

# **GOLDEN LANE ESTATE** **RESIDENTS' ASSOCIATION**

Simon Greenwood  
Principal Planning Officer  
Major Applications Team  
Development Management  
Planning and Development Division  
Environment and Regeneration Department  
London Borough of Islington  
Islington Town Hall  
Upper Street  
LONDON N1 2UD

*By email: Simon.Greenwood@islington.gov.uk*

14 September 2017

Dear Simon Greenwood,

**Re: P2017/2961/FUL**  
**Former Richard Cloudesley School, 99 Golden Lane, London EC1Y 0TZ**  
**Letter of Objection**

I am writing on behalf of the committee of GLERA - the Golden Lane Residents' Association. We have held four public meetings for local residents to review the design in detail and this letter represents the view of the overwhelming majority at those meetings and our other consultations.

GLERA is designated as one of the stakeholders, along with other local residents.

This letter is to be read alongside the detailed comments on the application attached and Alec Forshaw's analysis of the planning application, also appended to this letter, that was commissioned by GLERA. Our arguments are laid out there in full. His analysis makes reference to relevant planning documents and the Golden Lane Estate Listed Building Management Guidelines, a revised version of which was adopted in 2013 by the City of London as Supplementary Planning Document.

The residents are determined that any development immediately adjacent to the estate should respond sensitively to its setting in terms of architectural heritage and quality of life for present and future residents.

## **The Proposals**

We are opposed to the basic principle of attempting to fit both a double entry school and a residential tower block on to this site. There is already great pressure on existing green spaces in the area - this development will simply increase that.

While we appreciate the pressing need for social housing, we consider that any new buildings on this site needs to respond sympathetically to the existing urban environment. It needs to be of a high quality that will not impact negatively on already existing housing, and adequately provide for its own future residents in terms of green space and other amenities.

The proposal should be considered in the context of the development of Bernard Morgan house, also on Golden Lane, within the boundary of the City of London. Bernard Morgan House previously provided 120 units of subsidised accommodation for key workers (police officers) and is being replaced by a new residential block of 99 private luxury flats with no affordable housing. The proposed 66 units in this proposal still fall short of the affordable housing that Bernard Morgan House previously provided.

## **Consultation**

We consider that there has been a poor level of consultation with Golden Lane Estate Residents. The project was being developed for over a year before we were consulted. By then the basic principles of the development had been established: a two level entry academy and residential tower block to be built on the site. Small tweaks to the proposal do not address the central issue of over-development, the huge impact such a development would have on its immediate environment, nor do they address the fact that both the school and the residential block are compromised, from the outset, by not being given enough space.

In addition, the proposed development is cross-boundary. This raises sensitive issues: firstly part of the Golden Lane Estate is being absorbed into the site. Secondly, it is challenging for residents in both boroughs to navigate the planning application process. For example, residents of Golden Lane Estate are engaging with planning teams from two boroughs and two planning committee meetings. This is making an already poor consultation process even more confusing: we are not convinced that our voices are being heard.

Moreover, the scheme has not achieved approval within Islington Council. The Design Review Panel considered the scheme three times at pre-application stage and has raised each time serious concerns about the design and massing. At its last review in May 2017 members of the Panel continued to raise concerns regarding the height and dominance of the residential development on the street scene, particularly in views from Old Street and Banner Street.

## **Petition**

Also attached to this letter is a petition of over 1240 signatures, objecting to the proposal. This is a sizeable number of signatures for an individual planning application, signed by people from over the world. This illustrates how significant the estate is, not just locally, but nationally and internationally.

## **Planning Policy, Public Benefit and Optimum Viable Use**

GLERA considers that this proposal breaks with national and local policy on all important counts. Please see Alec Forshaw's analysis for a full breakdown of this.

## **Conclusion**

- This is over-development of a small site.
- The proposals make no contribution to the provision of additional public open space in the area and will put more pressure on existing green spaces.
- There will be a major sound impact on the estate, and loss of natural light, particularly for residents of Hatfield House and Basterfield House.

- The new residential tower will overshadow Banner Street.
- This is not the right place for a new school - this location is far from where they are needed in Islington, and they are not needed within the City of London.
- The multi-purpose school sports hall is poorly located for public access, and makes no contribution to its surroundings. In addition, Golden Lane Estate already has an accessible Community Hall.
- The proposal causes substantial harm to the setting of the Golden Lane Estate and the St Luke's Conservation Area. Golden Lane Estate is listed Grade 2 and Grade 2\*
- The excessive density of development and lack of amenity space places a major question mark over the quality and suitability of the accommodation provided, particularly for family housing.
- The proposal breaks with Planning Policy, local and national, in terms of building heights, massing, density, and other important factors.
- This is not the Optimum Viable Use of the site.

Therefore, we consider that the benefits do not outweigh or justify the harm caused to Golden Lane Estate and St Luke's Conservation Area. We consider that the site should be redeveloped more sympathetically, with less harmful impact on the heritage assets and on the amenities of neighbouring residents whilst achieving equal benefits. We request that the height restrictions of the Finsbury Local Plan be observed, that the Local Planning Authorities consider a scheme of less density, and that in its current form the planning applications should be refused.

Should permission be granted, we will consider Judicial Review.

Yours sincerely,



**Tim Godsmark**

Chair

Golden Lane Estate Residents' Committee

rca.glera@gmail.com

23 Hatfield House  
Golden Lane Estate  
London  
EC1Y 0SJ

# **AN INDEPENDENT APPRAISAL OF PROPOSALS FOR THE RICHARD CLOUDESLEY SCHOOL, GOLDEN LANE EC1**

**L.B.Islington Planning Application Ref: P2017/2961/FUL**

**City of London Planning Application Ref: 17/00770/FULL**

Demolition of the former Richard Cloudesley School, City of London Community Education Centre, garages and substation, erection of a 3 storey building with rooftop play area (Class D1) (2300.5 sqm GEA) and a single storey school sports hall (Class D1) (431 sqm GEA) to provide a two-form entry primary school, erection of a 14 storey building to provide 66 social rented units (Class C3) (6135 sqm GEA), landscaping and associated works. Duplicate application submitted to the City of London as part of the site falls within the City.

## **Brief Description of Proposals**

1. The scheme proposes the comprehensive redevelopment of the former Richard Cloudesley School and part of the north edge of the Golden Lane Estate, comprising a mixed use scheme to provide a new two-form primary school (the City of London Primary Academy), plus nursery provision, together with a new block of housing facing Golden Lane.
2. The school comprises an L-shaped three storey classroom range plus a screened rooftop play ground which effectively creates a scale of four storeys. In addition there is a single storey double-height hall on the south side.
3. The residential block occupies the frontage to Golden and rises to 14 storeys in height for most of its length, and comprises 66 flats.
4. The site straddles two boroughs. While the majority of the site lies within the London Borough of Islington, the southern edge of the site encroaches into the City of London. Planning applications are therefore being made to both local authorities by the applicant who is the City of London Corporation.

## **Method of Appraising the Proposals**

5. This document appraises the current proposals in terms of its various impacts on designated and undesignated heritage assets, and assesses its merits against the following material considerations:
  - National Planning Policy Framework March 2012
  - National Planning Policy Guidance March 2014
  - The London Plan 2016
  - London Borough of Islington Local Plan 2013
  - Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell) 2013

- St Luke's Conservation Area Guidelines
- City of London Local Plan 2015
- Golden Lane Estate Listed Building Management Guidelines - Supplementary Planning Document 2013

## **THE SITE, THE HERITAGE ASSETS AND THEIR CONTEXT**

6. The majority of the site includes the former Richard Cloudesley School, built in the early 1970s as a special needs school for the London Borough of Islington. This was constructed on land that had previously been occupied by buildings on the south side of Hatfield Street and the north side of Basterfield Street, which had run west of Golden Lane, parallel to Baltic Street before the war. The older buildings here and further south had been bombed and cleared after the war to provide an area for comprehensive redevelopment which included the Barbican and Golden Lane sites.
7. The existing school buildings, now vacant, are low-rise, and in a modernist style with distinctively angled pitched roofs. The frontage to Baltic Street retains brick boundary walls from the old Board School playground.

### **Golden Lane Estate**

8. The site lies immediately to the north of the Golden Lane Estate, and includes part of the original curtilage of the Estate, presumably with the intention of creating a straight southern boundary and a larger development site. The Golden Lane Estate, designed and constructed between 1952 and 1960 by Chamberlin Powell and Bon, is a Designated Heritage Asset of exceptional significance and importance. It is recognised as one of the best and most influential post-war housing estates in Britain and is statutorily listed Grade II, and partly Grade II\* (the Crescent House frontage to Goswell Road).
9. The Golden Lane Estate originally lay within the Metropolitan Borough of Finsbury, which became part of the London Borough of Islington in 1965, but following the boundary changes of 1994 was transferred into the City of London. This appeared to make some sense at the time, as the Golden Lane Estate was owned and managed by the City Corporation, and still is.
10. A petition of some 767 signatures has been presented to the City Corporation requesting the designation of a new conservation area to include the Golden Lane Estate and neighbouring sites including Bernard Morgan House, and the Corporation have agreed to investigate this and report back.

