

Ms. Sally Fraser  
Principal Planning Officer  
Major Applications Team  
London Borough of Islington,  
P O Box 333,  
222 Upper Street,  
London N1 1YA

2<sup>nd</sup> October 2015

Dear Ms Fraser,

**Planning application P2015/2913/FUL - Southern Part of the Site of Whitehall Park Primary School**

This letter of representations about the planning application augments individual letters that we have sent to the Council as Local Planning Authority which have comments about specific aspects of the development proposed.

With respect to the comments below, we have acted in concert as concerned local residents and now submit one letter. We have not individually submitted duplicate letters, thereby conserving officer time by obviating the need to read several letters. Where the undersigned have also submitted individual responses to the planning application, please regard this letter as part of the same representation. For those others, we kindly request that you count this letter as new representation from each. Please see individual letters submitted for more detail in terms of specific concerns about the proposal.

As a general matter, we support appropriate redevelopment on this site, brownfield sites are hard to come by in this densely-developed part of London.

Living in this area, we are very well aware that there is an urgent need for affordable housing and are very supportive of development that brings about new homes at prices that reflect the abilities of people to pay for it and which meet the Council's housing needs.

The site clearly has potential to meet a small part of these pressing needs.

However, the site is bounded by established housing and it is, therefore, critical that any such development be supported by detailed and accurate information that allows the Local Planning Authority and all those that live next and near to it to understand precisely the impacts, physical and visual, and upon the amenities of existing – and future – residents of those homes before any positive decision can be made about a planning application.

This importance is accentuated by the fact that the site is situated within the Whitehall Park Conservation Area. It is settled law that in a conservation area, a much stricter control over development than elsewhere should be exercised with the object of preserving or, where possible, enhancing the qualities in the character

or appearance of the area which underlie its designation as a conservation area under s 277 of the Town and Country Planning Act 1971.

Having made a very thorough examination of all the material supplied in support of the planning application, it is obvious that the requirements for detailed and accurate information have not been met, and that the Council's own requirements under the June 2013 Islington Local Validation Requirements have not been met. Further we have significant concerns that what is proposed is excessive for the site and that its impacts will be severe and adverse.

Our main concerns about the adequacy of information as follows;

- i. There are no detailed or accurate sections showing the relationships and spaces between the proposed blocks or between the blocks and the adjacent properties.
- ii. There is no topographical survey illustrating existing levels and no drawings showing those proposed. This is essential to examining the implications for overlooking, privacy, outlook and impact on existing and proposed planting. It is also critical to understand the likely impacts upon the root protection areas of retained Tree Preservation Order Trees and thereby resulting impacts upon their future health and lifespan.
- iii. In relation to the trees on the site, the assessment provided is insufficient, inconsistent and contains misleading classifications not in accordance with the Tree Categorisation Method within BS5837-2012 (Paragraph 4.5). Furthermore, no detail is provided on impacts of proposed works such as foundations and drains on the root protection areas, nor the mitigation measures to be applied.
- iv. The light assessment is incomplete and a number of considerations have not been addressed. For example, the impact of proximity of the retained trees to the south of Blocks B & C and the impact of Block A on its own amenity space to the north. It is notable that Shadow diagrams have not been included in the Daylight & Sunlight Assessment to support the impact upon this amenity area.
- v. A number of additional items were not included in the application, yet would seem necessary in properly assessing the scheme. These include but are not limited to a full disclosure of feedback from the Islington Design Review Panel; details of façade elements; a planting proposal to replace trees removed; and a detailed design for the proposed play space.

Our main concerns about the specifics of the development and its possible / likely impacts are;

- i. This proposal is for a high density development close to boundaries and brings with it associated negative impacts for both the existing residents, and equally significantly, for the future residents of the new housing if not subject to proper design and planning processes. Spacing between Blocks A and B is minimal, the blocks themselves form relentless continuous massing, the

proposal creates a quality of light issue for new residents with windows to habitable rooms being overshadowed by trees to the south, and critically for family housing poor quality amenity and play spaces are proposed which are inadequately small and often overshadowed or overborne by trees or built form. Amenities provided for affordable housing should not fall below a standard otherwise upheld. The planning guidelines must surely apply equally to all types of development and be 'tenure blind'.

- ii. The value of the conservation area will be diminished by this proposal. The proposed design does not respect or positively relate to the existing buildings or street scene. It is not similar in urban form, plot sizes, scale, building and storey height, proportion or key design lines to the existing housing. The resultant unsophisticated design does not meet the need for a sensitive elevational treatment as advised by the Islington Design Review Panel and has not responded to pre-planning comments from the Council or the Design review panel clearly presented in the submitted Planning Statement.
- iii. There has not been proper consideration of the trees to be retained on the site, all of which benefit from TPO designation. We have grave concern that these are under severe threat from this development despite reassurances in the application.

The deficiencies and certain specifics of the proposed development mean, therefore, that the applicant is unable to demonstrate that the planning application proposal satisfies the well thought-out and clearly stated policies of the London Borough of Islington as Local Planning Authority or London Plan (FALP)(March 2015) policies and would therefore not be in compliance with the National Planning Policy Framework.

Accordingly, as planning applications should be determined in accordance with the Development Plan, unless material considerations suggest otherwise, the Local Planning Authority must reject this planning application and refuse the grant of planning permission. It should consequently seek a new application and require the applicants, ISHA, to work closely with local residents to prepare it, with the objective that a good-quality development supported by local residents and which provides as much as possible for new housing for ISHA and residents of Islington can come about.

We are confident that our Council will give very serious consideration to these representations and those already made.

Yours sincerely,

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