Northview

Northview Residents' Association's response to planning application no P101448



A natural community on a human scale: 14-43 Northview, the "back block", is part of an enclave tucked behind Holloway Road. Below: its grounds contain mature and protected trees. Both images viewed from Northview's front block, nos 1-12.

Northview is a unique example of small-scale 1930s domestic architecture, the only one of its kind in Islington. Its human scale and clear boundaries give it a cohesive feel and creating a community corner.

Its architecture has received official recognition, most recently with an invitation to take part in this year's London Open House.

The London Plan says that many successful neighbourhoods built in the interwar years no longer exist. Northview is such a neighbourhood, and has survived reasonably intact, with original features.

Although it is between two main roads, it provides a restful setting, with green areas and mature trees. What is proposed – an additional storey on the rear, larger block – would detract from its community feel and human scale, and make it less attractive and less safe.

The proposal contravenes numerous Islington council policies, particularly those concerning sustainability, heritage and safety. They also contravene national and London policy.



"A modest but attractive development characteristic of its time… a quiet and pleasant pre-war development with delicacy of scale of the existing bay window and other features"
James Dunnett, Islington architect and expert on modern architecture

Why Northview needs protection

Why we are objecting to proposal no P101448

Northview Residents' Association is objecting to this for several reasons, including:

- The scheme is clumsy and unattractive and takes no account of its surroundings;
- It will cause irretrievable damage to a 1930s enclave that is the sole survivor of its type in the borough;
- It is too bulky, will extend the rear block by about one-third and draw attention to itself;
- The applicant has brushed aside council policy, and taken no account of the council's Core Strategy;
- Many council and London Plan policies – such as those on security, sustainable transport and flexible homes – have not been addressed but treated merely as boxes to be ticked;
- There is a woeful lack of attention to detail in the application, showing a rushed and slapdash approach;
- The drawings are misleading and inaccurate, showing window frames as masonry and views that are impossible for example, and omitting architectural features and other structures;
- Loss of daylight is treated as minimal, even where found to breach BRE standards;
- Original features – including original Crittall windows over staircases and decorative parapets – will be damaged, but this is not addressed;
- No affordable or flexible homes, or homes to meet gaps in supply, will be provided;
- Safety and security will be compromised;
- Community cohesion will be undermined, and the estate will become less diverse;
- The applicant has failed to consult those materially affected;
- There are many failures on sustainability.

Further objections are being submitted by individual residents.

Back in 1948, an application to build a Nissen hut next to back block was rejected on the grounds that it would be "detrimental to the amenities of the adjacent buildings". The same more than applies now and we hope the council will adopt the same position.

Paul Thurlow, chair
Christy Lawrance, secretary
Ben Porter, secretary

Northview Residents' Association

22 June 2011

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Policy context

Core Strategy

Islington's main planning document is its Core Strategy, which was adopted in February.

Yet paragraph 3.01 of the Design and Access statement states that the most relevant planning documents are the 2002 UDP and the 2002 standards guidelines. It makes no mention of Islington's Core Strategy, part of Islington's local development framework, which was adopted before the latest documents were produced.

Given the importance of this and the emphasis on this in the council's website in recent months (you cannot miss it and its predecessor documents if you're looking up planning policy), this is an extraordinary omission.

This is particularly concerning given the application has been submitted by an established local agent and supported by professional advice.

Northview residents are not property professionals yet we accessed the strategy when these professionals did not.

Anyone seeking out planning documents and strategies for the N7 area could also not miss the emphasis put on the Nag's Head area.

Nag's Head is one of Islington's two designated major town centres and has had its own area strategy for several years. This does not even merit a mention in the application.

There are a number of breaches of the Core Strategy and other policies, concerning equalities, sustainability, safety and feeling safe, environmental matters, building character and heritage.

This shows what we believe to be a lazy or even arrogant attitude to the council and to Islington residents.