### **St Luke's Conservation Area**

11. The site lies partly within the St Luke's Conservation Area, first designated by the London Borough of Islington in 1975 but substantially extended in 2002. The Conservation Area includes the 1888 Board School in Baltic Street, now occupied by the London College of Fashion. The western end of the original curtilage of the Board School, beyond the school keeper's house is within the application site, including the brick school playground boundary walls.

12. The former school is a particularly fine example of its type designed under the direction of the London County Council architect E.R. Robson. It has an impressive north elevation facing Baltic Street, with an expressive gable visible along Honduras Street, but also boasts a fine southern elevation in the form a broad curving bay. This was always intended to be seen by the public from the street, facing as it originally did onto the north side of Hatfield Street, which had buildings only on its southern side. The southern elevation of the Board School remains clearly visible from Golden Lane and contributes very positively to the character and appearance of the area.
13. The part of the St Luke's Conservation Area which is close to the application site is characterised by primarily late 19<sup>th</sup> century commercial buildings, former warehouses, mainly 3 or 4 storeys in height. The buildings on the corner of Baltic Street and Golden Lane are particularly good examples and together with the school, make an important contribution to the character and appearance of the conservation area.
14. Particular care has been taken by the local planning authority over the last twenty years in controlling roof extensions in this part of the conservation area. Roof extensions on existing three or four storey buildings in Golden Lane, Banner Street, Garret Street and elsewhere have been modestly scaled and set back from the street frontage to minimise their impact.
15. The only tall building within the St Luke's Conservation Area is the tower and spire of St Luke's Church, which is a significant historic landmark. The top of the tower, with its unusual taper and extraordinary weather-vane can be seen from Fann Street, south of the Golden Lane Estate, across the top of Basterfield House.

## **POLICY CONTEXT**

### **National Planning Policy Framework**

16. Various parts of NPPF are relevant to the development of the site, including a requirement for good design and sustainable development, provision of good quality housing, and policies on conserving and enhancing the historic environment.

### **The London Plan 2016**

17. The London Plan provides an important context for housing standards, density of development and the paramount importance of good design.

### **Local Development Framework**

18. Islington's Local Plan provides guidance on the suitable locations for tall buildings across the Borough. The application site is not an area that has been identified by Islington Council as being appropriate for high buildings. It does not form part of or lie close to the cluster of tall buildings around the Old

Street roundabout and the adjacent part of City Road, or the clusters around City Road Basin or Chiswell Street. These locations for existing and new tall buildings are a long way from the application site, and have no visual connection.

### **The Finsbury Local Plan 2013**

19. The site lies within an area identified in Figure 17 of the Finsbury Local Plan where a building height of around 6 storeys would be appropriate. Policy BC9 makes it clear that “the existence of a tall building in a particular location will not of itself justify its replacement with a new tall building on the same site or in the same area”.
20. The site is allocated as Site BC34 in the Finsbury Local Plan which makes specific proposals for future development of the Richard Clousdesley School site. It notes that the previous school function will be fully incorporated within the Golden Lane Campus, and recommends that the site is redeveloped to provide housing, open space and play facilities. It states that any new buildings should be sensitively designed to minimise impacts on neighbouring residential buildings, and that proposals should conserve and enhance heritage assets, including the neighbouring locally listed buildings to the north, the Golden Lane Estate, and the St Luke’s Conservation Area.
21. The site also falls within an area of deficiency in access to nature. The Finsbury Local Plan states that public open space should be provided to offset the loss of playground space and to relieve pressure on Fortune Street Park.

### **Conservation Area Policies**

22. Policies for the St Luke’s Conservation Area stipulate that new buildings and extensions to existing buildings, should conform to the height, scale and proportions of existing buildings in the immediate area, using materials sympathetic to the character of the area in terms of colour and texture

### **Golden Lane Estate Listed Building Management Guidelines Supplementary Planning Document 2013**

23. This important document, produced jointly by English Heritage (now Historic England) and the City of London Corporation, and adopted by the City Corporation as SPD in 2013, stresses the holistic significance of the Golden Lane Estate. “The Estate should be appreciated in its entirety: not only for its various components but also for its setting within the surrounding urban fabric. The views from and into the Estate have become important, and part of its special interest lies in its relationship with adjoining buildings. Their height, scale, mass form, materials and detailing could, for example, have an impact on that special interest. Any development on the immediate boundaries of the listed area should take into account the significance of the Estate’s setting. No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the Estate as a whole. The relevant local authority should, therefore, take into account the

significance of the Estate's setting to its special architectural interest when considering any developments on the immediate boundary of the Estate.”

## **EVALUATION OF PROPOSALS**

### **Demolition**

24. The existing Richard Cloudesley School buildings are of some interest as an example of the typology of low-rise primary schools built in Islington by the Inner London Education Authority (ILEA) in the late 1960s/early 1970s following the Plowden Report 1965 which recommended a domestic scale – ‘little buildings for little people’. It is acknowledged however that the original special needs educational use of the buildings has ceased, and been relocated nearby in the Golden Lane Campus. Redevelopment is acceptable, in principle.
25. The proposal involves the demolition of part of the original Board School boundary wall on Baltic Street, west of the former School House, which is regrettable and avoidable, at least in its totality.

### **Archaeology**

26. The site lies within the Moorfields Archaeological Priority Area, and there is potential for significant archaeology on the site, a short distance outside the Roman city walls. It seems most unlikely that a thorough investigation of the site was carried out after the war. At the very least, a watching brief is required while demolition, excavations and foundation works are being carried out on any new development.

### **Scale and Massing of New Buildings**

27. The proposed residential block rises to a height of 46 metres above ground level, which makes it a tall building in policy terms, well over the threshold of 30 metres. The site lies outside an area where tall buildings are either promoted or considered appropriate, and thus presents a fundamental conflict with policy.
28. Islington's policy on tall buildings does potentially allow exceptions where there are exceptional or outstanding design merits for the proposal. That is very definitely not the case with the current proposal, which breaks almost every principle of good urban design.
29. The scale and height of the residential block poses serious challenges to the existing townscape and historic environment. It will be extremely dominant in the immediate and wider urban context. In terms of the conservation area it will challenge the scale and dominance of the spire of St Luke's Church (Grade I listed), which is the main landmark in the area. It will have a hugely detrimental impact on the listed Golden Lane Estate.

30. While there are post-war residential slabs to the south and south-east of the site, it is significant that none of these lie immediately on the back edge of any existing street line, but are set back and located within substantial areas of open space, following Corbusian principles. All the blocks on the east side of Golden Lane, with the exception of the very narrow six-storey No.88, are well set back from the street, so that their impact is reduced. Most of the Peabody Estate buildings are 6 or 7 storeys, very similar to the lower blocks of the Golden Lane Estate. The 13 storey Peabody Tower is well set back from the street, behind a well-planted garden.
31. An argument is put forward by the applicant that the proposed residential slab relates to and replicates the mass of Great Arthur House, and thus acts as a natural and acceptable 'extension' to the Golden Lane Estate. The argument shows a complete failure to understand the master plan and overall layout of the Golden Lane Estate. Great Arthur House is the centre-piece of the estate, oriented north-south and carefully placed as part of the orthogonal estate layout so that the width of the open areas to its east and west were equal to or greater than the height of the block. Put more simply, Great Arthur House could be laid down on its side in either direction in the communal spaces to its east or west. For Chamberlin Powell and Bon, the spaces between the buildings were as important as the buildings themselves.
32. By contrast, the proposed tower on the application site (actually taller than the residential element of Great Arthur House excluding its sculpted roof element), has no space around it to ameliorate or soften its massive bulk. The proposed residential slab is positioned so as to rise hard up against the existing pavement, both denying it any space in which to stand, and resulting in an over-bearing impact on the street.
33. While it may have been accepted by the City of London within its 'cluster' of tall commercial buildings in the eastern part of the City that these might rise vertically from the back-edge of pavement (e.g. the Bishopsgate Tower), producing a New York-style canyon effect, this is not a premise that should be remotely acceptable in a residential or mixed residential/commercial area.
34. The urban design and heritage consultants for the applicant presume that because there are some tall buildings within the vicinity of the site then there is a straightforward case for allowing another. It is a false and self-serving argument. If repeated elsewhere in Islington it could be used to justify towers anywhere in the borough, for example at Highbury Corner (next to Dixon Clark Court), Clerkenwell (next to Michael Cliffe House) or in King's Cross (next to Bevin Court).
35. In terms of the application site the very tall Barbican towers are a considerable distance away. Indeed when viewed from the east side of Golden Lane between Garret Street and Banner Street the Barbican towers appear to be a similar height to Great Arthur House. This also happens to be one of the best public views of the ensemble of the listed Barbican towers and Great Arthur House, with the low-rise elements of the Golden Lane Estate in the foreground. The proposed residential slab will block this view. It will be

overpoweringly prominent in views along Golden Lane, from Old Street in the north and approaching from the south from Beech Street. It will rise dramatically above the existing low-rise blocks of Basterfield House, Stanley Cohen House, Bowater House and Bayer House.

