



# Housing Delivery Test Action Plan 2018

September 2019



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# Introduction

1. The Housing Delivery Test (HDT) was introduced through a revision to the National Planning Policy Framework (NPPF) published in July 2018, and was unaffected by the further revision to the NPPF published in February 2019<sup>1</sup> and the subsequent revision in June 2019 (which removed paragraph 209a). The HDT is an annual measurement of housing delivery in a local planning authority area, defined in Annex II to the NPPF as follows: "*Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.*".
2. The Housing Delivery Test Measurement rulebook<sup>2</sup> sets out the method for calculating the HDT result. National Planning Practice Guidance (PPG) provides further information on how the HDT is to be applied.
3. The first HDT results, covering the three-year period from April 2015 to March 2018, were published in February 2019 (having originally been planned for release in November 2018, as stated in the NPPF). The results were accompanied by a Measurement Technical note which explains the technical process followed in order to calculate the 2018 Housing Delivery Test measurement, in line with the published Housing Delivery Test rulebook.
4. Islington's 2018 HDT results show that Islington delivered 71% of its housing target between April 2015 and March 2018. By way of context, approximately a third (108) of Local Planning Authorities (LPAs) had a level of delivery below 95%; of these 86 also fell below 85%. There are a number of consequences for an authority which fails to meet the HDT.
5. Authorities that fall below 95% delivery are required by paragraph 75 of the NPPF to produce an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.
6. In addition, authorities where housing delivery falls below 85% are required by paragraph 73 and footnote 39 of the NPPF to include a 20% buffer in their five-year housing land supply calculation.
7. Finally, if an authority's housing delivery falls below 25% (based on November 2018 HDT figures); 45% (based on November 2019 HDT figures) or 75% (from November 2020 HDT figures onward), the presumption in favour of sustainable development (NPPF paragraph 11d) would be applied (even where there was shown to be a five-year housing land supply) – see footnote 7 and paragraph 215 of the NPPF.

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<sup>1</sup> Available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>2</sup> Available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728523/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)

8. The PPG<sup>3</sup> states that a HDT action plan should identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery. There is no prescribed form that the action plan should take.
9. The decision on whether to consult on an action plan, and which stakeholders to involve, is for the local planning authority<sup>4</sup>. Islington do not intend to consult on this HDT action plan. Of the key stakeholders who can be involved in creation of an action plan<sup>5</sup>, the council has regular contact with neighbouring boroughs and infrastructure providers, and has recently engaged extensively with landowners and developers through the Local Plan Regulation 18 consultation<sup>6</sup>.
10. Representations received during the consultation have been assessed and the issues raised in response to the emerging Local Plan are relevant to the production of this action plan, especially in terms of the aspects which local planning authorities could review as part of the action plan, as identified in the PPG<sup>7</sup>. The views of the relevant consultees are well known at present as a result of the local plan process, and on this occasion, further consultation is not necessary.
11. In formulating this action plan, Islington have had regard to PPG and information produced by the Planning Advisory Service<sup>8</sup>.

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<sup>3</sup> Housing and economic land availability assessment, paragraphs 068 and 070, Available from: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#housing-delivery-test>

<sup>4</sup> Ibid, paragraph 074

<sup>5</sup> Ibid, paragraph 070

<sup>6</sup> Further information on this consultation is available at:

[https://www.islington.gov.uk/planning/planning-policy/local\\_plan\\_review](https://www.islington.gov.uk/planning/planning-policy/local_plan_review)

<sup>7</sup> Op cit, footnote 3, paragraph 071

<sup>8</sup> The action plan headings are based on the Planning Advisory Service action plan template, available here:

<https://www.local.gov.uk/sites/default/files/documents/PAS%20Action%20Plan%20template%20public%20draft%20180607.pdf>. Further information is available from: <https://local.gov.uk/pas/pas-topics/monitoring/preparing-effective-action-plan>.