Breach of policy

Against the Core Strategy objectives 1, the proposed development:

- will not encourage a mix of tenure and type of household but will increase the proportion of flats let to flat sharers on short lets – assured shorthold is already the dominant tenure;
- will not help tackle inequality and exclusion – they will not be suitable for people with children, elderly people or those with disabilities, and flexibility has not even been considered
- will provide a poor-quality environment, making our attractive 1930s enclave ugly
- could cause health problems – the extra homes and their layout will lead to noise nuisance;
- will damage wellbeing by making Northview feel less safe;
- will damage the historic environment – this is particularly reprehensible as Northview is the last survivor of its type in Islington – and does not consider conservation of existing structures. (A leasehold valuation tribunal this year told Northview's managing agents should return half their management fees since they took over in 2003, because of their failure to maintain the existing structures);
- contains no measures to reduce its impact on the environment.

Key issues highlighted in the Core Strategy include:

- conserving what is best about the borough's built environment;
- ensuring that new development results in a high quality built environment that feels welcoming and safe;
- lessening our impact on the environment and preparing for climate change;
- the missing middle (see Local Housing).

The application will act against Islington's priorities for all these.

The Core Strategy is referred to throughout this document. Paragraph numbers and policies are usually prefixed with CS.



14-43 is part of an estate – it should not be seen in isolation. With 1-12 Northview (centre, with white balconies), it makes up the Northview estate, which itself is part of a 1930s corner. See Designation

Designation

Paragraph 1.05 of the Design and Access statement says the site has no special designation. However, 14-43 is an integral part of an estate, as shown on the applicant's Location Plan of July 2010 and on the photograph above – it is not a single entity.

In addition, 1-12 Northview has been designated both as a special policy area and an area of special character, so the effects on it of

any development should be considered. You can find both designations documents on the internet yet neither are referred to in the application.

In the Core Strategy, Northview appears to be on the edge of the Nag's Head key area in Map 2.4.

In the Nag's Head town centre strategy, 1-12 Northview is shown as being within the town centre, and 14-43 is referenced on the map as "housing within or adjoining the town centre". It is surrounded on three sides by the town centre area, which shows both its strategic position and its contrasting feeling as a quiet enclave in a busy commercial area.

It is also close to the Mercers Road/Tavistock Terrace conservation area; the application for building at Holbrooke Court mentioned this.

The comment that the site has no special designation fails to give the full picture of its location and the sensitivity of the area.

Previous errors and concerns

The Design and Access statement repeats a number of errors that we raised in previous objections.

These run from the minor – to Northview's date of construction being incorrect – to major ones concerning inaccurate drawings and policy standards being met.

Serious concerns raised in previous objections have not been addressed. For example, the proposed cycle store will still be a magnet for crime and the "stacking" of flats contravenes policy and cause noise problems.

Given that our previous objection document to this application has been downloaded over 120 times in the past five months, it is unlikely that those involved in this application are unaware of the shortfalls, inaccuracies and policy breaches we outlined.

This, again, shows the attitude of the applicants to the council and local residents.



Stair window, showing details above window and parapets, omitted in drawings

Sustainability

Policy highlights the importance of sustainability on development. This application fails to meet standards and policy on sustainable homes on several grounds. See page 11.

Heritage

Northview Residents' Association welcomes the increase in emphasis on heritage in our area. This application does not take Northview's heritage or architecture into account. See page 16.

Proposal documents

Drawings

The drawings illustrate the slapdash approach to this project or a lack of familiarity with the site. Simple matters – such as existing building materials and direction of light – are wrong.

The drawings are not easy to understand, distorted and contain a number of inaccuracies. Several drawings are missing, so the proposal is not seen in context of the whole estate.

UDP Policy D2 says: "The Council will require all planning applications for new development to include appropriate, clear and accurate drawings and a supporting design statement."

It also says at 12.1.4: "The quality of the submitted drawings will tend to reflect how well the design has been thought through."

Despite its name, Pinnacle Architecture, which drew up the latest plans, does not employ any architects.

Estate layout: out of date or missing

The existing ground floor plan PL01 uses a layout that has long since gone, showing a circular garden layout that disappeared several decades ago. We have very similar drawings dated 1973 and 1957.

The proposed 3D layouts on PL12 show the former green area superimposed over the parking bays.

The use of an out of date, incorrect layout shows poor attention or laziness.

Incomplete plans

No proposed layout plan has been provided, nor is there a proposed 3D plan showing the new storey in the context of the whole estate.

The plans referred to in the daylight and sunlight studies have not been provided.

The plans are therefore incomplete.

Flats layout absent

The internal arrangement of existing flats is not shown, making the existing section and layout drawings meaningless.