36. From within the Golden Lane Estate the new slab will loom over Basterfield House when viewed from the communal open space to its south. The size and proximity of the new residential block will have a very detrimental impact on the appearance and setting of the Golden Lane Estate. It will destroy the prominence of Great Arthur House as the focus of the Golden Lane Estate.
37. Overall, the proposals cause very serious harm to the setting of the Golden Lane Estate, and run completely contrary to the principles involved in its original layout. The Golden Lane Estate Listed Building Management Guidelines are admirable in extolling the high importance of the Estate, its layout and its setting. Given that English Heritage was a contributor and co-author of the Guidelines, it is extraordinary that the current advice of Historic England appears to pay them little attention.
38. From within the St Luke's Conservation Area the proposed residential block will be very dominant, rising above the gable of the former Board School in Baltic Street when viewed from Old Street along the length of Honduras Street. The contrast in scale between the new slab and the commercial buildings in the conservation area will be extreme, a juxtaposition which Chamberlin Powell and Bon handled with far greater sensitivity and understanding with the design of Hatfield House.
39. Similarly the view westwards along Banner Street from Whitecross Street will be dominated by the proposed new block on the west side of Golden Lane, belittling the scale of buildings within the conservation area on the north side of Banner Street.
40. The new frontage to Golden Lane will block existing views of the fine south elevation of the Board School. Only a limited side-on view will remain visible in the narrow gap left in the Golden Lane frontage. The applicant's argument in paragraph 7.148 of its Planning Statement that the new residential building will improve the setting of the locally listed buildings 'by removing a gap' and 'providing a better townscape context' is extremely unconvincing. The locally listed buildings will be simply dwarfed by the proposals.
41. The view of St Luke's spire currently visible from Fann Street will be lost, obstructed by the proposed new residential block.
42. The scale of the new L-shaped school block is also not inconsiderable, slightly higher than the Victorian Board School which it abuts, and equal in height to Hatfield House. Even without the residential element, the new school on its own would present a sizeable addition to the townscape.

## **Design**

43. It is telling that the applicant has chosen to attempt to differentiate the tall element of the residential block by placing it on a podium (although neither the tower or podium are set back from the pavement edge building line). The podium block, in dark materials, attempts to be sympathetic with the architectural language of Basterfield and Stanley Cohen Houses, as if to concede that this is an appropriate scale and design for the street. The attempt to ‘disguise’ the tall element by using paler colours, as if it might somehow disappear or recede from view, is an unconvincing and unsuccessful device.
44. In terms of being an ‘outstanding’ or ‘exceptional’ design, which might justify a major departure from tall buildings policy, there is nothing to indicate this is the case. Islington Council’s Design Review Panel considered the scheme three times at pre-application stage and has raised each time serious concerns about the design and massing. At its last review in May 2017 members of the Panel continued to raise concerns regarding the height and dominance of the residential development on the street scene, particularly in views from Old Street and Banner Street. The Panel felt that the architectural expression was unresolved and did not sit well as currently proposed.
45. There is also a fundamental point that the mass, bulk and scale of the proposed residential block is so flawed that no amount of tinkering with design details or materials will alleviate its adverse impact.

## **Impact on adjoining residential amenity**

46. The proximity of the new residential block has a highly detrimental impact on the outlook and overshadowing of existing flats in Basterfield House. Even though the 4<sup>th</sup> – 13<sup>th</sup> floor element of the block has been moved away from the southern boundary of the site, the four storey element, taller than Stanley Cohen House, will have a major impact.
47. Information provided by the applicant (paragraphs 7.194 and 7.195 of the Planning Statement) states that the existing recessed rooms of Basterfield House and Hatfield House will be adversely affected by the proposals. The Statement ‘blames’ this on the presence of the original balconies and projections, suggesting that if these did not exist then there would not be a problem. It is a ludicrous argument, as they are clearly part of the listed building. Any reduction in day-lighting to existing habitable rooms should be avoided.
48. The school hall, dining room and kitchen, located on the southern boundary of the site will also have a detrimental impact on the western end of Basterfield House.

## **Land Use**

49. Mixed school and residential development has been done before in Islington, notably in King Henry’s Walk and Hungerford Road/York Way, but

inevitably involves compromise on the part of both elements. Particularly issues of concern are overlooking of classrooms and play areas from residential properties, and the provision of adequate amenity and play space for both. The proposal to accommodate a two-form entry primary and infant school together with a large amount of housing appears to be over-ambitious, resulting in a gross over-development of a comparatively small site (0.4 hectares). It is telling that the applicant's Design and Access Statement lists its first 'Design Principle' as maximising the development of the site.

### **The School**

50. The combined two-form entry and nursery provision will accommodate 458 children. This in itself is an enormous intensification in educational use over the previous school on the site. The scale of the new school buildings is significant, equal to the Board School adjacent.
51. The proposed location of the sports hall and kitchens along the south-west edge of the site has an undesirable impact on the residents of Basterfield House. The building is 3.5 metres tall along the boundaries of the site, comprising an increase in what is currently there. The main part of the hall is 5.5 metres in height, and although set back by two metres from the boundary, will remain very close to the Basterfield House flats.
52. Venting of smells from the kitchens might also have a negative impact on nearby flats.
53. The rooftop playground is screened by a wall in an attempt to contain noise, but the open playground areas are not and will likely be a major source of noise, which will be very difficult to contain. The noise assessment report produced by the applicant appears to have ignored this aspect of the scheme. The only mention of noise mitigation measures in the applicant's report is the 'quiet teaching space' near Hatfield House.

### **Residential Density**

54. The proposed residential density is grossly in excess of the maximum allowed in the London Plan or Islington's Local Plan, even allowing for good access to public transport. The London Plan allows for a range of 650 – 1,100 habitable rooms per hectare in areas of excellent public transport, and recommends that the maximum should only be exceeded where social infrastructure, open space and play facilities are adequate.
55. With 187 habitable rooms in the proposed scheme, the residential density will be around 2,000 habitable rooms per hectare, almost double the recommended maximum. This super-high density is not mitigated by generous provision of public open space. Indeed there is a complete lack of open space in the scheme itself and an existing deficiency in the local area.

56. The density proposed is enormously greater than existing residential densities in the area, including Great Arthur House, the whole of the Golden Lane Estate and the nearby Peabody estate.
57. It should be noted that in pre-application discussions between the City and Islington Housing Departments, it was agreed that the mix of unit sizes and apportionment to each authority would apply in a scheme of only 40 units, if that was a consequence of planning or other unforeseen development restrictions. A smaller, less dense, scheme has therefore been contemplated.

### **Residential Mix and Tenure**

58. While the provision of 66 new units of social rented housing may seem highly desirable, this must be considered in the context of recent decisions nearby within the City of London. The planning approval in May 2017 for the redevelopment of Bernard Morgan House permits the replacement of a block which previously provided 120 affordable housing units for key workers (police officers) by a new residential block of 99 private flats with no affordable housing. A sum of £ 4.5 million is included in a Section 106 agreement to fund off-site provision, presumably contributing to some of, but by no means all, the housing proposed on the Richard Cloudesley School site. Care must be taken therefore in how many boxes are ticked in terms of meeting targets for affordable housing by the two boroughs. Under normal circumstances, the 99 private flats approved at Bernard Morgan House should fund 66 affordable units off site. Taking the two sites together it would appear that the Richard Cloudesley School site merely meets the off-site requirements of the proposed redevelopment of Bernard Morgan House. Overall, it still falls short of the affordable housing that Bernard Morgan House previously provided. If social housing were being provided on the Bernard Morgan House, then there might be less of an argument to put so much on the Richard Cloudesley School site.
59. The mix of units provides a considerable number of 2 and 3 bed units, potentially accommodating children. None of these units have gardens, and only have balconies of limited size. Perhaps because of overlooking issues with the school at the lower levels, and the arrangement of deck access, the balconies to the 3 bed units face east, and so receive no afternoon sun.
60. The Finsbury Local Plan 2013 highlighted the need for socially rented family homes in the area, but it is highly questionable whether it is right to provide these in a slab block of such high density or with so little play space.
61. The applicant's Design and Access Statement notes that the position and design of the housing has been so arranged because they 'need to be marketable with their own distinct address.' Presumably the flats will not, in fact, be marketable.

