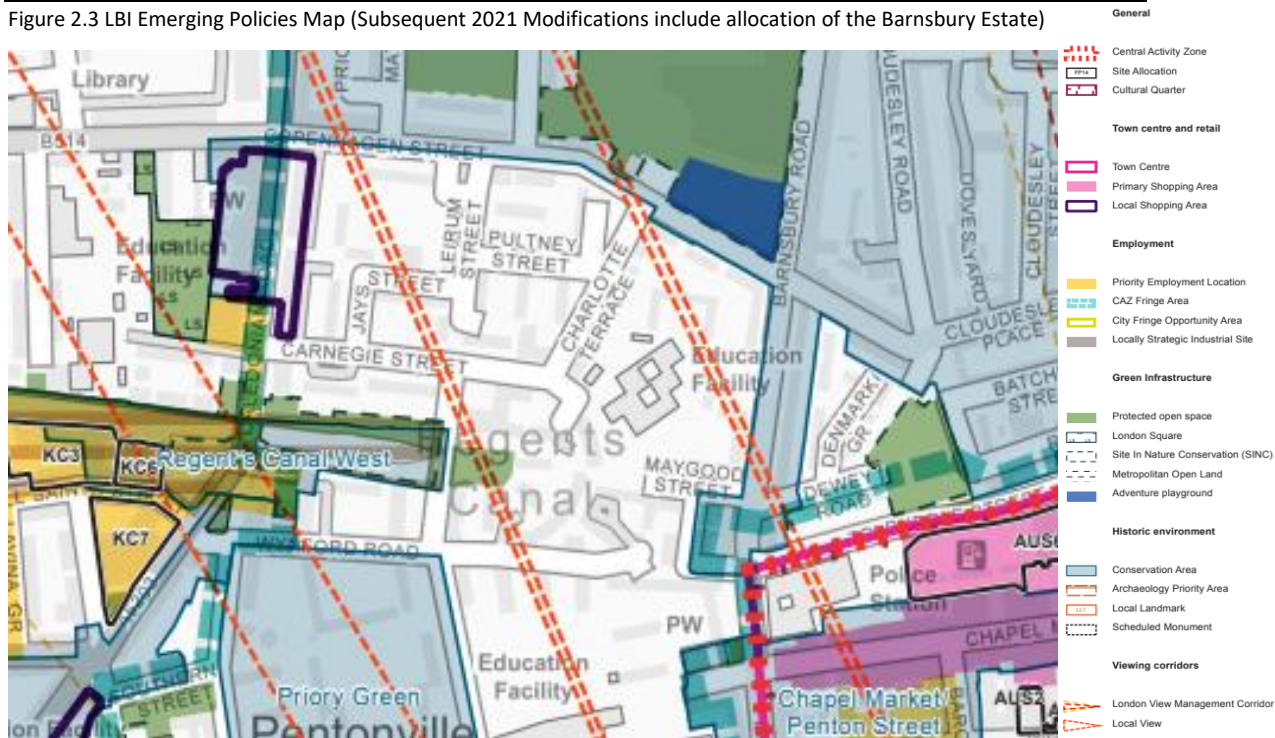
Figure 2.2 LBI Policies Map



Source: Source: London Borough of Islington (Interactive Map: <https://mapapp.islington.gov.uk/mapthatv3/Default.aspx>)

- 2.16 The Policy Map identifies that in the surrounding area, the Barnsbury Conservation Area (ref. CA10) is located immediately to the north and west of the site along with the Regent’s Canal Conservation Area to the south. The site is also in the vicinity of Grade II Listed buildings off Caledonian Road to the north-west and the Grade II Listed West Portal Tunnel over Regent’s Canal to the south east. The canal, to the south of the application site, is designated as a Site of Importance for Nature Conservation (SINC).
- 2.17 The Draft Islington Local Plan allocates the wider Barnsbury Estate for a housing led development (Site Allocation ref. OIS28: Barnsbury Estate). The allocation promotes the provision of additional homes in this location, including affordable housing, as well as the delivery of a new community centre and new commercial units. The allocation also promotes improvements to existing estate open spaces and the creation of public parks, as well as enhancement of landscaping, planting, lighting, security, play spaces, seating and bin and cycle storage across the estate.

Figure 2.3 LBI Emerging Policies Map (Subsequent 2021 Modifications include allocation of the Barnsbury Estate)

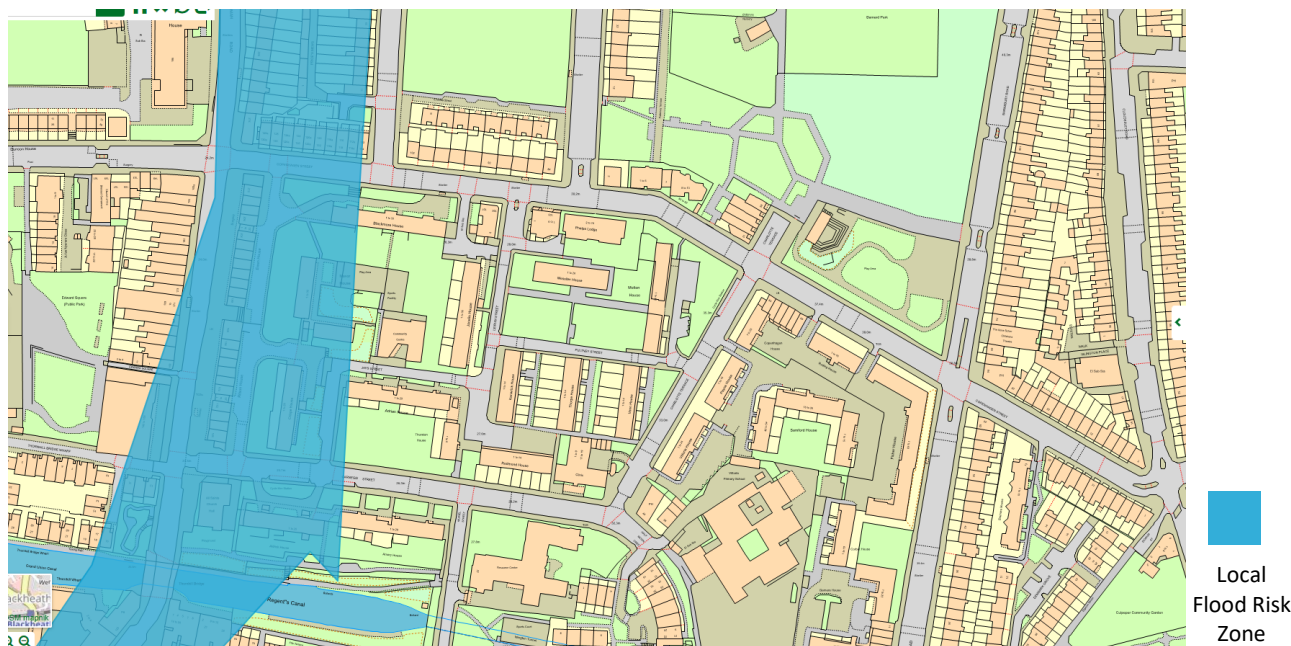


Source: Source: London Borough of Islington (https://www.islington.gov.uk/planning/planning-policy/local_plan_review/local-plan-examination-library)

2.18

The Site is located within Flood Zone 1 for fluvial flooding, which comprises land assessed as having a low (less than 1 in 1,000) annual probability of river or sea flooding (<0.1 %) and a zone in which all uses of land are considered appropriate. The west of the site is within a Local Flood Risk Zone (Ref. LFRZ3004) for surface water flooding (pluvial), as detailed at Figure 2.4.

Figure 2.4 LBI Local Flood Risk Zone



2.19 There are 204 existing trees on site, of which 94 are subject to Tree Preservation Orders (TPO) as shown at Figure 2.5.

Figure 2.5 TPO Map



Planning History

2.20 New Barnsbury has been subject to several planning applications in the past relating to refurbishment works and tree management across the site. The most recent of these applications was approved in December 2021. The planning history contains no applications of substance relevant to the current application for comprehensive phased redevelopment.

3.0 **Consultation and Engagement**

3.1 This Hybrid Planning Application represents the culmination of an inclusive and responsive process of engagement with estate residents and the wider community, alongside pre-application consultation with LBI, the GLA and other stakeholders. This section sets out the consultation and engagement timeline of the project, summarises the key points of feedback from planning pre-application meetings, and identifies the various public and resident consultation events that have taken place.

3.2 On large multi-phased estate projects, it is critical to ensure that engagement with estate residents, the wider community and planning officers and other stakeholders is undertaken in a suitably balanced and integrated manner. The scheme's iterative design development process has been informed by successive rounds of discussion and feedback with estate residents, the wider Barnsbury community, Officers and other stakeholders over a period of two and a half years. This process is discussed below and expanded upon in the accompanying Statement of Community Involvement prepared by London Communications Agency.

Consultation Summary

3.3 Consultation with estate residents began in September 2019 and has continued following the residents' ballot in advance of the planning application being submitted. The applicant is committed to continuing to engage with residents throughout the determination period and, if approved, throughout the subsequent ongoing transformation of the Estate.

3.4 The team has worked to ensure that the consultation process is inclusive and all consultees have had opportunities to engage with the applicant and professional team during the challenging lockdown periods enforced due to Covid-19. The applicant has adhered to the best practice measures set out in guidance from the GLA on estate regeneration ballots.

3.5 The team set out to achieve a number of objectives through consultation with residents and the wider community. These objectives formed the basis of each phase of the engagement process and can be summarised as:

- 1 Engage with every resident on the Estate and ensure all were provided with the opportunity to feedback on the proposals.
- 2 Ensure the proposals were accessible to all by presenting them clearly, transparently and in a variety of formats, including digitally, via printed materials and through in-person workshops.
- 3 Provide everyone with an opportunity to provide feedback on the proposals by using a range of feedback mechanisms and ensuring there was multiple opportunities throughout the evolution of the masterplan for people to have their say.
- 4 Provide residents with enough information to make an informed vote in the Spring 2021 ballot, and support the statutory voting process through continued, consistent engagement.
- 5 Continue to engage in a meaningful manner in the post-ballot period and invite the wider community to have their say.

6 Make sure that all residents and the wider community were able to genuinely help shape the masterplan as it evolved and clearly explaining how feedback had been incorporated into the design of the proposals.

3.6 Engagement on the project has been split into distinct phases, with enough time to meaningfully update and incorporate feedback in between each. Before the consultation launched, a dedicated website was set-up, which was used as a central hub for all consultation materials, FAQs and details about each phase of consultation.

3.7 A consultation framework was developed with a view to providing residents with a clear narrative throughout, directly explaining each iteration of the proposals at each stage. At each stage, the detail available to residents was increased, partly due to the evolving nature of the proposals, but also to ensure that residents could track and follow their progress. This enabled an effective consultation process, whereby agreed elements from previous workshops formed the basis for discussion at the next meeting.

3.8 For each consultation event a thorough and robust communications plan for each phase of engagement was created. This was tailored in response to resident feedback collected from each previous phase of engagement.

3.9 To ensure that digitally excluded audiences were kept up to date, the team also made use of a variety of physical media, including letters, brochures, newsletters, flyers, and full booklet documents.

3.10 A visible consultation brand was created, with all materials clearly labelled as part of the 'Barnsbury Estate Transformation Project' - using the acronym 'BEST'.

3.11 The feedback received from LBI's planning team, local political representatives, and the authority's cabinet has been carefully considered at each stage. Guidance has also been sought from the GLA throughout the process.

Residents' Ballot

3.12 A Residents' Ballot was held between February and March 2021 to gauge the support from residents across the Barnsbury Estate for the comprehensive phased transformation of New Barnsbury alongside upgrade and enhancement works at Old Barnsbury. The ballot was the result of a comprehensive consultation programme with residents which started in September 2019.

3.13 The Landlord Offer for the Ballot made the following commitments to estate residents:

- 1 New Barnsbury social housing tenants guaranteed a right to remain on the estate.
- 2 Tenants will have a new home reflecting their households' housing need and if the number of bedrooms does not increase the rent shall stay the same, subject to policy increase.
- 3 They will have the same tenancy rights.
- 4 New Barnsbury resident leaseholders are guaranteed a new home on the estate if they want to remain on the estate via shared equity arrangement based on property values.

- 5 Resident leaseholders will be offered open market value for their home based on a RICS Red Book valuation and may be entitled to statutory home loss of 10% of value, as well as disturbance costs connected to relocation.
- 6 Residents will not be rehoused permanently off the estate unless they want to be.
- 7 The new homes will be of a far higher standard than the existing housing stock. Each new home will meet or exceed minimum space standards and will have its own private space, such as a balcony, terrace or patio, and access to semi-private communal courtyards.

3.14 Residents were invited to vote either “yes” or “no” as to the following question – ‘Are you in favour of the proposal for the transformation of the Barnsbury Estate?’. The turnout saw 506 of the estate’s 639 eligible residents, or 79.2%, vote in the ballot. A total of 369 residents or 72.9%% of those who voted, voted “yes” for the transformation.

3.15 This overwhelmingly positive ballot outcome, based on a high voter turnout, gives a clear positive mandate for the comprehensive transformation of New Barnsbury in accordance with the landlords’ commitments from Newlon Housing Trust. This provides a clear indication that estate residents are supportive of the project and are keen to see the estate’s transformation and the associated public benefits delivered.

3.16 A four-page newsletter was issued to all residents of the Estate in August 2021 in order to provide an update since the completion of the resident ballot. Engagement with estate residents has continued post-ballot, and residents have been closely involved in discussions around the ongoing design development process.

Public Consultation

3.17 Following the Ballot, consultation work has continued with residents and the wider local community to refine and develop the proposals in preparation for the submission of the hybrid planning application.

3.18 In November 2021, a public consultation event was held at the Barnsbury Community Centre with the aim of engaging with neighbours of the Barnsbury Estate and hearing their feedback on the proposals. The information presented at the exhibition provided an overview of the proposed masterplan as well as the history of engagement with residents of the Estate, the residents’ ballot, and the appointment of Mount Anvil as Newlon Housing Trust’s development partner. In total, 70 people attended both dates of the public exhibition. Attendees included residents on the Barnsbury Estate, other local residents from surrounding areas, business owners from local shops on Caledonian Road, local architects and members of the Islington Society.

3.19 At the exhibition, there was a general positivity and enthusiasm for the transformation of the estate from the local community; providing wider corroboration for the ballot outcome. Most notably, there was an appreciation that the estate is in need of investment and work and the proposals have the potential to vastly improve the local area. The public were happy to see provision for affordable housing, and some attendees noted that the work would only serve to increase the value of their own properties in the area.

3.20 In March 2022, a second public consultation event was held with a dedicated residents’ preview, to present the final proposals to the local community. Feedback was collected

verbally and using a feedback form, posted on the consultation website, with the project team encouraging residents to provide feedback at the consultation event using tablet computers provided. Following the exhibition, the public were asked to respond to a survey and the responses showed that residents were broadly happy with the final aspects of the proposals. The average response received confirmed that respondents were 'broadly positive' about the scheme.

Pre-Application Consultation

3.21 The proposals for the New Barnsbury Estate have undergone a thorough pre-application process since the project commenced with Islington's Officers, Members and DRP and with GLA and TfL Officers.

3.22 The following timeline highlights the key meetings held relating to the project:

- 1 3 June 2019 - Initial Pre-app with LBI
- 2 19 August 2019 - LBI PPA 1 Pre-App Meeting 1
- 3 28 August 2019 - LBI Viability Meeting 1
- 4 5 September 2019 - Ward Councillor Presentation
- 5 2 October 2019 - LBI PPA 1 Pre-App Meeting 2
- 6 17 October 2019 - Design Review Panel 1
- 7 17 October 2019 - LBI Technical Pre-app- Energy and Sustainability 1
- 8 6 November 2019 - LBI Viability Meeting 2
- 9 19 November 2019 - LBI PPA 1 Pre-App Meeting 3
- 10 5 December 2019 - LBI Technical Pre-app- Energy and Sustainability 2
- 11 17 December 2019 - GLA Pre-app 1
- 12 24 February 2020 - LBI Members' Forum 1
- 13 30 April 2020 - Design Review Panel 2
- 14 18 November 2020 - LBI PPA 1 Pre-App Meeting 4
- 15 14 December 2020 - LBI Members' Forum 2
- 16 31 August 2021 - LBI PPA 2 Pre-App Meeting 1
- 17 16 September 2021 - LBI PPA 2 Pre-App Meeting 2
- 18 26 October 2021 - GLA Pre-App Meeting 1
- 19 11 November 2021 - LBI PPA 2 Pre-App Meeting 3
- 20 16 November 2021 - LBI Technical Pre-App - TVIA
- 21 18 November 2021 - LBI Technical Pre-App - Daylight/Sunlight/Overshadowing
- 22 19 November 2021 - LBI Technical Pre-App - Transport 1
- 23 25 November 2021 - Design Review Panel 3
- 24 3 December 2021 - GLA Pre-App Meeting 2
- 25 8 December 2021 - LBI Technical Pre-App - Transport 2
- 26 8 December 2021 - LBI Member's Briefing 1
- 27 17 December 2021 - GLA Viability Meeting 1

28	20 December 2021	- LBI Technical Pre-app - Health Impact Assessment
29	21 December 2021	- LBI Technical Pre-App - Transport 3
30	21 December 2021	- GLA Pre-App Meeting 3
31	12 January 2022	- LBI Technical Pre-App- Transport 4
32	17 January 2022	- LBI Technical Pre-App - Flood Risk and Drainage 1
33	18 January 2022	- LBI Viability Meeting 1
34	20 January 2022	- LBI PPA 2 Pre-App Meeting 4
35	25 January 2022	- LBI Technical Pre-App - Housing Mix
36	18 January 2022	- LBI Technical Pre-App - Energy and Sustainability 1
37	8 February 2022	- LBI Technical Pre-App - Energy and Sustainability 2
38	10 February 2022	- LBI Streetbook Surgery
39	15 February 2022	- LBI and GLA combined technical Pre-app - TVIA
40	22 February 2022	- LBI Technical Pre-app- Energy and Sustainability 3
41	3 March 2022	- GLA Viability Meeting 2
42	8 March 2022	- Design Review Panel 4
43	11 March 2022	- LBI Viability Meeting 2
44	23 March 2022	- LBI's Member's Briefing 2
45	4 April 2022	- LBI Design Meeting - Design Code and Parameter Plans
46	4 April 2022	- LBI Technical Pre-app- Flood Risk and Drainage 2
47	5 April 2022	- GLA Pre-App Meeting 4
48	14 April 2022	- Design Review Panel 5, Chair's Briefing
49	26 April 2022	- LBI Meeting - Commercial Property Strategy
50	11 May 2022	- LBI Daylight and Sunlight Meeting

3.23 Consultation with residents remains ongoing. Consultation events are planned with residents of the estate on 17th and 18th May to both discuss the works and planning application preparation for Old Barnsbury and celebrate submission of this planning application for New Barnsbury.

3.24 The Design & Access Statement submitted with the application provides a comprehensive review of the pre-application engagement process, outlining how the scheme's design has evolved in direct response to comments raised by residents, LBI, the GLA and other stakeholders.

Summary

3.25 The proposed scheme has been influenced by a wide-ranging, thorough and engaging pre-application design evolution process with estate residents, the local community, LBI, GLA and Transport for London as well as other key stakeholders. The issues raised have been carefully considered in order to amend and refine the scheme, and the community consultation has reinforced the local support for the development. The development is the product of a lengthy, inclusive and responsive process of engagement. Further details are

provided in the submitted Statement of Community Involvement prepared by London Communications Agency and the Design & Access Statement prepared by PTE Architects.

4.0 **Proposed Development**

4.1 This section provides a description of the Proposed Development. Full details of the proposals are set out in the DAS and illustrated in the submitted planning application drawings.

Description of Development

4.2 The planning application seeks planning permission for the following development:

“Outline planning application for the phased redevelopment of the site comprising:

- 1 *Phased site-wide demolition of all existing buildings and structures, site preparation and enabling works (including excavation) (No Matters Reserved for future approval);*
- 2 *Phased construction of buildings (including basements) comprising residential units (Use Class C3); Hard and soft landscaping works including public open space access and highway alterations, car and cycle parking provision, and; All other associated ancillary works (No Matters Reserved for future approval (the “detailed element”)); and*
- 3 *Phased construction of buildings (including basements) comprising residential units (Use Class C3) and flexible commercial, business and service floorspace (Use Class E) and local community floorspace (Use Class F2); Hard and soft landscaping works including public open space, access and highway alterations, car and cycle parking provision, and; All other associated ancillary works (All Matters Reserved for future approval (the “outline element”))*

(Being a hybrid application)”

4.3 In summary, the hybrid proposals at New Barnsbury comprise:

- 1 Up to 950 residential dwellings, in buildings ranging from 3-13 storeys;
- 2 Up to 494 affordable homes (of which 291 are re-provision of existing and 203 are new affordable homes based on the illustrative scheme);
- 3 Up to 52% affordable homes overall (calculated by unit), of which up to 88% are Social Rent and up to 12% Intermediate;
- 4 Up to 2,775sqm of flexible commercial floorspace and community uses including new community centre and nursery (Use Class E and F2)
- 5 Over 16,210sqm of open space including over 5,000sqm of play space.