It is not possible to see from these how rooms in the proposed floor will be stacked, which has implications for noise nuisance and sustainability. The layout of existing flats should have been provided so we could compare plans – we have had to rely on our own knowledge instead.

Drawings of the new flats do not show circulation spaces, room or corridor widths or door opening spaces.

Distortion

While the 3D drawings help give an idea of how the proposed development would look, the perspective seems skewed, especially on 3D view 1 on PL12; this "stretches" windows and the nearest door and stairwell to an unacceptable extent.

Inaccuracies and errors in appearance

Of major concern to us it that the drawings are riddled with inaccuracies.

The drawings fail to show the tanks on the roof of the back block and pipework, or what will happen to them. Sections show staircases to have rotated 90º.

The drawings are not clear, with elements in drawings PL04A and PL05A difficult to recognise. One view shown cannot exist (see section on PL04A, below). We have raised this in our previous objection document.

Some inaccuracies are listed here.

Window frames as masonry

We are highlighting this error as it clearly illustrates the lack of attention and slapdash approach that permeates this application.

It is of particular concern that whoever drew up these plans has paid so little attention that window frames have been shown as masonry/ brick columns (see photos and drawings right).

Most people can tell the difference between window frames and render. If something so simple and obvious is incorrect, how can the rest of the plans be relied upon?

A concern is that these plans are used as the basis for the daylight study.

Window and parapet inaccuracies

The heavy black window frames in the drawing appear designed to make the block look heavy and uninviting. The tall windows that rise over several floors look pinched, unlike the original airy design. Parapet details, with their typical 1930s stepped detail, have been omitted (see drawing, right, and photograph, opposite left).

The windows over the stairwell appear smaller than in real life, and the decorative feature near the top, echoed in the parapets, looks much plainer than it does in reality and has sometimes been omitted altogether.

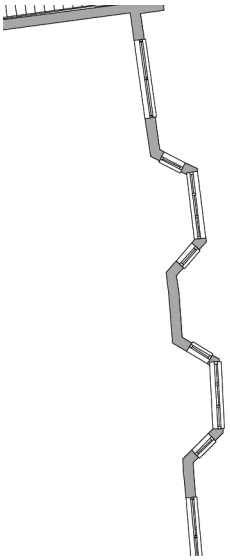
The drawings of the back of the flats omit several details and make it look like a factory. It doesn't.

Sections of white rendering with columns of windows between them create visual columns to give the block height. The drawings show the render around the bay windows rather than between them.

The rendering between the windows appears heavy and straight in the drawings. Curved detailing on the rendering (see photo, above) has been omitted from the drawings.

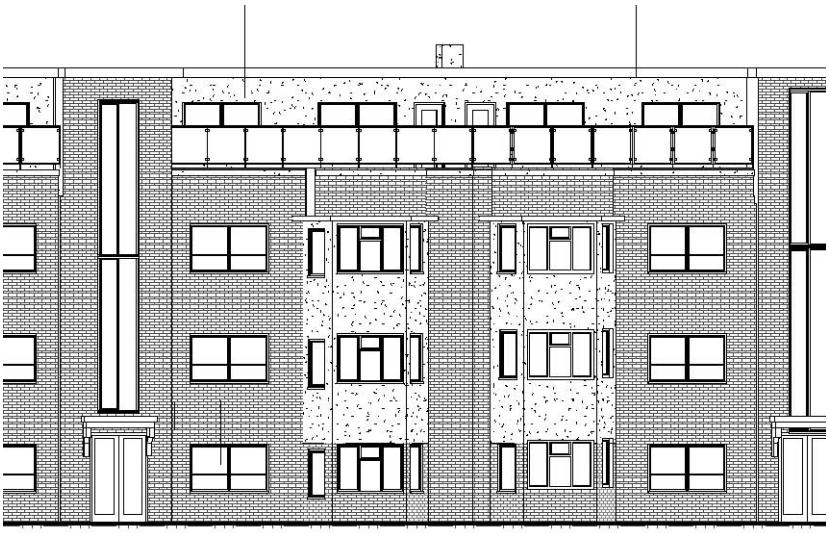
One of the best known characteristics of 1930s architecture is that window corners, for the first time, did not require masonry support, following the introduction of metal window frames. This drawing shows not only a lack of attention to the existing building, but also a poor knowledge of 1930s architecture. We would expect someone proposing such a major change to architecture of this period to be aware of this.