# Housing Delivery Analysis

12. The new London Plan (and emerging Local Plan) sets a target for delivery of 7,750 homes between 2019/20 and 2028/29, or 775 homes per annum. This is a significant reduction from the previous housing target of 1,264 units per annum, set out in the adopted London Plan; this is mainly due to a reduction in the availability of large housing sites, as assessed in the Strategic Housing Land Availability Assessment (SHLAA).
13. The new London Plan is expected to be adopted in early 2020. The emerging Local Plan is currently at Proposed Submission (Regulation 19) stage; the Council intends to submit the plan for examination by the end of 2019, with examination hearings likely to take place in spring 2020 and adoption likely towards the end of 2020.
14. A key aspect of housing delivery is the local housing market. Islington is an Inner London borough where land prices are high, which can be a barrier to entry for developers looking to build new housing, especially SME builders. However, development returns are also high, meaning that there is a clear incentive to build out permissions once secured. Identifying the specific 'root cause' of under-delivery in a market such as this is difficult, if not impossible.
15. Islington has a five-year supply in excess of the housing target set out in the new London Plan, and has consistently maintained a five year supply in recent years; however, there is an increasing lack of sites in Islington, partly due to the fact that many development sites have been delivered and the fact that Islington is a small, densely developed borough – the most densely populated local authority area in the UK - which does not have an endless supply of sites. As noted above, this is the key reason why Islington's housing target has reduced significantly in the new London Plan.
16. In Inner London, there appears to have been a slowdown in housing development activity in recent years, which correlates with wider economic uncertainties. This is likely to have been one of the main causes of the specific under-delivery evident in 2017/18, which has triggered the requirement for Islington to produce this action plan.
17. Responses to support housing delivery therefore need to be proportionate, recognising that the council has, for a considerable time, facilitated the delivery of new housing through a variety of means. The role of an action plan is to identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery. While this document does consider a broad range of potential actions to improve housing delivery (see below), this does include a number of actions which the Council has already been undertaking (and continues to undertake). Continuing to pursue this range of actions has the potential to be effective in delivering new housing going forward (and have contributed to the Council consistently meeting housing targets in previous, as demonstrated in Table 4).
18. Any actions should also ensure that measures to increase housing delivery alone (quantity focused) do not compromise broader objectives of the Development Plan and the achievement of sustainable development. The Development Plan provides a coherent strategy and policies to guide all development in the borough, not just housing. Islington has strong planning requirements – including requirements for other development needs such as business floorspace. These strong requirements are essential to ensure that adverse impacts on the borough's character and diverse mix of uses are avoided. They

are also eminently viable, as shown through Local Plan viability evidence which underpins the adopted and emerging Local Plans.

19. At a macro level, uncertainty around Brexit is causing significant negative impacts on housing growth. Since the EU referendum three years ago, housing development activity in London has slowed down significantly. This is particularly the case in high value boroughs like Islington, and throughout Zones 1 and 2. Housing development schemes in these high values areas have for many years relied heavily on overseas investors purchasing new build homes, but this has declined since the referendum. In addition, residential sales values have reduced across London and construction costs have increased significantly. The combined impacts of these factors are acting as a disincentive to housing development, through schemes not coming forward and/or through significant delays in the delivery of approved schemes. The council is developing new housing on its own land, and has had first-hand experience of schemes being slowed down, due to very significant increases in construction costs. Further, the long-standing capacity constraints in the construction industry have been exacerbated by the Brexit uncertainties and the drop in the pound, with a significant number of construction workers from other EU countries leaving the UK and fewer new workers arriving. These issues will undoubtedly have factored into the under-delivery of housing in Islington.
20. The increasing viability of commercial schemes may also affect the delivery of new homes. For a number of years, the returns associated with residential development greatly exceeded returns from commercial development (except in specific core commercial locations such as Central London); this is now not the case, and we are seeing a significant growth in commercial activity, in particular in office developments. Sites therefore may not come forward for new homes on the basis that they do not provide an equitable return compared to commercial development<sup>9</sup>.
21. The individual circumstances of landowners and developers is one of the key issues which impacts the speed at which sites get built out, and one which is entirely out of the Council's control. Issues that create barriers to homes being built include:
  - the business model of the landowner – whether or not they intend to build themselves or sell the site at a profit after securing an uplift in land value following the grant of planning permission;
  - access to finance and cost of interest payments;
  - land value expectations; and
  - the extent of the freeholder/leaseholder motivation to develop the site.
22. The Council is seeing an increasing number of Section 73 applications, where applicants gain permission and then attempt to revise certain elements of the scheme. These revisions can be an attempt to maximise profit margin, rather than being a response to a significant change in site circumstances; however, regardless of the rationale behind applying for a S73, they will inevitably delay delivery.

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<sup>9</sup> The emerging Local Plan identifies significant need for new commercial floorspace, particularly business floorspace.