4.4 A comparison between the detailed and outline elements of the hybrid application is summarised in the table below.

Table 4.1 Summary of Detailed and Outline Elements of Hybrid Planning Application

	Detailed	Outline
Phases	Phase 1A - Blocks A3, B1, B2, B3, B4 and Carnegie Street Park (part) Phase 1B - Blocks B3, C6, C7, C8, C9 and Pultney Park Phase 3A - Blocks D1, D2 and D3	Phase 1C - Blocks B5, B6, B7, B8, B9 and Carnegie Street Park (part) Phase 2A - Blocks A1, A2, A4 and A5 Phase 2B - Blocks A6, A7, A8, A9, A10 Phase 3B - Blocks C1, C2, C3, C4, C5
Homes	427 homes	Up to 523 homes
No of Affordable Homes	233 affordable homes (191 replacement social rent and 42 net additional social rent)	Up to 261 affordable homes (Up to 200 social rent and up to 61 intermediate)
Commercial Floorspace	N/A	Up to 2,775sqm (GEA), including: -Up to 1,500sqm (GEA) Flexible Class E (Commercial) -Up to 1,275sqm (GEA) Flexible Class F2/E (Community Centre / Nursery)
Overall Floorspace	45,684.3sqm (GIA)	Up to 78,875sqm (GEA)
Building Heights	3-13 storeys	3-9 storeys
Open Space	16,211sqm	
Play Space	5,198sqm	

Source: PTE

- 4.5 The New Barnsbury estate transformation project is an affordable housing-led development. It will include up to 494 affordable homes composed of 291 replacement homes for existing estate residents and 203 new affordable homes, equating to 52% affordable homes overall. The majority of these affordable homes will be social rented tenure dwellings – there are 433 social rented homes overall, composed of 291 replacement social rented homes and 142 new social rented homes (88% of the estate’s affordable homes will be social rented, which equates to 46% of the transformed estate’s total dwellings).
- 4.6 The ground floors of the new buildings fronting Caledonian Road and Carnegie Street Park will support up to c.2,775 sqm (GEA) of commercial and community floorspace (Class E and F2), the latter comprising a new community centre and nursery.
- 4.7 The development includes comprehensive private, communal and public open space and playspace, including the creation of two publicly accessible parks. Overall, more than 16,210sqm of new open space will be created at New Barnsbury. Enhancement works to roads and the public realm across the site are also proposed.
- 4.8 Car parking spaces for existing residents holding parking permits will be re-provided, together with loading bays and blue badge parking spaces. No additional car parking will be

provided and there will be managed reduction of parking over time as new residents moving into the estate will be ineligible for parking permits.

- 4.9 The development will incorporate energy efficiency in the built fabric and through the use of renewable technologies and passive measures, alongside other sustainability measures and systems to help tackle the climate emergency.

Demolition, Phasing & Resident Rehousing Strategy

- 4.10 The development will be phased over a period of 10 years with some initial demolition being undertaken to enable the construction of the first detailed phases. The remaining demolition will be coordinated with the construction of each successive phase, to facilitate the site-wide resident rehousing strategy, allowing existing estate residents to remain at the estate. All occupants of each phase will be considered sensitively during the later construction phases.

Figure 4.1 Demolition Plan



Source: PTE

- 4.11 The phased demolition of all existing buildings within the New Barnsbury Estate is proposed with a detailed comprehensive resident rehousing strategy. For further details please refer to the Design and Access Statement.
- 4.12 The phases of development are outline below and in Figure 4.2.

Detailed Element

- **Phase 1A:** Blocks A3, B1, B2, B4 and Carnegie Street Park (part)

- **Phase 1B:** Blocks B3, C6, C7, C8, C9 and Pultney Park
- **Phase 3A:** Blocks D1, D2, D3

Outline Element

- **Phase 1C:** Blocks B5, B6, B7, B8, B9 and Carnegie Street Park (part)
- **Phase 2A:** Blocks A1, A2, A4, A5
- **Phase 2B:** Blocks A6, A7, A8, A9, A10
- **Phase 3B:** Blocks C1, C2, C3, C4, C5

4.13 It is intended that the construction will be sequenced in the following order and span a delivery period of c.10 years: 1a, 1b, 1c, 2a, 2b, 3a, 3b.

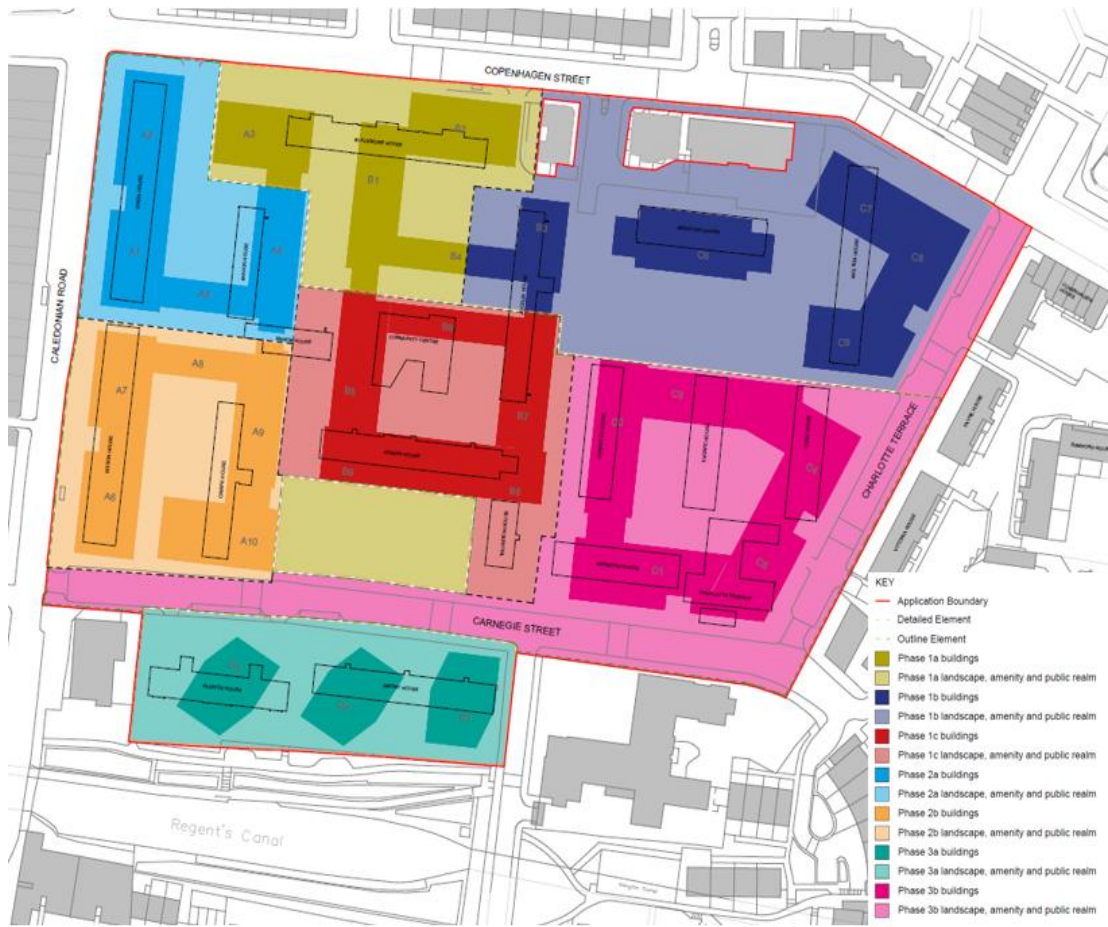
4.14 Logistically, Phase 1b cannot start until Phase 1a is completed as it is intended that residents will be rehoused from the blocks currently occupying the Phase 1b land into the new homes in Phase 1a.

4.15 Logistically, Phase 1c, 2a and 2b cannot then start until Phase 1b is completed as it is intended residents will be rehoused from the blocks currently occupying the land in these phases into Phase 1b's new homes. As some households choose to move off-site, or through voids arising for other reasons, it is anticipated that there will be sufficient homes for the number of households requiring rehousing.

4.16 Works on Phase 1c shall not start until temporary replacement facilities for the existing community centre and nursery have been secured and the operators of these facilities have relocated.

4.17 The Applicant is currently exploring temporary accommodation options and it is intended that the ground floor of the Charlotte Terrace building could accommodate the existing services on a temporary basis. The objective is to maintain continuity of use of these community facilities throughout the development's phased delivery programme.

Figure 4.2 Phasing and Development Programme



Source: PTE

Indicative Phasing Programme (For ES purposes):

- Phase 1a: 2023 – 2025
- Phase 1b: 2025 – 2027
- Phase 1c: 2027 – 2029
- Phase 2a: 2027 – 2030
- Phase 2b: 2027 – 2031
- Phase 3a: 2029 – 2032
- Phase 3b: 2029 - 2032

4.18 The ‘detailed’ element of the scheme comprises Phases 1A, 1B and 3A and is wholly residential in nature. The earliest phase (Phase 1A) will accommodate existing residents and will be entirely social rented in tenure.

4.19 The ‘outline’ element of the application comprises Phases 1C, 2A, 2B and 3B. In these outline phases, the application seeks approval for development parameters and a design code to guide the detailed design for the future ‘reserved matters’ phases, while maintaining sufficient flexibility to respond both to the estate’s changing demographic and household needs and to the changing market conditions.

Residential Mix and Density

4.20 The Proposed Development will deliver up to 950 residential dwellings. A detailed residential mix is provided by tenure and dwelling size for the 'detailed' part of the application in Table 4.2 below.

Table 4.2 Proposed Residential Units Mix for Detailed Element of Scheme

Detailed Element (427 Units)	1Bed		2Bed		3Bed		4Bed		5Bed		Total	
	Unit	Hab Room	Unit	Hab Room	Unit	Hab Room	Unit	Hab Room	Unit	Hab Room	Unit	Hab Room
Replacement Social Rent Homes	45	96	92	296	36	147	13	73	5	35	191	647
Net Additional Social Rent Homes	8	16	14	42	20	80	0	0	0	0	42	138
Net Additional Intermediate Homes	0	0	0	0	0	0	0	0	0	0	0	0
Replacement Leasehold Homes	6	12	18	59	1	4	0	0	0	0	24	71
Net Additional Market Homes	89	178	79	237	2	8	0	0	0	0	170	423
Total	148 (35%)	302 (24%)	203 (48%)	634 (50%)	58 (14%)	235 (18%)	13 (3%)	73 (6%)	5 (1%)	35 (3%)	427	1,279

4.21 The residential mix for the outline element of the scheme is provided in Table 4.3 below. Owing to the outline nature of these later phases, a range is provided for each dwelling size to provide suitable flexibility to respond to need and market conditions in the future. The details of the residential mix for each successive outline phase of the scheme will be submitted and agreed with LBI as part of a future Reserved Matters Application.

Table 4.3 Proposed Residential Unit Mix Range for Outline Element of Scheme

Outline Element (523 Units)	1Bed	2Bed	3Bed	4Bed	5Bed
Replacement Social Rent Homes	15-19%	36-40%	26-30%	13-17%	0-4%
Net Additional Social Rent Homes	16-22%	53-58%	11-16%	4-10%	5%
Net Additional Intermediate Homes	100%	0%	0%	0%	0%
Replacement Leasehold Homes	22%	24%	42%	11%	2%
Net Additional Market Homes	25-34%	50-56%	13-22%	0%	0%

4.22 In terms of density, the Proposed Development results in a density of 217 dwellings per hectare. The resulting density figures are the result of carefully considered design-led optimisation of the site which has responded to pre-application feedback.

Affordable Housing

4.23 The New Barnsbury development will re-provide the existing affordable housing stock with replacement homes matched to the returning household's needs as identified in Newlon's Housing Needs Survey, which shall be updated throughout the programme. All existing households in social rented homes will have a right to return to a new home matched to their requirements.

4.24 Existing rents for affordable homes on New Barnsbury are (on average) c. 32% less than the rents that would be chargeable for new social rent homes with the equivalent number of bedrooms in Islington. The new replacement affordable homes will comprise high quality housing stock meeting or exceeding relevant space standards and served by dedicated private amenity space. In addition, 35% of the increase/uplift in homes will be delivered as affordable housing (calculated by unit) - this equates to 203 units based on the illustrative scheme. This will be split 70:30 between social rent (142) and intermediate (61) tenures.

4.25 Overall, tenure split could be 88% social rent (up to 433 units) and 12% Intermediate (up to 61 units)

4.26 The proposed mix for the detailed element of the hybrid application is as follows:

Table 4.4 Tenure Split for Detailed Element of Scheme

Tenure	Homes	Habitable Rooms
Social Rent	233	785
Intermediate	0	0
Market Housing	194	494
Total	427	1,279

4.27 One possible mix for the outline element (based on the illustrative scheme) is below:

Table 4.5 Tenure Split for Outline Element of Scheme

Tenure	Homes (Max Parameter)
Social Rent	200
Intermediate	61
Market Housing	262
Total	Up to 523

4.28 Overall, the mix could comprise (again, including the mix based on the illustrative scheme for the outline element):

Table 4.6 Overall Tenure Split (Detailed and Outline)

Tenure	Homes
Social Rent	433 (46%)
Intermediate	61 (6%)
Market Housing	456 (48%)
Total	Up to 950

Building Heights

4.29

The Proposed Development comprises 31 individual buildings. The maximum height, in meters AOD, of each building is set out below, together with an expression of how this may manifest itself in storey heights for the Outline element in particular.

Table 4.7 Proposed Building Heights (Storeys and AOD)

Block	Storey Heights	Max AOD (metres)	Tall Building ¹ (Y/N)
<i>Detailed Element</i>			
A3	5 + 2	48.10	No
B1	6 + 1	48.60	No
B2	5 + 2	51.75	No
B3	6 + 1	51.75	No
B4	3	36.00	No
C6	6 + 1	53.10	No
C7	6 + 2	60.25	No
C8	6 + 2	61.75	No
C9	6 + 2	60.25	No
D1	12	66.50	Yes
D2	13	67.70	Yes
D3	11	60.30	Yes
<i>Outline Element</i>			
A1	7+2	53.60	No
A2	7+2	54.40	No
A4	6+1	48.60	No
A5	3	34.85	No
B5	6+1	48.60	No
B6	4	39.15	No
B7	6+1	51.75	No
B8	7	51.75	No
B9	7	51.75	No
A6	7+2	53.60	No
A7	7+2	53.60	No
A8	4	38.00	No
A9	6+1	48.60	No
A10	7	47.80	No
C1	7	52.60	No
C2	6+1	51.75	No
C3	Part 3, part 4	42.30	No
C4	6+2	59.25	No
C5	6+2	58.25	No

¹ As defined by London Plan Policy D9 – greater than 30m when measured from ground level to floor level of uppermost storey

Architecture & Materiality

- 4.30 Full details of the architectural concepts, materiality and overarching design approach can be found in the accompanying Design and Access Statement (DAS) prepared by PTE.
- 4.31 The application will include a family of buildings using high quality materials and spaces to facilitate place making.
- 1 Mansion Blocks
 - 2 Lanes
 - 3 Mews Houses
 - 4 Park Blocks
 - 5 Canal Blocks

Figure 4.3 Building Typologies



Source: PTE

- 4.32 A simple, contextual material palette is proposed, including a composition of two brick types and two mortar joint types to create interest and detail to the buildings, providing depth and texture. The brickwork is contrasted with a suite of metal components - from window frames, to cladding panels and louvres - creating a smart but subtle building within the context of the Conservation Area. High quality, durable materials will be utilised across the development to ensure the scheme has longevity. These have been fixed and secured in the enclosed Design Code.

Landscape, Public Realm and Amenity Space

4.33 Details of the proposed landscaping, public realm and amenity space are provided in full in the Landscape Strategy section of the accompanying DAS. The below summarises the proposals:

4.34 In total a maximum of 16,211sqm of open space is proposed comprising:

- **Private Amenity:** 1,317sqm
- **Shared Resident Garden:** 5,809sqm (+ rooftop: 494sqm)
- **Community Garden:** 487sqm
- **24 hour Open Space:** 4,157sqm
- **Landscape buffer-non accessible:** 3,975sqm

4.35 The open space strategy includes retention and enhancement of the estate’s two public open spaces, Pultney Street Park and Carnegie Park (the Community Heart). The majority of Carnegie Park will be provided ahead of demolition of Phase 1a to ensure there is reprovision and continued access to the ball court and play facilities. In addition, the development provides communal residents’ courtyards with amenity and doorstep play, as well as a pedestrian only ‘green walk’ linking east to west, connecting Old and New Barnsbury together and with surrounding communities.

4.36 Barnard Park to the north east of the site and Regent’s Canal to the south will be joined up though new tree planting along Charlotte Terrace.

4.37 The development will effectively match the existing quantum of open space at the New Barnsbury Estate (16,210sqm) and will significantly enhance the access, quality and usability of the estate’s open space.

Play Space

4.38 The GLA play-space calculator (v 3.2) estimates the below quantum of place space required within the development assuming the maximum parameters and highest concentration of larger units within the ranges:

Table 4.8 Play Space Requirements

		Play Space Requirement
Ages 0 - 4	(Doorstep)	2,541 sqm
Ages 5 - 11	(Active)	2,071 sqm
Ages 12+	(Youth Space)	1,707 sqm
<u>TOTAL</u>		<u>6,319 sqm</u>

Source: Greater London Authority

4.39 The overall play space proposed as part of this scheme is outlined below in Table 4.9:

Table 4.9 Proposed Play Space

		Proposed Play Space
Ages 0 - 4	(Doorstep)	1,790 sqm
Ages 5 - 11	(Active)	728 sqm
Ages 12+	(Youth Space)	533 sqm
Playable Multi-Use Space		2,147 sqm
<u>TOTAL</u>		<u>5,198sqm</u>

4.40 The Proposed Development therefore meets 82% of the space required by policy. The New Barnsbury Estate is located in close proximity to a number of other outdoor areas for children to play in. The closest area of open space includes Barnard Park to the north (approximately 20m), which includes a dedicated play area and Edward Square to the west (approximately 50m).

Access, Servicing and Parking

4.41 Car parking will be re-provided for returning residents with existing permits. Permits will not be issued to new residents for parking on the public highway or on the estate, to enable parking levels to be managed and progressively reduced over time. LBI is responsible for issuing parking permits.

4.42 There are currently 121 car spaces and 4 car garages located within the New Barnsbury Estate. There is also an existing Zipcar Car Club location 400 metres to the north of the estate on Richmond Avenue.

4.43 A summary of the proposed car parking is provided below:

- 1 119 Spaces (of which 97 spaces are for replacement homes)
- 2 31 Accessible Spaces (included within the 119 total)
- 3 Parking Ratio: 0.13 spaces per unit

4.44 In line with the London Plan requirement, provision will be made for 20% active Electric Vehicle Charging Points (EVCPs) and 80% passive EVCPs.

4.45 A total of nine delivery bays are proposed across the estate.

4.46 The development's parking strategy looks to achieve an appropriate balance between the needs of existing estate residents who benefit from parking spaces, while addressing strategic and local policy aims to reduce car dependence. The parking situation at the redeveloped estate should not be considered as a static level of provision, but will be progressively reduced throughout the development's lifetime as permits are taken out of circulation once users give them up. This approach is consistent with other estate projects across London.

Energy and Sustainability

4.47 Development will target meeting the Mayor of London's net-zero carbon target. The scheme will meet the minimum on-site 35% reduction in carbon emissions beyond Part L of 2013

Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund using the GLA's recommended carbon offset price – in this case the development is expected to achieve a 60.7% reduction with the 39.3% shortfall equating to a £1,396,500 offset payment.

- 4.48 London Plan heating hierarchy has been followed. It has been agreed with LBI and Etude that no connections is feasible at this time with the Bunhill and Kings Cross District Heat Network, or any other District Heat Networks. Therefore, the proposed communal heating system will be Air Source Heat pumps.

Relationship between New Barnsbury and Old Barnsbury

- 4.49 Alongside the phased redevelopment of New Barnsbury, works will be undertaken to the existing housing stock and open spaces at Old Barnsbury. A separate full planning application for Old Barnsbury will subsequently be prepared and submitted by Newlon Housing Trust, to be determined in parallel with the Hybrid Planning Application for New Barnsbury.

- 4.50 The proposed works at Old Barnsbury include:

Old Barnsbury Building Enhancements:

- New double-glazed windows;
- New front doors and balcony doors and core entrance doors;
- New Kitchens and bathrooms;
- Repairs to roofs, brickwork and upgrades to deck access;
- Internal redecorations including flooring; and
- Replacement domestic heating systems (assumed to be electrically-led for the purposes of this assessment).

Old Barnsbury Landscape, Environmental and Wayfinding Enhancements:

- A new green walkway/link;
- General greening of the landscaping with new planting;
- New paving and seating areas; and
- New bin and cycle stores.

- 4.51 A number of these proposed works constitute development and will form the basis of the forthcoming planning application for Old Barnsbury. They will be assessed against development plan policy in the Old Barnsbury application submission. The intention is to deliver the enhancement of Old Barnsbury in conjunction with the phased redevelopment of New Barnsbury. The costs of the proposed refurbishment works for Old Barnsbury are included within the Financial Viability Assessment enclosed in this planning application.

