



# Housing Delivery Test Action Plan

2019-20

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**MARCH 2022**

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**London Borough of Islington**

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# 1 Introduction

- 1.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery in a local authority area and was introduced by the government in the 2018 update of the NPPF. As housing delivery in Islington was below 95% in the three-year period 2017/18 - 2019/20 an action plan is required to be produced.
- 1.2 This plan identifies the main issues that have affected delivery rates in 2019/20 and sets out steps the authority is taking, and is planning to take to try to address them and increase housing delivery.
- 1.3 This Housing Delivery Test Action Plan follows previous Action Plans published in 2019 (for 2017-18) and 2020 (for 2018-19).
- 1.4 In formulating this plan, Islington have had regard to Planning Practice Guidance and information produced by the Planning Advisory Service. The decision on whether to consult on an action plan, and which stakeholders to involve, is for the local planning authority. Islington do not intend to consult on this Action Plan. Of the key stakeholders who can be involved in creation of an Action Plan, the council has regular contact with neighbouring boroughs and infrastructure providers, and has engaged extensively with landowners and developers as part of the review of the Local Plan. Representations received during this process have been assessed and the issues raised are relevant to the production of this action plan. This plan reviews the commitments made in the previous plans and outlines further measures the Council is taking to facilitate the delivery of housing and in particular high quality affordable homes.

## 2 Housing Delivery Analysis

2.1 The Housing Delivery Test results in Table 1 below show delivery in the period 2017/18 – 2019/20. These results are set out against the adopted Plan targets and, in the second part of the table the results are shown in the context of the housing capacity outlined in the 2017 Strategic Housing Land Availability Assessment and reflected in the new London Plan.

Table 1 – HDT 2020 housing delivery figures 2017/18 to 2019/20:

	2017-18	2018-19	2019-20	Total
<b>Housing Target</b>	1,264	1,264	1,264	<b>3,792</b>
<b>Housing Delivery - 2020 HDT</b>	370	983	757	<b>2,110</b>
<b>Percentage</b>	29%	78%	60%	<b>56%</b>
<b>Official HDT figure</b>	370	983	1,955	<b>3,308</b>
<b>Percentage</b>	29%	78%	155%	<b>90%</b>
<b>LBI housing delivery figures</b>	414	960	757	<b>2,131</b>
<b>Percentage</b>	33%	76%	60%	<b>56%</b>
<i>Housing Delivery in context of SHLAA capacity</i>				
<b>Housing Target/ SHLAA capacity</b>	1,264	1,264	775	<b>3,303</b>
<b>Housing Delivery - 2020 HDT</b>	370	983	757	<b>2,110</b>
<b>Percentage</b>	29%	78%	98%	<b>64%</b>
<b>LBI housing delivery figures</b>	414	960	757	<b>2,131</b>
<b>Percentage</b>	33%	76%	98%	<b>64%</b>

- 2.2 Islington maintains a record of housing delivery based on monitoring of starts and completions each year as well as engagement with landowners/developers on larger sites. In the past the LBI housing delivery figures have differed slightly from the HDT, largely due to how student accommodation development was counted. The 2018 HDT method calculated student accommodation on a 2.5 bedspace: 1 unit basis. Student accommodation schemes in London have historically been counted on a 1 bedspace: 1 unit basis, resulting in differences in the reporting of figures for past completions, and was an important material consideration in assessing planning applications. The PPG was revised so that studio flats within student accommodation schemes are calculated on a 1:1 basis. In light of this change, the 2017/18 figures for that year's HDT should have been revised upwards by an additional 44 units, as set out in Table 1. The LBI housing delivery figure for 2019/20 was the same as the HDT.
- 2.3 In relation to the Official HDT figures set out in Table 1, there is a significant disparity between these and Islington's housing completion figures for 2019-2020 (757 vs. 1,955). The reason for this is an unforeseen GLA database issue which mis-reported data in relation to completed and partially completed schemes. Islington have raised this matter with the GLA and MHCLG (now DLUHC) and this has been corrected and will be updated in due course.
- 2.4 The reporting year (2019/20) saw 757 Housing completions, 60% of the London Plan overall housing target (1,264). All completions in the reporting year were conventional (self-contained) homes.
- 2.5 The year 2019/20 is the third since the introduction of housing targets that Islington has failed to meet the annualised benchmark after a ten-year period of exceeding housing targets.
- 2.6 In terms of the performance over three years, as set out in table 1 above, with a HDT delivery of 2,110 units, the Council has fallen short of its target for this period, 3,792, delivering 56% of the target. For the LBI figures the delivery of 2,131 homes also amounts to 56% of the target. The Council is, however, on track to deliver housing in excess of the longer term targets in the Draft Local Plan and the London Plan as set out in the latest housing trajectory.
- 2.7 In considering the 2019/20 results it is important to be aware that the borough's capacity to deliver housing was assessed as part of the 2017 Strategic Housing Land Availability Assessment. This London-wide assessment identified that Islington has a reduced housing capacity compared to the situation several years earlier, and that there are less large sites available for housing development.
- 2.8 In preparing the SHLAA a detailed assessment was made of each Borough's capacity to deliver housing. This involved a call for sites as well as extensive research. The overall capacity assessment for each local authority area was calculated based on projections of the amount of housing large and small sites in the area could deliver. The SHLAA informed the new London Plan housing targets which identified that Islington has capacity to deliver 7,750 homes between 2019/20 and 2028/29, or 775 homes per annum, a significant reduction compared to previous housing target.
- 2.9 While this was not the adopted target in the London Plan or the Local Plan in the year in question, 2019/20, the estimate is based on an objective and recent assessment of the real housing capacity of the borough. Given that the first year of the London Plan target is 2019/20 it is reasonable to compare housing delivery for that year against the identified annual capacity, as set out in table 1 above.