## **2015/16 to 2017/18 housing delivery**

23. This section covers housing delivery during the period between 1 April 2015 and 31 March 2018.
24. Islington maintain a housing trajectory which details past housing delivery and projects future housing delivery. The figures used as the basis for the trajectory come from detailed annual surveys of extant planning permissions, supplemented by additional sources of data from other council departments including council tax and building control records; and external information including discussions/correspondence with agents and developers. The council has maintained its own monitoring system in recent years to enable detailed recording and assessment of local statistics.
25. These figures are submitted to the Greater London Authority (GLA) each summer, which uses the figures to compile the London Plan Annual Monitoring Report (AMR) (amongst other things). The GLA maintain statistics in the London Development Database (LDD).
26. The GLA submit figures to the Ministry of Housing, Communities and Local Government (MHCLG) on behalf of London boroughs. These figures form the basis for a number of national statistical publications.
27. It is important to note that the delivery figures held by the Council, the GLA and MHCLG employ different methodologies, which count certain types of housing in different ways. Further, it should be noted that the MHCLG figures are taken at a certain point in time, hence they only provide a ‘snapshot’. Figures produced by the Council and the GLA are often updated on an ‘ad hoc’ basis when new information comes to light.
28. With regard to the housing target used to assess delivery, the Housing Delivery Test Measurement rulebook specifies that, in areas where a Spatial Development Strategy (SDS) is also in place:
  - the district target will continue to be used until it is more than five years old, or the requirement has been reviewed and found not to require updating; or
  - the apportioned housing requirement in a SDS will be used where the district target is more than five years old and the SDS is less than five years old (or where relevant strategic policies have been reviewed and found not to require updating).
29. The second bullet point applies to Islington, as the housing target set out in the Local Plan is more than five years old, but the target set out in the London Plan was adopted within the last five years. Islington’s target for the purposes of the HDT is made up of 1,178 units per annum in 2015/16, and 1,264 units per annum in 2016/17 and 2017/18. The lower target in 2015/16 reflects the adopted Core Strategy target, as in 2015/16 the Core Strategy was less than five years old. From 2016/17 onwards, the Core Strategy was more than five years old, hence the target in the HDT reverts to the London Plan target of 1,264 units per annum adopted in March 2015.

### **Islington Housing Trajectory**

30. Islington’s most recent housing trajectory shows the past completions and anticipated housing delivery between 2012/13 and 2033/34, with 2017/18 being the monitoring year in question (for the purposes of the Authorities Monitoring Report). For the period covered by the HDT, the trajectory shows the following delivery:

**Table 1 – Islington housing delivery figures, 2015/16 to 2017/18**

	2015/16	2016/17	2017/18	Total
<b>LBI housing delivery</b>	1,568	1,585	411	3,564
<b>Housing target (from London Plan Further Alterations 2015)</b>	1,264	1,264	1,264	3,792
<b>Percentage</b>	<b>124%</b>	<b>125%</b>	<b>33%</b>	<b>94%</b>

31. As shown in table 1, Islington's trajectory has significantly different figures than the 2018 HDT (shown in table 3 below). This is primarily due to how student accommodation development was counted toward delivery. For example, the 2016/17 completion of a large student development consisted of 862 student bedspaces, which, for the purposes of monitoring the Local Plan and the London Plan, are counted on a 1 bedspace:1 unit basis<sup>10</sup>. However, the HDT (in table 3) counts such accommodation on a 2.5 bedspace:1 unit basis, meaning that only 345 units/bedspaces are counted (a reduction of 517 units/bedspaces towards housing delivery compared to Islington/GLA figures).
32. In addition, a 2015/16 completion of a large student development consisted of 475 student bedspaces, which only counted as 190 units/bedspaces for the purposes of the 2018 HDT (a reduction of 285 units/bedspaces towards housing delivery compared to Islington/GLA figures).
33. These student accommodation proposals were permitted on the understanding that the proposal would contribute to the housing target on 1:1 basis. This fact was an important material consideration in the decision to award planning permission. Since 2011, Islington's Local Plan has taken a fairly restrictive approach to student accommodation developments, due to the acute shortage of land in the borough and the need to deliver on other priorities such as maximising delivery of conventional housing and affordable housing. Only a very limited number of sites were identified as being suitable for student accommodation, on the understanding that each bedspace is counted as one housing unit. It is therefore not appropriate to change the rules retrospectively.
34. This issue was a key factor during the making of an Article 4 Direction in 2014, removing office to residential permitted development (PD) rights in the borough. Islington initially proposed an Article 4 Direction to remove PD rights across the entire borough (where they were not already exempt). The Secretary of State cancelled this Direction partly due to perceived under delivery of housing against identified targets; however, the Secretary of State calculations compared only conventional housing delivery against the overall housing target (made up of conventional and non-self-contained such as student accommodation). When non-self-contained was included, housing targets had been comfortably exceeded. The Secretary of State recognised this statistical error (and therefore accepted monitoring on a 1:1 basis) in response to a pre-action protocol letter related to a proposed judicial review of the Secretary of State's decision to cancel the Article 4 Direction; subsequently, the Secretary of State then agreed to a modified Direction which came into force in September 2014.
35. There are also other small differences, due to the 'snapshot' issue explained above.