These combine to make the existing building look boring and ugly, so less deserving of preservation.





Lack of attention: the plans fail show window frames as masonry columns. The detail from drawing no PL03 (left) shows a cross-section of the windows in the photograph. The frame between the window panes is drawn as masonry. Drawing PL09 (detail below) clearly shows columns of masonry between windows. Note also that windows are not in line, parapet top details are missing and the cycle shelter is on the other side of the courtyard in other drawings.



Existing Elevations PL04A: the top drawing marked "1 North"

There is nowhere you can stand that would show part of Tufnell Park Mansions and Northview's garages, as shown here.

Viewed from the north, you would see Tufnell

Park Mansions over its shops on the left (east) and 1-12 Northview on the right (west); most of 14-43 would be obscured from the road, with the only view being down the driveway. However, this drawing shows part of Tufnell Park Mansions on the left, what must be the back of the garages in the middle, and no Northview front block.

The view of Tufnell Park Mansions here, in terms of the windows and doors, seems to be that from the back (ie looking north east, as seen from Northview car park) and not from the north (ie the view from Holloway Road). However, the "sticking out" roof at the right side of the building is roughly how you would see it from this viewpoint.

One parapet is shown above the entrance and stairway windows in this drawing, roughly in the middle, but the parapets above the two entrances and stairway windows to the right are missing.

Existing Elevations PL05A: the lower drawing marked "2 East"
The parapet above the entrance and stairway windows in the centre of the picture is shown as lower than the level of the roof, but it is higher, as is shown above the entrance to the right.

The section immediately to the left of this central doorway is drawn as if the design of that part of the block is different, but it is not: here sections of white wall are shown going the full height of the building (wrong) and there no entrances and stairway windows are shown.

The dark, horizontal strips shown on this section of the block don't exist.

At the far left of this drawing, the back of the far end of the block (ie the back of flats 38/40/42) is shown, but the blank end wall of the block, which you would see too, is missing.

Proposed Elevations PL09: upper drawing marked "East"
The parapet above the entrance and stairway window is shown incorrectly.

Window panes on bay windows are shown as columns of brickwork/masonry. The bay windows are shown as being surrounded by render. They are not.

The window panes are shown smaller than they are.

Southernmost window panes in 20-25 on the ground and first floors are shown as being below the panes in bay windows at the same level. Similar side bay windows elsewhere in the elevation are level.

The drawings says "anodised aluminium bicycle shelter" in front of the door to flats 20-25. We understand from other drawings that the cycle rack (hardly a shelter) is hidden behind the garages. This shows a slapdash attitude.

Proposed section PL10
This shows windows incorrectly as per PL09, plus showing a view of Northview that is impossible

Cycle rack
The drawings show space for five cycles, not seven as in the application.

Light
3D drawing PL12 shows sunlight coming from the north east.

Flues
While some flues have been shown, none are provided for bedroom chimneys and the living room ones are in the wrong place. It is not clear whether these flues are intended to serve new flats.

Anyone familiar with 1930s architecture will know that flues were necessary. Anyone familiar with the estate will know that some of the flues are in still in use.

Building regulations

The applicants claim that the extra storey will meet all Building Regulations requirements at paragraph 3.06. This is another unsubstantiated claim – like the one on sustainability – with which the document is peppered.

Given the poor and sometimes nonexistent evidence for other claims and the lack of attention to detail in this application, we would expect the council to demand more detail on this, for example regarding materials to be used and, perhaps, the fall on the flat roofs or how the frequently blocked drains (picture, right) will cope with extra demand on them.

As the council's Core Strategy says, good planning policy needs good evidence. We say that statements in planning applications, likewise, need to be underpinned with good evidence.

Structural stability
While we understand that this may be a matter for Building Control rather than Planning, we are concerned that the application is not accompanied by a structural report.

It is assumed that the structure is strong enough to support an additional floor, although no evidence has been provided on this. There is a large crack in the easternmost flank wall – we have not yet had formal notification of its cause or longer term implications (picture, right).

A leaseholder in the back block was recently been told by a construction professional that the block suffers from subsidence and would need underpinning to support another storey.