5.0 **Planning Policy Context**

- 5.1 Section 70 (2) of the Town and Country Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004 require that planning applications be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

Development Plan

- 5.2 The statutory Development Plan for the site comprises:

- 1 The London Plan (March 2021)
- 2 Islington's Core Strategy (February 2011)
- 3 Islington's Local Plan: Development Management Policies (June 2013)
- 4 Islington's Local Plan: Site Allocations (June 2013)
- 5 Islington's Local Plan Policies Map (2013)

The London Plan (2021)

- 5.3 The London Plan provides the Spatial Development Strategy for Greater London, setting out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 5.4 **Policy GG1 (Building Strong and Inclusive Communities)** provides the criteria for good and inclusive growth. This includes: early and inclusive engagement; positive changes in the physical environment; provide good quality community spaces, services amenities and infrastructure; ensuring streets and public spaces are consistently planned for and welcoming; ensure that new buildings and the spaces they create are designed to reinforce or enhance identity, legibility, permeability and inclusivity of neighbourhoods; support and promote the creation of a welcoming and accessible London to all; and support and promote the creation of an inclusive London.
- 5.5 **GG2 (Making the Best Use of Land)** looks to create successful and sustainable mixed-use places that make the best use of land by: prioritise sites which are well-connected by existing public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and plan for good local walking, cycling and public transport connections, enabling car free lifestyles that allow an efficient use of land.
- 5.6 **Policy GG4 (Delivering the Homes Londoners Need)** aims to create a housing market that works better for all Londoners by: ensure that more homes are delivered; support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable; and create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

- 5.7 **Policy D3 (Optimising Site Capacity Through the Design-Led Approach)** indicates that development must make the best use of land by following a design-led approach that optimises the capacity of sites.
- 5.8 **Policy D6 (Housing Quality and Standards)** states that housing development should be of high quality design and provide adequately-sized rooms.
- 5.9 **Policy D7 (Accessible Housing)** requires residential development to ensure at least 10% of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’ and that all other dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.
- 5.10 **Policy D9 (Tall Buildings)** seeks to manage the development and design of tall buildings within London. Policy D9 states that Development Plans should define what is considered a tall building for specific localities, although not less than 6 storeys or 18 metres (Part A); identify suitable locations where tall buildings may be appropriate (Part B1); and identify any such locations and appropriate tall building heights on maps in Development Plans (Part B2). Policy D9 (Part B3) states that tall buildings should only be developed in locations that are identified as suitable in development plans. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.
- 5.11 **Policy D12 (Fire Safety)** requires all development proposals to achieve the highest standards of fire safety.
- 5.12 **Policy H1 (Increasing Housing Supply)** emphasises the importance of increasing the housing supply in London and sets the ten year targets for net housing completions that each local planning authority should plan for. It sets out Islington’s 10 year target for net housing completions at 7,750 (2019/20 - 2028/29).
- 5.13 **Policy H4 (Delivering Affordable Housing)** emphasises the importance of increasing the supply of affordable housing and sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. Policy H6 (Affordable housing tenure) comprises the required split of affordable housing tenure, namely (1) a minimum of 30% low cost rented homes (London affordable rent or Social rent); (2) a minimum of 30% intermediate products (London living rent and London shared ownership), with the remainder being agreed with the local planning authority.
- 5.14 **Policy H4 (Delivering Affordable Housing)** sets the strategic target for 50% of all new homes delivered across London to be genuinely affordable. Affordable housing should be provided on site.
- 5.15 **Policy H6 (Affordable Housing Tenure)** requires the affordable product within a development to be split as: 30% low cost rented homes (London Affordable Rent or Social Rent), a minimum of 30% intermediate rent and 40% to be determined by the Borough at low-cost rented homes.
- 5.16 **Policy H10 (Housing Size Mix)** states that schemes should generally consist of a range of unit sizes.
- 5.17 **Policy H8 (Loss of Existing Housing and Estate Redevelopment)** states that the loss of existing housing should be replaced by new housing at existing or higher densities

with at least the equivalent level of overall floorspace. With regards to affordable housing it states that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.

- 5.18 **Policy H10 (Housing Size Mix)** advocates development schemes to consist of a range of unit sizes, informed by a number of factors, including site context.
- 5.19 A number of other relevant policies contained within the London Plan are acknowledged in the Planning Assessment section of this Statement.

Islington's Core Strategy (2011)

- 5.20 **Policy CS9 (Protecting and Enhancing Islington's Built and Historic Environment)** requires high quality architecture and urban design to enhance and protect Islington's built and historic environment. Part E of this policy specifies that tall buildings generally will not be supported in Islington
- 5.21 **Policy CS10 (Sustainable Design)** promotes zero-carbon development and requires buildings to achieve the highest level of sustainable building standards.
- 5.22 **Policy CS12 (Meeting the Housing Challenge)** seeks to ensure Islington meets its housing challenge by providing more high quality, inclusive and affordable homes. This policy sets the affordable housing requirement at 50%.
- 5.23 **Policy CS16 (Play Space)** requires new inclusive play space as part of new developments, particularly in those areas that have the greatest predicted increases in child population.

Islington's Development Management Policies (2013)

- 5.24 **Policy DM2.1 (Design)** requires all development to be high quality, inclusive and to make a positive contribution to the local character and distinctiveness of an area. Part C of this policy requires proposals for tall buildings to meet other design policies and have regard to the criteria set out in English Heritage's guidance on tall buildings/
- 5.25 **Policy DM2.3 (Heritage)** states that new developments within the setting of a listed building are required to be of good quality contextual design.
- 5.26 **Policy DM2.4 (Protected Views)** seeks to protect and enhance local views within Islington.
- 5.27 **Policy DM3.1 (Mix of Housing Sizes)** requires all sites to provide a good mix of housing sizes.
- 5.28 **Policy DM3.4 (Housing Standards)** sets out the criteria for all new housing development.
- 5.29 **Policy DM3.5 (Private Outdoor Space)** requires all new residential development to deliver high quality outdoor space provision.
- 5.30 **Policy DM3.6 (Play Space)** states that all major housing developments must make provision for play space, based on anticipated child yield.

- 5.31 **Policy DM3.7 (Noise and Vibration (Residential Uses))** requires all new residential development to demonstrate how potential adverse noise impacts will be mitigated through housing layout, design and materials.
- 5.32 **Policy DM6.2 (New and Improved Public Spaces)** states that major housing developments provide on-site publicly accessible public open space.
- 5.33 **Policy DM6.5 (Landscaping, Trees and Biodiversity)** requires developments to protect, contribute and enhance the landscape, biodiversity value and growing conditions of the development site.
- 5.34 **Policy DM7.4 (Sustainable Design Standards)** sets out the sustainable design standards that new development must meet.
- 5.35 **Policy DM8.2 (Managing Transport Impacts)** states that Development proposals are required to meet the transport needs of the development and address its transport impacts in a sustainable manner and in accordance with best practice.

Emerging Planning Policy

Draft Islington Local Plan

- 5.36 LBI is at an advanced stage in the preparation of a new Local Plan. The Council submitted the Draft Islington Local Plan to the Secretary of State in February 2020 for Examination. The Examination Hearings ran between September and October 2021. Following the Hearings, the Inspectors requested that further modifications be made to the Plan in January 2022 and that these be further consulted upon. The receipt of the Inspector's report is currently expected in Spring 2022 and adoption expected later in 2022.
- 5.37 The Draft Islington Local Plan comprises the following documents:
- Draft Islington Local Plan Strategic and Development Management Policies (September 2019) with Modifications for Consultation (March 2021) ('Draft Local Plan 2019, as modified 2021')
 - Draft Islington Local Plan Site Allocations (September 2019) with Modifications for Consultation (March 2021) ('Draft Site Allocations 2019, as modified 2021')
 - Draft Islington Local Plan Policies Map (September 2019) with Post Submission Policies Map Changes (January 2021) ('Draft Policies Map 2019, as modified 2021')
- 5.38 Upon adoption, the Draft Islington Local Plan would form part of the Development Plan and supersede the Islington's Core Strategy (February 2011), Islington's Local Plan: Development Management Policies (June 2013) and Islington's Local Plan: Site Allocations (June 2013).
- 5.39 At the point of application submission, the Draft Islington Local Plan can be afforded some moderate weight and will continue to do so up until receipt of the Inspector's Report.

Islington's Draft Strategic and Development Management Policies (2019; mods 2021)

- 5.40 **Policy H2 (New and Existing Conventional Housing)** sets out Islington's aim of meeting and exceeding its 10 year housing target set by the London Plan.
- 5.41 **Policy H3 (Genuinely Affordable Housing)** requires for sites capable of delivering more than 10 units must provide at least 45% on-site affordable housing.
- 5.42 **Policy H4 (Delivering High Quality Housing)** states that all new residential development must meet minimum space standards and address other requirements for private internal amenity space.
- 5.43 **Policy H5 (Private Outdoor Space)** sets the minimum requirement for private outdoor space is 5sqm on upper floors and 15sqm on ground floors, for 1-2 person dwellings. For each additional occupant, an extra 1sqm is required on upper floors and an extra 5sqm on ground floors.
- 5.44 **Policy SC2 (Play Space)** requires major residential development must make appropriate on-site provision for free-to-use publicly accessible play space, which is suitable for children and young people of all ages and abilities.
- 5.45 **Policy R4 (Local Shopping Areas)** states that proposals must maintain and enhance the retail and service function of the Local Shopping Areas
- 5.46 **Policy G1 (Green Infrastructure)** requires major development to conduct an Urban Greening Factor (UGF) assessment and must score 0.4 for predominantly residential development.
- 5.47 **Policy G3 (New Public Open Space)** requires new development in excess of 200 net additional dwellings to provide on-site publicly accessible public open space.
- 5.48 **Policy G4 (Biodiversity, Landscape Design and Trees)** seeks to protect Sites of Importance for Nature Conservation (SINCs) from inappropriate development.
- 5.49 **Policy S3 (Sustainable Design Standards)** requires new buildings to achieve certified BREEAM excellent or outstanding.
- 5.50 **Policy S4 (Minimising Greenhouse Gas Emissions)** requires new buildings to be net-zero and to comply with the interim' Fabric Energy Efficiency Standard (FEES), as defined by the Zero Carbon Hub. 'Full' FEES will apply from the start of 2022 onwards.
- 5.51 **Policy T3 (Car-Free Development)** requires all new development to be car-free. The policy specifies that some residents moving into car-free homes might face exceptional circumstances, in particular, existing residents in social rented housing who have a parking permit, who move to different accommodation or return to a site after the development has been completed (such as with estate redevelopment). In such circumstances, occupiers may be allowed the right to keep a parking permit.
- 5.52 **Policy DH3 (Building Heights)** states that buildings over 30m or twice as high as their contextual reference height of their surrounding context will be considered tall. Buildings of more than 30m are only acceptable in principle in locations allocated within the Local Plan or within specific sites identified in a Spatial Strategy Area. All proposals for tall buildings

must mitigate the individual and cumulative visual, functional and environmental impacts on the surrounding and wider context. The application of this draft policy is discussed in greater detail in the following assessment sections.

Material Considerations

The National Planning Policy Framework (NPPF) (2021)

- 5.53 The National Planning Policy Framework (NPPF) sets out national planning policy, providing strategic direction on a range of planning matters. It is supplemented by the Planning Practice Guidance (PPG) which gives further guidance on how national policy should be interpreted.
- 5.54 At the heart of the NPPF is a presumption in favour of sustainable development. This presumption should be reflected in the plan-making process and any associated guidance. The NPPF states that development should be approved unless any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits of that development.
- 5.55 The NPPF specifically states that planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration, and local planning authorities should use their planning powers to help deliver estate regeneration to a high standard (Paragraph 94).

Other Material Considerations

- 5.56 Other material considerations of relevance to the site include:
- 1 Planning Practice Guidance (PPG)
 - 2 LBI Development Viability SPD (2016)
 - 3 LBI Environmental Design SPD (2012)
 - 4 LBI Inclusive Design SPD (2014)
 - 5 LBI Inclusive Landscape Design SPD (2010)
 - 6 LBI Urban Design Guide SPD (2017)
 - 7 LBI Planning Obligations (S106) SPD (2016)
 - 8 LBI Streetbook SPD (2012)GLA Affordable Housing & Viability SPG (2017)
 - 9 GLA Housing SPG (2016)
 - 10 GLA Social Infrastructure SPG (2015)
 - 11 GLA Accessible London: Achieving an Inclusive Environment SPG (2014)
 - 12 GLA Character and Context SPG (2011)
 - 13 GLA Play and Informal Recreation SPG (2012)
 - 14 Better Homes for Local People: the Mayor's Good Practice Guide to Estate Regeneration
 - 15 GLA Be seen Energy Monitoring LPG (Adopted: Autumn 2021)

- 16 GLA Public London Charter LPG (Adopted: Autumn 2021)
- 17 GLA Circular Economy Statements LPG (Adopted: Winter 2021)
- 18 GLA Whole Life Carbon LPG (Adopted: Winter 2021)

6.0 **Planning Assessment**

6.1 The subsequent section assesses the Proposed Development against relevant policies in the Development Plan having regard to other material considerations, as set out in the previous section. The key planning issues on which determination of the application are expected to be based are listed below:

- 1 Principle of Development:
 - a Overall Principle of Development;
 - b Principle of Residential Use (Use Class C3);
 - c Principle of Commercial Use (Use Class E);
 - d Principle of Flexible Community Use (Use Class E/F2);
- 2 Housing:
 - a Housing Mix;
 - b Optimisation;
 - c Residential Quality;
- 3 Affordable Housing Statement:
 - a Affordable Housing;
 - b Breakdown of Affordable Units;
- 4 Design:
 - a Design and Materials;
 - b Landscape, Public Realm and Open Space;
 - c Playspace;
 - d Urban Greening Factor and Biodiversity Net Gain;
 - e Accessibility and Inclusive Design;
 - f Fire Safety;
- 5 Tall Buildings, Townscape and Heritage:
 - a Tall Buildings;
 - b Townscape Effects;
 - c Heritage Effects;
- 6 Daylight, Sunlight & Overshadowing;
- 7 Sustainable Transport:
 - a Car Parking;
 - b Car Club;
 - c Cycle Parking;
 - d Access;

- e Delivery, Servicing and Refuse;
- 8 Energy and Sustainability:
 - a Energy;
 - b Overheating;
 - c Sustainability and Whole Life Carbon;
- 9 Other Environmental Considerations:
 - a Air Quality;
 - b Noise and Vibration;
 - c Wind Microclimate;
 - d Ecology;
 - e Trees;
 - f Flood Risk and Drainage;
 - g Land Contamination;
 - h Utilities and Foul Drainage.
- 10 Delivery
 - a Phasing and Resident Rehousing Strategy
 - b Relationship between New Barnsbury and Old Barnsbury

6.2 These matters are discussed in turn in subsequent sections of the report.

7.0 **Principle of Development**

Site Allocation and Residents' Ballot

- 7.1 At the heart of the NPPF is a presumption in favour of sustainable development. This means that development proposals that accord with the development plan should be approved without delay (Para 11c). Para 119 of the NPPF is clear that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 7.2 New Barnsbury is a previously developed brownfield site in a highly accessible location (its PTAL range of 3-6b). The New Barnsbury part of the estate currently contains substandard accommodation and public realm. Its dwellings suffer from damp, poor outlook and impractical layouts, and many homes are overcrowded. The Estate presents a significant opportunity for enhancement and intensification befitting of its location and context, whilst improving the quality of homes and lives of its residents.
- 7.3 LBI have recognised this opportunity as the New Barnsbury Estate is allocated within the Draft LBI Local Plan - Site Allocations (Site Allocation ref. OIS28: Barnsbury Estate) for:
- “Refurbishment of Old Barnsbury estate and redevelopment of New Barnsbury estate for residential use, including the provision of additional new homes and genuinely affordable housing. Improvements to existing estate open spaces including the creation of a park on Pultney Street, and the provision of a new park on Carnegie Street with a community centre, play and exercise equipment and ball court. Improvements to landscaping, planting, lighting and security measures, play spaces, seating and bin and cycle storage across the estate.”*
- 7.4 In accordance with the Mayor’s Good Practice Guide to Estate Regeneration a Residents’ Ballot was held between February and March 2021 to establish the extent of support among residents for the estate’s comprehensive phased transformation. The turnout saw 506 of the estate’s 639 eligible residents, or 79.2%, vote in the ballot. A total of 369 residents or 72.9%% of those who voted, voted yes for the transformation. This local mandate, together with the site allocation, sets the context for the Proposed Development.
- 7.5 The principle of redevelopment of New Barnsbury is consistent with the site’s allocation and is supported by wider development plan policy and local residents. It is supported by LBI and GLA officers and by other key stakeholders, as evidenced throughout the lengthy and inclusive process of pre-application engagement. Importantly, the principle of redevelopment is supported by estate residents and the ballot establishes a clear and compelling mandate for the Proposed Development.
- 7.6 New Barnsbury presents a significant opportunity for comprehensive phased redevelopment to deliver more dwellings, more genuinely affordable homes, better quality accommodation, enhanced landscaping planting and open spaces and a more attractive estate, befitting of this prominent accessible location in LBI. There is no doubt that the overarching principle of development is acceptable in planning terms.

Residential Use

- 7.7 Planning policy, both strategically and locally, highlights the acute need for new homes in Islington and across London. There is an identified need for housing within Islington and there is significant need for affordable housing. London Plan Policy H1 sets out the ten-year housing target for Islington with 7,750 homes to be delivered between 2019/2020 – 2028/29. This includes the requirement to optimise the potential for housing delivery on all suitable and available brownfield sites including ones with high public transport access levels.
- 7.8 The ten-year housing target from the London Plan Policy is reflected in Draft Local Plan Policy H2 and equates to an annualised target of 775 per annum. The New Barnsbury Estate is allocated in the emerging Local Plan for housing-led redevelopment - the allocation requires provision of additional homes, including affordable housing.
- 7.9 The London Plan (Policy D3) emphasises that developments should make the best use of land following a design led approach that optimises the capacity of sites, including site allocations, and that higher density developments should be promoted in locations that are well connected to jobs, services, infrastructure and amenities by sustainable transport modes.
- 7.10 The Barnsbury Estate has an established residential use, albeit it is inefficient and unsustainable in its current form with wide ranging housing deficiencies. The estate presents a significant opportunity for a residential-led transformation delivering a meaningful uplift in homes at a scale and quantum more appropriate to the site's location and character.
- 7.11 The Proposed Development will deliver up to 950 homes across the Estate (an uplift of up to 579 homes), with up to 494 of these affordable homes (an uplift of up to 203 homes, with affordable tenures representing 52% of the total housing provision). The homes will be delivered in a range of different sizes, tenures, typologies and will make an invaluable contribution to help meet identified needs. The proposals respond directly to the residential land use objectives set out in the London Plan, adopted local policies and the NPPF which requires the delivery of objectively assessed housing needs.
- 7.12 Pre-application discussions with LBI and GLA have confirmed that the site is appropriate for residential intensification. A residential led scheme is endorsed by local and strategic policy and the development's contribution to housing need represents a major benefit associated with the scheme. The proposed residential land use is wholly acceptable.

Commercial Use

- 7.13 The Outline Element of the Proposed Development includes up to 1,500sqm (GEA) of flexible Class E floorspace (1,350 sqm GIA in the illustrative scheme), anticipated to be delivered on the lower floors of buildings fronting Caledonian Road. No commercial use is proposed within the Detailed Part of the application.
- 7.14 This flexible commercial floorspace will replace the existing 22 commercial units on the Caledonian Road frontage (arranged over basement and ground floor) as well as a single unit on Carnegie Street used as an office for local parking wardens. A summary of the existing units are identified at Table 7.1 below. The replacement flexible commercial space

will constitute a substantial improvement in the quality of accommodation, and designed flexibly to enable existing tenants to re-occupy and to appeal to potential new occupiers.

Table 7.1 Existing Commercial Premises on Caledonian Road

Address	Tenant	Use	Use Class	Floorspace (GIA)
166 Caledonian Road	A France & Son	Funeral Directors	Class E	125.1 sqm
168 Caledonian Road	Vacant (Since 2010)	Electronic Shop	Class E	81.2 sqm
170 Caledonian Road	Cole & Sons Deli	Deli	Class E	79.7 sqm
172 Caledonian Road	Andu & Co.	Solicitors	Class E	83.1 sqm
174 Caledonian Road	South East Site Engineers	Surveyors	Class E	93.9 sqm
176 Caledonian Road	Andu & Co.	Solicitors	Class E	82.1 sqm
178 Caledonian Road	G2	Property Services	Class E	81.8 sqm
180 Caledonian Road	Chicken Spot	Restaurant	Class E	80.9 sqm
182 Caledonian Road	Cosmo	Barbers	Class E	81.5 sqm
184 Caledonian Road	ZAC	Dry Cleaners	Class E	80.9 sqm
186-188 Caledonian Road	Nisa Local	Convenience Store	Class E	166.5 sqm
190 Caledonian Road	CU Diner	Restaurant	Class E	81.1 sqm
192 Caledonian Road	Dentalmark	Dentist	Class E	81.8 sqm
194 Caledonian Road	Delina Hair & Beauty Salon	Salon	Class E	80.5 sqm
196 Caledonian Road	Merkato	Restaurant	Class E	81.8 sqm
198 Caledonian Road	Simple Vehicle Hires	Car Hire	Sui Generis	81.8 sqm
200 Caledonian Road	Smartline	Dry Cleaners	Class E	81.5sqm
202 Caledonian Road	Alibaba Pound Saver	Convenience Store	Class E	80.5 sqm
204 Caledonian Road	The Laundry Room	Dry Cleaners	Class E	83.6 sqm
206 Caledonian Road	Avni Internet Café	Internet Café	Class E	80.7 sqm

Address	Tenant	Use	Use Class	Floorspace (GIA)
208 Caledonian Road	Caledonian Road Television	Video Repair	Class E	80.5 sqm
210-212 Caledonian Road	Healthyish/Restore	Health Food Store	Class E	184.8 sqm
Carnegie Street	Barnsbury Parking Office	Office	Class E	367.5 sqm
Total				2,402.8 sqm
Total Class E				2,321 sqm
Total Sui Generis				81.8 sqm

Source: Lichfields Analysis/PTE

- 7.15 Depending on the future design of the Outline element, the Proposed Development will result in a net reduction in Class E floorspace of 971sqm (GIA). Effectively, there is no reprovision of the existing 1,005sqm (GIA) floorspace located at basement level – this space is not typically attractive to tenants nor consumers, and its reprovision would require unnecessary below ground works.
- 7.16 The adopted LBI Policy Map and draft Local Plan LBI Policy Map both identify the Caledonian Road frontage within the Caledonian Road (Copenhagen Street) Local Shopping Area². Islington Core Strategy Policy CS14 confirms that any major new retail development should be located within its defined network of town centres in accordance with the sequential assessment set out in PPS4 (now revoked).