<sup>10</sup> The London Plan AMR sets out how various types of housing will be monitored. The AMR 14 (published September 2018) notes, at paragraph 3.123, “*for the purposes of monitoring the London Plan the number of separate bedrooms is counted, whereas the Housing Flows Reconciliation records the number of Council Tax rateable units, which will generally be a lower figure.*”

36. The HDT also identifies Islington's 2015/16 housing target as 1,178 units per annum, based on the adopted Core Strategy which was at that point still less than five years old; for the purposes of the trajectory however, we measure 2015/16 delivery against the updated London Plan target of 1,264 units per annum adopted in March 2015.
37. In total, the difference between the 2018 HDT delivery figures and those in Islington's housing trajectory amounts to 939 units; this would be enough to take the Council out of the 'buffer' category, although it would still trigger the requirement for an action plan.

### London Plan Annual Monitoring Report

38. The latest AMR (no. 14) covers the period 2016/17<sup>11</sup>, while the AMR no. 13 covers the period 2015/16<sup>12</sup>. The AMR no. 15 is due to be published in autumn 2019 and will show figures for 2017/18. Table 2 shows conventional and non-self-contained housing delivery in 2015/16 and 2016/17, which aligns almost exactly with Islington's trajectory figures noted in table 1.

**Table 2 – London Plan AMR housing delivery figures, 2015/16 to 2017/18**

	2015/16	2016/17	2017/18
<b>LBI housing delivery (as per London Plan AMR)</b>	1,502	1,580	
<b>Housing target</b>	1,264	1,264	1,264
<b>Percentage</b>	<b>119%</b>	<b>125%</b>	

39. These figures do not include vacants brought back to use (homes which have been vacant for a certain period of time before being utilised for housing). The council's trajectory includes a small amount of vacants brought back to use in 2015/16, but none in the remaining two years of the HDT period. The trajectory notes the issues with determining a vacant returned to use figure, due to the reliability of the information. The London Plan AMR sources data from national housing statistics<sup>13</sup>, using a year-on-year change in the total amount of vacant properties. Islington doubt the reliability of this information as it is liable to significant variances due to poor quality data. Notwithstanding this, we note that, if the London Plan AMR vacant figures are included in the 2015/16 and 2016/17 figures, this would increase delivery by 309 (+454 in 2015/16; -145 in 2016/17). Ahead of the publication of the AMR covering 2017/18, the national statistics show that 2017/18 vacants figures have reduced by 23 units from 2016/17, meaning that an additional 23 units would be added to any conventional and non-self-contained housing delivery.

40. Taking into account just the 2015/16 and 2016/17 London Plan AMR delivery (without vacants brought back into use), this comprises 81% of the three-year housing target (2015/16-2017/18) without counting the 2017/18 conventional and non-self-contained housing delivery. This suggests that, once the 2017/18 London Plan AMR delivery figures are included, Islington would not trigger the 'buffer' category (see paragraph 6).

### Housing Delivery Test results (published February 2019)

41. The HDT results published in February 2019 shows the following delivery:

<sup>11</sup> Available from: [https://www.london.gov.uk/sites/default/files/amr\\_14\\_final\\_20180927.pdf](https://www.london.gov.uk/sites/default/files/amr_14_final_20180927.pdf)

<sup>12</sup> Available from: [https://www.london.gov.uk/sites/default/files/amr\\_13.pdf](https://www.london.gov.uk/sites/default/files/amr_13.pdf)

<sup>13</sup> MHCLG Live Table 615, available from: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

**Table 3 – HDT 2018 housing delivery figures, 2015/16 to 2017/18**

	2015/16	2016/17	2017/18	Total
<b>LBI housing delivery (as per 2018 HDT)</b>	1,219	1,035	370	2,625
<b>Housing target (as per 2018 HDT)</b>	1,178	1,264	1,264	3,706
<b>Percentage</b>	<b>104%</b>	<b>82%</b>	<b>29%</b>	<b>71%</b>

42. As noted above, these results, taken at face value, would place Islington in the ‘buffer’ category (see paragraph 6). However, given the differences between the HDT and Islington/GLA figures, and the non-statutory status of national planning policy and guidance, these figures should be treated with caution and regard should be had to other well established methods of monitoring housing delivery.

### **Discussion**

43. Islington have a very strong record of housing delivery, going back well over a decade. Table 4 and Figure 1 below show Islington’s record over the last ten years, between 2008/09 and 2017/18<sup>14</sup>.