2.10 In 2019/20, with 757 units completed, there was under delivery relative to the new London Plan target of 18 units, or 2%.

2.11 In terms of the performance over the three years, with a delivery of 2,110 units in the three-year period, the Council fell short of its target for this period, 3,303, delivering 64% of the target in HDT and LBI.

*COVID 19 Pandemic*

2.12 The end of the 2019/20 financial year coincided with the early stages of the COVID 19 pandemic which caused travel difficulties and impacted on some construction sites. The first national lockdown came into effect on 23 March 2020 and, as a result of these impacts, the government reduced the “Homes required” within the 2019/ 20 Housing Delivery Test by a month. This reduced Islington’s annual target for 2019/20 from 1,264 to 1,160, meaning delivery against targets increased as set out in table 2 below.

	2017-18	2018-19	2019-20	Total
<b>Housing Target</b>	1,264	1,264	1,160	<b>3,688</b>
<b>Housing Delivery - 2020 HDT</b>	370	983	757	<b>2,110</b>
<b>Percentage</b>	29%	78%	65%	<b>57%</b>
<b>LBI housing delivery figures</b>	414	960	757	<b>2,131</b>
<b>Percentage</b>	33%	76%	65%	<b>58%</b>
<i>Housing delivery with SHLAA target adjusted due to impact of COVID</i>				
<b>Housing Target</b>	1,264	1,264	710	<b>3,238</b>
<b>Housing Delivery - 2020 HDT</b>	370	983	757	<b>2,110</b>
<b>Percentage</b>	29%	78%	107%	<b>65%</b>
<b>LBI housing delivery figures</b>	414	960	757	<b>2,131</b>
<b>Percentage</b>	33%	76%	107%	<b>66%</b>

- 2.13 As set out in the second part of table 2, if the new London Plan target had been adopted in 2019/20 (reflecting the SHLAA) and the reduction of the “Homes required” applied to this (due to the COVID pandemic), this would have meant a target of 710 units, meaning the Council would have exceeded the adjusted figure by 47 units, resulting in a delivery of 107% of the target for the year.

*Longer-term housing delivery trends*

- 2.14 Looking at housing delivery over a longer time span helps put in context the delivery in the current 3-year period. Delivery over the ten years up to 2019/20 is set out in table 3 below:

*Table 3 Islington Housing Delivery 2010/11 to 2019/20*

	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Totals
<b>Housing delivery</b>	1,403	1,481	1,564	1,654	1,234	1,568	1,585	414	960	757	<b>12,620</b>
<b>Housing target</b>	1,160	1,160	1,170	1,170	1,170	1,264	1,264	1,264	1,264	1,160	<b>11,557</b>
<b>Percentage</b>	121%	127%	134%	141%	105%	124%	125%	33%	76%	65%	<b>109%</b>
<b>Rolling 3-year delivery</b>	6,344	5,116	4,448	4,699	4,452	4,456	4,387	3,564	2,956	2,131	
<b>Rolling 3-year target</b>	3,480	3,490	3,500	3,510	3,510	3,604	3,698	3,792	3,792	3,688	
<b>Percentage delivery</b>	182%	147%	127%	134%	127%	124%	119%	94%	78%	58%	