Above: Overflowing drain; below: crack in flank wall of back block

Underground river

An underground river, the Hackney Brook, runs below or near to Northview – we understand it caused a road collapse outside Barclays Bank some years ago.

This is evidenced by old maps, which also show a fountain in the same area or adjacent to the southernmost part of the estate, as well as from informal discussion with a professional concerned with the redirection of watercourses for the St Pancras Station development.

Design and Access Statement

While some of the errors here are minor, they illustrate the lack of attention to detail or unfamiliarity with the estate.

Paragraph 1.02 The existing flats were built in 1938. The brickwork is not as described.

There is a bin store but no recycling facilities.

The pavement crossover is not strictly shared – if anyone tried to use Northview's section of crossover to access Tufnell Park Mansions, they would drive into a brick wall.

1.03 There is no longer a grassed area separating Northview from Holbrooke (not Hillbrooke) Court. Construction work has been in progress for some time - it was certainly in progress at the date of this document.

1.05 See reference to designation above.

3.02 (ii) says a fourth floor would be "entirely consistent" in planning terms. However, nearby houses are lower than this, and an extra floor would be inconsistent with Northview's character and the "stepped" design of the 1930s rooflines that can be seen on page 3.

3.02 (iii) The development is unlikely to become home to families. This is detailed elsewhere in this document.

3.02 (v) is not logical. Extra flats will be just plonked on top of existing homes and look out of kilter. Because an existing development works well now does not mean it will continue to do so if density is increased in the manner suggested.

3.02 (vii) The proposed internal arrangement will increase noise disturbance, as will an increase in people using the common parts. The implications for community safety are discussed elsewhere.

There are further inaccuracies, inconsistencies and claims that are not backed with evidence in the Design and Access Statement – for example those concerned with living space, design, safety, parking, sustainability and planning policy – which are detailed elsewhere in this document.



The application: misses off parapets; says back block uses only one colour of brick; does not mention existing structures, such as roof water tanks, or what will happen to them; and does not cover building issues such as the fall on a proposed flat roof.

Application form

On 19 June, the application form was dated 5 July 2010, for a development of a different size with a different number of flats. By 22 June, this had been taken down but not replaced.

For the purposes of this objection, we have assumed that the information remains the same, other than that concerning the number of flats.

While this may seem relatively unimportant, it covers a number of issues.

The application forms refer to the materials to be used externally, including type, colour and finish. So we have had to assume that the materials are the same as in previous applications.

The freeholder has failed to consult with all residents with at least seven years' leaseholder interest over what is a major change to their homes.

Light and privacy

Daylight and sunlight

Drawings and information

It is difficult to comment on the daylight and sunlight studies because:

- information is missing;
- room use is not clear;
- the drawings named are not all included with the application.

The drawings used for these studies are

- Proposed floor plans PL07A;
- Proposed roof plans PL08A;
- Proposed elevations PL09C;
- Proposed elevations PL10C;
- Proposed sections PL11C.

While we have PL07A, we do not have the others, so used PL08, PL09, PL10 and PL11. Other documents that vary by suffix may or may not be equivalent. For example, PL06 and PL06A are both existing sections, while PL12C refers to proposed sections and PL12 is a proposed 3D view.

The drawings we have show major faults with the design, size and appearance of windows. So the consultants are working from inaccurate drawings.

Comments

The BRE minimum values are referred to as "target" values – ie as maximums to be attained rather than minimum acceptable values.

The paragraph quoted at paragraph 3.1.3 looks like the standard disclaimer you'd get on any professional good practice guide or advice book. A recommendation to use guidelines flexibly is not a licence to cut light to people's homes and downgrade what is acceptable; the opposite should apply – flats in built-up areas need all the natural light they can get for reasons of wellbeing and light should be protected.

A limitation of this study (acknowledged) is the wide variety of glazing installed (some without Building Control permission by the applicants).

Holbrooke Court and other neighbours

Although the Design and Access statement refers to the proposed blocks of flats at Holbrooke Court gaining permission two years ago, the applicants have not seen fit to tell their daylight consultants. Works on the new blocks are now well underway. (Incidentally, we did not object to these.)

The study is incomplete because it does not consider the effect of the proposed development regarding these new homes. There are implications for both light and privacy for residents of both schemes.