## **Open Space and trees**

62. Despite the requirements of the Finsbury Plan, the proposals make no contribution to the provision of additional public open space in the area. The area is already deficient in open space, and the only nearby facility, Fortune Street Park, is heavily used, including by children from the Golden Lane Campus. Islington Council's Parks Department and the Friends of Fortune Street Park made strong objections to the City Corporation regarding the adverse impacts on the park of the proposed redevelopment of Bernard Morgan House, objections that were completely ignored.
63. The applicant's Planning Statement states that, using the GLA's planning guidance, an area of 430 square metres of separate children's play space should be provided for the residential element of the scheme. No such space is provided. The excuse given is that 'the site is heavily constrained in terms of the available area.' It is symptomatic of the overdevelopment of the site.
64. There is perhaps an assumption by the City that the new residential block can be regarded as an 'extension' of the Golden Lane Estate, and that the additional residents will be entitled to share its existing private facilities. The applicant's Design and Access Statement labels the spaces within the Golden Lane Estate as 'public', when in fact they are semi-private, for the benefit of the residents of the Estate. The over-used Fortune Street Park is the only public open space in the immediate vicinity of the site.
65. The proposal involves the needless loss of existing semi-mature trees in the south-west corner of the site. These silver birch and cherry trees are an important amenity in an area where there are few trees. They are appropriate for their situation, are in good health and have a reasonable life-expectancy. This is confirmed by Appendix 3 of the applicant's Tree Report, which confirms that all the existing trees have a future life span of 10+ or 20+ years. They should be retained. The proposed replanting of young trees will not be adequate compensation.
66. The applicant's suggestion that it is retaining existing mature plane trees in Baltic Street is a spurious claim, as they are beyond the application and development site.
67. The location of the kitchens and double-height sports hall in the south-west corner of the site will have a detrimental impact on the adjacent Golden Lane Estate allotments in terms of shadowing.

## **Public Realm and Permeability**

68. A considerable part of the ground floor to Golden Lane is made up of access gates to refuse storage, utilities and a substation, providing an extremely unappealing frontage for pedestrians. The school entrance will be busy at the beginning and end of the school day, but completely dead at other times. Security of schools is a major issue, understandably preventing any sense of permeability or visual access into the site.

69. Despite the City of London's intention to improve the public realm along Golden Lane, following its area development strategy produced by Publica, the ground floor uses do little to produce an animated frontage outside school opening and closing times.
70. The proposed public access to the community use of the hall is down a narrow alleyway next to Hatfield House. It is a tortuous and uninviting route. The hall itself in its proposed position contributes nothing to the public realm. It would be far better to locate the multi-purpose hall on the Golden Lane frontage, where it might contribute to the vitality of the street.

### **Sustainability**

71. While the new buildings themselves are designed to comply with current requirements for sustainability, the most questionable consequence of the proposal is traffic generated by the new school. The normal requirement for primary schools in urban areas is that pupils should be able to walk to and from home. A school should thus be located within the catchment area for the pupils it will serve. There is no evidence that this will be the case with the proposed school here. The existing Golden Lane Campus provides infant and primary places for the local catchment area and special needs places for a wider area. The applicant's Travel Plan makes an assumption that all the pupils will be live very close to the school and thus be able to walk, accompanied by a parent or guardian. However there is a strong possibility that pupils at the proposed new school will not all live within walking distance and will be driven by bus or car.
72. The proposal involves the loss of existing garages which are part of the Golden Lane Estate and which currently provide valuable parking for disabled residents. There is no proposal to replace this.

### **BALANCE OF HARM AGAINST PUBLIC BENEFITS**

73. The proposals cause harm to designated heritage assets, notably the setting of the Golden Lane Estate and the St Luke's Conservation Area. Some residents of the Golden Lane Estate will argue that the harm is substantial, invoking consideration under Paragraph 133 of NPPF. Others may argue that the degree of harm is less than substantial, triggering consideration under Paragraph 134 of NPPF. In either case, the local planning authority is required to weigh or balance the harm caused against the public benefits achieved by the proposal.
74. It should also be noted that while it has been held that 'substantial' harm might require the virtual destruction of the significance of a designated heritage asset, the implication is that 'less than substantial' harm can involve very serious harm to the asset. In all cases, it has been held that when balancing harm against public benefit, heritage matters should be given very considerable weight. The Planning Act requires that 'special' care be given to conserving and enhancing the historic environment.

75. In addition the claims of the applicant that the proposals will provide significant public benefits need to be examined in detail.

### **Provision of school**

76. While it is the case that Islington's population is increasing, resulting in a need for more school places, it is far from evident that Golden Lane is the right location. New primary school provision should have regard to the greatest concentrations of family housing. The recent creation of the Golden Lane Campus, comprising the redevelopment and enlargement of the former Prior Weston School, has already created a very sizeable new primary education facility in the immediate vicinity of the site. The Golden Lane Campus already accommodates in the order of 800 pupils. The school in Moreland Street has also been significantly enlarged recently. Given the location of the site on the very edge of borough, it is doubtful that the site successfully meets identified educational need within the London Borough of Islington.
77. There is no convincing evidence that either population levels or numbers of children of primary school age are rising significantly within the City of London, and certainly not to a level that justifies a new two-form entry school.

### **Provision of Housing**

78. The proposal includes 66 new social rented housing units, which is welcomed by Islington. In reality it does little more than meet the City of London's affordable housing obligations, providing off-site provision conveniently outside the borough, for luxury residential developments within it. The excessive density of development and lack of amenity space places a major question mark over the quality and suitability of the accommodation provided, particularly for family housing.

### **Provision of Community Facilities**

79. It is intended that the multi-purpose school sports hall will be available for community use. However the hall is poorly located for public access, and makes no contribution to the public realm. The hall cannot be regarded as an adequate alternative to public open space and external play space. Nor is it clear what the community demand for the hall will be, given that there are existing community hall facilities nearby. Given its location, tucked away at the back corner of the school site, rather than facing the Golden Lane frontage, it remains unclear how it will be used and managed by the wider community.

## **OPTIMUM VIABLE USE**

80. Paragraph 134 of NPPF requires that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'. National Planning Policy Guidance 2014 suggests that the issue of Optimum Viable Uses should include consideration as to whether an alternative scheme or proposal might cause less

harm whilst also achieving equal or greater public benefits, even if that scheme is not the most profitable.

81. It is surely the case that a less dense development, achieving fewer but higher quality housing units, together with the provision of new public open space, better public realm and a multi-purpose hall that is more accessible to the community would result in a far better balance of public benefit against harm caused, and would enhance the local area rather than putting it under great stress.

## **CONCLUSION**

82. The proposed redevelopment of the Richard Cloudesley School in Golden Lane will cause very serious harm to the significance of the designated heritage assets that comprise the Golden Lane Estate and the St Luke's Conservation Area. It is considered that this harm should be accorded very great weight.
83. The excessive development of the site will bring further pressure to bear on existing over-stretched local facilities, notably the Fortune Street Park.
84. Although the scheme does provide public benefits from the point of view of the London Borough of Islington in terms of social housing, this provision should be seen in the context of the City of London trying to meet its own obligations to provide social housing, but seeking to do this outside its own boundaries. The effective loss of affordable housing units for key workers at Bernard Morgan House (within the City) should be taken into consideration. The overall net gain in affordable housing is marginal.
85. The very high density and lack of external garden or play space makes the quality of the family housing highly questionable.
86. The school might be seen as a public benefit, but the location of this new facility is debatable, given that the demand for new school places is not local. It is highly likely that many pupils will need to be driven considerable distances from their homes to the new school, which is unsustainable and undesirable in terms of community cohesion.
87. The proposed community use is poorly located in terms of independent public access.
88. Overall it is considered that the benefits do not outweigh or justify the harm caused. It is considered that the site should be redeveloped more sympathetically, with less harmful impact on the heritage assets and on the amenities of neighbouring residents whilst achieving equal benefits. In its current form the planning applications should be refused.