- 2.15 The Council aims to exceed its housing target and has consistently done so in the past, as evidenced in table 3 which shows housing delivery of 109% of the target over the 10-year period.
- 2.16 The new London Plan, adopted in early 2021, sets a target for delivery of 7,750 homes between 2019/20 and 2028/29, or 775 homes per annum. This reduction from the previous annual target of 1,264 units is mainly the result of a reduction in the availability of large sites for housing delivery, as evidenced in the SHLAA. The borough has been in a period of transition for several years with lower overall capacity to deliver housing hence the lower annual target.
- 2.17 The London Plan (with the lower housing target) was not formally adopted until 2021. As a result, notwithstanding the findings of the SHLAA, the official annual housing target in place in the year subject to this Plan 2019/ 20 was 1,264 units, reduced to 1,160 due to the government’s COVID 19 – related adjustment.
- 2.18 The delivery of 757 units, as was achieved in 2019/20, may have been an underperformance at a time when there was more developable land available in the borough. However, the context has changed since the target of 1,264 units came into force in 2015/16, as recognised by the SHLAA. As the adoption of the London Plan and the Local Plan lagged behind the SHLAA, the housing delivery in 2019/20 should therefore be viewed not only against the adopted housing target at the time, but also in the context the objectively-assessed housing capacity of the borough.

## ***Reasons for under-delivery***

- 2.19 Islington is a small, densely populated borough with a vibrant economy and is located in the heart of London.
- 2.20 On most sites in the borough there are a high number of planning constraints. Over half the borough is covered by Conservation Areas and there are more than 4000 listed buildings. Almost all sites already have a building or buildings on them and there are a wide range of planning issues that need to be considered when assessing development proposals including heritage, amenity, open space, sustainability and urban design. When delivering higher volumes of housing on larger sites, other more strategic issues need to be taken into consideration including land ownership, finance, phasing and the need for infrastructure. There are also competing demands for different land uses on sites as well as the requirement to meet identified needs, including in relation to providing for social infrastructure and employment uses.
- 2.21 Looking at table 3 above, it is noted that housing delivery for the period between 2010/11 and 2016/17 was well above adopted targets. As evidenced in the SHLAA, this pace of delivery over a sustained period resulted in a reduction in the number of large sites available for housing development. In this context the lower housing target in the London Plan 2021 reflects the real situation on the ground, albeit after a lapse of time.
- 2.22 In situations where there have been unexpected delays in delivering development on large sites or when there are less large sites available, such as in more recent years, this can skew housing delivery figures. In the 3-year period 2017/18 - 2019/20 housing delivery was below target. This is not, however, in itself an indicator that housing objectives are not being delivered. Housing delivery needs to be considered over the longer plan period both in terms of significant past delivery over targets as well as future anticipated delivery in excess of targets.
- 2.23 The delivery of housing depends to a large extent on external factors which are not in the Council's control. The circumstances and approach of a landowner play an important role as the owner may decide not to build out a scheme after planning permission has been granted. This could be based on a multitude of factors including wider economic considerations and the availability of finance. The uncertainty brought about by the COVID 19 pandemic and the lockdowns in 2020 has impacted on the wider economy and the development industry, although it is recognised that the early stages of the pandemic took place towards the end of the 2019/20 financial year and the "Homes Required" target of the Housing Delivery Test has been adjusted down for that year as a result.
- 2.24 Given the pipeline of permissions in place and the measures set out in the Housing Delivery Action Plans published in 2019 and 2020 it is projected that in the coming years housing delivery will again exceed the adopted target, as it did between 2010/11 and 2016/17.



### **3 Action Plan**

- 3.1 The role of a Housing Delivery Test 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.
- 3.2 The Council has, for a considerable time facilitated the delivery of new housing through a number of actions. Responses to support housing delivery therefore need to be proportionate, recognising that the high levels of delivery in the past has left less capacity for delivery in the future. In addition, Council policies have to cater for a wide range of other needs including employment, open space, town centres, education, cultural uses and the numerous other priorities of the Plan.
- 3.3 The actions set out below follow the actions points set out in the 2019 and 2020 Plans and bring them up to date to the current year.

## Action Point 1: Taking a proactive approach to the development management process

### *2018 Action points*

- The Council will continue to actively encourage engagement as early in the planning process as possible through pre-application advice and utilise PPAs to ensure issues are identified as early as possible and permission granted without long delays.