Retail Statement

- 7.17 Islington Development Management Policy DM4.4 (Promoting Islington’s Town Centres) states that “*Applications for more than 80m² of floorspace for uses within the A Use Classes, D2 Use Class and for Sui Generis main Town Centre uses should be located within designated Town Centres. Where suitable locations within Town Centres are not available, Local Shopping Areas or edge-of-centre sites should be chosen. Where this is not possible, out-of-centre sites may be acceptable... [then sets a series of 3 criteria]*”. It also confirms that an impact assessment is required for applications for main town centre uses exceeding 80sqm. Islington Development Management Policy DM4.6 (Local Shopping Areas) states that within these designated areas “*Proposals will only be permitted where an appropriate mix and balance of uses within the Local Shopping Area, which maintains and enhances the retail and service function of the Local Shopping Area, is retained*”.
- 7.18 The above approach is broadly repeated in draft Local Plan policies R1 (Retail, leisure and services, culture and visitor accommodation), R3 (Islington’s Town Centres) and R4 (Local Shopping Areas) of the Islington Local Plan: Strategic and Development Management Policies which confirms that both a retail sequential test and retail impact assessment are required for proposals in excess of 200sqm of main town centre uses outside of a defined town centre. Of particular relevance, Part E of Policy R3 states that “*Proposals for development of up to 200sqm main Town Centre use in LSAs are not required to meet the*

² Appendix 3 of the LBI Development Management Policies confirms this includes Nos. 157, 161, 166-170 (even), 172-194 (all), 196-212 (even)

sequential test. Proposals in excess of 200sqm must meet the sequential test and actively investigate and consider preferable locations in line with the Council's retail hierarchy. An impact assessment may also be required for proposals in excess of 200sqm, to assess the impact of larger proposals on the existing character and function of the LSA and relevant Town Centres." In addition, Part E of draft Policy R4 states that *"New development in the E use class over 200sqm gross floorspace will be required to provide an impact assessment and may need to meet the sequential test in line with Policy R3. Development within the E use class under 200sqm conditioned to retail use will not have to provide an impact assessment."*

7.19 Given that the proposed Class E floorspace will replace existing accommodation in the same location within a defined Local Shopping Area, its principle is considered wholly acceptable. In respect of the net reduction in overall commercial floorspace, it is not necessary for a Sequential Test or Impact Assessment to be undertaken in this case. Undertaking such an exercise would be counter intuitive as the proposed space is replacing existing space in the same location, and will provide an opportunity for existing tenants to return to the site. Similarly, the net reduction in floorspace would likely result in a lesser 'impact' on the town centre network, notwithstanding the locational specific need for re-provision to support the Local Shopping Area (Caledonian Road) and the wider sustainability credentials and service expectations of the Estate. It is also relevant to note that the Caledonian Road footway is expected to be enhanced, adjacent to the new units, which will improve and enhance the vitality and viability of the area.

7.20 Flexible Class E floorspace is sought to respond to market demand and ensure that an appropriate mix and balance of uses can be provided within the Local Shopping Area – the approach will be refined and agreed with LBI at Reserved Matters stage. Overall, the Class E commercial element will maintain and enhance the retail and service function of the Local Shopping Area, in accordance with Policy E9 of the London Plan, LBI Core Strategy Policy CS14, LBI Development Management Policies DM4,4 and 4.6 as well a draft policies R1, R3 and R4 of the draft Islington Local Plan.

Community Use

7.21 The Outline Element of the proposed development also includes up to 1,275sqm (GEA) of flexible community floorspace (Use Class F2/E) which is anticipated to be located within the Ground and 1st Floor of Buildings B8 and B9 facing onto Carnegie Park. It is envisaged that this space will be split between the replacement community centre (Use Class F2) at up to 970sqm (GEA) and a larger up to 305sqm (GEA) for a non-residential crèche, day centre or nursery (Use Class E(f)).

7.22 This flexible community floorspace will replace the existing New Barnsbury Estate Community Centre Hall (256sqm) and Tiddley Tots Nursery (123sqm). In both cases, greatly enhanced and much larger facilities will be provided to the benefit of existing and new residents of the Estate and local community.

7.23 Part C of London Plan Policy S1 (Developing London's social infrastructure) states that *"Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported."* It goes on to support (D) making the best use of land including the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.

- 7.24 Part B of Policy DM4.12 (Social and strategic infrastructure and cultural facilities) of Islington’s Development Management Policies states that *“The council will seek the provision of new social infrastructure and cultural facilities as part of large mixed-use developments. Developments that result in additional need for social infrastructure or cultural facilities will be required to contribute towards enhancing existing infrastructure/facilities, or provide/contribute towards new infrastructure/facilities. This contribution will be addressed through CIL and/or section 106 obligations, as appropriate.”*
- 7.25 Part C adds that *“New social infrastructure and cultural facilities, including extensions to existing infrastructure and facilities, must:*
- i. be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport;*
 - ii. provide buildings that are inclusive, accessible, flexible and which provide design and space standards which meet the needs of intended occupants;*
 - iii. be sited to maximise shared use of the facility, particularly for recreational and community uses; and*
 - iv. complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.”*
- 7.26 The above policy requirements are broadly repeated at the Draft Islington Local Plan Policy SC1 (Social and Community Infrastructure). In addition, Part C adds that *“Where a proposed social and community infrastructure use/facility is deemed necessary to mitigate the impacts of existing or proposed development (e.g. a health centre to serve the residents of a large housing scheme), that specific use will be secured at planning stage.”*
- 7.27 Part I also adds that *“Proposals involving new/redeveloped social and community infrastructure should provide free, publicly available provision of accessible toilet, baby change and drinking water facilities. ‘Changing Places’ toilets will be required in appropriate social and community facilities.”*
- 7.28 The proposed flexible community floorspace will replace and exceed the existing provision and will genuinely serve the local community. The development will deliver a quantitative increase in community floorspace and will significantly enhance the quality of community infrastructure at the estate; replacing low grade accommodation with high quality, flexible space for the community centre and nursery. This quantitative and qualitative enhancement of community infrastructure serving the estate and neighbouring parts of Barnsbury is a significant benefit arising from the Proposed Development. The specific facilities contained within the community centre will be subject to future discussion with LBI and residents, with the detailed design subject to a future Reserved Matters application.
- 7.29 In terms of availability of the existing nursery and community centre during construction, these facilities will remain operational until replacement facilities have been provided. The strategy currently being explored is to relocate the community centre and nursery to office demise in the ground floor of Charlotte Terrace. This relocation would take place at the end of Phase 1b to enable a start on site on Phase 1c. Both the community centre and nursery

would move back into Phase 1c once it is complete. Other alternate locations are also being explored, including considering the suitability of All Saints Church on the corner of Caledonian Road and Carnegie Street. It is expected that this continuation of service availability can be secured by planning condition or legal agreement, as may be required. The existing nursery operator, Tiddley Tots Nursery, are supportive of the Proposed Development.

7.30 The proposed community and nursery are a significant benefit are considered to accord with relevant development plan policy, including London Plan Policy S1, LBI Development Management Policy DM4.12 and Draft Islington Local Plan Policy SC1.

8.0 Housing Mix, Optimisation and Residential Quality

Housing Mix

- 8.1 London Plan Policy H10 states that development schemes should generally consist of a range of unit sizes. Emerging LBI Local Plan Policy H2 requires all new development proposals for residential dwellings to provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out below in Table 8.1.

Table 8.1 Housing Size Mix and Priorities for Each Housing Tenure

Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Social Rent	None	Low/Medium	High	Medium	Low
Intermediate Rent (LLR)	None	Medium	High	Medium	Low
Intermediate Rent	None	High	Medium	None	None
Intermediate Rent (SO)	None	High	Medium	None	None
Market	None	Low	High	Medium	Low

Source: London Borough of Islington - Local Plan Review

- 8.2 The affordable housing re-provision element of the Proposed Development comprises the replacement of the Estate’s existing social housing stock on a like-for-like tenure basis, with the mix of unit sizes tailored to meet the needs of rehousing households (informed by Newlon’s needs survey). The mix of homes sizes in the re-provision element of the development is therefore dictated by the requirements of existing households, rather than expressly responding to planning policy.
- 8.3 The dwelling mix for the uplift in new homes within the Detailed element of the development has been informed by local need, the character of the site and its context, and the need to complement the wider New Barnsbury estate resident rehousing strategy.
- 8.4 The Outline element includes a range of unit sizes, while retaining an appropriate degree of flexibility to allow the mix to respond to changing demographic and household needs over the lifetime of the development, as well as changes in the market. The specific housing mix within the Outline element will be discussed and agreed with LBI as part of the future Reserved Matters applications.
- 8.5 The proposed dwelling mix is set out below for the Detailed and Outline elements of the development respectively.

Table 8.2 Proposed Dwelling Mix - Detailed Element

Detailed Element (427 Homes)	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total
Replacement Social Rent Homes	45	92	36	13	5	191
Net Additional Social Rent Homes	8	14	20	0	0	42
Net Additional Intermediate Homes	0	0	0	0	0	0

Replacement Leasehold Homes	6	18	0	0	0	24
Net Additional Market Homes	89	79	2	0	0	170
Total	148 (35%)	203 (47%)	58 (14%)	13 (3%)	5 (1%)	427

Table 8.3 Proposed Dwelling Mix - Outline Element

Outline Element (Up to 523 Homes)	1Bed	2Bed	3Bed	4Bed	5Bed
Replacement Social Rent Homes	15-19%	36-40%	26-30%	13-17%	0-4%
Net Additional Social Rent Homes	16-22%	53-58%	11-16%	4-10%	5%
Net Additional Intermediate Homes	100%	0%	0%	0%	0%
Replacement Leasehold Homes	22%	24%	42%	11%	2%
Net Additional Market Homes	25-34%	50-56%	13-22%	0%	0%

- 8.6 The Outline element (i.e. Phases 1c, 2A, 2B and 3B) provides a housing mix range to ensure flexibility to enable the applicant to adapt to changing housing needs and market demands over the significant project programme of c. 10 years. This includes:
- 1 A minimum 39% of **replacement** social rent homes as 3bedroom or larger, with potential to increase up to 51%.
 - 2 A minimum 19% of **net additional** social rent homes as 3bedroom or larger, with potential to increase up to 31%.
 - 3 A minimum 30% of **all social rent homes** as 3bedroom or larger, with potential to increase up to 40%.
- 8.7 On the basis of the emerging draft Local Plan the priority for new social rented homes in Islington is for two-bedroom units, with medium priority assigned to two bedroom units and a low/medium priority categorisation to 1 bedroom units. Against these priority levels, the proposed uplift in low cost rented housing prioritises two-bedroom homes with good levels of one, three, four and five bedroom units.
- 8.8 The Council's highest priority for Intermediate tenure homes is generally for one-bedroom units - the Outline element contains 1-bedroom Intermediate homes only.
- 8.9 The Council priority for market homes are two bedroom units. Again, this is reflected in the proposed dwelling mix which proposes a high proportion of two bedroom units across the Detailed and Outline elements of the scheme.
- 8.10 Overall, the development will include a good mix of social rented, intermediate and market homes which responds to identified needs, the Council's dwelling mix priorities set out in policy, whilst reflecting the character of the estate and the development's reprovision

requirements. The mix has been tailored to the Council's priorities across each tenure while retaining sufficient flexibility to allow the mix to respond to changing demographic and market requirements.

- 8.11 The transformed New Barnsbury Estate will comprise a mixed, balanced and sustainable community meeting the housing size requirements of existing estate residents and making a meaningful contribution to addressing Islington's acute housing need, both in terms of overall quantum and the scheme's housing mix. The proposed approach to housing mix has been discussed and agreed with LBI officers during the pre-application process, and in our view complies with relevant planning policy.

Optimisation

- 8.12 Chapter 11 of the NPPF sets out that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 goes on to state that decisions should promote and support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained.
- 8.13 Core Strategy Policy CS12 refers to residential developments following and not exceeding the densities level set in the London Plan. This Policy was adopted at the time the London Plan 2008 was in place. The current London Plan does not specify a numeric density guide as the previous iterations of the document did. Policy GG2 seeks to make the best use of land by supporting the intensification of land to support additional homes, promoting high-density development, particularly in locations that are well-connect to jobs, services, infrastructure, and amenity by public transport, walking and cycling and that a design-led approach should determine the optimum development capacity of a site.
- 8.14 This design-led approach to site optimisation is to be considered alongside the requirement to demonstrate a high-quality development which ensures access to services for future residents, provides residential quality and overarching compliance with the Mayors housing standards, housing mix, quality and quantum of play and amenity space, public realm, environmental performance and contribution to local place making. Policy D3 builds upon this and requires the optimisation of site capacity through a design-led approach which is something the Applicant and design team have considered carefully through a diligent approach to pre-application engagement, design evolution and refinement.
- 8.15 Draft Local Plan Policy H1 states that Islington supports high density housing development and that proposals for housing must make more efficient use of land to ensure that the optimal amount of housing is delivered. The draft Local Plan goes on to set out 4 design principles for new development; contextual, connected, inclusive and sustainable.
- 8.16 The Proposed Development will provide up to 950 homes on a 4.38ha site, equating to a residential density of 217 dwellings per hectare. This density is considered appropriate for the site's highly accessible inner London context, optimising land to help deliver much needed new market and affordable housing within Islington. The design-led approach, evolution of the proposal and its refinement in this optimisation context is set out in greater detail in the accompanying Design & Access Statement. Rigorous testing throughout the pre-application process, for instance in respect of townscape view testing and consideration

of heritage effects, to proximity of homes and availability of amenity space, has informed the design of the Detailed element and the overarching approach to the maximum parameters and design coding for the Outline element.

- 8.17 Overall, it is considered that the Proposed Development has been sufficiently optimised in accordance with relevant policy. As set out further below and within the accompanying technical reports, the Detailed element of the scheme nor the illustrative design of the Outline element exhibit any obvious signs of over-development that would otherwise be considered symptomatic of over densification. The design-led approach to optimisation has been successfully informed by officer feedback from GLA and LBI, as well as the Design Review Panel, all of which have noted overarching support for the approach.

Residential Quality

- 8.18 The Proposed Development has been designed in order to promote and maximise the quality of new homes. The standards have been met in order to deliver good quality homes on a tenure blind basis, as summarised below:
- 1 The new homes provided are generously sized with floorspace in accordance with, or in excess of, the London Plan space standards and the Mayors Housing Design Guide;
 - 2 10% provision of wheelchair homes in accordance with Building Regulation Part M(4);
 - 3 Dedicated private amenity space (in the form of balconies, terraces, gardens) is provided to all properties;
 - 4 All homes enjoy access to shared landscaped amenity space at ground level, podium and/or roof, including provision of two enhanced public park spaces;
 - 5 The buildings have been designed to ensure that the majority of units will be dual or triple aspect with the number of single aspect dwellings reduced to a minimum;
 - 6 The layout, fenestration and balcony arrangements have been carefully designed to prevent any unacceptable effects in terms of privacy and overlooking;
 - 7 The proposed units will experience good levels of internal daylight with 90% of the proposed rooms meeting BRE guidelines for ADF, and the remaining homes have been optimised through design refinements.
 - 8 The buildings have been designed to minimise overheating and maximise ventilation wherever possible.
 - 9 Internal noise levels are considered to be acceptable for residents with acoustic measures able to be implemented into the design to achieve appropriate acoustic standards.
- 8.19 The development has been designed to target compliance with London Plan Policy D6 (Housing quality and standards), the Mayor's Housing Design Guide and local policies concerned with the amenity standards of proposed residents.

9.0 Proposed Affordable Homes

9.1 The Site currently comprises 291 existing social rented homes. The Proposed Development will re-provide all of these homes, through a mix that meets housing needs and in accordance with modern space standards. The existing rents paid across the Estate for each social rented unit type will continue to apply to existing residents who return to a replacement home.

9.2 In terms of floorspace, the illustrative scheme includes 22,598sqm of replacement social rented floorspace which equates to an uplift of 4,867sqm compared with the existing position. The floorspace of replacement social rent homes is weighted towards the Detailed Element (14,232sqm), with the remainder in the Outline Element (8,366sqm) based on the illustrative scheme. The precise housing mix and the design of homes within the Outline Element will be determined following further housing needs surveys and Reserved Matters Applications.

9.3 In addition, up to 35% of the uplift in homes will be delivered as affordable housing (calculated by unit) - this equates to up to 203 affordable homes. This additional affordable housing will be split 70:30 between social rent (142) and intermediate (61) tenures.

9.4 Overall, the scheme could provide up to 52% affordable housing by unit (up to 494 affordable homes based on the illustrative scheme). The overall tenure split is 88% social rent (433) and 12% intermediate (61 units) tenures.

9.5 The proposed affordable housing has been subject to discussion and negotiation with both GLA and LBI, as well as their independent viability consultants. The Proposed Development will follow the viability tested route as is required for all estate transformation schemes, and is utilising available grant funding to maximise the provision of affordable housing.

9.6 Affordable housing in the Detailed element of the Proposed Development comprises:

Table 9.1 Tenure Split for Detailed Element of Scheme

Tenure	Homes	Percentage	Habitable Rooms	Percentage
Social Rent	233	55%	785	61%
Intermediate	0	0%	0	0%
Market Housing	194	45%	494	39%
Total	427		1,279	

9.7 Affordable housing in the Outline element of the Proposed Development (based on the illustrative scheme) comprises:

Table 9.2 Table 4 Tenure Split for Outline Element of Scheme

Tenure	Homes (Maximum Parameter)
Social Rent	200
Intermediate	61
Market Housing	262

Total	Up to 523
--------------	------------------

9.8 The overall affordable housing provision across the scheme could, therefore, comprise:

Table 9.3 Overall Tenure Split (Detailed and Outline illustrative scheme)

Tenure	Homes
Social Rent	433 (46%)
Intermediate	61 (6%)
Market Housing	456 (48%)
Total	Up to 950

9.9 Please refer to the Accommodation Schedules submitted with the application for a breakdown of the unit mix, bedroom and sizes of habitable areas. All of the affordable homes exceed the London Plan minimum floorspace requirements.

Policy Framework

9.10 Affordable Housing is defined in Annex 2 Glossary of the NPPF as:

“Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) Affordable housing for rent*
- b) Starter homes*
- c) Discounted market sales housing*
- d) Other affordable routes to home ownership”*

9.11 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to “support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations” (paragraph 8).

9.12 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 60 confirms the Government’s objective of “significantly boosting the supply of homes”.

9.13 The NPPF is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include “those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes” (paragraph 62).

9.14 It places a great responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. Paragraph 65 establishes that “at least 10% of new homes on major residential developments be available for affordable home ownership”.

- 9.15 Islington's Core Strategy Policy CS12 states the affordable housing will be sought on all new developments which will be negotiated on the basis of a 50% provision. Emerging Policy H3 requires sites capable of delivering more than 10 units must provide at least 45% on-site affordable housing.
- 9.16 London Plan Policy H4 sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable and should be delivered on site. London Plan Policy H6 requires the affordable product within a development to be split 30% low cost rented homes (London Affordable Rent or Social Rent), a minimum of 30% intermediate and 40% to be determined by the Borough.
- 9.17 London Plan Policy H8 requires the replacement of existing residential floorspace on an estate, reprovision of affordable housing at the same tenure as existing stock and the maximum viable and practical uplift in affordable homes based on development viability; noting that all estate projects follow the Mayor's viability tested route for affordable housing (i.e. there is no threshold for affordable housing on estate projects; the policy requirement is delivering the maximum viable quantum of affordable homes).
- 9.18 The New Barnsbury Estate development will re-provide the estate's existing affordable housing stock with replacement homes matched to the returning household's needs as identified in Newlon's Housing Needs Survey. In terms of floorspace, the illustrative scheme includes 22,598sqm of replacement social rented floorspace which equates to an uplift of 4,867sqm compared with the existing position. The floorspace of replacement social rent homes is weighted towards the Detailed Element (14,232sqm), with the remainder in the Outline Element (8,366sqm) based on the illustrative scheme. The precise housing mix and the design of homes within the Outline Element will be determined following further housing needs surveys and Reserved Matters Applications.
- 9.19 Existing rents for affordable homes on New Barnsbury are (on average) c. 32% less than the rents that would be chargeable for new social rent homes with the equivalent number of bedrooms in Islington. Newlon has committed to honour existing rents on the estate for existing residents. The new (replacement) affordable homes will comprise high quality housing stock meeting or exceeding relevant space standards and served by dedicated private amenity space.
- 9.20 Alongside reprovision of existing affordable homes (291), the Proposed Development will deliver 35% of net additional dwellings as affordable housing, including up to 142 new social rented homes based on the illustrative scheme. The delivery of this significant quantum of new social rented homes across the estate will make a meaningful contribution towards Islington's acute need for low cost rented homes and is a considerable benefit associated with the scheme.
- 9.21 The overall affordable housing quantum proposed across New Barnsbury equates to 52%; meaning that more than half of the homes at the newly redeveloped estate will be affordable. The vast majority of these maximum 494 affordable homes will be social rented homes (88%), with the remainder proposed as an Intermediate housing product.
- 9.22 The reprovision of the New Barnsbury Estate's affordable housing, qualitative enhancement of affordable housing stock and the proposed uplift in affordable homes are all substantive benefits being delivered by the scheme, and the accompanying Financial Viability Appraisal

prepared by DS2 demonstrates that the maximum reasonable amount of affordable housing is being provided, taking into account the allocation of grant funding.

- 9.23 In our view the affordable housing element of the Proposed Development complies with relevant planning policy, namely London Plan Policies H4, H5, H6 and H8, and Local Plan Policy CS12.

10.0 **Design: Architecture and Landscape**

Architectural Approach

- 10.1 The approach to urban design, architecture and materiality in respect of the overarching Masterplan and design of the Detailed element is explained in greater detail within the accompanying Design and Access Statement. The accompanying Design Code provides design guidelines for the Outline element of the development which will guide the detailed design of the future Reserved Matters applications to ensure that the development knits together over the 10-year delivery programme.
- 10.2 The approach to both the Detailed and Outline elements have been discussed thoroughly during pre-application meetings with GLA, LBI Officers and the LBI Design Review Panel, evolving and being refined in response to resident feedback.
- 10.3 The overarching masterplan seeks to repair the urban fabric of the existing estate and weave into the surrounding context to create a high quality, safe and attractive neighbourhood that makes a positive contribution to the local character and distinctness of the area - 7 key principles have guided this masterplan approach:
- 1 Understanding place;
 - 2 Responding to street hierarchy;
 - 3 Creating a new community heart;
 - 4 Celebrating open space and trees;
 - 5 Connecting to the past;
 - 6 Creating a safe pedestrian network; and
 - 7 Creating a place rich in character.
- 10.4 The masterplan includes a complementary family of building typologies with spaces grouped into distinct character areas to facilitate place making. The proposed building typologies comprise (see Figure 10.1):
- 1 Mansion Blocks;
 - 2 The Lanes;
 - 3 Mews Houses;
 - 4 Park Blocks; and
 - 5 Canal Blocks.
- 10.5 A simple, contextually responsive materials palette is proposed, including a composition of two brick types and two mortar joint types to create interest and detail to the buildings, providing depth and texture. Alongside the massing strategy, the proposed buildings provide variation without the need for a fussy palette of many differing materials. The brickwork is contrasted with a suite of metal components - from window frames, to cladding panels and louvres - creating a smart but subtle building within the context of the adjacent Conservation Area. High quality, durable materials will ensure the buildings not only look good when completed, but that it will go on looking good for the life of the

development. It is expected that the delivery of the Detailed element of the scheme in the early phases will set the benchmark for architectural quality, with this approach tied into the Design Coding for future phases.