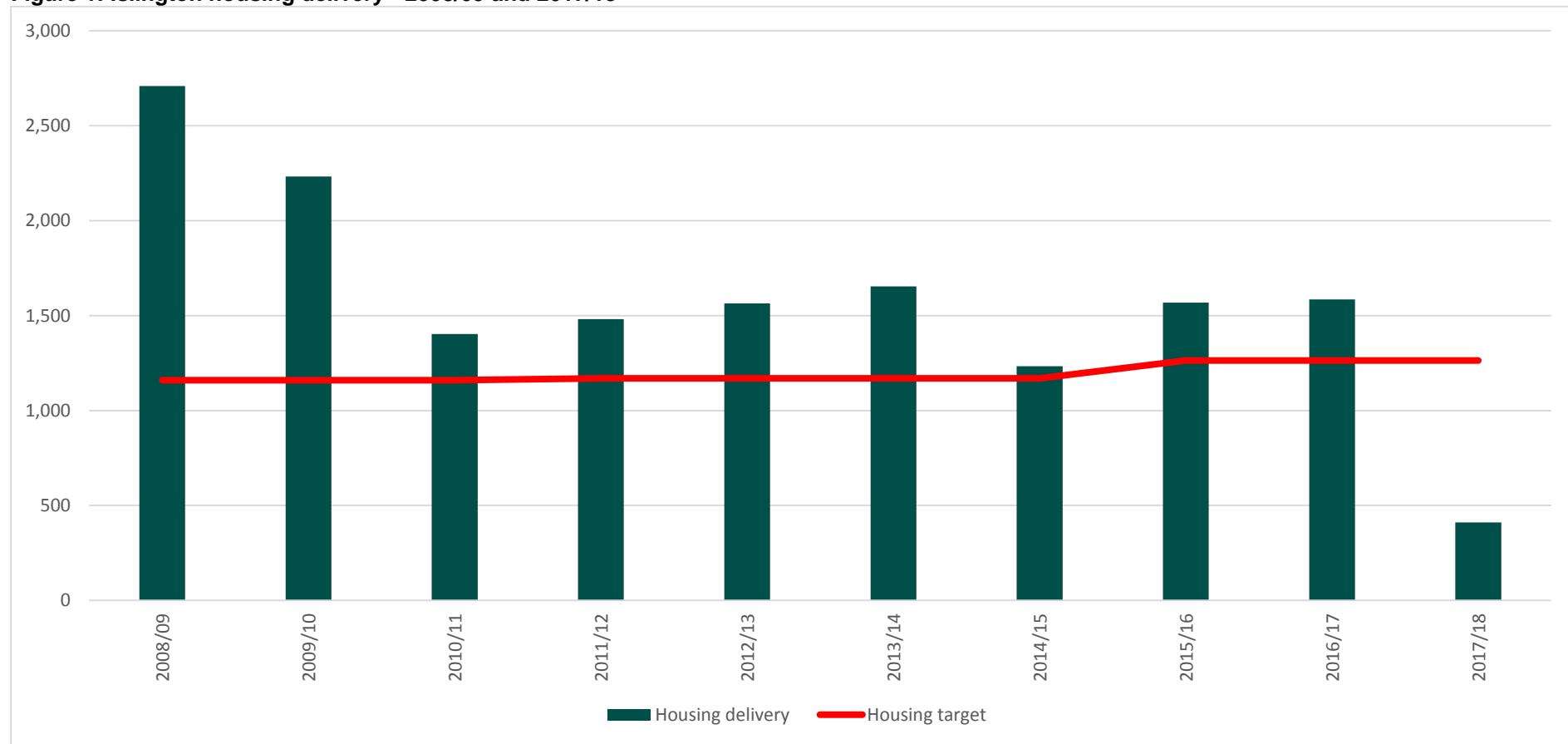
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<sup>14</sup> Figures are sourced from AMRs/housing trajectories. There is some very marginal year on year differences for some years following updates to survey information in subsequent AMRs/housing trajectories. The table reflects the figure from the most up-to-date AMR/housing trajectory.

**Table 4: Islington housing delivery - 2008/09 to 2017/18**

	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total
<b>Housing delivery</b>	2,709	2,232	1,403	1,481	1,564	1,654	1,234	1,568	1,585	411	<b>15,841</b>
<b>Housing target</b>	1,160	1,160	1,160	1,170	1,170	1,170	1,170	1,264	1,264	1,264	<b>11,952</b>
<b>Percentage</b>	234%	192%	121%	127%	134%	141%	105%	124%	125%	33%	<b>133%</b>
<b>Rolling three year delivery</b>			6,344	5,116	4,448	4,699	4,452	4,456	4,387	3,564	
<b>Rolling three year housing target</b>			3,480	3,490	3,500	3,510	3,510	3,604	3,698	3,792	
<b>Percentage delivery</b>			182%	147%	127%	134%	127%	124%	119%	94%	

**Figure 1: Islington housing delivery - 2008/09 and 2017/18**



44. Table 4 shows that Islington has over-delivered on its housing targets by a third over the decade from April 2008 to March 2018. The HDT looks at a very narrow three-year window and, as a consequence, can trigger the buffer due to a single year of under delivery, which is the case with the 2018 HDT figures.