### *2019 Further action points*

- Engaging with developers around their anticipated delivery timeframes.
- Ensuring applications are not unduly stalled throughout the Covid 19 crisis, including continuing to host development committees on online platforms.

- 3.4 As highlighted in LBI's 2018 and 2019 Action Plans, the Council continues to encourage pre-application discussions and Planning Performance Agreements (PPAs) with applicants to facilitate a smoother development management process.
- 3.5 In 2019-20 Islington received a total of 3,219 planning applications, which includes Prior Approvals, Certificates of Lawfulness and Pre-Applications. Within this, the number of Major/ Minor/ Other applications received was 1,842. This is a slight reduction compared to 2018-19 with an overall number of 3,491 applications, of which 1,905 were Major/ Minor/ Other. In 2017-18 there were 4,153 applications, of which 2,374 were Major/ Minor/ Other. In 2020-21, which was impacted by the COVID pandemic, there were 3,447 applications, of which 1,719 were Major/ Minor/ Other. Overall, the number of applications per year has stabilised in recent years, albeit at a lower than in 2017-18.
- 3.6 Some of the pre-applications and applications relate to allocated sites: of the 101 sites allocated in the 2013 Site Allocations and Finsbury Local Plan DPDs 44 have either been developed or are under construction.\* A further set of 115 allocations were put forward as part of the local plan update, dated September 2019. A large proportion of these are expected to provide housing, in many cases as part of mixed use developments, although in particular parts of the borough allocations are predominantly commercial, for example in the Bunhill and Clerkenwell Action Plan Area.
- 3.7 To facilitate the delivery of new homes the Council's Development Management Service works with developers to secure funding for additional resourcing and to agree specific work programmes and dedicated meetings to address all aspects of a development. Very large sites and developments have dedicated planning, urban design and heritage resources to pro-actively support the consideration of the proposals.
- 3.8 For larger strategic major applications, the Council has monthly internal pre-application review panels and Design Review Panels so that proposals can be scrutinized and

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\* As of 29 May 2020

potential difficulties identified at an early stage. Issues raised can then be addressed through negotiation, thereby reducing uncertainty and delays later on.

- 3.9 The Council has significant in-house expertise in a number of key areas to assist the deliverability of schemes, including housing schemes, and prevent delays. In addition to development management officers, this includes additional capacity in relation to sustainability, viability, inclusive design and urban design. On larger projects the Council's New Build Housing programme is supported by the Major Applications Team, the Design and Conservation Teams and Building Control to strengthen housing delivery.
- 3.10 The Council's Design Review Panel continues to play an important role by providing peer led architectural advice to help realise developments on complex sites with numerous constraints.
- 3.11 The Council has adapted its working practices to ensure planning applications continue to be processed during the Covid-19 pandemic. A hybrid model was adopted for planning committees, which are now legally required to be in person. Pre-application meetings continue to take place electronically and planning appeal hearings and inquiries as decided by the Planning Inspectorate.
- 3.12 These pro-active measures have helped identify sites, bring them through the planning process to decision, and have also helped progress the site allocations in the Local Plan. By helping to progress planning applications, the measures will help with future delivery.

#### **Further Actions Proposed**

- Continued engagement with developers to provide greater certainty in bringing forward schemes

## Action Point 2: Council Housebuilding

### *2018 action points*

- The Council has committed to 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.
- The council's New Build Housing team has been expanded and will work closely with other teams, including Planning to facilitate the acceleration of the council's house building programme.

### *2019 action points*

- Deliver 550 new council homes by 2022;
- Ensure at least 50% of new homes on all eligible sites in the borough are genuinely affordable homes; and
- Identify further sites that can deliver new housing in the medium to longer term.