**Alec Forshaw**  
**August 2017**

**The Author**

Alec Forshaw (MRTPI, IHBC) worked as a town planning, urban designer and conservation officer with the London Borough of Islington from 1975 to 2007. He appeared as an expert witness at the 2014 Public Inquiries on Smithfield Market and the Liverpool Welsh Streets. He lectures, campaigns and acts as a trustee in a volunteer capacity for many heritage organisations, including the Victorian Society, the 20<sup>th</sup> Century Society, the Heritage of London Trust, the Churches Conservation Trust, SAVE Britain's Heritage and the Islington Building Preservation Trust.

He is the author of *Smithfield, Past, Present and Future* (2015), *1970s London* (2012), *Twentieth Century Buildings in Islington* (2001) and *New City: Contemporary Architecture in the City of London* (March 2013), and co-author of *The Barbican: Architecture and Light* (2015).

**Comments on Application from Golden Lane Estate Residents' Association (GLERA)**

Islington Application: P2017/2961/FUL

City of London Application: 17/00770/FULL

13 August 2017 v.5

A series of four public meetings were held by GLERA to consider the response to the proposals. This schedule summarises the comments made at those meetings and subsequently and forms part of our objection to the proposed development.

The meetings agreed the following resolutions:

- 1) *"We welcome social housing on this site, however the COLPAI scheme is not fit for purpose".*
- 2) *"The scheme should properly respond to - and extend - the existing Golden Lane Estate, and should minimise negative impact to the area, facilities and residents."*

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.1	Density (Housing)	Proposals are for 66 housing units. CoL contend that the social housing gain outweighs the planning policy issues of the site.	Paragraph 134 of NPPF requires that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'.	The choice of the tower typology is inappropriate for the site as it results in an overly inflated scheme. The size has been driven by efficiency considerations rather than a sensitive approach to the urban context.  National Planning Policy Guidance 2014 suggests that the issue of Optimum Viable Uses should include consideration as to whether an alternative scheme or proposal might cause less harm whilst also achieving equal or greater public benefits, even if that scheme is not the most profitable.
1.2	Density (Housing)	Proposal is for 66 units on approximately 0.071 hectares site. Proposal is for 173 habitable rooms which would give a density of 2436 hr/ha		The density is more than double the maximum anticipated density in the London Plan and five times the density of the original estate. This site footprint should have no more than 78 habitable rooms.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.3	Density (School)	Proposals increase the school population from approx 80 to 458	Islington Primary and Secondary School Roll Projections from 2016/17 to 2030/31: Planning Area 6 - Finsbury demonstrates the least demand of any part of the borough. Morelands School re-opened after refurbishment at half strength and has spare capacity which is not being used.	It is noted that the single form entry proposal has been increased to two form entry due to funding conditions imposed by the Education Funding Agency, not because of demand. The five fold increase in pupils on site puts unacceptable constraints on the site layout and density. The proposal should be reduced to single form entry, or the housing element should be removed/ reduced to accommodate the larger school.
1.4	Impact on Heritage Asset and Conservation Area/Context	The design is poorly resolved and does not reflect the design of the listed Estate	The Finsbury Local Plan identifies the RCS site (Site BC34) noting that "proposed buildings must be sensitively designed to minimize impacts on neighbouring buildings"	There is insufficient relationship between the design of the tower block and the scale or detailing of Stanley Cohen House and the Golden Lane Estate. The location of the proposed School Hall impacts negatively on the original masterplan of the site.
1.5	Context	The proposed tower and school hall dominate Golden Lane, Banner Street and the listed Estate	The Finsbury Local Plan identifies the RCS site (Site BC34) noting that "proposals should also conserve and enhance heritage assets, including... the Golden Lane Estate"	The relationship with the listed Estate is poor. The scheme dominates the heritage asset of Golden Lane Estate by its scale and height and proximity (Less than 9 metres). The proposed School Hall competes with the adjacent Ralph Perrin Centre and is insensitively designed with a blank facade.
1.6	Context	Housing element situated along Golden Lane frontage		The proposed 14 storey housing block on an elongated footprint presents itself as a high wall, rather than a slender tower, and will interfere with key views across the estate, and in particular the refurbished Great Arthur House. The housing component is overpowering the exemplary Grade II listed Golden Lane Estate, and Basterfield and Stanley Cohen House in particular. Any new scheme to extend the listed estate should be subservient to it, and there must be an intelligent response to the heritage asset.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.7	Amenity (Housing)	The plans show no amenity areas available to the housing other than private balconies	Islington Development Management Policy DM6.2 (para 6.20) states: <i>“Given the pressures on public open space within the borough and population increases, additional public open space should be provided in new development based on the following standards: 5.21m2 per resident”</i>	Insufficient public open amenity space will result on greater pressure and use of GLE amenity space. In fact the scheme proposes to remove
1.8	Public Open Space	There is no Public Open Space to be provided under the scheme.  Further, approx 275 sqm of amenity space and publicly accessible open land currently part of Golden Lane Estate and the CoLAEC is to be removed by the application.	The City of London Open Space Strategy SPD states that the existing level of public open space is low and proposes: “using the development management process to secure additional open space as part of new developments. Islington’s Local Plan specifies that “Public open space should be provided to offset the loss of playground space and relieve pressure on Fortune Street Park”	It is acknowledged in Islington’s planning policy that Fortune Street Park is already overcrowded and it is now proposed that 66 residential units, in addition to the 100 or so units recently approved at Bernard Morgan site use it as well.  When combined with the loss of open space grabbed by the new development this will result in greater pressure on the available open space and a reduction in quality of existing amenity space.
1.9	Playspace	There is no children’s play space proposed for the development	London Plan, Policy 3.6: The new housing is expected to yield: Under 5: 27 Children 5-11: 11 Children 12+: 6 Children <b>= 430 sqm of children’s play space for the residential</b>	The Planning Consultants state that <i>“The GLA allows for a financial contribution for play provision within the vicinity under a Section 106 agreement”</i>  This is absurd. All the finance from this project is <i>already coming</i> from Section 106 agreements. If this logic is followed the finance will circulate, but the playspace will never be provided and the children will never have anywhere to play..

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.10	Form and Massing (Height)	The residential block is proposed as 14 storeys with 5-6 units on each floor above the ground floor level.	Islington Development Management Policy DM2.1C: "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)."	The resultant residential tower would be on the scale of Great Arthur House and would exceed Islington Planning Policy BC9 and the urban design study of 2010 set out in the Finsbury Local Plan (Figure 17, "Tall buildings and contextual considerations for building heights"). Where Great Arthur House is carefully set with open space around it the new proposed tower sits on the street edge with no open space at all.
1.11	Form and Massing (Tall Buildings)	When taken with development at Bernard Morgan House the effect is to transform the open nature of Golden Lane and the Peabody and Golden Lane Estates and to create a canyon of tall buildings on Golden Lane.	City of London Local Plan 3.14.4: "Proposals for new tall buildings should take account of the cumulative impact of the proposed development, in relation to other existing and proposed tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, which have a detrimental impact on amenity, and maintain pedestrian permeability."	The proposals should be assessed in the context of the recently granted permission for Bernard Morgan House which encloses the Southern side of the Golden Lane Estate, creating a cumulative effect on Golden Lane. There is no public open space provided, contrary to City policy. There is no pedestrian permeability on the site.
1.12	Form and Massing (Housing)	The arrangement of the housing and the school hall block views across the site and decrease the sense of openness which was an essential aspect of the original design of GLE.	From the Golden Lane Estate Listed Building Guidelines: " <i>The single block along Golden Lane was left largely open at ground level to provide access and views of the interior of the estate. The openings were intended to create a link with the Peabody development on the east side.</i> "	One of the defining characteristics of GLE is the long views under/through buildings and this appears to be a missed opportunity. The position of the school hall is problematic, creating a poor relationship with the existing swimming pool and Ralph Perrin Centre and blocking views across the estate; increasing the sense of enclosure.
1.13	Form and Massing (Movement through areas)	The arrangement of the School Hall blocks movement across the estate and the housing is separate.	Islington DMP, Policy DM2.1: New development should "improve movement through areas, and repair fragmented urban form"	The applicants state that this is intended to be "an extension to the Golden Lane Estate". But the new housing and school are completely cut off from the rest of the Estate by the form and layout.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.14	Form and Massing/Layout (Housing)	At 15.6m, the depth of the tower will block views from habitable rooms in Basterfield House	Islington Policy DM2 states that “visual context, such as location and scale of landmarks, strategic and local and other site specific views, skylines and silhouettes, and scale and form of townscape setpieces or urban compositions;	The Eastern end of Basterfield House will be affected resulting in an overwhelming sense of enclosure and loss of daylight to bedrooms,
1.15	Form and Massing (School)	The school building volume is set against and therefore reads as a continuation of Hatfield House		This layout is in conflict with the staggered nature of the residential blocks on GLE. Any new scheme at the fringe of the listed estate should be subservient to it, and there must be a developed response to the heritage asset.
1.16	Form and Massing/Layout (Housing)	The residential development is only 8.5m away from Basterfield House and impacts adversely on the open space around Basterfield House, shading and oppressing it.		In comparison to Great Arthur House there is no space around the tower block - it comes right up to the boundary of the site with GLE. As a result it uses the amenity space of GLE as “part of its setting”. It is a poor neighbour that takes, but does not give. The residential element should be reduced in size and set within the site, not butting up to the boundary with GLE.
1.17	Design Quality	The scheme is cramped on the site and misses the opportunity to emulate the outstanding design of The Golden Lane Estate by constructing a lowered playground level.	From the GLE Listed Building Management Guidelines: “The deep basements from the buildings formerly on the site were exploited to produce courts at different levels, with sunken courts giving access to service roads and stores “	The Ground Floor levels are oppressive and poorly designed in contrast to the life, openness and human scale of the Golden Lane Estate.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.18	Design Quality	Response to Golden Lane Estate		<p>One of the principal criticisms of the proposal is that the opportunity for lowering the level of the playground and creating a basement level looking out into it has been overlooked. This is the pattern throughout the rest of the Estate on Basterfield Lawn, the water garden and the tennis courts and simply in townscape terms, it ought to be replicated. It would mean that:</p> <ol style="list-style-type: none"> <li>1) The impact of noise from the playground would be reduced,</li> <li>2) The tower could be reduced in height and the space redistributed around the site, reducing construction cost as the tower model is expensive to build</li> <li>3) The ground floor level along Golden Lane could be given to other uses, providing life to the facade.</li> <li>4) The School Sports Hall could be integrated with the School</li> <li>5) More efficient use of the site.</li> </ol>
1.19	Blank Facade	More than 50% of the facade of the new housing block at street level comprises rubbish store, substation, cold water storage tank or generator.	<p>Islington's Local Plan: <i>"Premises shall provide and retain clear views into and out of shop windows... to contribute to the attractiveness, safety and vitality of the Town Centre and avoid blank frontages to the street"</i>.</p> <p>Finsbury Local Plan Policy BC9 states that development shall: <i>"Create an interesting street frontage"</i></p>	<p>It is not compatible with modern notions of urban design and placemaking that a street facade that will be predominantly blank. This will cause an unpleasant and unneighbourly street frontage with no interest and consequent issues around security. All over London these blank facades are being got rid of. We felt this aspect of the design is unacceptably poor and will reflect badly on the City of London's design standards.</p>
1.20	Fire Safety	Single Staircase tower block		<p>GLERA question the decision to bring forward a single-storey tower block with one access stair on the pattern of Grenfell Tower. Internal Flat layouts are missing fire doors. External deck access balconies present smoke/ access danger.</p>