We have measured the rear gardens between back block, and the new scheme appears nearer the new Holbrooke Court blocks than the acceptable 18m suggested by council policy or the 20m "rule of thumb" suggested by the government and CABE – so represents an unacceptable intrusion into residents' privacy.

Likewise, this appears to apply to properties on Parkhurst Road, although it was not possible to measure the distance accurately as we do not have access.

Effects on other properties

A number of houses in Parkhurst Road would lose light. Proposed buildings in Parkhurst Road have not been considered.

It is likely that the gardens between the houses and the back block of Northview will also lose daylight. This has implications for the sustainability, from both the environmental point of view and as places to live.

While the space below 71 is marked as "non habitable", the report does not say what its usual use is – it may be a bathroom or store room, but could be a kitchen, albeit a void one.



Left: afternoon sun casts shadow on wall in hallway. Note the original art deco banisters with papyrus motif



Above: evening light on back block – this is the only direct sunlight living rooms and some bedrooms receive. It will be considerably reduced by the proposed scheme

Room use and BRE breaches

The Design and Access Statement and the daylight and sunlight studies both say that the breaches of light are minimal. However, they provide no evidence that they are minimal to those occupying the rooms affected.

It appears that a whole row of windows at Tufnell Park Mansions will fail the No Sky Line test (33, 36-41, 44-51, 71 and 74). This will increase the "single aspect" feel of the best part of a floor. Council and London Plan policy is generally not in favour of single aspect housing.

All the Tufnell Park Mansions have been labelled Supp Light. We would question this as living rooms and other habitable rooms (based on the flats' traditional layout) in 1-12 Northview have been labelled as Supp Light as follows:

- Windows 1, 2, 3, 28, 29 and 30 are to kitchens
- Windows 7, 8, 9, 22, 23 and 24 are to bedrooms that may be used as bedsitting rooms by flat-sharers.

The issue of not being able to ascertain the use of the room at window 63 is strange, given that is managed by the applicant.

The statement that it falls 1% short of BRE guidelines is misleading. This one percentage point means that light to this window will be 12.5% less than the BRE minimum, not 1%.

Breaches are described as "borderline" and "minor transgressions". Expert opinion has long been recognised as being among the least reliable in the hierarchy of evidence. No basis is given for this opinion.

Loss of light to habitable rooms

The sitting rooms and main bedrooms of the back block overlook the car park, so those in the south part of back block get most of their strong daylight from the west in the afternoon and evening.

The loss of evening light, particularly important for those living in back block, has not been considered, which will have implications for wellbeing.

As one resident of a one-bedroom flat says: "We will also lose most of the direct sunlight we get. By 8.30pm the sun is shining directly in to my living room and bedroom. It is fully on my back walls. When I look out of my window I can see the sun going down behind the stairwell of 14/19. It is very pleasant and I do not wish to lose this."

The London Housing Design guide says that all homes must provide for direct sunlight to enter at least one habitable room for part of the day, and that living areas should preferably receive direct sunlight. Rooms in the southernmost part of Northview facing roughly north-west rely on evening light for this.

Privacy

The Design and Access Statement says there will be no increase in noise nuisance or intrusion into privacy because of the balconies, but has not provided any diagrams or figures to support this statement.

People on the new balconies may be able to see into bedroom and living rooms on lower floors, especially those near the central "corner" of 14-43 Northview.

While the application refers to sound insulation, it does not refer to the "sound well" effect of the courtyard, which could be increased with an additional storey.

One resident says: "The balconies will affect us very badly. It is a loss of amenity because we will be overlooked and the noise pollution from them will be very bad because sound is amplified in the car park."

Layout and quiet enjoyment

Related to privacy and noise is the issue of being able to hear neighbours.

In contravention of Islington's council's policy on conversions, the living/dining/kitchen space of most flats is directly above the bedroom of the flats below, which will disturb existing residents and cause noise nuisance. This matter is covered in more detail in "Sustainability".

Community safety

The Core Strategy, which the council says should be seen alongside the Sustainable Communities Strategy, says at par 1.07 that Islington is "particularly focused on … people's feelings of safety" and wants to "build stronger communities". The proposed development will weaken community cohesion and make people feel less safe.

The Design and Access statement says in 3.03(iii) that "existing security arrangements will be assessed and any appropriate updating will be installed", that the site "does not have a vulnerable public exposure" and "observation from existing and proposed property provides a visible deterrent".