Figure 10.1 Building typologies



Source: PTE

- 10.6 The design rationale and architecture has been supported by LBI Officers and the LBI Design Review Panel during pre-application discussions. The masterplan will deliver a high quality, contextually appropriate development composed of well-designed buildings and spaces, which echo and reference the vernacular, materiality and character of Barnsbury in a suitably restrained but contemporary manner. The scheme’s design is considered to comply with relevant planning policies and guidance, with further analysis and assessment set out in the Design & Access Statement prepared by PTE.

Landscape, Public Realm and Open Space

- 10.7 Policy DM2.1 (Design) of the LBI Development Management Policies requires development proposals to improve the quality, clarity and sense of spaces around or between buildings; enhance legibility and have clear distinction between public and private spaces; improve movement through areas, and repair fragmented urban form, as well as consider landscape design holistically as part of the whole development.
- 10.8 The existing New Barnsbury Estate provides 16,210 sqm of open space, however, almost half of this is a non-accessible landscape buffer (6,672sqm) and the space that is usable is illegible and often disorientating, car dominated, poorly lit causing safety concerns and has a number of level changes, gates and fences which prevent accessible permeability through the site.

- 10.9 The open space strategy has been informed by this existing context, engagement with residents and local stakeholders and an assessment of existing trees. The overarching concept designs and aim of Farrer Huxley, the landscape architect, is to create a better quality and usable environment for residents and visitors including coherent, animated, safe, appropriately illuminated and overlooked routes that are accessible with clear and pedestrian friendly east-west and north-south routes.
- 10.10 The Proposed Development comprises the following maximum elements (based on the Detailed and Outline illustrative scheme):
- **Private Amenity:** 1,317sqm
 - **Shared Resident Garden:** 5,809sqm
 - **Shared Resident Rooftop:** 4774sqm
 - **Community Garden:** 486sqm
 - **24 hour Open Space:** 4,157sqm
 - **Landscape buffer (non accessible):** 3,975sqm
- 10.11 The open space will retain and significantly improve the two estate (public) open spaces, Pultney Street Park and Carnegie Park. The latter will be provided ahead of demolition of Phase 1 to ensure there is suitable reprovision of the existing ball court and play facilities. Communal residents' courtyards will comprise amenity and doorstep play, as well as a pedestrian only 'green walks' linking east to west, connecting Old and New Barnsbury with each other and the surrounding communities throughout the site.
- 10.12 Overall, the open space, landscape and public realm provision for the proposed scheme represents a high quality uplift on the existing site in terms of accessible quantum and its quality/useability. This element of the scheme is considered to accord with relevant development plan policy, namely LBI Policy DM2.1, DM2.2, DM6.2 and DM6, draft Islington Local Plan policies addressing green infrastructure, sustainable design and public realm, as well as London Plan policies G1, G4, G5, G6 and G7 in particular.

Playspace

- 10.13 London Plan Policy S4 (Play and Informal Recreation) requires that residential developments incorporate good-quality, accessible play provision for all ages. The GLA Play and Informal Recreation SPG (2012) provides further guidance on the approach to play space provision. At least 10sqm of playspace should be provided per child that:
- a provides a stimulating environment
 - b can be accessed safely from the street by children and young people independently
 - c forms an integral part of the surrounding neighbourhood
 - d incorporates trees and/or other forms of greenery
 - e is overlooked to enable passive surveillance
 - f is not segregated by tenure

- 10.14 This 10sqm requirement is repeated at LBI Development Management Policy DM3.6 (Play Space), however, it is only applied as a benchmark in Draft LBI Local Plan Policy SC2 (Play Space). Paragraph 3.167 of the draft supporting text states that (**our emphasis**):

*“Major housing developments are expected to make **appropriate** provision of play space. In determining the amount of play space required the Council will consider the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development. The Council will take into consideration the London Plan benchmark for 10sqm of play space to be provided per child as a starting point, but it is recognised that in Islington’s context, delivery at this level may not always be feasible.”*

- 10.15 The existing New Barnsbury Estate comprises 371 homes with a total of 387 children estimated to live within the site. There is 646sqm of dedicated play space available (equivalent to 1.67 sqm per child) which increases to 2,648sqm (6.97sqm per child) if playable space in the public realm is included. In both cases this falls well below the GLA play space requirement of 10sqm per child, and the dedicated play space is in a poor state of condition. The existing level of playspace only meets 68% of the space required to meet demand from the existing population based on current policy requirements.

Table 10.1 Existing Play Space

		Existing Play Space
Ages 0 – 4	(Doorstep)	115 sqm
Ages 5 – 11	(Active)	297 sqm
Ages 12+	(Youth Space)	234 sqm
Playable Space		2,002 sqm
TOTAL		2,648 sqm

- 10.16 The Proposed Development will provide up to 950 homes with an estimated 631 children living with the site – this generates an estimated child play space requirement of 6,319sqm (using the GLA Play-space calculator version 3.2), as summarised in the table below. It should be noted that the figure of 631 children is generated by assuming the homes in the Outline element come forward as predominantly larger units, within the ranges set out in earlier sections. The 631 figure, therefore, represents the maximum end of a range and therefore a maximum playspace requirement.

Table 10.2 Play Space Requirements

		Play Space Requirement
Ages 0 – 4	(Doorstep)	2,541 sqm
Ages 5 – 11	(Active)	2,071 sqm
Ages 12+	(Youth Space)	1,701 sqm
TOTAL		6,319sqm

- 10.17 The development will significantly enhance the amount and quality of play space across the estate. The play strategy provides good mix of play provision focused towards each age group, alongside playable multi-use space. The play space will provide a stimulating environment, can be safely access from the street, forms an integral part of the surrounding

neighbourhood, incorporates trees and other form of greenery, is overlooked to enable passive surveillance and is not segregate by tenure.

10.18 In total 5,198sqm of dedicated play and useable space is provided, equivalent to 8.06sqm per child which is considered appropriate in the context of Draft LBI Local Plan Policy SC2 and the proximity of the site to Barnard Park which is accessible via the improved linkages within the site. It reflects a 16% increase in play space / child compared to the existing provision on-site and a considerable increase in the quality of these play areas. The Proposed Development therefore meets 82% of the space required by policy, a significant improvement on the existing situation.

10.19 Table 10.3 below summaries the overall maximum play space proposed as part of the scheme.

Table 10.3 Proposed Play Space

		Proposed Play Space
Ages 0 – 4	(Doorstep)	1,790 sqm
Ages 5 – 11	(Active)	728 sqm
Ages 12+	(Youth Space)	533 sqm
Playable Multi-Use Space		2,247 sqm
TOTAL		5,198 sqm

10.20 The play space provision is a significant quantitative and qualitative improvement on the existing condition and in our view accords with the aspirations of Policy S4 of the London Plan, Policy CS 16 of the LBI Core Strategy, Policy DM3.6 of the LBI Development Management Policies and Policy SC2 of the Draft Islington Local Plan.

Urban Greening Factor and Biodiversity Net Gain

10.21 London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. This is echoed in emerging Islington Policy G1, which requires major development proposals to conduct an Urban Greening Factor assessment which results in a score of 0.4 for predominantly residential developments. The New Barnsbury Estate development has an Urban Greening Factor Score of 0.44 which is in accordance with relevant policy.

10.22 Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating that schemes that cannot adequately mitigate or compensate the harm to biodiversity resulting from a development, then planning permission should not be granted. Emerging Islington Local Plan Policy G4 requires all development to protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area. The Policy goes on to specify development proposals must aim to secure a net gain in biodiversity value, with a clear priority for on-site measures.

10.23 The Environment Act, 2021 mandates the requirement for new development in England to deliver a minimum 10% biodiversity net gain. A Biodiversity Net Gain Assessment has been prepared by Greengage. The Assessment sets out the biodiversity enhancements that are proposed as part of the development and concludes that the development proposals will

result in a post-development area-based value 13.94 units. This equates to a 20.27% increase in area-based value and is in accordance with national and local planning policy.

Accessibility and Inclusive Design

- 10.24 The Proposed Development has been designed in accordance with the principles of inclusive design. The proposed residential units and landscaped public realm will enable level access and convenient movement in terms of the approach to the buildings and internal circulation. The needs of disabled occupants and visitors have been integral to the design process, and this topic was one of many considered at ‘Streetbook Surgery’ forum with LBI officers during the pre-application process. Care has been taken to ensure that the design of the Detailed element provides equitable access for all in accordance with the Equality Act (2010) and the requirements of Part M of the Building Regulations. This approach will be carried through and refined for the Outline element as detailed design comes forward via Reserved Matters.
- 10.25 Level access is provided to the majority of the development site. There is one instance of stepped access on Site which is in the Mews between Jay Street and Leirum Lane due to a change in levels. There are a number of convenient and accessible alternate routes as demonstrated at Section 6.8 of the DAS.
- 10.26 London Plan Policy D7 (Accessible Homes) requires developments to provide at least 10% provision of wheelchair accessible homes. Existing residents who do not need a fully adapted wheelchair home will benefit from improved accessibility and any adaptations required to reflect their specific needs, for example level access showers, can be provided. The scheme will provide 43 wheelchair accessible homes within the Detailed Element(10.1%), exceeding the 10% policy requirement and will target achieving the 10% requirement for the Outline Element, as identified in the accompanying material prepared by PTE.
- 10.27 31 wheelchair accessible parking bays, equating to 3% of the total homes will be provided. 22 of those spaces are proposed to be located within the public realm and 9 within the podium car parks. This strategy is detailed within the accompanying Transport Assessment having been discussed and agreed with Islington Planning Officers and Transport for London during pre-application discussions.

Fire Safety

- 10.28 London Plan Policy D12 (Fire Safety) requires that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. Policy D5 details the expectations for evacuation, and the GLA have published guidance to accompany the aforementioned policies. There are no adopted or draft LBI policies that relate to fire safety.
- 10.29 The application is supported by a Fire Statement & Gateway One Form, prepared by Affinity Fire who have been engaged throughout the design process.
- 10.30 To meet the requirements of Policy D5 and D12 for the London Plan, the non-firefighting lift in each core should be provided as an evacuation lift to assist the evacuation of persons

of restricted mobility. An automatic fire sprinkler system is to be provided to a Category 4 standard for all buildings.

- 10.31 Overall, the Fire Statement concludes that where the recommendations made within the assessments are met, developed in detail, and implemented accordingly, that the requirements of London Plan Policy will be met in full (both in content and intent), together with relevant guidance, Building Regulations and legislation.

11.0 Tall Buildings, Townscape and Heritage

Tall Buildings

Policy Context

- 11.1 London Plan Policy D9 (Tall Buildings) Part A comprises a definition of tall buildings and Part B sets out locational criteria for their siting. Only proposed Blocks D1, D2 and D3 are tall buildings by definition (i.e. over 30m), and all are within the Detailed element of the scheme. Part C of the policy deals with the impacts of tall buildings, namely visual impacts, functional impacts, environmental impacts and cumulative impacts.
- 11.2 LBI Core Strategy Policy CS 9 Part E (Protecting and enhancing Islington’s built and historic environment) is a locational policy, akin to Policy D9(B) of the London Plan. It identifies that tall buildings (over 30m) are generally inappropriate in LBI (aside from in parts of Bunhill and Clerkenwell key area) and will not be supported:
- “New buildings and developments need to be based on a human scale and efficiently use the site area, which could mean some high-density developments. High densities can be achieved through high quality design without the need for tall buildings. Tall buildings (above 30m high) are generally inappropriate to Islington's predominantly medium to low level character, therefore proposals for new tall buildings will not be supported. Parts of the Bunhill and Clerkenwell key area may contain some sites that could be suitable for tall buildings, this will be explored in more detail as part of the Bunhill and Clerkenwell Area Action Plan.”*
- 11.3 LBI Development Management Policy DM2.1 Part C (Design) is also a locational policy, akin to Policy D9(B) of the London Plan. It states that:
- “The only locations in Islington where tall buildings may be suitable are set out in the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell). Any proposal for tall buildings must meet other design policies and have regard for the criteria set out in English Heritage/CABE's Guidance on tall buildings (2007).”*
- 11.4 Paragraph 2.18 of the reasoned justification applies an impact caveat, akin to Policy D9(C) of the London Plan, stating that:
- “Tall buildings, as referred to in Part C of Policy DM2.1, are defined as over 30m in height. Proposals for tall buildings must have regard to the relationship to context, including historic context and World Heritage Sites, the quality and credibility of its design, its contribution to public spaces and facilities, its effect on the local environment including microclimate and overshadowing, and be sustainably designed and constructed. Further guidance on these issues is provided in English Heritage/CABE's Guidance on tall buildings (2007).”*
- 11.5 Parts A-F of Draft LBI Policy DH3 (Building heights) of the Modifications for Consultation version (March 2021) of the draft Islington Local Plan: Strategic and Development Management Policies states:

- a *Buildings of more than 30 metres, or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) will be considered to be tall buildings.*
- b *Buildings of more than 30 metres are only acceptable in-principle:*
 - i *on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or*
 - ii *within specific sites identified in a Spatial Strategy area.*
- c *Each relevant allocation and/or Spatial Strategy area policy identifies the maximum permissible heights (in metres) suitable on the respective sites/locations. Any buildings proposed on these sites which exceed the identified maximum heights will be refused. Proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part F.*
- d *Proposals for buildings which are more than twice the contextual reference height of surrounding buildings, but less than 30 metres, must fully satisfy criteria identified in Part F.*
- e *Buildings that do not meet the criteria in Part A but which are still considered prominent in their surrounding context must respond appropriately to local contextual building heights, the character of the area and other relevant policies, and may be subject to Part F of this policy.*
- f *Tall buildings must be high quality in accordance with policy PLAN1. Designs for tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. The following criteria must be fully satisfied: [not repeated]*

- 11.6 Limb a) is engaged by the Proposed Development at the New Barnsbury Estate as it contains three tall buildings by definition.
- 11.7 Limb b) which refers to tall buildings ‘in principle’ is not expressly met as the site allocation for New Barnsbury does not make specific reference to suitability of heights of 30 metres or more; nor is the site identified in a Spatial Strategy area.
- 11.8 However, in the same way that Policy D9 of the London Plan is interpreted, LBI policy does not expressly rule out tall buildings outside of these specified areas – it only states they are acceptable ‘in-principle’ in those specific areas.
- 11.9 The New Barnsbury application site forms part of a wider site allocation (OIS28: Barnsbury Estate) within the Site Allocations Modifications for Consultation document (March 2021). The draft allocation is silent on building heights. This draft allocation was introduced to Islington’s draft Site Allocations for the first time in the March 2021 Modifications for Consultation. It was not included within the Proposed Submission Regulation 19 draft (September 2019) that was submitted for Examination in Public. The introduction of the allocation was 2.5 years after publication of Islington’s Tall Buildings Study (November 2018).
- 11.10 The allocation and justification states **(our emphasis)** “*Refurbishment of Old Barnsbury estate and redevelopment of New Barnsbury estate for residential use, including the*

provision of additional new homes and genuinely affordable housing.

Improvements to existing estate open spaces including the creation of a park on Pultney Street, and the provision of a new park on Carnegie Street with a community centre, play and exercise equipment and ball court. Improvements to landscaping, planting, lighting and security measures, play spaces, seating and bin and cycle storage across the estate...”

Relevant Planning Appeals

- 11.11 Against the aforementioned context it is relevant to note how Policy D9 of the London Plan is being interpreted and applied.

Appeal APP/A5270/W/21/3268157: 51-56 Manor Road and 53-55 Drayton Green Road, West Ealing, London W13 0LJ

- 11.12 An application was refused by LB Ealing in December 2020 for an 18 storey building comprising 144 affordable homes. It was refused on grounds of affordable housing tenure and an unacceptable effect of the proposal on the character and appearance of the area. The application was allowed at appeal in October 2021, prior to the Hillingdon decision referenced above.

- 11.13 The Inspector made the following salient points:

“One of the main questions informing a proper analysis of the impact of the tall building proposed is whether it optimises, rather than maximises, the obvious potential of the appeal site. There are other questions to address too. These are best expressed by LP Policy D9: Tall Buildings.

First of all, the policy deals with the principle of ‘Locations’. We are told that Boroughs should determine if there are locations where tall buildings may be an appropriate form of development and that any such locations and appropriate tall building heights should be identified on maps in Development Plans. Tall buildings, we are told, should only be developed in locations that are identified as suitable in Development Plans. The Policy then goes on to deal with ‘Impacts’.

There is an understandable reluctance from local residents to accept the nature and extent of the change proposed. Linked to that, in terms of the ‘Locations’ element of LP Policy D9, the site is not identified as a suitable one for a tall building in the Development Plan. The idea that proceeding with the proposal without offering the community the opportunity to address that question through an examination process would be harmful stands alongside the many complaints I have heard and read about what is perceived to be a lack of consultation by the appellant.

I return to this matter below but would observe at this stage that the appeal site is, as I have set out, chronically under-used. In the light of the very much heightened housing requirement set out for the London Borough of Ealing in the LP, and the Council’s failing performance in relation to those targets, best use really does have to be made of this site.”

- 11.14 The Inspector Concluded:

“There would be clear compliance with LP Policies H5, D3, GG2, and the ‘Impact’ element of D9.

That said, there would be failure to accord with... the 'Locations' element of LP Policy D9.

...

On that basis, my judgment is that the proposal accords with the development plan read as a whole and there are no material considerations of sufficient weight to justify a decision contrary to its provisions."

11.15 In summary, the Inspector concluded that as a significant housing need was identified, and compliance was demonstrated with Part C (Impacts) of London Plan Policy D9, it would be unreasonable to refuse an application for tall buildings on the grounds of conflict with the 'Locations' part of Policy D9.

11.16 Whilst the New Barnsbury site is allocated in the draft Local Plan for housing-led development, it is not expressly identified for tall buildings. However, the New Barnsbury Estate site was not considered as part of the Council's tall building evidence base which in turn informed the site allocation drafting.

London Borough of Hillingdon, R (On the Application Of) v Mayor of London [2021] EWHC 3387 (Admin) (15 December 2021)

11.17 The London Borough of Hillingdon brought a judicial review against the Mayor of London's decision to grant planning permission for a mixed-use development comprising buildings up to 11 storeys (the 'Master Brewer' case). There were three grounds to the judicial review brought by the Council, the first of which related to an alleged misinterpretation of London Plan Policy D9 by concluding that, notwithstanding conflict with Part B of that policy (i.e. the locational limb), tall buildings were to be assessed for policy compliance against the criteria in Part C (Impacts). This has confirmed our understanding that the GLA's approach to London Plan Policy D9 since adoption of the London Plan has been to apply the impact Policy D9(C) to schemes which do not fall within locations set out by Policy D9(B).

11.18 The Council submitted that the ordinary meaning of the words in Policy D9, read as a whole, sets out a clear process for the grant of planning permission for tall buildings. In terms of the definition and location of tall buildings (Parts A and B of the policy), the Council submitted that the planning judgment of the local planning authority at the plan-making stage should be given primacy, and that Policy D9 did not allow the Mayor to claim policy support for overriding the Council's judgment by reference to Part C (Impacts). Mrs Justice Lang rejected this and found that there is no wording that indicates that Part A or Part B of the policy are 'gateways' or pre-conditions to Part C. On that basis, when considering whether to grant permission for a tall building which did not comply with Part B(3), a decision-maker is permitted to rely on the factors set out in Part C.

11.19 The decision effectively means that even if a tall building proposal does not comply with the Policy D9(B) locational criteria, it is still capable of being considered and approved in line with Part C and the development plan read as a whole. Islington's draft tall building policy is structured in a manner that conforms with London Plan Policy D9, so it follows that this approach is applicable at New Barnsbury and the proposed tall buildings D1, D2, D3 can be considered accordingly.

Tall Building Assessment

- 11.20 It is possible that Islington's new Local Plan may be adopted by the time the application for the New Barnsbury Estate is determined. On that basis, the relevant development plan policies for the consideration of tall buildings would be London Plan Policy D9 and draft Local Plan Policy DH3.
- 11.21 The interpretation of London Plan Policy D9 has been confirmed by the 'West Ealing' appeal decision and latterly by the courts in the 'Master Brewer' case. This confirms that compliance with the 'Locations' part of the policy is not a 'gateway' or 'pre-condition' and can be overcome if a scheme can demonstrate compliance with the 'Impacts' part of the policy, and/or considering the proposals against the development plan as a whole.
- 11.22 Draft Local Plan Policy DH3, which is required to conform with the London Plan, should be interpreted in the same way. In fact, the draft wording does not expressly prevent tall buildings on 'non-qualifying' sites – so in the case of New Barnsbury, whilst proposed tall buildings may not benefit from 'in principle' support in the draft site allocation, this does not preclude them from gaining support when considered against the development plan as a whole.
- 11.23 Weighing further in favour of this approach is the fact that the site benefits from a draft site allocation, which itself was included in the Draft Local Plan after the Council's tall buildings evidence base was prepared. It could be argued that if the tall building study was to be prepared now it could have considered the realistic prospect of tall buildings at New Barnsbury.
- 11.24 In light of the above, it is reasonable to conclude that the New Barnsbury Estate development is supportable in the context of relevant development plan policy London Plan Policy D9 and (current draft) Local Plan Policy DH3.
- 11.25 In the context of Policy D9C1, the visual impacts and consideration of heritage harm arising from the proposed tall buildings D1, D2 and D3 (Canal Blocks), and the Proposed Development as a whole, are robustly considered as part of the Heritage, Townscape and Visual Impact Assessment (HTVIA) prepared by Montagu Evans. The rationale in respect of spatial hierarchy, legibility and wayfinding is set out in the Design & Access Statement, as is the approach to exemplary standards of appearance architecture. The remaining limbs of London Plan Policy D9C1, namely glare and light pollution, are addressed in the assessments prepared by Point 2 Surveyors and the Outline Lighting Strategy by Light Follows Behaviour.
- 11.26 The functional impact of the proposed tall buildings, considered as a constituent part of the overarching Proposed Development, are addressed in a number of accompanying assessments to satisfy Policy D9C2, for instance the Design & Access Statement, Transport Assessment and Socio-Economics chapter of the ES.
- 11.27 The environmental impact of the Proposed Development (D9C3), including the tall building elements, is considered in the accompanying application documents, including the wind microclimate assessment, daylight, sunlight and overshadowing assessment and noise assessment.