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.21	Air Quality	<p>The proposed development is in an area that has some of the highest levels of pollution in the country due to its location, at the heart of London, and the density of development.</p> <p>National health based objectives for the pollutants nitrogen dioxide (NO2) and small particles (PM10) are not being met in the City, so the whole of the Square Mile has been declared an Air Quality Management Area.</p>	<p>Islington Development Management Policy states that: <i>The council will take into account the impact of existing air quality on development proposals, including the suitability of the site for occupation for the proposed use, based on the air quality that potential occupants will be exposed to.</i></p>	<p>The over-development of the site and increased traffic generated by the school use is likely to negatively impact air quality in the area. There is low demand for school places in the South of the Borough and we anticipate that school journeys from the North of the Borough will add unacceptably to the pollution load locally.</p> <p>No justification has been advanced in the application for constructing additional school places in the South of the Borough rather than in the North of the Borough where the demand is.</p>
1.22	Refuse Collection and siting	<p>Disturbance from bin collection. Kitchen bin stores are located near to residential areas at the centre of the Estate.</p>		<p>The proposed method of rubbish collection from the school involves refuse trucks using the route under the Estate to complete their collection. A better location for the refuse collection is advisable.</p>
1.23	Refuse Collection Area	<p>The School bin stores are inadequate</p>		<p>We have compared the refuse collection areas to those at Prior Weston School nearby. There is less than 50% of the necessary area. We believe that the designers have grossly underestimated the necessary provision.</p>
1.24	Overlooking	<p>Residential element will overlook habitable rooms to Basterfield House.</p>	<p>Islington DMP, Policy 2.14 “To protect privacy for residential developments and existing residential properties, there should be a <b>minimum distance of 18 metres</b> between windows of habitable rooms.”</p> <p>City of London Policy DM21.3: “All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.”</p>	<p>Windows of living and bedrooms and balconies in the proposed block are only <b>9.3m</b> away from bedroom windows in Basterfield House which is less than permitted under development management policy. This will give rise to direct overlooking and unacceptable loss of privacy to the existing residential units.</p> <p>There has been no attempt to mitigate overlooking by screening or other means.</p>

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.25	Views	New proposed tower will interfere with views of Great Arthur House	City of London SPD on Protected Views designates Golden Lane Estate and Great Arthur House as “City Landmarks”. The effect of development proposals on the setting of these landmarks will be assessed in accordance with Core Strategy Policy CS13 (2). Islington Policy DM2.1 xiii) development must not “not result in an unacceptable adverse impact on views of local landmarks”	The height of the tower and the density of the development will adversely affect the composition of the Golden Lane Estate which is a local landmark
1.26	Views	Street view is blocked by proposed tower	Finsbury Local Plan BC9 states that development shall “ <i>Enhance the quality of street-level and long-distance views, including across borough boundaries</i> ”	The development blocks both street level and long distance views, including across borough boundaries
1.27	Tenure	Residential element is shown as single-tenure social housing.	London Plan Policy 3.8 (“social inclusion objectives and should be conceived and developed through an effective design process” ) and Islington Core Strategy objectives seek to encourage mixed communities. “Mixed communities include...different tenures.” (Islington DMP para 3.8.	Single tenure social housing tower blocks are questionable from a social inclusion perspective. Current planning policies promote 'mixed tenure' and 'tenure blind' typologies, which can be better achieved with 'low rise, high density' schemes. Rather than insisting on the distribution of social and affordable housing across the city as intended to achieve a healthy urban mix of people, the client of the scheme uses section 106 contributions to fund a development where social tenants are concentrated in one location, which nurtures stigmatisation and undermines integration. This is an outdated model of providing socially rented accommodation.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.28	Transport	Insufficient cycle storage in residential block	Residential Provision: 1 space per studio and 1 bedroom, 2 spaces per all other dwellings. 1 space per 40 units for visitors (London Plan 2016) = <b>99 Cycle Spaces</b> Required	<b>48 Cycle spaces only</b> provided in Ground floor storage (Already double stacked). Insufficient provision. Cycles shown stored on public walkways both insecure and a fire escape risk and contrary to published policies in both Islington and City of London.
1.29	Transport	Insufficient cycle storage in school	School Provision: 1 space per 8 staff (28 Staff). 1 space per 8 students (420 students) = <b>56 Cycle Spaces</b> Required	<b>12 Cycle Spaces</b> only provided and these are on street and not secure. Proposal fails to meet policy.
1.30	Transport	No wheelchair accessible parking being provided. Two essential accessible parking garages being lost from Golden Lane Estate.	66 units have been provided, a minimum number of 7 homes are required to be wheelchair accessible, 7 wheelchair accessible parking spaces are to be provided which equates to the 5% policy. (Hawkins\Brown Design and Access Statement, para 8.3)	7 wheelchair parking spaces should be provided, plus the 2 to be lost from GLE. Total 9 spaces. None are being provided. On-street availability is maximum 2 spaces within 50 yards of entrance to residential block due to school entrance (zig zags)
1.31	Transport	No visitor parking	Islington SPD: Accessible Housing in Islington: "The potential to secure a reasonable number of on street bays, for blue badge holders within 50m of the development, should be established.  ...if that potential does not exist some facility should be provided on site.  Consideration should also be given to the needs of some disabled people for Home Care and non-resident carer visits, other essential visitors, deliveries and drop-off (the latter for taxis and dial a ride buses).	There has been no consideration of the provision of wheelchair accessible parking other than to say it will be provided on the street, which is impossible.  There are 7 wheelchair accessible flats proposed with no allowance for Home Care and non-resident carer visits, other essential visitors, deliveries and drop-off. The proposed development could include for these by moving the plant and tank rooms to the basement.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
1.32	Documentation	Application drawings contain numerous errors and inconsistencies. These defects invalidate the application.	Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015: <i>Any plans or drawings required to be provided by paragraph (1)c(i) or (ii) must be drawn to an identified scale and, in the case of plans, must show the direction of North.</i>	<p>1. Scale Bar: The Scale bar on all the plans is drawn to the wrong scale. Using this scale bar the tower block would be 8m x 22.5m, when we believe it is actually twice that size.</p> <p>2. Not to Scale: The proposed planning drawings are all annotated as follows: "Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility." Our understanding is that such wording on a planning drawing is unacceptable.</p> <p>3. North Arrow: The North Arrow shown on the plans is aligned with the page, so that the Tower appears to be oriented North-South whereas in reality the tower will be 24.13 degrees away from North.</p>