It appears that this matter has been treated as a box to be ticked, and that existing and future security has not even been considered.

There are no existing security arrangements.

There is, for example, no mention of criminal activity near the fire escape or the security of either gate. The site has been recorded by the police as a site of repeated attempted burglaries. There has been repeated vandalism, as well as chronic low grade nuisance such as fly tipping.

Despite the lack of a "vulnerable public exposure", there have been problems with street drinkers causing nuisance; we have found human excrement and condoms in the grounds. As a settled community, we have been able to work with the police on this.

Most of additional flats will not provide extra surveillance to the car park for the simple reason that they are set back behind balconies. Unless any residents are actually out on the balconies, they will not see a thing.





The application says that Northview does not have a vulnerable public exposure. Our photos, taken near the front gate, show otherwise; Tufnell Park Road can be seen in the background in the picture above. Both photos also show fly tipping.

Policy and practice

In addition to Core Strategy comments, the UDP Env 12 says that enhancing community safety and reducing opportunities for crime will be of the highest priority. The London Plan says it is important for London's ongoing attractiveness that residents feel safe in their homes.

DM at paragraph 5.0.11 says that new developments should promote safety and security. The London Plan supports "safe, secure and appropriately accessible environments where crime and disorder and fear of crime do not undermine quality of life or community cohesion".

The London Plan also says that measures to improve safety and security should be incorporated at the design stage.

Yet the application makes no mention of Safer Places, Designing Out Crime or Secured by Design, or that the applicant has taken advice from the police. No mention is made of problems with break-ins or poor security between Northview and the commercial and residential premises around it.

Crime, community safety and nuisance have not been considered, for example, in relation to how increasing the number of homes sharing each stairwell increases the potential for problems.

In addition, the design and position of the open bike rack could act as an open invitation to criminals (see Sustainable Transport).

The position of the bike store, as shown on the 3D drawings no PL15 and PL12 views 1 and 4, will create a deep hidden recess. People will be able to lurk behind the rack, hidden from public view by a walls and a garage block. Such areas are against the advice in Islington's Urban Design Guide.

This corner is already the source of major security problems on the estate and neighbouring commercial premises.

Problems with antisocial behaviour caused

by non-residents on the estate were alleviated after the police were supplied with photographs identifying the culprits in action. The store will create an area where natural surveillance is not possible.

Resident turnover

Northview has become dominated by flat sharers on assured shortholds, often students who require accommodation only for a set time. We understand that the "family" flats at Tufnell Park Mansions, which is under the same management as Northview, have been let to flat sharers. It is likely this trend will increase.

Safety is becoming increasingly compromised by a high turnover of tenants – there are many unfamiliar faces, and this is set to rise. Islington's figures show turnover is very high in the private rented sector – two thirds of these households have lived in their current home for less than two years.

The Nag's Head town centre strategy mentions "[encouraging] a sense of community identity and welfare" and "[reducing] crime, antisocial behaviour and the fear of crime". This addition will do the opposite and reduce community cohesion.

People on a short term tenancy are more likely to move on when there are problems than those with a longer term interest. Increasing this will detract from the natural security in the estate.

Sustainability

The Design and Access statement at par 3.30(iv) says that the additional storey will meet all current criteria for sustainable development. This statement is extraordinary.

This appears to be another example of the "tick box" approach. The proposed development is unsustainable in many ways. The application does not even mention local and national guidance on sustainability, such as the Code for Sustainable Homes, or Islington's SPG on Green Construction.

The Core Strategy emphasises "green building", including the use of water and energy. The UDP states that development is an opportunity for environmental improvement and sustainable development. Islington's local development scheme at par 3.8 highlights the council's statutory duty "to undertake their planning functions with a view to contributing to the achievement of sustainable development".

Sustainability here is considered in two main contexts: of building homes that will stand the test of time; and in "green" terms. Sustainable transport is covered in its own section

Homes that stand the test of time

The flats are designed in an unsustainable fashion regarding layout and "stacking", which the UDP says is a vital consideration. The Core Strategy says that high-density housing requires noise minimisation to be a top priority and that noise from neighbours can cause stress, prevent sleeping, make studying difficult, lead to conflicts and contribute to poor mental and/or physical health (CS 3.3.13).