- 3.13 The delivery of housing via the Council New Build Team is a key element of the Council housing programme.
- 3.14 The New Build Team is a multi-disciplinary team. It identifies sites that are owned by the Council which may be suitable for development. It works with internal partners like the Council's property team, prepares planning applications and project manages sites until delivery.
- 3.15 The team is made up of architects, project managers and support staff and aims to develop sites in Council ownership to provide genuinely affordable housing. The team delivered its first scheme in 2007/08 and to the date of this Action Plan has provided a total of 436 units in 36 schemes.
- 3.16 Based on the grant of planning permission and the date, or anticipated date, of start of works the team estimates practical completions by year. It is estimated that over 200 units will be brought to practical completion in 2021/22, over 150 units in 2022/23, with a consistent pipeline until 2027/28. A number of these schemes are in pre-app discussions at the moment and the New Build Team and the planning department are working closely together to progress these sites. As part of Local Plan review the Council consulted on modifications to Council owned sites at Cluse Court, Hillside Estate, New Orleans Estate and Kerridge Court which are estimated to have capacity to provide 310 homes. The Council is on course to deliver on its target of 550 new council homes by 2022.
- 3.17 The Council is working hard across teams to accelerate Council housebuilding; there is a pipeline of schemes to come forward, the team is being strengthened with new recruitment and studies are being undertaken on an ongoing basis to identify sites. New recruitment includes roles to increase the amount of new supply and accelerating delivery, as well as improving quality and value for money.
- 3.18 As well as development on the council's housing estates, the new build team is working with other internal departments such as Social Services, to reconfigure their post – COVID service offer by developing existing assets including additional housing. The

Council is also working with health providers such as GPs and the local hospital trust to identify sites for joint working and additional housing. New recruitment includes roles whose responsibility it is to acquire new sites, both public and private, to increase the delivery of new housing.

### **Further Actions Proposed**

- Deliver 550 new council homes by 2022;
- Ensure at least 50% of new homes on all eligible developments are genuinely affordable; and
- Continue work to identify sites that can deliver new housing in the medium to longer term.

## Action Point 3 Joint Working

### *2018 Action Points*

Maintain a close and consistent working relationship with adjoining boroughs and with the Greater London Authority (GLA).

### *2019 Action Points*

Continue close working relationship with partners.

- 3.19 To achieve the objectives set out in the Local Plan the Council is committed to working proactively and positively with stakeholders. The objective of delivering decent and genuinely affordable homes for all (Objective 1 of Draft Local Plan) is one of the most pressing challenges we face. The Council will work consistently with partners, the GLA and neighbouring boroughs to help deliver the homes that are needed.
- 3.20 The Council maintains a close working relationship with the Greater London Authority on strategic issues that cut across borough boundaries, including housing. It provides data, including monitoring data and formal consultation responses that help shape GLA policy and guidance.
- 3.21 Islington works closely with neighbouring boroughs on cross border issues, for example on sites that straddle the borough boundary such within the Kings Cross Area and on the Mount Pleasant Royal Mail site where Islington works closely with the London Borough of Camden. The borough is working jointly with six other north London Boroughs on the North London Waste Plan.
- 3.22 Some of the major public sector land owners in the borough are Transport for London, London Underground, Government Departments and the NHS. Shared working with these bodies has resulted in developments providing housing. The emerging Local Plan includes a number of sites owned by TfL as well as large sites formerly in government ownership like Holloway Prison which will deliver housing. The Council worked closely with these partner organisations in drafting site allocations and maintains a close ongoing working relationship with land owners.
- 3.23 In 2016 Islington became part of the One Public Estate programme in 2016, in partnership with LB Haringey, and in 2021 LB Camden. This programme provides funding to bring forward sites in public sector ownership to provide housing and other key uses.

### **Further action proposed**

- The Council will continue and strengthen work with partners to help respond to pressing housing need.

## Action Point 4: Local Plan

### *2018 Action Points*

- Additional housing capacity identified as part of the Local Plan review through site allocations, including a significant proportion of smaller sites which enables greater diversity and opportunities for developers (including SME builders) to bring forward housing sites in the borough.
- Reduce the reliance on site-specific viability by prescribing a fixed affordable housing target for identified housing sites; 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.

### *2019 Action Points*

- Progression of the draft Local Plan towards adoption, this will provide further certainty around housing supply going forward.