**Effect on Golden Lane Estate**

2.1	Transport: Basterfield Access Mews	School Collection will take place adjacent to Mews. Mews entry likely to be used for pull-in space.		The existing access gate to the service road should be changed to an automatic opening / closing gate with fob key access, with fobs restricted to fire tenders and other designated and approved users. This will help sustain the safety of the Estate, and ensure this space is a tranquil space to help compensate for the increased noise and disruption generated by the new School.
2.2	Curtilage Encroachment/ Loss of Garages	The RCS site boundary is shown as "re-aligned" to incorporate garages, currently part of the GLE Estate.		The garages are part of the Golden Lane Estate. Two of them are now rented to residents and are the only garages suitable for disabled residents. They are not part of the Adult Education site. Parking on Golden Lane will be very limited, posing a threat to the serviceability of the existing buildings for daily maintenance etc.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.3	Curtilage Encroachment	The RCS site boundary is shown as "re-aligned" to incorporate amenity space that is currently part of GLE. Approx. 275sqm of public open space will be lost.	Islington Development Management Policy DM6.3 states: <i>"Development is not permitted on semi-private amenity spaces, including open space within housing estates and other similar spaces in the borough not designated as public open space within this document, unless the loss of amenity space is compensated and the development has over-riding planning benefits."</i>	The triangle of land to the West of the garages is currently a paved pedestrian area that is part of the amenity space around GLE. Encroaching on this land will reduce the amenity of GLE, and impact adversely on the setting of the listed building by bringing the school site/building approx 5m closer.
2.4	Curtilage Encroachment	The RCS site boundary is shown as "re-aligned" to incorporate amenity space that is currently part of GLE.	From the Golden Lane Estate Listed Building Management Guidelines: <i>"Inappropriate and ill-considered alteration of the publicly accessible or visible elements of the estate, whether buildings or spaces, whether single interventions or incremental changes, will impact most directly on the special interest, identity and significance of Golden Lane"</i>	This land has always been part of GLE and is shown on the Chamberlin, Powell Bon masterplans and on lease plans and on Management Plans. It is part of the curtilage of the Estate. No justification has been provided for the encroachment, which brings the school buildings in direct proximity with the residential blocks.
2.5	Amenity/Golden Lane Allotments	The Golden Lane Allotments are an award winning community project set up by residents in 2010. The proposals show the new School Hall located approximately 4m away from the allotments	Islington Policy DM6.3E states: <i>"Development of private open space is not permitted where there would be a significant individual or cumulative loss of open space/open aspect and/or where there would be a significant impact on amenity, character and appearance, biodiversity, ecological connectivity, cooling effect and/or flood alleviation effect."</i>	Despite the minor changes made during the consultation, the location of the School Hall, immediately to the East of the allotments will still shade the allotments during the mornings.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.6	Amenity	There are external amenity areas accessed from the Stanley Cohen staircase which will be in close proximity to the blank facade of the residential block		Amenity areas will be less useable due to proximity of tower
2.7	Amenity/ Landscaping	Loss of established trees and biodiversity	There are currently mature trees to the boundary between the Golden Lane Allotments and the RCS site and at the entrance to CoLCEC	These trees will be removed to allow for development of the School Hall and new trees planted. Existing mature trees provide a better natural habitat and should be preserved.
2.8	Amenity/Planting	The Finsbury Local Plan identifies the RCS site (Site BC34) noting it falls within an "Area of deficiency in access to nature".	Finsbury Local Plan	The proposals do not show sufficient publicly accessible landscaping proposals. Public open space should be provided to offset the loss of playground space and to relieve pressure on Fortune Street Park in accordance with Finsbury Plan Policy. Landscape design should be brought forward.
2.9	Amenity: Wind effects	The tall buildings proposed will cause additional wind at street level		At present there is an issue of excessive wind speed around the base of Great Arthur House. Concern was expressed that this similarly sized and oriented tower block will cause similar effects, but is much closer to existing housing on the site. Loss of amenity will result to residents. Mitigation proposals provided at the consultation - that the access balconies will break-up the facade were not felt to be unscientific and not convincing. Detailed analysis should be brought forward of the effect of the height and orientation of the tower block on wind speed around the site; particularly in the Basterfield Access Mews entrance area.
2.20	Amenity: Floodlighting	Sports areas are directly opposite residents windows		Details should be provided of any lighting proposed for the playground and MUGA and any planning consent should expressly forbid external floodlighting to sports areas, as was imposed for Prior Weston School.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.11	School Hall	A multi-purpose school hall is proposed for the SW corner of the site. It was suggested that this location helped "Define the boundary" of the site.	From Golden Lane Estate Listed Building Management Guidelines SPD: "The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting. No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole."	<p>The proposed location of the hall also inadvertently "Defines the boundary" of the GLE site and impacts adversely by being sited so close to the listed buildings. Due to its height and bulk it will block strategic long views across the estate which were an important aspect of the original design of the listed estate.</p> <p>The School Hall should be moved away from the boundary, preferably into the body of the school, with access from Golden Lane itself to facilitate use of the hall.</p> <p>It is felt that, in the location proposed, the School Hall interrupts the established layout of the listed Estate, blocks strategic views and conflicts with the adjacent blocks. Alternative locations for the School Hall that connect directly with the School have been drawn up and it is felt that insufficient weight has been given to the impact of the School Hall on the setting of the Listed Estate and impact on amenity of residents.</p>
2.12	School Hall	There are kitchens proposed for the School Hall	Islington DMP, 6.12: "The council will take into account the impact on air quality, including pollution, smells and fumes, when assessing development proposals."	Concern was expressed about the impact of cooking smells and noise from plant in the centre of a residential area. It was noted that the windows to GLE are designed to have permanent ventilation and cannot be completely sealed.
2.13	School Hall	The proposed school hall is to be available for community uses	Islington Development Management Policy DM2.1Ax states developments shall: "provide a good level of amenity including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution, fumes between and within developments"	There is already a community centre on the GLE. There has been disturbance from this use in the evenings. As a condition of any consent a proposal should be brought forward for management of the community centre and how disturbance would be managed/Community Use Agreement.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.14	School Hall	The proposed School Hall is shown as approximately 5.5m high externally on the Sections provided.	According to Design Guidance Note from Sport England (February 2012), hall need be no higher than 3.5m internally (4m externally).	Height of School Hall should be reduced in accordance with Sport England Guidance. To be no higher than 4m externally.
2.15	School Hall	School Hall will be directly in front of windows to habitable rooms in Basterfield House.	Islington Development Management Policy DM2.1Ax states developments shall: "provide a good level of amenity including consideration of ... overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook"	In its proposed location the School Hall will block open views and provide an increased sense of enclosure and contribute to a loss of access to daylight. There will be noise disturbance from children going to and from the Hall in the open air.
2.16	Acoustics	Playgrounds are sited directly opposite residential block	City of London Policy Policy DM 21.3 (Residential environment) "All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials."	There was concern noted that there would be considerable disturbance from school drop-off and break times
2.17	Acoustics	Rooftop playgrounds proposed. Additional traffic from collection/ drop-off		The existing windows to Basterfield House are single glazed and have fixed ventilators that stop them being entirely closed. A section 106 contribution should be made to the cost of double glazing the windows facing the RCS site to reduce the impact of increased noise disturbance.
2.18	Acoustics	Noise Report by Peter Brett Associates contains gross errors which affect the calculations.	Noise Report by Peter Brett Associates	The report estimates that the nearest sound receptors are "about 25m to the South". In fact the bedroom windows at Basterfield House are 8.8m from the playground. The estimates of the impact of the playground noise, which we anticipate will be very significant, are therefore incorrect. There is no acoustic screening proposed between the playground and Basterfield House.