45. Table 4 also looks at the rolling three-year delivery figures against rolling three year targets, from 2008/09-2010/11 to 2015/16-2017/18. This shows that the only instance where Islington falls below 100% delivery is the latest three-year period (where the HDT began operation). For the other seven instances back to 2008/09-2010/11, delivery was never less than 119%.

46. One contributing factor to recent under-delivery is delays to certain large sites; the following four schemes have all been projected to complete at least partly in 2017/18 in recent housing trajectories:

Planning ref	Site address	Number of units	Comments
P041261	Kings Cross Triangle Site, York Way	115	Scheme permitted in 2008. Delays due to slow progress building out wider King's Cross permission
P052245	Block A,B,D,F (Site 1), Islington Square, Former North London Mail Centre, Upper Street	185	Scheme permitted in 2007. A number of additional ad hoc change of use applications submitted on site, which has delayed completion.
P090774	Site 2 (Block C), Royal Mail Sorting Office, Almeida Street and Upper Street	76	Scheme permitted in 2012. As above, site has been delayed due to developer ad hoc applications for change of use.
P092492	City North Islington Trading Estate, Fonthill Road	355	Scheme permitted in 2010. Delays due to transport issues and change of ownership of site.
<b>TOTAL</b>		<b>731</b>	

47. Projected completion dates are informed by a range of sources, but ultimately to be counted in a five-year housing supply, a site must conform with the definition of deliverable in the NPPF. The four sites in the table above would have all been classed as deliverable at the point when they were assumed to have some delivery in 2017/18. Had this delivery taken place as projected within 2017/18, Islington would not have been placed in the 'buffer' category based on the HDT results. The completion of planning permissions can be delayed for a range of reasons, but the delays on the sites outlined above are considered to be unusually long compared to other similar sites in Islington.

48. This experience highlights an important point; delays to planning permissions being built out are largely outside the council's control. The council can only make projections based on information available at the time, hence it was reasonable to assume delivery from these schemes in 2017/18.

# Actions and responses

49. This section identifies the actions the Council will/is undertaking to facilitate housing delivery.

## Planning permission

50. Measures to improve housing delivery are embedded throughout the planning process, starting with the grant of planning permission. In terms of the planning permission process, the Council actively encourages engagement as early in the planning process as possible. Pre-application advice<sup>15</sup> is strongly recommended prior to submitting planning applications, as this can identify potential problems early on and work to explore potential solutions; this can help to speed up delivery through the granting permissions quicker and by ensuring that schemes are more realistic. It can also identify issues that may impede deliverability, thereby enabling issues which may affect the scheme coming forward post-permission to be resolved at an early stage.

51. Planning performance agreements (PPAs)<sup>16</sup> allow a more bespoke project management approach to be taken to engagement, negotiation and determination of planning applications, which can ensure that issues are identified more quickly and permission is granted without long delays. As with pre-application advice, it can also enable issues of deliverability to be identified, thereby enabling issues which may affect the scheme coming forward post-permission to be resolved at an early stage.

52. Early engagement also extends beyond the Council to the local population. Islington has an engaged and articulate resident population, who have a clear understanding of the planning process and expect appropriate engagement to allow for meaningful consultation. This requires a team with sufficient expertise on the applicant's side to engage appropriately. Early engagement with the local population prior to submission of a planning application offers a meaningful way for the local community to engage in design development – this includes creative ways to encourage young people to get involved in the planning system.

53. High quality design of new housing is fundamental, due to the densely developed nature of the borough which means that development sites are often in very close proximity to existing development and specific designations/constraints such as heritage assets (including the fact that over half of the borough is covered by conservation areas and the fact that Islington has more than 4000 listed buildings). In this sense, the Council's Design Review Panel (DRP) play an important role. DRP is a process that requires engagement at pre-application stage and requires a design team to have carefully analysed the context of the site as well as heritage assets, and that this analysis can be clearly explained as having informed the design proposals that come forward to planning. Provision of specific architectural advice is important in order to bring forward successful schemes.