- 11.28 The cumulative impacts (D9C4) of the above are considered as part of the ‘cumulative’ testing scenario set out in the accompanying ES. London Plan Policy D9D is not engaged as it is not appropriate to provide publicly accessible areas within the proposed tall buildings.
- 11.29 Notwithstanding the above, it is also relevant to consider the approach taken to height and scale across the wider masterplan and to take into account the development’s substantive wider material benefits. As part of a design-led optimisation process the applicant has introduced amendments to the scheme’s height, scale and quantum elsewhere across the masterplan which will mitigate against potential townscape and amenity effects. However, given the viability context these reductions in scale can be offset by retaining the proposed height and quantum on Blocks D1, D2 and D3 (Canal), in turn delivering on commitments made to existing residents in canal side blocks to be able to move back to the canal zone.
- 11.30 Lastly, the development’s significant public benefits further support the tall building element of the Proposed Development when considered in the planning balance, including public benefits.
- 11.31 In the case of the New Barnsbury Estate, these benefits are substantive:
- 1 Comprehensive renewal and transformation of an underperforming estate in accordance with overwhelmingly positive residents’ ballot.
 - 2 950 new homes (52% affordable) making a significant contribution to acute local and strategic housing need.
 - 3 291 high quality social rent homes that will replace deficient affordable homes across the estate. These new homes will be let at existing social rental levels for returning residents, which are on average c. 32% less than new social rent levels with the equivalent number of bedrooms. They will address a range of existing social and environmental challenges including overcrowding, cramped conditions, limited accessibility, and energy efficiency.
 - 4 203 additional affordable homes, including 142 social rent homes and 61 intermediate homes, together reflecting 35% of all net additional dwellings.
 - 5 A new community centre that is at least double the size of the existing facility and a new nursery that is at least 60% larger.
 - 6 High quality commercial floorspace to replace the existing units, contributing to the local economy and animating Caledonian Road.
 - 7 Delivery of an exemplary masterplan composed of high-quality, contextually responsive contemporary buildings set within a network of outstanding landscaped spaces.
 - 8 More than 16,210 sqm of high quality public realm, communal amenity space, extensive play space provision as well as private amenity space resulting in an urban greening factor of 0.44 and a biodiversity net gain of 20% and an environment that promotes active travel;
 - 9 A sustainable, energy efficient masterplan that delivers 60%+ carbon emissions reduction against Part L targets.
 - 10 Creation of local training, jobs, curriculum support and mentoring programmes; and

11 Funding to unlock the refurbishment and enhancement of 213 social homes and the open spaces of Old Barnsbury.

12 Approximately £12m of Community infrastructure Levy for LBI to spend locally.

11.32 These wide-ranging benefits carry significant planning weight and militate strongly in support of the tall building element of the Proposed Development, as well as the planning application overall.

11.33 In light of the above, specifically given the correct interpretation and application of London Plan Policy D9 and by association the application of LBI's own draft policies relating to height of buildings, we consider there to be a strong planning case for the inclusion of tall buildings of the scale and character proposed at New Barnsbury.

Townscape

11.34 A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared by Montagu Evans and forms part of the enclosed Environmental Statement. This provides an assessment of the impact of the Proposed Development on heritage, townscape and visual receptors.

11.35 The visual assessment considers the likely effect of the Proposed Development on visual receptors based on viewpoint locations that are presented as Accurate Visual Representation (AVRs) and presented in either AVR1 (wireline) or AVR3 (render) format. The outline parts of the scheme are all presented as maximum parameter wirelines.

11.36 The HTVIA identifies 10 character areas and assesses the impact of the Proposed Development on each of these areas in turn. In terms of the impact of demolition and construction to townscape, there would be a minor adverse effect on the character area in which the site is located. This effect would not be significant and would be temporary (short to medium-term) in nature.

11.37 The remainder of the surrounding townscape areas would experience likely effects of negligible adverse to none depending on the proximity and relationship between the character area and the site during the demolition and construction phase. These effects would be indirect, temporary, short to medium-term and not significant.

11.38 The HTVIA concludes that as a result of the Proposed Development there would be a moderate to major beneficial effect on Character Area 1 in which the Site is located. This effect would be significant and permanent. There would be other effects ranging from moderate beneficial to none on the surrounding character areas.

Heritage Effects

11.39 The HTVIA also considers both the impact of the Proposed Development on heritage assets that fall outside the red line boundary of the site (500m radius). At New Barnsbury, no listed or locally listed structures fall within the site boundary and the site is not located within a Conservation Area.

11.40 The following heritage receptors are identified within the assessment as most likely to be impacted by the Proposed Development by reason of their proximity and/or relationship to the Site:

- 1 Barnsbury, Regents Canal West, Keystone Crescent, Priory Green, King's Cross and Regent's Canal Conservation Areas;
- 2 Various statutorily listed buildings including those location at Caledonian Road, Matilda Street, West Portal and Islington Tunnel (Regent's Canal), Barnsbury Road, Copenhagen Street, Cloudesley Road and Cloudesley Place, Thornhill Crescent and Thornhill Square, West Library and Church of St Andrew, Hemingford Road, Richmond Avenue
- 3 Locally listed (non-designated) buildings on the southern bank of the Regent's Canal, Caledonian Road, Hemingford Road, Prince's Yard, Richmond Avenue, Matilda Street, Copenhagen Street, Barnsbury Road, Cloudesley Road, Crinan Street, New Whard Road and Wharfdale Road, York Way to Treaty Street, the Priory Green Estate and Copenhagen Primary School.

- 11.41 The demolition and construction phase of the Proposed Development could introduce new environmental conditions into the setting and experience of the heritage receptors considered within the assessment, but there are no direct impacts. The indirect impacts could include increased noise, vibration, dust and traffic in the surrounding area, which could affect a heritage receptor's value temporarily. Such impacts will mainly be felt in close proximity to the Site, including on the Caledonian Road, Copenhagen Street and Charlotte Terrace. There will be no permanent change to the way the heritage value of receptors identified in the assessment are appreciated or understood and therefore this effect is to be expected for development of this type – on that basis it is considered acceptable, with environmental effects managed during the demolition and construction phases via robust management plans.
- 11.42 In terms of more permanent effects arising as a result of the Proposed Development, the assessment concludes that the likely effects on listed buildings would range from none to adverse and indeed some beneficial effects. The effects on conservation areas similarly range from negligible to neutral and beneficial, with no adverse effects identified. The effects to locally listed (non-designated) range from none, negligible to beneficial and again find no adverse effects.
- 11.43 Montagu Evans have prepared a Heritage Assessment which considers the Proposed Development against the development plan and relevant legislative and policy tests (see Appendix 1).
- 11.44 On account of finding 'less than substantial harm' and undertaking the heritage balancing exercise, Montagu Evans find that the Proposed Development accords with:
- London Plan (2021) Policy HC1;
 - Islington Core Strategy (2011) Policy CS9; and
 - Islington Development Management Policies (2013) Policy DM2.3.
- 11.45 If the decision maker does conclude there to be a finding of 'less than substantial harm' to a designated heritage asset, or harm to a non-designated heritage asset, Montagu Evans do not consider there to be a conflict with the development plan policies. The Proposed Development is justified partly on the basis of delivering a demonstrable public benefits as

part of a estate transformation programme. And on that basis, the Proposed Development would comply with the heritage-related policies in the development plan.

- 11.46 In light of the above, the decision maker would be able to discharge their legal duties under sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

12.0 Daylight, Sunlight & Overshadowing

Policy Context

- 12.1 Part D of London Plan Policy D6 (Housing Quality and Standards) states that *“The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.”*
- 12.2 Part E of Policy DM3.4 (Housing standards) of the LBI Development Management Policies states that:
- i *The design of all residential development is required to maximise natural light into the room (subject to passive heating and cooling considerations). The glazing to all habitable rooms should be generous and aim to be not less than 20% of the internal floor area of the room.*
 - ii *All dwellings should provide for direct sunlight to enter the main habitable rooms for a reasonable period of the day. Living areas, kitchen and dining spaces should preferably receive direct sunlight.*
- 12.3 Paragraph 2.13 of the supporting text to Policy DM2.1 (Design) of the LBI Development Management Policies adds that *“The design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings and ensure that adjoining land or properties are protected from unacceptable overshadowing. The Building Research Establishment (BRE) provides guidance on site layout planning to achieve good sunlighting and daylighting (Site Layout Planning for Daylight and Sunlight: a guide to good practice).”*
- 12.4 Part C (vii) of Policy PLAN1 (Site appraisal, design principles and process) of the Draft Islington Local Plan: Strategic and development management policies that all development proposals must submit details of daylight and sunlight levels, based on relevant best practice/guidance. Paragraph 1.67 of the supporting text adds that this is in order *“to ensure that there is sufficient levels of sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing. Further guidance is provided in the Building Research Establishment (BRE) publication ‘Site Layout Planning for Daylight and Sunlight: a guide to good practice”*
- 12.5 The BRE guidance is cited in the development plan as providing the broad methodology and guide levels for daylight, sunlight and overshadowing analysis. The guidance itself, however, is not an instrument of planning policy and should be applied with an appropriate degree of flexibility reflecting a site’s character and context, and a wider planning policy framework which promotes efficient and optimised forms development in accessible urban locations. This is the context against which the development’s daylight, sunlight and overshadowing effects should be considered.

Proposed Development: Natural Light Conditions

- 12.6 The Internal Daylight, Sunlight and Overshadowing Report (prepared by Point 2 Surveyors) considers the potential levels of daylight and sunlight that will be enjoyed within the

Proposed Development and the potential levels of sunlight and overshadowing to the proposed amenity spaces.

- 12.7 Average Daylight Factor (ADF), Daylight Distribution (No-Sky Line (NSL)) and Annual Probable Sunlight Hours (APSH) assessments have been undertaken for the proposed habitable rooms. In addition, sun on ground studies have been undertaken to the proposed amenity spaces.
- 12.8 As the proposals are for a hybrid planning application, Point 2 Surveyors have undertaken ADF, NSL and APSH assessments for all of the proposed habitable rooms across the detailed elements of the scheme. The detailed design of the scheme's outline elements will be subject to reserved matters applications and the reserved matters proposals will provide the detail needed for further detailed daylight and sunlight analysis at that stage. Nonetheless, Point 2 Surveyors have undertaken Vertical Sky Component (VSC) façade mapping assessments and spot check ADF assessments to understand the likely levels of daylight that will be experienced by the development's outline elements. The purpose of this analysis is to demonstrate that the outline parameters proposed provide a sound basis from which to develop detailed proposals for residential accommodation that will experience acceptable natural light conditions.
- 12.9 Successive rounds of daylight and sunlight analysis have been undertaken throughout the project to inform the iterative design development process for both the detailed and outline elements of the development. These analyses have demonstrated progressive improvements in the natural light conditions experienced across the scheme. They have been shared with LBI and GLA Officers and the Council's DRP throughout the extensive pre-application engagement process.
- 12.10 The following summarises the natural light levels within the detailed and outline elements of the development on this basis, as well as sun on ground conditions within the proposed open spaces.

Detailed Element

- 12.11 Assessments have been undertaken to those blocks that form part of the detailed element of the scheme (i.e. Blocks D1, D2, D3, C6, C7, C8, C9, A3, and B1, B2, B3 and B4). The assessment has been undertaken with the illustrative scheme for the outline elements of the application in place. The illustrative scheme has been used as it is the most advanced design of the outline elements and follows the assessments shared with LBI, the GLA and the Council's DRP on successive occasions throughout the pre-application engagement.
- 12.12 Across all of the assessed blocks, the results of ADF assessments show that approximately 90.1% of the habitable rooms will meet the ADF criteria for its room use when applying a target value of 2% to any rooms including a kitchen element. When applying a target value of 1.5%, which is the target for a living room or dining room, 92.5% of all rooms would meet the guidance. This is considered by Point 2 Surveyors to comprise a very good level of compliance given the urban location and character of the Proposed Development.
- 12.13 Whilst the overall percentage of rooms meeting the guidance is considered very good, it is also notable that these proportionate levels of compliance also include the proposed bedrooms, which are considered secondary to main habitable rooms. When considering the living rooms alone (i.e. the main habitable spaces within each flat) the results show that

98.3% of living rooms achieve an ADF target of at least 1.5% ADF. This is considered to be a very good level of compliance.

- 12.14 The rooms that do not meet the suggested ADF criteria are typically those located beneath/behind a recessed balcony or in a corner of a projecting extension which restricts the amount of daylight that can be enjoyed to the room behind them. It is important to recognise that the balconies themselves provide an important amenity function which offsets the associated reduction in natural light they cause.
- 12.15 The APSH results show that 44.1% of the rooms will strictly meet the BRE guidelines within all detailed blocks regardless of their orientation. However, the results for the rooms with windows orientated within 90 degrees of due south show that 63% of the rooms will receive APSH which is in line with the BRE guidelines criteria. This is considered by Point 2 Surveyors to be a good level of compliance for an urban area. Again, the windows that will experience a lower level of sunlight are generally those located beneath balconies, and overhangs or are recessed. As with daylighting, the reduction in sunlight is a function of the balconies which themselves provide an important amenity function for the development.

Outline Element

- 12.16 The VSC façade mapping assessment has been undertaken against the maximum parameter massing which follows the latest assessments shared with Officers at LBI and the GLA and the Council's DRP.
- 12.17 It has been established from the detailed ADF results that a VSC of around 13% is required to achieve the ADF guide level for a Living/Dining/Kitchen. The VSC can therefore be mapped onto the outline blocks to understand broadly whether the target interior daylight levels are likely to be enjoyed across the outline elements of the development.
- 12.18 Overall, the VSC façade results indicate that around 85% of the façade areas assessed are likely to enjoy a VSC of 13% and above; equating to the ADF guide level in the BRE guide. This is considered by Point 2 Surveyors to be a very good level of compliance. It is notable that these results are based on the maximum development parameters for the outline elements of the scheme. The maximum parameters will of course be refined and their massing reduced at the reserved matters stage, meaning that higher levels of ambient and internal daylight can be expected as the detailed design of the outline blocks is progressed.
- 12.19 In addition to the VSC façade mapping, more detailed ADF assessments have been undertaken to a discrete number of potential flat layouts to compare against the conclusions drawn from the faced mapping exercise. This exercise has focused on the 'worst-case scenario' flat positions (i.e. those units in the corners of the proposed courtyard blocks). The results show that the majority of notional habitable rooms will achieve the ADF guide levels, corroborating the façade mapping exercise
- 12.20 Overall, is it therefore considered that when the reserved matters proposals are developed for the outline elements of the hybrid development, it is likely that similar levels of daylight compliance will be achieved to those set out above for the detailed elements. This is considered a positive aspect of the scheme design. Further detailed daylight and sunlight analysis will of course be undertaken at the reserved matters stage to evidence the natural light conditions achieved across the detailed proposals.

Proposed Open Spaces: Overshadowing

- 12.21 The overshadowing results for the Proposed Development's open spaces show that all but one of the spaces will meet the BRE guide level of 2 hour sun on ground across least 50% of their area. This is a good level of compliance for an urban development project.
- 12.22 The single space that does not meet guidance achieves 2 hours of sunlight to 40% of its area on 21 March. This is only marginally below the guide level and 50% of the open space will receive in excess of two hours of sunlight (the target level) just two weeks after the conventional assessment date. This is a minor and isolated departure from the guide levels.
- 12.23 Overall, the development proposes a variety of well lit public and communal open spaces which perform very well against the guide levels for an urban development project of the character proposed.

Proposed Development: Conclusions on Natural Light

- 12.24 The BRE guidelines provide a flexible basis for the assessment of daylight and sunlight and are not an instrument of policy. Daylight and sunlight availability is just one of many factors in site layout design, and a balance between the various design considerations often needs to be struck, particularly in urban environments. The design of New Barnsbury has sought to maximise the available daylight and sunlight within each unit whilst also working within the constraints of the existing buildings/site and providing other necessities such as the provision of private amenity space (and improved privacy where these are inset or semi inset) and benefits such as gallery access to some blocks enabling another typology of dual aspect home and associated benefits such as cross ventilation.
- 12.25 Notwithstanding these often-competing design considerations, good levels of proportionate compliance with the BRE guide levels for natural light have been achieved across the development's detailed elements. Similar levels of compliance can be expected across the outline elements of the development. Sunlight levels within the proposed open spaces are good. The natural light conditions across the development have benefitted from successive rounds of daylight and sunlight assessment and associated discussions with LBI and GLA Officers and the Council's DRP.
- 12.26 The overall daylight, sunlight and shadow conditions across the development are considered to be very good for an urban environment in Islington when considered in the context of the BRE guidelines and relevant planning policies.

Surrounding Properties: Natural Light Conditions

- 12.27 The Daylight and Sunlight Chapter of the Environmental Statement provides analysis of:
- 1 The daylight and sunlight amenity to the surrounding residential properties; and,
 - 2 Overshadowing to surrounding private gardens and public amenity spaces;
- 12.28 The comprehensive assessment considers 991 windows serving 553 residential rooms in 21 individual properties surrounding the site which are material for consideration in daylight terms. These windows and the habitable rooms they serve have been assessed in terms of the VSC and NSL analyses discussed above.

- 12.29 The results of the assessment demonstrate that the majority of neighbouring properties will achieve the BRE guide levels or will retain levels of natural light which are considered to be typical and appropriate for a development of the scale and character proposed in an urban environment.
- 12.30 While the ES chapter identifies certain adverse daylight and sunlight effects to neighbouring properties, it is important to recognise that these effects are defined on the basis of the standardised EIA categorisation of effects and terminology against the BRE guidance. The impacts need to be considered in the context of the aforementioned flexibility of the BRE guidance, its suburban basis, the character and location of the development and the prevailing planning policy framework which promotes more intensive and optimised forms of urban developments. In this context the development's daylight, sunlight and shadow effects on neighbouring properties and open spaces are considered acceptable.

13.0 Sustainable Transport

- 13.1 The site has a PTAL Rating³ ranging between 3 and 6B (the best possible rating) and, as such, is highly accessible via multiple public transport modes. It is within walking distance of Caledonian Road and Barnsbury Overground Station, Angel Underground Station and Kings Cross St Pancras International, mainline and Underground Station. Six bus routes are accessible within 650 metres of the site, providing a frequency of 33 services in the morning peak hour in each direction, including the 274, 17, 91, 259, 153 and N91.
- 13.2 The application is supported by a Transport Assessment prepared by Stantec. The Transport Assessment includes the Delivery and Servicing Strategy, the Parking Design and Management Plan and the Travel Plan for the Proposed Development.
- 13.3 Stantec have undertaken a number of transport-focused pre-application meetings with LBI and their highway's consultants (Steer Group) on the following occasions:
- 19 November 2021 - LBI highways pre-application meeting;
 - 8 December 2021 - LBI highways pre-application meeting;
 - 12 December 2021 - LBI highways pre-application meeting;
 - 21 December 2021 - LBI highways pre-application meeting;
 - 12 January 2022 - LBI highways pre-application meeting;
 - 10 February 2022 - Barnsbury Streetbook Surgery.
- 13.4 This extensive pre-application engagement has informed the development's parking, transport, access and servicing strategies and defined the approach and scope to the Transport Assessment.
- 13.5 The following provides an overview and assessment of the development in terms of parking, cycle parking, access and delivery, servicing and refuse collection arrangements.

Car Parking

- 13.6 The estate has 121 existing car parking spaces as well as 4 car garages. The long term objective for the development is to minimise car parking and to promote softer, sustainable transport modes. However, it is important to recognise that the applicant is working within the constraints of an existing estate accommodating many longstanding residents with existing parking. Consequently, it is inappropriate to only consider the current parking position and important to adopt a medium/longer term view of the dynamic parking position and opportunity to minimise parking across the estate.
- 13.7 All parking spaces proposed for the development are solely for a) returning residents with existing parking permits and b) disabled users only. A maximum of 121 vehicle spaces is proposed; equating to a maximum ratio of 0.127 spaces per unit. This marks a full re-provision of existing on-site parking spaces, the 121 spaces include 31 wheelchair accessible parking spaces. The wheelchair accessible parking spaces will be provided in combination of podium parking and on-street spaces in the newly created streets as well as converted spaces on Carnegie St and Charlotte Terrace bordering the site.

³ Baseline PTAL and Forecast PTAL (2031)

- 13.8 The proposed parking provision is as follows:
- Undercroft Podium B - 44 spaces (5 of which are accessible)
 - Undercroft Podium A - 53 spaces (4 of which are accessible)
 - Jays Lane - 7 spaces (all of which are accessible)
 - Leirum Lane - 5 spaces (all of which are accessible)
 - Carnegie St - 5 spaces (all of which are accessible)
 - Charlotte Terrace - 5 spaces (all of which are accessible)
- 13.9 Parking at the site will be controlled through the existing permit system and a Car Park Management Plan. An outline CPMP is included as Chapter 10 of the Transport Assessment and it is anticipated a full CPMP which will be secured by condition and approved prior to occupation of the development.
- 13.10 The parking strategy embraces the ongoing growth in electric vehicles which itself contributes to a shift towards more sustainable travel behaviour at new Barnsbury. Across the scheme, 20% of all parking spaces will be provided with active charging facilities. These spaces will be located primarily in the podium spaces. The remaining 80% of parking spaces will be provided with passive provision with the option to convert all spaces at a future point. This strategy is in accordance with Policy T6.1 of the London Plan.
- 13.11 Policy DM8.5 of the Islington Local Plan states that the Council encourages accessible parking bays to be located on-street where practical. The majority of the accessible parking spaces proposed (22) are located on-street level with nine further spaces located at podium level. The podium level parking will be easily accessible and covered, in close proximity to the accessible homes proposed and with direct lift access. It is proposed that once parking permit for standard parking spaces within the podiums are given up or taken out of circulation, the spaces may be converted into accessible bays and may replace the on-street provision. The on-street parking provision will be returned to the public realm and further emphasise the pedestrian / cycle priority within the street scene.
- 13.12 The applicant's objective is to eventually phase-out issued permits for conventional (non-accessible) parking spaces as residents give these up. While this will inevitably take time and needs to be based on a natural progression in the reduction of permits, a clear and logical system is in place to manage this process.
- 13.13 Overall, the approach to car parking conforms with the objectives of relevant policy in terms of sustainable travel, while addressing the challenges of developing a parking strategy across a large phased estate development within which existing communities have allocated parking permits.