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.19	Acoustics	Incorrect measurements of ambient noise taken for baseline rendering noise assessments completely inaccurate and grossly underestimating effect of noise from playground.	Noise Report by Peter Brett Associates	<p>The report assumes the Typical Ambient Noise Level (LAeq,9h) to the South is <b>65dB</b>, which seems highly unlikely. Their own survey within the Estate boundary gave readings of between <b>50 and 54</b> dB (Table 4.3) No acoustic survey was undertaken to the South of the site (Basterfield House) which is the most directly affected, but it most closely resembles the location to the West. NOTE The labels on the map of the locations of the noise survey are wrong. We therefore believe that the noise impact has been grossly underestimated.</p> <p>The assessment levels they have used are not correct (table 8.1). By definition, the levels in policy (LOAEL/ SOAEL) are absolute levels and not variable.</p>
2.20	Acoustics	Incorrect assumptions for calculations of noise impact which do not follow the rest of the application.	Noise Report by Peter Brett Associates	<p>The Multi-use Games Area (MUGA) is not listed in the report and no account has been taken of it. This is situated directly North of the closest residential receptors.</p> <p>The hours of operation of the school and the noise exposure from the playground assume two twenty minute break times. This does not accord with the extended school day advertised in the school website <a href="http://www.colpai.org.uk/activities">http://www.colpai.org.uk/activities</a>. The school will operate from 8am to 6pm. It does not take account of the detached design of the School Hall - it will be necessary for children to move constantly through the playground in the open air to the school hall several times a day for meals and PE. It does not take account of noise arising from school drop off and pick up, when the children will access the school via the open playground.</p>

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.21	Acoustics	Air handling Plant is indicated to the roof of the lower section of the School Hall		<p>Likely to have adverse impact by reason of its proximity to the residential building at Basterfield House.</p> <p>An acoustic report is to be brought forward to include the following information:</p> <ul style="list-style-type: none"> <li>* The proposed operational hours of the plant/activity, plant type, number and locations.</li> <li>* The measured Ambient noise level (L<sub>aeq</sub>) for the 16 hours daytime and 8 hours night time (If plant to operate at night) to assess which planning condition applies.</li> <li>* The representative lowest background noise level assessment (LA<sub>90</sub> 15 minutes) over the proposed hours of operation including the time, date and weather conditions, instrumentation and calibration, noise sampling locations and a copy of the noise survey data, (Graphical &amp; numerical).</li> <li>* Manufacturers Specifications of plant and/or proposed noise levels of internal activity in Octave or 1/3 octave band format.</li> <li>* Calculations for the predicted noise level 1 metre from the window of the nearest sensitive property including distance, directionality and screening effects.</li> <li>* You will need to demonstrate that the predicted noise level outside the most affected window will be 10dB below the lowest background LA<sub>90</sub> (15mins. with correction penalties for tonality or intermittency).</li> <li>* Include any proposed attenuation measures and details of noise reductions achieved.</li> </ul>

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.22	Daylighting	<p>Daylight levels will be negatively impacted by proposed scheme. Reductions are significantly worse than BRE guidelines permit.</p> <p>Altogether <b>122 windows</b> in adjacent buildings will be impacted beyond BRE guidelines.</p> <p>Some rooms are <b>losing 60-70% of their access to natural light.</b></p>	<p>Anstey Horne Daylight and Sunlight Report LH/BD/ROL7520</p> <p>Finsbury Local Plan Policy BC9 states that development shall: <i>“Not have adverse environmental effects at ground level, nor overshadow neighbouring habitable rooms”</i></p>	<p>The report by Anstey Horne omits to mention in its Executive Summary the important point that the proposed development will reduce the daylighting levels below BRE guidelines to a substantial number of flats. For example The bedroom of Flat 1, Basterfield House will have the Vertical Sky Component reduced to less than 50% of existing. Worse, the kitchen of Flat 12 will be reduced to 40% of its current VSC. BRE guidelines state that a reduction beneath 80% is likely to be noticeable, so these effects are likely to be <b>highly significant.</b></p> <p>The arguments that Anstey Horne adduce to excuse these transgressions are tenuous, for example positing what harm a building similar to Basterfield House on the other side of Basterfield Mews would cause. This ignores the fact that Basterfield Mews is not a public highway and the design of the estate is a pattern of alternating open space and residential blocks.</p>
2.23	Daylighting	Daylighting Report Misleading	Anstey Horne Daylight and Sunlight Report LH/BD/ROL7520	<p>The report by Anstey Horne is deliberately confusing. The table summarising the loss of VSC does not contain the flat numbers/addresses. It is necessary to cross reference these with plans, which has made the report extremely difficult to interpret. The Table should be clearly labelled with property addresses so that the potential impact can be readily understood by those affected.</p>
2.24	Overlooking	Rooftop playgrounds are proposed for the school buildings		<p>Concern was expressed about potential overlooking into residential units and noise disturbance. The existing plans for the rooftop do not demonstrate effective buffering and attenuation of the sounds of play. The nearby Golden Lane Campus has a rooftop playground that is surrounded by netting and does not effectively buffer the sounds produced by children at play.</p>

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.25	Construction Management Plan			The residents asked to be consulted formally in the development of a CMP
2.26	Construction Impact	Basterfield Access Mews		Concern was raised about impact on the estate during construction and, in particular, ensuring that site activities are conducted solely within the site and not dependent on use of the Basterfield Access Mews, which is required for emergency vehicles at all times.
2.27	Management	It is understood from a City officer at the consultation on 25 Feb that the new residential block is to be considered an extension of the Golden Lane Estate, and is to be managed by the Golden Lane Estate management team.		Concern was expressed that the new residential block would be “all take and no give”. It contains none of the amenities that make Golden Lane particularly attractive and brings nothing to the table in the way of public amenities or open space. It will therefore automatically have a negative impact on the quality of life at Golden Lane Estate.
2.28	Management	New residential block is to be considered an extension of the Golden Lane Estate, and is to be managed by the Golden Lane Estate estate management.		How will this new block affect the division of communal service charges across the Estate? Will this require a change to existing leases to reflect new percentages of allocation? Further details on the financial impact of the expansion of the Estate on leaseholders and residents was requested, but not provided.
2.29	Management	Sports Hall Community Use Management		<p>There is concern about the management and use of the Hall, which will affect existing residents of GLE and the new housing element. Management will be in the hands of the School, but will impact primarily on residents.</p> <p>Historic issues have occurred with the management of both the building that COLCEC now operates from (prior to it’s conversion into the COLCEC site), and the old Golden Lane Estate Community Association letting of the old Golden Lane Estate Community Centre.</p>

	Issue	Issue/Concern	Relevant Policies/Documents	Comment
2.30	Signage	If the new block is to be integrated into the Estate, signage will need to be provided around the Estate		Noted: that some of the signage around the Estate was designed by the original architects; is listed and should not be altered.
2.31	Transport	New block is to be “car free” and residents will not have access to Islington or CoL parking permits		Presently there is private parking on Golden Lane Estate. It is in high demand with a waiting list. If no new parking is to be provided, it should be clarified that the additional residential block will not have access to existing parking garages.
2.32	Alterations to Basterfield Entrance	Pavement is to be narrowed and wall placed directly in front of Basterfield Entrance	Listed Building Management Guidelines	The proposals include moving the wall and entrance gate attached to Basterfield House and narrowing the pavement outside it. This area is within the curtilage of a listed building. The proposal will cause dangerous congestion at the entrance to Basterfield House. No details are shown of the highly significant proposals.

**Policy Compliance Checklist. How compliant is the Proposal?**

Density	<b>Non compliant</b>	Table 3.2 of London Plan
Height	<b>Non compliant</b>	Islington Development Management Policy DM2.1C
Overshadowing	<b>Non compliant</b>	Finsbury Local Plan Policy BC9
Views	<b>Non compliant</b>	Islington Policy DM2, City of London SPD on Protected Views
Overlooking	<b>Non compliant</b>	City of London Policy DM21.3: Islington DMP, Policy 2.14
Enhance Heritage Asset	<b>Non compliant</b>	Finsbury Local Plan/GLE Management Guidelines
Interesting Street Frontage	<b>Non compliant</b>	Finsbury Local Plan Policy BC9
Public Open Space on site	<b>Non compliant</b>	The City of London Open Space Strategy SPD, Islington DM6.2 (para 6.20)
Access to Nature	<b>Non compliant</b>	Finsbury Local Plan Policy BC9
Noise	<b>Non compliant</b>	City of London Policy Policy DM 21.3
High Standard of Design	<b>Non compliant</b>	Finsbury Local Plan Policy BC9
Cycle parking provision	<b>Non compliant</b>	London Plan
Wheelchair Parking provision on site	<b>Non compliant</b>	Islington SPD: Accessible Housing in Islington
Play space	<b>Non compliant</b>	London Plan, Policy 3.6
Pedestrian Permeability	<b>Non compliant</b>	City of London Local Plan 3.14.4
Loss of Biodiversity	<b>Non compliant</b>	Islington Policy DM6.3E
Cumulative Development	<b>Non compliant</b>	City of London Local Plan 3.14.4
Social Inclusion	<b>Non compliant</b>	London Plan Policy 3.8