54. Provision of appropriate information as early as possible in the planning process enables the achievement of high quality schemes and also minimises potential for additional costs

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<sup>15</sup> Information on Islington's pre-application services is available here:

<https://www.islington.gov.uk/planning/applications/permission-check/need-planning-advice>

<sup>16</sup> Information on PPAs is available here:

<https://www.islington.gov.uk/planning/applications/permission-check/need-planning-advice/performance-agreement>

being incurred and abortive work being undertaken, for both the Council and applicants. For example, the provision of sunlight/daylight information early at pre-application stage helps inform detailed discussions and bottom out massing parameters (from both design and amenity perspectives) before vast sums of design fees have been spent.

#### Council housebuilding

55. Islington Council has developed its own housebuilding programme and is committed utilising its own land, particularly small parcels of land on existing housing estates, to 'turbocharge' Council housebuilding and deliver 550 new council homes by 2022.
56. The Council has a specific New Build Housing team who are advancing a number of schemes to achieve this target<sup>17</sup>. This involves close working with various Council departments, notably Planning. The New Build Housing team has been expanded significantly in order to facilitate the acceleration of the council's house building programme.

#### Joint working

57. Islington maintains a close and consistent working relationship with adjoining boroughs and with the Greater London Authority (GLA), including through meeting 'Duty to Cooperate' requirements as part of Local Plan preparation and monitoring. These relationships can help bring to light wider development trends and relevant issues regarding housing delivery.
58. Joint working can also help to unlock specific sites for housing development. The Council is working with the GLA to purchase the vacant Clerkenwell Fire Station site in order to develop new homes. The Council has developed specific guidance for the site which will inform any development which does take place. By getting involved directly in the purchase and development of key sites, this removes an element of uncertainty and speculation from the planning process, giving much greater certainty that development will come forward quickly.
59. The Council worked closely with the GLA on the SHLAA, which informed Islington's housing target set out in the new London Plan and emerging Local Plan. The SHLAA involved a review of some 400 sites in Islington to determine their capacity for delivering housing.
60. Another example of joint working is the preparation of a Supplementary Planning Document (SPD) for the former Holloway Prison site, produced jointly with the GLA. The SPD aims to enable this major new housing development opportunity to progress speedily through the planning process. It was informed by a detailed development capacity study, and a viability study, as well as an extensive consultation with local residents to gain support for future development of the site. The SPD sets out clear planning parameters for the development, in order to give certainty to potential purchasers/developers in terms of what will be expected on the site and prevent unnecessary delays further down the line. The overall objective was to facilitate speedy delivery of housing on the site. The site has now been sold and the developer aims to deliver approximately 1,000 homes. The council is now engaged in an intensive pre-application process with the developers.

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<sup>17</sup> Details of schemes at consultation stage, planning stage, and on-site, are provided on the Council's website: <https://www.islington.gov.uk/housing/housing-development-and-involvement/new-building>

61. Early discussions regarding the future of the Pentonville Prison site have also taken place, with a view to setting out clear parameters for the site to unlock its development potential. These discussions have also informed an emerging site allocation in the Local Plan review.

#### Local Plan and further guidance

62. The Council is currently undertaking a review of the Local Plan. A six-week consultation on the proposed submission (Regulation 19) Local Plan commenced on 5 September 2019. The Local Plan is expected to be submitted for examination by the end of 2019.

63. As part of the Local Plan review, the Council has revisited all allocated sites from the adopted Local Plan, as set out in the Site Allocations and Finsbury Local Plan DPDs (June 2013). In addition, there are a number of new housing sites proposed to be included, some of which have been sourced from recent 'Call for Sites' exercise conducted between 2016 and 2018. The expected housing capacity from all allocated sites in the emerging Local Plan is approximately 4,000 units. This includes a significant proportion from small sites of less than one hectare, in line with the NPPF, which enable greater diversity and opportunities for a wider range of developers (e.g. SME builders) to develop in Islington.

64. The emerging Local Plan has been informed by numerous assessments and evidence documents, including the tall buildings study which proactively investigated suitable locations for tall buildings to achieve a balance between unlocking further development capacity and limiting potential adverse impacts from allowing tall buildings.

65. The Local Plan is underpinned by robust viability evidence, which demonstrates that the policies can be delivered while ensuring that various types of development, including housing, is viable. 50% affordable housing is viable on many of the sites tested, with a number of sites proven viable at even higher percentages. The emerging Local Plan aims to reduce the reliance on site specific viability by prescribing a fixed affordable housing target; this will ensure certainty and could speed up delivery by ensuring that schemes are not subject to delays as a result of protracted viability assessment/negotiations.

66. The Council has commissioned a borough-wide characterisation study to further identify scope for intensification and development. This could include further supplementary guidance to facilitate further intensification of development.