Car Club

- 13.14 There are several Zipcar locations within a 1 kilometre walk from the site via the existing pedestrian network. The closest locations to the site are Richmond Road, approximately 400 metres to the north, and Killick Street and Bachelor Street, approximately 500 metres to the south and east of the site respectively.

13.15 The presence of car clubs within a very short walk offers an excellent alternative to the private and justifies the viability of a car-free scheme

13.16 No additional car club spaces are proposed as part of the development.

Cycle Parking

13.17 Secure cycle parking provision for the development will be provided in accordance with the standards outlined in the London Plan and the London Cycle Design Standards (LCDS, 2016).

13.18 Residents’ long stay cycle parking spaces will be provided as follows:

- 1 **Detailed:** 780 Spaces against a requirement for 780 spaces.
- 2 **Outline:** 945-969 Spaces against a requirement for 954-969 spaces
- 3 **Total:** 1,734-1749 Spaces against a requirement for 1,734-1,749 spaces.

13.19 Resident’ short stay cycle parking spaces will be provided as follows:

- 1 **Detailed:** 12 Spaces against a requirement for 12 spaces.
- 2 **Outline:** 14 Spaces against a requirement for 14 spaces
- 3 **Total:** 26 Spaces against a requirement for 26 spaces.

13.20 Non-residential long stay cycle spaces will be delivered as follows:

Table 13.1 Non-residential cycle parking provision

Use Class	Long-stay spaces	Short-stay spaces
Retail	10	83
Community Centre	1	8
Commercial	1	2
Total	12 spaces	93 spaces

Source: Stantec

13.21 In accordance with the LCDS and LBI’s Draft Local Plan requirements, 5% provision will be made for larger/adapted cycles and (in the detailed element) a further 15% provision of Sheffield stands will be provided to accommodate those with additional needs. In the outline element of the development, the specific design solution of cycle facilities for the 15% provision for ambulant disabled cyclists will be confirmed through the reserved matters application(s).

13.22 The provision of cycle parking across the estate will accord with London Plan requirements. The cycle parking arrangements will be of a suitably high quality in line with the London Cycle Design Standards. The cycle storage arrangements will ensure all estate residents have the maximum opportunity for active and sustainable travel in line with strategic and local policy.

Access

13.23 The pedestrian and cycle access strategy for the development is a critical component of the applicant’s objectives to promote increased uptake of active and sustainable transport

modes. As such, the site layout and open space strategy, the locations of entrances and the position of cycle stores have all been carefully conceived to improve pedestrian permeability throughout, as well as providing practical, safe and convenient facilities to encourage the uptake of cycling by existing and prospective residents.

- 13.24 The pedestrian environment within the site will be of high quality with the provision of extensive networks of attractive routes and open space, well maintained and legible pathways. The layout and design of the proposed buildings will significantly improve natural surveillance across the estate while the landscape design and the approach to lighting will enhance public safety and perceived security.
- 13.25 The proposed masterplan includes the creation of two new north-south streets; Jays Lane and Leirum Lane, (known as 'The Lanes'). These new routes will improve connections with communities to the north and south and facilitate north-south pedestrian and cycle movements across this area of Barnsbury. Similarly, an East-West 'Green Walk' will improve the integration and connectivity between new and Old Barnsbury and will enhance the estate's relationship with both the Caledonian Road and Barnsbury Road.
- 13.26 Each vehicular access point has been designed to promote pedestrian priority, with adequate space and slow speeds to reduce the likelihood of pedestrian/cycle/vehicle conflicts. Vehicular accesses will be provided to parking spaces (on-street/podium) and delivery and servicing bays. Again, the detailed design of these access points will significantly improve pedestrian movement and safety in comparison with the estate's existing roads, accesses and parking arrangements.

Delivery, Servicing and Refuse Collection

Delivery and Servicing

- 13.27 The majority of delivery and servicing trips to the residential units are anticipated to arise from 'day-to-day' activities such as groceries and Amazon-type deliveries. Loading bays will be provided within the site for servicing vehicles, which will be supported by appropriate on-street locations to better enable the delivery of bulky items, access for removals vans, and other similar delivery types. For smaller vehicles with a lower dwell time, it is anticipated that vacant parking spaces or on-street locations around the development may also be appropriate for use alongside the dedicated loading bays. Further details of the proposed delivery and servicing strategies are set out in Chapter 8 of this TA.

Refuse

- 13.28 The layout has been designed to accord with Islington Recycling and Refuse Storage Requirements and includes 9 proposed laybys within an around the site's boundary. The locations of refuse and recycling stores and the proposed collection points will enable fast, convenient and safe refuse collection across the estate. Again, the proposed arrangements have been carefully conceived, discussed at length with Officers and represent a substantial improvement on the existing arrangements at New Barnsbury in line with local policy.

14.0 **Energy and Sustainability**

Energy

- 14.1 The New Barnsbury development has evolved having regard to the Mayor of London's net-zero carbon objectives and the London Plan's heating hierarchy. Extensive work has been undertaken by the applicant and professional team to progress a development which materially reduces energy demand, and its associated carbon emissions.
- 14.2 No connections are currently feasible to link the development to any District heat Networks, including the Bunhill and Kings Cross networks which are remote from the site. Instead, the focus has been on optimising fabric efficiency and maximising the use of renewable technologies on site.
- 14.3 This has led first to passive measures being identified to reduce the energy demand by 11.2% / c139 tonnes/CO₂/year. The Government Future Homes Standards encourages the using all electric heat pump systems. The proposals for the Barnsbury Estate reflect this best practice and propose the residential units only use electricity. Therefore, the proposed communal heating system will principally focus on the use of Air Source Heat pumps. The heat pumps will be supplemented and the carbon abatement enhanced further through the inclusion of PV arrays.
- 14.4 Overall, through energy demand reducing fabric performance measures, the use of a community network and these on site renewable technologies, in line with the Mayor's energy hierarchy the development will achieve a 60.7% level of carbon abatement compared against Part L. The residual shortfall against net zero carbon will be met through a carbon offset payment as detailed in Aecom's Energy Assessment.

Overheating

- 14.5 An Overheating Study has been prepared by AECOM. The assessment demonstrates that the development has been designed to following the cooling hierarchy, which includes passive design features such as low g-value glazing and shading via balconies to help minimise risk of overheating. It has further been optimised to maximise use of natural ventilation strategies to help mitigate summertime overheating.
- 14.6 This analysis is based on a sample of 51 units across the development. It demonstrates that all 51 flats assessed will comply with TM59 criteria when assessed using London Weather Centre CIBSE 2020 DSY 1 50th Percentile weather tape.
- 14.7 Under extreme heat wave scenarios (DSY 2 & 3), it has been shown that the percentage of dwellings passing TM59 reduces which is typically expected on this type of development and cannot be mitigated without inclusion of mechanical cooling strategies which does not align with the London Plan cooling hierarchy.
- 14.8 The assessment has also modelled the risk of overheating in 10 sample communal corridors. In line with TM59 requirements, it has been demonstrated that through mechanical ventilation at a rate of 9 ach-1, the number of hours that the temperature would exceed 28°C is less than 3%.

Sustainability and Whole Life Carbon

- 14.9 The following summarises the development's wider sustainability credentials:
- **Energy and CO₂:** Lean Design and Specification, all electric heat pump system and PV panels enable a carbon emission reduction of over 60% to be targeted;
 - **BREEAM:** targeting scores of Excellent for the outline non-domestic units;
 - **Water consumption:** domestic units are able to target a potable water use of 105 lppd whilst the nursery can target 3 out of 5 water consumption BREEAM credits;
 - **Biodiversity:** a matrix of native and non-native planting including trees, shrubs and perennial planting as well as green roofs are incorporated to provide ecosystems across the site;
 - **Climate change adaptation:** reduced risks of overheating, enhance Sustainable Urban Drainage, long term pathway for reducing carbon emissions;
 - **Material, waste and construction impacts** Whole Life Carbon Assessment has been undertaken to assess the carbon emissions resulting from the construction and the use of the buildings over their entire life, including the materials and waste and their impacts. Construction waste minimisation will be targeted and over 95% of the construction waste will be diverted from landfill;
 - **Operational sustainability:** The energy and potable water use will be reduced. A Green Performance Plan has been produced which sets out how they, and other operational items, will be monitored so there can be a continual circle of learning.
 - **Form factor:** Considered in the design of all buildings. The forms are simple and stacking, with stepping of the building minimised to set-back top floors.
 - **Materials:** Robust palette of materials (brick and concrete) selected for their longevity and local context. Reviewing opportunities to reuse material from the existing buildings and hard landscape.
 - **Performance:** Homes designed and tested, and networks installed and commissioned to CIBSE guidelines, to reduce overheating, whilst achieving good levels of daylight and ventilation without compromising layout.
 - **Building Efficiency:** Repeating home types, typical floors and building components. Designed to accommodate bathroom and utility cupboard pods
 - **Natural Ventilation:** An optimised number of window types, designed for ease of operation by residents.
 - **Dual Aspect:** Target 80% of homes across the masterplan achieve dual aspect for cross ventilation.
 - **PV Arrays:** Building roofs designed to accommodate PVs, balanced with attenuation and BNG and UGF requirements.
- 14.10 It is clear that the New Barnsbury development is sustainable in terms of carbon abatement, climate change adaptation, materials consumption, water usage and many other measures. This is a considerable benefit associated with the development in comparison

with the existing low buildings at the estate which are highly deficient and failing in terms of many of these measures.

15.0 **Other Environmental Considerations**

15.1 This section of the Planning Statement provides an overview of the New Barnsbury development's performance in relation to other environmental considerations. Further details of the scheme's effects in relation to these wider technical considerations are provided in the Environmental Statement and accompanying assessments.

Ecology

15.2 The Preliminary Ecological Appraisal (PEA), undertaken by Greengage in May 2021 (Doc Ref: 551730jc24jun21FV04_PEA) identified the site as having confirmed presence of nesting birds, low potential to support foraging and commuting bats and hedgehog (*Erinaceus europaeus*) and up to moderate potential to support roosting bats. The potential for all other species was negligible. Further bat surveys were also undertaken by Greengage in 2021.

15.3 Ecological enhancements will be implemented on site to improve the ecological value of the site, including provision of:

- 1 Biodiverse and biosolar green roof;
- 2 Native mixed scrub behind Block D bordering the Regents Canal SINC;
- 3 New tree canopy cover;
- 4 Rain gardens;
- 5 Amenity grassland;
- 6 Wildflower meadow;
- 7 Hedgerow planting;
- 8 Green wall (trellis with climbing plants);
- 9 Integrated bird boxes, targeting swifts (*Apus apus*), and bat boxes; and
- 10 Invertebrate habitat features such as loggeries and bee posts.

15.4 Within BREEAM New Construction 2018 there are four headings (LE 02, LE 03, LE 04 and LE 05) relating to the provision of a maximum of 11 available credits for Land Use and Ecology. This report provides the information and background to the credits that are deemed suitable to be awarded.

Trees

15.5 The application is supported by an Arboricultural Impact Assessment and Method Statement and a Tree Protection Plan, prepared by Sharon Hosegood Associates.

15.6 The Arboricultural Impact Assessment and Method Statement identifies that there are 204 existing trees on site, 56 of which these will be retained as part of the Proposed Development, as summarised at Table 15.1

Table 15.1 Trees/small groups to be retained and removed (on site)

Categorisation	Tree/small groups to be retained	Tree/ small groups to be removed
Category A	5	0
Category B	28	37
Category C	23	95*
Category U	0	16 (recommend for approval Irrespective of the proposal)
Total	56	148

Source: Sharon Hosegood Associates

*The c grade groups comprise small bushes/trees which total 28 closely grown individuals

15.7 Of these 204 existing trees, 94 of which are protected by Tree Preservation Order 474. The trees are generally in a fair to good condition, and some have been managed by regular pruning. However, the relic of the original landscaping scheme has resulted in many trees having a greatly restricted rooting environment of raised brick planters/abrupt level changes. The trees are typical London estate species of predominantly cherry, maples, whitebeams, rowans, hawthorn, field maple, Lawson cypress.

15.8 There has been close collaboration with the team to minimise tree removal however the scale of demolition and construction, together with the change in levels, results in the removal of trees. As a result, 59 of these trees require removing, as summarised at Table 15.2.

Table 15.2 Trees protected by TPS to be retained and removed

Trees protected by TPOs (all categories)	Trees protected by TPOs (all categories)
Retained	Removed
35	59 - of these 27 are Bm 25 are C and 7 are U

Source: Sharon Hosegood Associates

15.9 The Proposed Development will retain 56 trees (including 35 within TPO 474) and will then plant a further 172 trees, resulting in a net uplift of 24 trees in total, as summarised at Table 15.3.

Table 15.3 Tree retention/removal/planting

Trees to be retained	Trees to be removed	Trees to be planted	Net impact- gain
56	148	172	24

Source: Sharon Hosegood Associates

15.10 The approach to trees and biodiversity is supported by LBI pre-application officers in the context of Local Plan Policy DM6.5 and draft Local Plan Policy G4.

Flood Risk and Drainage

- 15.11 The application is supported by a Flood Risk Assessment and Surface Water Drainage Strategy prepared by Stantec.
- 15.12 In accordance with the fundamental objectives of the National Planning Policy Framework (NPPF), the Flood Risk Assessment demonstrates that:
- 1 The development is safe;
 - 2 The development does not increase flood risk; and,
 - 3 The development does not detrimentally affect third parties.
- 15.13 The Environment Agency (EA) data confirms that the site is located entirely within Flood Zone 1 for Fluvial and Tidal Flood Risk, defined in Planning Practice Guidance (PPG), Flood Risk and Coastal Change, Table 1 as follows:
- “Flood Zone 1 ‘Low Probability’ less than a 1 in 1000 (0.1%) Annual Probability of flooding from rivers.”*
- 15.14 The proposals for this residential led mixed-use development constitute a ‘More Vulnerable’ land use, which is considered appropriate within Flood Zone 1 and therefore passes the Sequential Test. The Exception Test is not required for the development.
- 15.15 The main source of flood risk for the site is Surface Water (Pluvial). The applicant’s flood risk consultant, Stantec, has confirmed that the surface water (Pluvial) flood risk for the majority of the site is considered to be low. EA Mapping shows that the surface water flood risk for the western portion of the site including Bryan Street and the surrounding residential areas are considered to be high to medium. However, LBI have confirmed that it will be updating the ‘Risk of Flooding from Surface Water Mapping’ taking into account of local site information. It is expected that there will be a reduction in the surface water flood risk extent and depth currently identified on the EA mapping. This matter is addressed in more detail in the submitted Flood Risk Assessment.
- 15.16 The FRA includes a Sustainable Drainage Strategy that outlines the management of surface water runoff for all storm events up to and including 1% (1 in 100) annual probability design storm event including a 40% allowance for climate change. It is proposed to attenuate surface water in blue roofs, permeable paving, rain gardens, swales, below ground geo-cellular attenuation tanks and oversized pipes. Surface water discharge will be throttled upstream of the outfall to LBI’s required Greenfield discharge rate of 8 L/s/ha, via vortex flow control devices.

Land Contamination

- 15.17 The application is supported by a Phase 1 Ground Condition Assessment, prepared by Stantec.
- 15.18 It includes a Ground Stability Risk Assessment to review the of potential ground stability hazards. This has identified a Moderate potential hazard associated with shrinking/swelling clays, a Low potential hazard with respect to slope instability and a Low/Medium hazard potential associated with unexploded ordnance. Due allowance will need to be made for the

shrinking/swelling clays, earth slopes and retaining walls in the design of the development and appropriate mitigation measures taken with respect to unexploded ordnance.

15.19 It also includes a Tier 1 Environmental Risk Assessment which concludes that the overall potential for significant contamination and hazardous ground gases and vapours to be present are assessed respectively to be low and very low.

15.20 Overall, the geo-environmental risk assessment does not indicate a significant risk to human health, controlled waters or ecology and wildlife associated with the development of the Site as currently proposed. On this basis, there is no reason that the condition of the Site would be deemed incompatible with the intended use of the Site in accordance with Policy E7 of The London Plan. It is anticipated that a ground investigation is not required to support the planning application for proposed redevelopment and that any requirement for an intrusive geo-environmental investigation can be dealt with by incorporation of a condition in the planning consent.

Air Quality

15.21 The ES Air Quality Chapter prepared by Hilson Moran provides a comprehensive assessment of the development's air quality effects considered against baseline air quality conditions in at the site and its environs.

15.22 The assessment considers the development's effects during demolition and construction, and its operational effects including transport related emissions. It assesses the development's impacts in terms of Nos, PM10 and PM2.5 and provides an air quality neutral assessment.

15.23 The air quality assessment concludes that no significant air quality effects have been identified for the Proposed Development during demolition and construction or once complete and operational

Noise and Vibration

15.24 An ES Noise and Vibration Chapter has been prepared by Hilson Moran. The assessment considers the effects of the development during construction across the c. 10 year phased delivery of the scheme, and once operational, with particular regard to plan and traffic noise. It also considers the site's suitability for ongoing residential use in terms of the acoustic environment.

15.25 The assessment concludes that there will be some residual noise effects during the construction process. These construction effects are not uncommon on urban development projects such as New Barnsbury and they will be controlled through applying the principle of Best Practicable Means. The development's operational effects are acceptable.

Wind Microclimate

15.26 GIA has prepared a wind microclimate assessment as part of the submitted ES. The assessment considers the effects of the development on the pedestrian environment based on a CFD analysis to measure expected wind speeds at and around the New Barnsbury site.

- 15.27 The ES chapter demonstrate for both the detailed and outline elements, that once the development is completed and operational and the proposed landscaping is in place, all residual effects in terms of pedestrian wind conditions will be negligible.
- 15.28 On this basis, the development is not expected to give rise to any unacceptable effects in terms of wind conditions.

16.0 **Section 106 and CIL Matters**

Section 106

- 16.1 The Applicant is committed to developing the scheme in accordance with obligations that may be considered necessary to make the development acceptable in planning terms, in accordance with the relevant statutory tests. Any such planning obligations will be discussed and agreed between the Applicant and LBI during the determination period, with an agreed set of Heads of Terms to form part of a prospective recommendation to the Planning Committee.
- 16.2 At this stage, without prejudice, the following list provides suggested Head of Terms to be discussed and agreed with LBI:
- 1 Affordable Housing
 - 2 Viability Review Mechanism
 - 3 Commitment to delivery of Old Barnsbury Works
 - 4 Community Centre and Nursery (Temporary/Permanent)
 - 5 Public Routes, Open Space & Play Space (Temporary/Permanent)
 - 6 Wheelchair Accessible Homes
 - 7 Carbon Offsetting
 - 8 Sustainability
 - 9 Employment, Skills and Training
 - 10 Car Parking Management Plan
 - 11 Section 278 Highways Agreement
 - 12 Code of Construction Practice

Community Infrastructure Levy

- 16.3 Both the Mayor of London and LBI have adopted CIL charging schedules.
- 16.4 The Mayor of London has updated the CIL charging schedule with MCIL2 which took effect from 1st April 2019. For LB Islington, the levy per sqm is £50 per sqm.
- 16.5 LBI CIL came into effect in September 2014. The site falls within a residential use band where the CIL charge is £250 per sqm in charging Zone B. There are other CIL charges for development falling under retail uses.
- 16.6 For the purposes of CIL, this application is a 'phased' development, as referred to in the description of development.
- 16.7 In due course, it is expected that any existing floorspace on the site that is in lawful use will be counted against the CIL liability, together with mandatory relief for the proposed affordable housing element of the development.

- 16.8 Notwithstanding the above, it is estimated based on the illustrative scheme that the Proposed Development could generate in the region of £2,923,098 of Mayoral CIL receipts and £12,189,203 of LBI CIL receipts. LBI will be able to use these significant receipts to enhance community infrastructure in the local area.

17.0 **Scheme Benefits and Conclusion**

17.1 This Planning Statement provides an assessment of the Proposed Development of New Barnsbury, The Barnsbury Estate against relevant national policy and the development plan.

17.2 The Proposed Development, subject to a Hybrid Planning Application (comprising a Detailed Element and an Outline Element) has been subject to an extensive pre-application consultation process and will deliver significant and wide-ranging benefits.

17.3 In summarising our consideration of the proposals against relevant policies, the following should be noted:

- 1 **Principle of Development:** the principle of residential development including the scale, quantum and composition proposed is supported by the NPPF, London Plan, LBI development plan and emerging planning policies. The site is allocated (OIS28: Barnsbury Estate) in the draft LB Islington Local Plan and the comprehensive renewal and transformation of an underperforming estate was overwhelmingly supported by a resident ballot in March 2021, with a 73% “yes” vote. The principle of development is wholly acceptable.
- 2 **Improvements for existing residents:** The Proposed Development addresses a range of existing social and environmental issues including 46 overcrowded households on New Barnsbury alone, cramped homes that do not meet space standards with poor energy efficiency (average EPC rating D) and open space that does not meet needs and where residents do not feel safe. In addition, there are a significant number of elderly and/or disabled households at New Barnsbury, with over 100 households reporting medical needs and over 43 households with a member aged 70+. Half of the existing buildings have no lift and are stair access only, with the remainder having only one lift which is problematic in the event of a lift breakdown. The layout and size of existing homes do not lend themselves to anyone using a wheelchair or those with disabilities. All of these issues can be greatly improved through the Proposed Development, in turn enhancing the lives of residents.
- 3 **Design-led Optimisation:** The current site is inefficient in design, scale, quantum and mix, and unsustainable with regards to the environment and public realm provision. The existing buildings provide low quality homes to LB Islington’s residents and are an inefficient use of land. The site is allocated in the draft Local Plan which envisions an uplift of the number of homes on the site - optimisation is supported by adopted LBI policies and the London Plan. The Proposed Development has undergone significant pre-application engagement, including design review panel, and its density has been optimised through a design-led approach.
- 4 **New Homes:** The Proposed Development would deliver up to 950 homes overall, making a significant contribution to meeting acute local and strategic housing need. The high-quality new homes will replace 371 deficient homes across the estate. All homes will meet or exceed minimum space standards and each home will also have their own private balcony, terrace or garden, with 10% wheelchair Part M compliant.
- 5 **New and Replacement Affordable Homes:** 52% affordable housing (up to 494 affordable homes) is proposed overall, including re-provision of 291 social rent homes

with rents remaining at existing levels for existing residents. These rents are on average 32% less than new Social Rent levels in Islington for homes with the equivalent number of bedrooms. Of the new social rent homes, a minimum of 78% will be family sized units (2bed+) and a minimum of 28% will be 3bed+. There is an uplift of 142 new social rented homes which will make a substantial contribution towards addressing Islington's housing waiting list.