- 3.24 Islington aims to deliver high quality housing to meet the needs of our residents and has a proven track record of achieving this. In terms of Housing Delivery Test targets, the Council is in a period of transition; the housing target in 2019/20 is associated with conditions several years earlier when a significant amount of large sites were available for development. Taking into account the new London Plan target which reflects the more constrained land supply in the borough, there is a pipeline of permissions in place in addition to allocated sites anticipated to come forward in the upcoming years to enable the Council to meet the target of 775 units.
- 3.25 In the Draft Local Plan the Council seeks to accommodate growth including, as a priority, the provision of housing, particularly affordable housing. The first chapter of the Local Plan sets out seven objectives which are the basis for all the policies in the rest of the Plan; these need to be actively considered in bringing forward every development proposal.
- 3.26 Objective 1 is “Delivering decent and genuinely affordable housing for all”. In paragraph 1.34, maximising the delivery of housing that is both genuinely affordable and high quality is identified as a key priority of the Plan.
- 3.27 The second chapter of the Draft Local Plan “Area Spatial Strategies” sets out policies for eight areas of the borough where growth is expected to occur in the plan period. To respond to housing need, residential development is anticipated in several of the areas, for example at sites in Nags Head and Holloway Area (Holloway Prison and Morrison’s Supermarket) and at smaller sites in Archway and Finsbury Park. These strategies also set out locations where taller buildings may be acceptable based on the findings of the Tall Buildings Study completed by Urban Initiatives Studio in November 2018. This Study provides guidance on where tall buildings may be appropriate and at what height. In the emerging Plan, twenty-two locations are identified as suitable for tall buildings, about half in areas where commercial development is a priority.
- 3.28 The emerging Local Plan identifies 115 allocation sites across the borough. These are sites which are developable at a large scale, generally as major developments (over 10 units or 1,000sqm of floorspace). A significant number of the sites are carried over from the 2013 allocations. Many are identified as having potential for development as housing, or mixed use including housing. Because of the need to accommodate a range of land uses, commercial space, amenity open space, education and other uses are among the land uses identified in the allocations. Over half the sites (90) are for allocations other than housing. The individual allocation sets out the ownership of the land and while many sites are owned by a single private owner or a group of owners, many other sites are owned by public sector bodies like TfL and the Council. If built out

in accordance with the allocation, the allocated sites would provide an estimated 4,650 homes over the duration of the 15-year plan period 2021-2 to 2035-6 (2,190 homes in Years 1-5; 1,720 in Years 6-10; and 740 in Years 11-15). In addition, sites identified in the Bunhill and Clerkenwell Area Action Plan are anticipated to provide an estimated 1,260 homes in Years 1-5 of the plan period. The overall delivery across both the emerging site allocations and the AAP for the entire plan period is estimated at 5,910 units.

- 3.29 In the Draft Local Plan, the housing delivery target has been set at 775 units per annum in accordance with the 2017 SHLAA and the London Plan 2021. The Draft Plan has been subject to several rounds of consultation, with further work to identify additional housing capacity set out in the Housing Trajectory updated as part of the examination process. As discussed in paragraph 3.16, the Council consulted on modifications to allocate a number of new sites to accommodate the delivery of further housing capacity. This work is in line with the Council's long-standing priority to deliver high quality housing to meet the needs of our residents, as set out in Objective 1 of the Draft Plan.

### **Further Actions Proposed**

- Continue to work to progress the Local Plan through the examination process with a view to adoption to support housing delivery.



## Action Point 5: PPG potential actions for improving housing delivery

### *2018 and 2019 Action Point*

Assess suitability of PPG potential actions for improving housing delivery in Islington

PPG action	LBI response
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.	<p>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.</p> <p>Outside the Local Plan making process Islington Council New Build team is working on a number of projects with CCG supported by funding through the One Public Estate programme to bring forward proposals to intensify use of public sector land with healthcare facilities and housing.</p>
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. Pentonville Prison, Holloway Prison, there is currently no indication that development will stall to the degree that site-specific actions will be necessary to expedite site delivery.
Offering more pre-application discussions to ensure issues are addressed early.	See above – paragraphs 3.4 - 3.5.
Considering the use of Planning Performance Agreements.	See above – paragraphs 3.4 - 3.5.
Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites.	Recent 'call for sites exercise' was conducted between 2016 and 2018. Further housing sites have also been identified as part of the Local Plan examination process.
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.	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. As part of the Local Plan examination process modifications are proposed to several site allocations to help enable the delivery of housing.
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

PPG action	LBI response
	other needs. In that sense, Article 4 Directions provide important protections for employment floorspace, and while they may restrict potential housing delivery in certain locations in particular the CAZ, outside the CAZ Article 4 Directions are very specifically targeted to key sites and areas and are important to help balance housing delivery alongside the need to plan for the provision of jobs.
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 their discharge phased on approved sites, and standardised conditions reviewed.	There is no evidence to suggest that planning conditions have been, or will be, a 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, work pro-actively to keep up to date on the latest market conditions 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 is seeking to maintain the brownfield land register (BLR) with as up to date information as possible. 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.	The expected housing capacity from all allocated sites in the emerging Local Plan 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

PPG action	LBI response
	developers, for example SME builders, to develop in Islington.