#### Constraints

67. There are a number of common constraints which affect the scope to develop in Islington. More than half the borough is covered by conservation areas and there are a number of sites which are in multiple ownership which can add complexity to redevelopment proposals, especially the delivery stage. There are other constraints which can affect development on a site-by-site basis, including issues with site access and legal issues (covenants, rights to light).

68. Islington's densely developed nature can prove challenging in terms of accommodating development, e.g. impacts on amenity of existing homes which are often in very close proximity to proposed development sites.

69. Conversely, the borough is generally well provided in terms of infrastructure, particularly public transport,

70. The Local Plan review (discussed above) has included detailed consideration of development constraints. The proposed policies and allocations in the emerging Local Plan will help to address and overcome these constraints where they arise.

## Potential actions from PPG

71. Paragraph: 051 Reference ID: 68-051-20190722, of the PPG identifies several actions which the LPA could consider to boost housing delivery. Table 5 sets out the suitability of these actions for improving housing delivery in Islington:

**Table 5 – PPG potential actions for improving housing delivery**

<b>PPG action</b>	<b>LBI response</b>
Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land.	In London, the SHLAA is led by the Mayor. The most recent SHLAA was completed in 2017 and, for Islington, remains an accurate assessment of housing land availability in the borough.
Working with developers on the phasing of sites, including whether sites can be subdivided.	Islington does not have many large sites where phasing is possible. For the large sites where it is possible, e.g. City Forum, Holloway Prison, there is currently no indication that development will stall to the degree that site-specific actions are necessary to expedite site delivery.
Offering more pre-application discussions to ensure issues are addressed early.	See above – paragraphs 50-54.
Considering the use of Planning Performance Agreements.	See above – paragraphs 50-54.
Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites.	See above – paragraphs 62-66.
Revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies.	See above – paragraphs 62-66. It is noted that the Local Plan addresses a broad range of development needs, including a need for significant amounts of new business floorspace. This is a key factor in the consideration of further opportunities for housing, with a clear need to balance needs to ensure sustainable development.
Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use.	Article 4 Directions are kept under review, but it is important to note the need to achieve sustainable development, which includes planning for employment and other needs. In that sense, Article 4 Directions provide important protections for employment floorspace, and while they may restrict potential housing delivery in the borough,
Engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed.	The Council undertakes annual surveys of planning completions, and also regularly source site specific information throughout the year, including specific engagement with developers and interested parties on particular schemes.
Establishing whether certain applications can be prioritised, conditions simplified or	There is no evidence to suggest that planning conditions have been, or will be, a

their discharge phased on approved sites, and standardised conditions reviewed.	barrier to housing delivery in the Borough. The Council will keep the use of conditions under review and will aim to simplify their use as far as reasonably possible, without compromising policy requirements.
Ensuring evidence on a particular site is informed by an understanding of viability.	Islington has a specialist viability team who regularly review site information, and also regularly seek advice from specialist external viability consultants. The emerging Local Plan policies have undergone rigorous viability testing to ensure that policies are deliverable and will not be a barrier to development coming forward. The Council also undertook site-specific viability work to inform the Holloway Prison Site SPD.
Considering compulsory purchase powers to unlock suitable housing sites.	The Council is focused on making best use of its own land to develop new Council housing. While CPO is not expressly ruled out, it is not a tool which is under active consideration at this time.
Using Brownfield Registers to grant permission in principle to previously developed land.	The Council has an up-to-date brownfield land register (BLR) and will continue to update this annually. As part of this update, the Council will consider which (if any) sites might benefit from PiP.
Encouraging the development of small and medium-sized sites.	See above – paragraphs 62-66.

# Management & Monitoring Arrangements

72. Responsibility for creating the action plan lies with the local planning authority, as does monitoring of the action plan.
73. The Council is committed to meeting and exceeding the housing target identified in the emerging Local Plan. The actions described above are a holistic set of measures which will enable the achievement of this commitment.
74. In order to ensure that delivery is on track, the Council will continue to monitor the progress of development in order to identify early where slippage might occur. This could then enable specific intervention where necessary and appropriate. The actions listed above are varied and there are no set methods for monitoring them. The Council may seek views from relevant stakeholders in future, to ensure robust, meaningful monitoring.
75. The Council is required to review the Local Plan every five years to determine whether there are any elements that require updating. Where there is robust, verifiable evidence of specific policies and/or allocations constraining the delivery of new homes, such policies/allocations may be revised in a Local Plan update, which in turn may lead to increased delivery of new homes.
76. The Council will also have regard to any review of the London Plan, in particular any revised housing targets provided as part of any such review.