- 6 **Dwelling Mix:** The dwelling mix responds to LBI policy requirements and the Ballot commitment to offer to re-house all existing residents. The scheme provides a range of unit sizes including 3, 4 and 5 bed family sized homes.
- 7 **Commercial Floorspace:** Creation of up to 1,500sqm (GEA) high quality commercial floorspace creating local jobs, contributing to the local economy and animating Caledonian Road (replacing 23 tired existing commercial units). The proposed Class E flexibility will ensure these new commercial properties appeal to a wide variety of potential tenants, giving them the best chance to be occupied, animating the area and meeting local service needs.
- 8 **Community Floorspace:** A substantial increase in the quantity of community space through delivery of up to 1,275sqm (GEA) for multi-purpose community accommodation (with free WiFi access) and a new nursery. This at least doubles the existing community centre and increases the size of the nursery by at least 60%. The quality of this space will be much enhanced compared to the existing provision. The application is supported by the existing nursery operator, Tiddley Tots.
- 9 **Design Quality:** High quality and tenure blind family of buildings comprising Mansion Blocks, the Lanes, the Mews and Canal Pavilions, together with public realm improvements including two north-south streets which reinstate the historic and traditional Islington street pattern and improve connections to communities to the north and south.
- 10 **Open Space and Play:** Over 16,210sqm of open space, including two public parks, community gardens, over 5,000sqm of play space provision, rooftop amenity space and new footways and routes. The Urban Greening Factor (0.44) of the development exceeds policy requirements, and there will be 20% Biodiversity Net Gain, both of which typify the positive approach to urban greening in the context of the biodiversity and climate emergency.
- 11 **Healthy Streets:** Each access and street has been designed to prioritise pedestrians, with adequate space and slow speeds to reduce the likelihood of pedestrian/cycle/vehicle conflict.
- 12 **Car and Cycle Parking:** Maintaining parking for existing permit holders and adding a further 3% provision of wheelchair user spaces (which can increase over time as permits are given up), as well as electrical charging. New and secure cycle parking will be provided in line with the London Plan, LBI's standards and the London Cycle Design Standards, promoting sustainable travel behaviour amongst residents and visitors.
- 13 **Energy & Sustainability:** A sustainable energy efficient masterplan, including air source heat pumps, photovoltaic panels and electric vehicle charging points, together with significant cycle parking and blue badge parking bays, all of which respond

positively to the climate emergency. The development achieves in excess of 60% reduction in carbon emissions against the Building Regulations Part L.

14 **Significant improvements to Old Barnsbury:** The development enables substantial improvements to the quality of homes and landscaping across Old Barnsbury as per Newlon Housing Trust's commitments in its Landlord Offer. It is expected that this investment will be secured through the prospective s.106 agreement, and the works will be delivered pending a separate planning application from Newlon Housing Trust.

17.4 The proposals for the redevelopment of this Site respond to the existing and emerging development context, significantly enhancing the wider public realm, townscape and visual amenity. The scheme represents a far more efficient, sustainable and attractive use of this site. The development has been designed to align closely with draft LB Islington Local Plan allocation (OIS28: Barnsbury Estate).

17.5 The redevelopment of New Barnsbury will deliver a range of planning, housing, community, economic regeneration and environmental benefits which weigh strongly in support of a grant of planning permission for this important development.

17.6 In conclusion, the scheme encapsulates the principles of sustainable development as set out in the NPPF and complies with the principles and objectives of the London Plan and LBI's Local Plan when considered overall; in particular the approach advocated by the Mayor of London in respect of Estate transformation and maximising the provision of affordable homes.

Appendix 1 Heritage Assessment by Montagu Evans LLP (13 May 2022)



TO

Newlon Housing Trust and Mount Anvil Limited

CC

Lichfields

FROM

Montagu Evans LLP

DATE

13 May 2022

SUBJECT

New Barnsbury, The Barnsbury Estate, London Borough of Islington

1. Montagu Evans LLP has been instructed by Newlon Housing Trust and Mount Anvil Limited to prepare a Heritage, Townscape and Visual Impact Assessment (HTVIA) to accompany a planning application for the redevelopment of New Barnsbury, the Barnsbury Estate in the London Borough of Islington.
2. The HTVIA forms Volume 2 of the Environmental Statement accompanying the application.
3. The purpose of this Note is to provide a policy analysis in relation to the heritage effects of the Proposed Development, to be appended and read alongside Lichfield's Planning Statement and other accompanying application documents.

HERITAGE ASSESSMENT

4. This hybrid planning application partly turns on the balance between any harm to the significance of heritage assets and the public benefits that would be delivered by the Proposed Development.
5. Under paragraphs 199-202 of the National Planning Policy Framework (NPPF), great weight should be given to the conservation of designated heritage assets even where the harm would be less than substantial, and any harm should require a clear and convincing justification.
6. From the Courts' interpretation of Section 66(1) of the 1990 Act, considerable importance and weight should be given to the desirability of preserving the special interest of listed buildings in any balancing exercise with material considerations which do not have this status. The considerable importance and weight to the desirability of preservation, should tip the scales to produce an unequal balance in its favour. However, the decision maker should still take account of the scale of change, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm should be a product of these factors.
7. There is no statutory protection afforded to the setting of conservation areas, rather the conservation of a conservation area (i.e. managing change to its setting and significance) is a matter of great weight.
8. The NPPF sets out the Government's planning policy relevant to the historic environment. The relevant material consideration is the NPPF and particularly paragraphs 197, 199-203, 206 and 207. The following approach is applied by these policies:
 - The significance of the heritage assets affected should be identified and assessed (paragraph 195 NPPF). Heritage interest may be archaeological, architectural, artistic or historic (Glossary to the NPPF);

- The impact of the Proposed Development on the significance of the identified heritage assets is then to be considered (paragraph 199 NPPF);
 - If the Proposed Development is held to cause harm to the significance of a designated heritage asset, such harm should be categorised as either less than substantial or substantial, and within each category the extent of harm should be clearly articulated (Planning Practice Guidance paragraph 18). The nature and extent of harm is important to ascertain because that analysis informs the balancing out of any harm against benefits. This assessment of heritage harm versus heritage benefit has come to be called the 'internal heritage balance'. On the facts of any case, it is open to an assessor or the decision maker to conclude that benefits outweigh harm, leaving no net harm. In that instance, the less than substantial harm provisions would not be engaged. There is an alternative approach, again fact specific, which has it that any harm at all engages those policies;
 - In either case, if a proposal would result in harm to the significance of a designated heritage asset, great weight should be given to the asset's conservation (paragraph 199 NPPF). Thus, great weight attaches as a matter of policy to effects which are positive (enhancements) as well as negative (harmful works);
 - However, and importantly, not all weighted harm is the same. The nature and extent of any weighted harm needs to be considered carefully alongside benefits. If these are heritage benefits, then these too are to be given great weight as a matter of policy;
 - Any harm to the significance of a designated heritage asset should require 'clear and convincing justification', as per paragraph 200 NPPF;
 - A clear and convincing justification does not create a freestanding test requiring the demonstration of less damaging alternatives. To the extent that there is a test it is to be found in paragraphs 201 (in the case of substantial harm) or paragraph 202 NPPF (in the case of less than substantial harm); and
 - If paragraph 202 is engaged, then the decision maker may have regard to whether a proposed use also comprises the Optimum Viable Use (OVU). In so doing, it is important not to count the benefit deriving from giving a listed building a secure future use twice. That in itself is a benefit. OVU is another kind of weighted benefit.
9. The key aspects of all of these principal policies in the development plan and the NPPF is that any harm to a heritage asset requires justification which includes the balance of public benefits.
10. In such cases the following principles apply:
- As a matter of good practice, it is desirable to work to remove, reduce or mitigate harmful impacts through the design process. This is not a policy requirement, since the policy generally works on a straightforward balance;
 - In either case, and particularly looking at less than substantial harm, the clear and convincing justification the NPPF requires are countervailing public benefits, and these can include benefits to the way an area appears or functions or to heritage assets (through, for example, reinstatement of lost features on a historic building) or land use planning benefits;
 - Underpinning the above principles, is one of proportionality, such that the more important the asset the greater its potential sensitivity to change;
 - And finally when looking at impacts, the assessment is made with reference to the project as a whole and the asset as a whole; and
 - Benefits can derive from physical works or use.
11. The judgment known as *Shimbles*¹ confirmed that there is no legal basis for distinguishing a spectrum of harm within the category of less than substantial harm. It is, however, important for any planning judgment to grapple with the degree of harm when it comes to strike the balance required by paragraph 202 of the NPPF (and as set out in the Planning Practice Guidance).
12. Any harm is weighted (just as is any benefit) and it is important to know whether one is giving great weight to a small amount of harm or to a lot of harm.
13. Volume 2 of the Environmental Statement forms the Heritage, Townscape and Visual Impact Assessment that accompanies the application. The HTVIA identifies the following assets as being most likely to experience an effect

¹ *R (Shimbles) v City of Bradford Metropolitan District Council* [2018] EWHC 195 (Admin), Kerr J

by the Proposed Development by reason of proximity and/or relationship to the Application Site (for completeness we include the likely environmental effect arrived at through the ES methodology while also applying professional judgement):

- Barnsbury Conservation Area (Minor-Moderate Beneficial);
- Regents Canal West Conservation Area (Minor Beneficial);
- Listed buildings to the north of the Site on Caledonian Road (No. 214 [Minor-Moderate Beneficial], Nos. 216-246 [Minor-Moderate Beneficial], Nos. 248-258 [Minor Neutral] and Nos.260-268 [Minor Neutral], Caledonian Road, all Grade II);
- Listed buildings on Matilda Street (Nos. 11 to 63 and attached railings, Grade II) (Minor Adverse);
- West Portal and Islington Tunnel (Grade II) (Negligible Beneficial);
- No. 157 Caledonian Road (locally listed) (Minor Beneficial); and
- Locally listed buildings on the southern bank of the Regent's Canal (Nos. 16-18 Fife Terrace [Minor Beneficial], The Swan Public House at No. 125 Caledonian Road, and Pembroke Wharf, 6 All Saints Street [Minor Beneficial].

14. For the purposes of the policy analysis we provide the following commentary in relation to specific assets which require specific attention. Unless otherwise stated, the assessment finds no harm to heritage assets.

Barnsbury Conservation Area

15. The analysis of the effect of the proposals is provided at paragraphs 9.19-9.44 of the HTVIA.
16. In our judgement the Proposed Development would, when considered as a whole, preserve the setting and significance of the Conservation Area. There would be a material change in the setting through intensification of the Site which would contrast with existing character focussed on Caledonian Road. The change in scale on Copenhagen Street, in contrast, is less pronounced and helps define the northern edge of the Estate, and southern boundary of the Conservation Area.
17. When the scheme is considered as a whole, the change in scale and appearance along Caledonian Road would be balanced by a scheme of high architectural quality that, through detailed design, will be articulated with refined massing, while also enlivening the streetscene and urban realm around the perimeter of the Site. Specifically, we highlight:
- The Proposed Development replaces the existing low quality built-form on the Site with a new comprehensive set of buildings that respond appropriately to the Conservation Area setting and reflect traditional architectural characteristics;
 - The street frontage along the Caledonian Road will be demonstrably improved through the provision of enhanced active frontages, public realm and landscaping, restoring vitality and enhancing the character of the Conservation Area's immediate setting;
 - New routes through the Site will create improved connections with the Conservation Area townscape to the north;
 - The Copenhagen Street buildings will serve to enhance the streetscape along the Conservation Area's southern boundary through the introduction of new high-quality buildings, legible routes and connections through the Site and associated enhancements to the landscaping and urban realm.
18. When considering the policy approach, we consider there would be no "net harm" to the Conservation Area on the basis of the internal heritage balance.
19. However, should the decision maker take the alternative policy "route" and engage paragraph 202 of the NPPF, it would be less than substantial because it would not seriously affect a key element of the significance of the Conservation Area. The harm would apply to a small part of a broad setting of the Conservation Area which is an asset that derives its intrinsic interest from the historic town planning set-pieces which lie some distance from the Application Site. Rather, the boundary of the Conservation Area to the south and southwest (Copenhagen Street and Caledonian Road respectively) lies in an area of transition following post-war alterations and development,

and which lacks the cohesive and coherent forms of development found elsewhere in the asset. That context reduces the sensitivity and susceptibility to change.

20. When taking account of the scale of change, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset, we consider the weight to be afforded to the harm would be low and weighed in the balance against the public benefits of the development.

No. 214, Nos. 216-246 Caledonian Road (Grade II)

21. The analysis of the effect of the proposals is provided at paragraphs 9.97-9.112 of the HTVIA.
22. This group of listed buildings form part of the same residential 19th century terrace forming a stretch of the eastern side of the Caledonian Road.
23. The experience of the Proposed Development in relation to the listed buildings within this group is varied, and the impact on their setting changes based on their proximity to the Site and their location along the Caledonian Road. Primarily, the Proposed Development will be understood in the context of the urban, central London environment of the Site, the regeneration of which is reliant on an uplift in scale. This part of the Caledonian Road has an existing variation in character and the Proposed Development does not seek to introduce forms or uses that contrast outright with the prevailing character of the setting in which this group of buildings are experienced. The assessment of the scale increase on the Caledonian Road is based on the maximum parameters defined in the Building Heights Plan and the result effect of this has the potential to be reduced and mitigated through the detail secured in Reserved Matters Applications.
24. Townscape View 10 demonstrates how the outline blocks (Blocks A1, A2, A6 and A7) along the western boundary of the Site will be experienced in combination with the listed buildings at No. 214-222 Caledonian Road. The Proposed Development introduces an increase in scale to the immediate setting of these closest listed buildings within the group, with a maximum AOD height of 54.40m as defined by the Building Heights Parameter Plan. The upper residential storeys of the northernmost block (outline Block A2) along the Caledonian Road appear above the pedimented parapet of No.214 and No.216, meaning that their rooflines are not seen against a clear background of sky as existing against the northern elevation of the new building beyond. This effect will change and evolve as viewers move north and south along the Caledonian Road although it is accepted the new blocks will appear set behind the roofline of No.214 from static points along the street. Notwithstanding, it is judged that the ability to appreciate the corner prominence of No.214 will not be diminished by virtue of its location on the corner given the distance from the new block to the south, moreover its former function as a public house will remain legible.
25. The visual impact is limited to the short stretch of the terrace where the new buildings appear directly behind Nos.214 and 216, and has the potential to be mitigated through the detailed design of the Caledonian Road blocks. The use of a different materiality to set apart the mansard, middle and lower levels will reduce the appreciation of the massing, and the use of inset balconies has the potential to create a recessive quality to this corner that reduces the impact referred to above. The detailing of the northern elevation will be particularly important for breaking down the massing of the new building and articulating its relationship with the listed terrace and will be secured through Reserved Matters Applications.
26. For Nos.218-246, the effect of the new buildings beyond the terrace's roofline is proportionately less than Nos. 214 and 216, and will reduce continually further north along the street. The Proposed Development does not diminish an appreciation of the listed buildings individually or as a group.
27. When considering the effect as a whole, one should be mindful of the benefits of the finished development. The enhancements to the architectural quality of the Site, its streetscape, public realm and active frontages along the

Caledonian Road will become legible closer to the Site and will be appreciable as a demonstrable enhancement in the townscape quality of the Site and the vitality of its immediate environs and the setting of the listed buildings.

28. Overall, and like the Barnsbury Conservation Area, we consider that there would be no “net harm” to the significance of this group of listed buildings (hence the beneficial assessment found in the ES).
29. Should the decision maker take the alternative policy “route” and engage paragraph 202 of the NPPF, the harm would be less than substantial because it would not seriously affect a key element of the significance of these listed buildings whose significance is primarily derived from the historic and architectural interest.
30. The harm would apply to a part of the setting of the listed buildings and only those with the terrace that lie to the south, and closer to the site. The visual impact would be experienced in views travelling south, along Caledonian Road, or directly to the west, and so part of a particular viewing experience. In our judgement, therefore, the weight to be afforded to that harm would be low when considering the extent of impact and relevance to the significance of the asset. Accordingly, that harm would be weighed against the benefits of the development.

Regents Canal West Conservation Area and West Portal and Islington Tunnel (Grade II)

31. The analysis of the effect of the proposals is provided at paragraphs 9.45-9.67 of the HTVIA and we provide a precis to aid this assessment.
32. The part of the Conservation Area closest to the Site has a different character to the western parts of the Conservation Area, where the watercourse’s edge is defined (at least to its southern side) by attractive historic and modern buildings which have an industrial character. The immediate setting of this stretch of the Conservation Area lacks cohesion to some degree, by reason of the post-war residential blocks poorly define its northern and southern edges.
33. The Proposed Development will introduce new residential and associated uses into the setting of the Conservation Area. The main effect arising from the proposals on the Conservation Area’s setting will be introduced by the three canal blocks (D1, D2 and D3), arranged along the southern edge of the site and adjacent to the boundary with the C Conservation Area:
 - Block D1 to the east will be arranged over 11-12 storeys;
 - the central Block D2 will be arranged over 12-13 storeys; and
 - the western Block, D3, will be arranged over 10-11 storeys.
34. The presence of new buildings of a greater scale in the setting of the Conservation Area would not, in our judgement, detract from an appreciation of the Conservation Area’s significance which is robust and ingrained in its physical form as a piece of industrial infrastructure. The verdant greenery encloses and defines the waterway and gives this part of the Conservation Area a different character to the rest of the canal, and lacks coherence.
35. While there would clearly be a change in scale as a result of the development, the new architecture would be appreciated as high quality buildings that reflect the prevailing materiality and vocabulary found in the local context.
36. In our judgement and when the development is considered as a whole, the character and appearance of the Conservation Area would be preserved.
37. In a similar manner, we find no harm to the setting and significance of the Grade II listed West Portal and Islington Tunnel.

38. The green character of the surroundings around the Portal would be retained, and the proposed buildings would be set back from the canal. Thus, any viewers along the tow path, or on the canal travelling in either direction, would remain focussed on the immediate surroundings (which are generally defined by the boundaries to the north and south of the Canal), and the Portal itself beneath the Muriel Street bridge in which it lies. The connection between the Canal and the Portal as being important to understanding the industrial character of the historic waterway would not be diminished.

PUBLIC BENEFITS

39. Paragraph 202 of the NPPF requires a balance in an instance of less than substantial harm to the significance of a designated heritage asset.

Design Quality

40. The first consideration must be that the quality of architecture prepared by Pollard Thomas Edwards is of the highest calibre. It would demonstrably uplift the quality of the of the Site through a thoughtful and well-considered masterplan together with the detailed design code.
41. The creative and expressive use of new materials is subtle, yet effective in emphasising the historic forms and rich architectural detailing of the existing building. The fine attention to detail is reflected in the submission before the Council, specifically within the Design and Access Statement, the Design Code and the CGIs that reflect the design.

Heritage Benefits

42. We consider that the heritage benefits of the Proposed Development are as follows, and form part of the overall justification of the development:
- Introduction of new residential, commercial and flexible uses in keeping with the existing character and identity of the Site and wider character area and contributing to the regeneration and revitalisation of this part of the setting and significance of the asset.
 - Improvement to the function of the townscape in this part of the character area through enhanced connectivity and permeability which will draw visitors and improve the ability to appreciate the setting of the Barnsbury and Regent's Canal Conservation Areas;
 - Retention, enhancement and creation of high-quality areas of green space and public realm which benefits the setting of adjacent Conservation Areas;
 - Provision of high-quality architecture that draws on local townscape context and, in the case of the canal blocks, provides a distinctive and highly articulated architectural landmark that reflects the regeneration of the Site and this part of the setting of the two Conservation Areas.
43. If the decision maker considers there to be 'net harm' following the internal heritage balance, then we also reference additional land use planning benefits which associated with the redevelopment of the site which are described elsewhere as part of the submission, specifically the Planning Statement, and which draw weight in favour of the proposals.

POLICY COMPLIANCE

44. Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan forms the starting point for determination of this application.
45. On account of finding less than substantial harm and undertaking the heritage balancing exercise we find that the proposals accord with:

- London Plan (2021) Policy HC1
- Islington Core Strategy (2011) Policy CS9
- Islington Development Management Policies (2013) Policy DM2.3.

46. If the decision maker does conclude there to be a finding of less than substantial harm to a designated heritage asset, or harm to a non-designated heritage asset, we do not consider there to be a conflict with the development plan policies. The Proposed Development is justified partly on the basis of delivering a demonstrable public benefits as part of a estate transformation programme. And on that basis, the Proposed Development would comply with the heritage-related policies in the development plan.
47. On that basis the decision maker would be able to discharge their legal duties under sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Montagu Evans LLP

13th May 2022

Celebrating
60
years

Birmingham

0121 713 1530

birmingham@lichfields.uk

Edinburgh

0131 285 0670

edinburgh@lichfields.uk

Manchester

0161 837 6130

manchester@lichfields.uk

Bristol

0117 403 1980

bristol@lichfields.uk

Leeds

0113 397 1397

leeds@lichfields.uk

Newcastle

0191 261 5685

newcastle@lichfields.uk

Cardiff

029 2043 5880

cardiff@lichfields.uk

London

020 7837 4477

london@lichfields.uk

Thames Valley

0118 334 1920

thamesvalley@lichfields.uk



@LichfieldsUK

lichfields.uk