- Flat A: Has its living/dining/kitchen above the back bedroom and its bathroom is above the front bedroom of flat 18.
- Flat B: Has its living/dining/kitchen above both the bedrooms of flat 25.
- Flat C: Has its living/dining/kitchen above the front bedroom and its bathroom above the back bedroom of flat 24.
- Flat D: Has its bathroom above the back bedroom of flat 30.
- Flat E: Has its bathroom above the back bedroom of flat 37.
- Flat F: has its living/dining/kitchen above the bedroom of flat 36.
- Flat G: has its living/dining/kitchen above

Floor areas

Proposed areas compared to minimum standards stipulated by the London Plan

Size of flat and occupation	Minimum area stipulated in London Plan (sq m)	Proposed (sq m)
1 bed, 2 person	50 sq m	49
2 bed, 3 person	61 sq m	64.2, 61.2, 61.7, 65.3. 66.2
3 bed, 5 person	86 sq m	79.2



There is plenty of official advice on green building – but the application fails to consider any of it

the bedrooms of flat 42. The door to this is also over the bedroom. Flat G is a two-bedroom flat, so there could be four or more people above the bedroom at any one time. Because it has an en suite bathroom, this flat could appeal to two couples sharing.

This poor stacking will cause noise and disturbance, especially as the flats are likely to be let in multiple occupation.

Tension as a result of noise nuisance could increase tenant turnover, which will in turn affect community cohesion and safety further.

Council policy, citing the Code for Sustainable Homes, notes that residents, including those with disabilities, find the combination of kitchen and sitting room unpleasant, so is against the incorporation of the kitchen/diner with the living room. Yet flats B, C and F have combined living/dining areas; and flats A, D, E and G each have a single combined kitchen/living/dining area.

In addition, flat A's bathroom appears to be over a bedroom at the front of building. Any soil pipe will have to run under the floorboards.

Space standards breached

In addition, the gross internal floor areas for the one-bedroom and three-bedroom flats are below minimum standards stipulated in London Plan.

The London Plan minimum area for a combined living/dining areas is 29m^2. Every flat breaches this so will be poky.

Areas are as follows: flat A has 26.79m^2; flat B has 28.40m^2; flat C has 20.18m^2; flat D has 22.95m^2; flat E has 25.52m^2; F has 21.37m^2; and flat G has 22.01m^2.

While areas of individual rooms are given, measurements for room widths, door turning areas and turning circles are not given.

Note that in flats A, D, E and G, this room includes a kitchen area, so will be even more in rabbit hutch style.

The Core Strategy recognises that inadequate space standards can lead to pressures and recognises the minimum standards "can easily come to be seen as maximum standards" and intends to use them as a "starting point in discussions with developers". Policy CS 12 says that, to help achieve a good quality of life the residential space and design standards will be "significantly increased". So, in future, the proposed spaces will be even further below minimum standards.

The London Housing Design Guide stipulates that all flats should have balconies.

Sense of community

The UDP at 3.1.2 points out that discontent over development can stem from it appearing less "friendly" to individuals and the community. An increase in housing for short-term tenants and an increase in turnover (see above) and will increase the number of unfamiliar faces and make appear Northview less of a friendly community.

In addition, there will more wear and tear on the communal spaces.

In the Community Safety section, we argue that the development will reduce community cohesion and safety. If nuisance, crime or the fear of crime rise, the whole estate will become less sustainable. This is backed by PPS1, which highlights how development affects the social fabric of communities and on safety.

Accessibility and inclusive design

Flexible homes and inclusive standards appear to have been blithely brushed aside. The Design and Access Statement says that these Lifetime Homes standards are not possible – and that's it. It is as if the applicant has put a quick tick in the "no" box.

Islington has taken a realistic approach to accessible homes, with its "flexible homes" approach set out in paragraph 3.3.22 of the Core Strategy and supplementary documents. Policy CS 12 H requires all new housing to comply with flexible homes standards

This has not even been considered. The Design and Access Statement at paragraph 3.06 says "it would be impractical to incorporate *all* of the *Lifetime Homes* standards" (our italics). However, the council is not insisting on this and the applicant is being disingenous in implying this.

Two- and three-bedroom flats on the fourth floor with no lift are unlikely to attract families with small children, or anyone with mobility problems. The census showed that one household in every five in Islington includes someone with a long-term limiting illness.

Tenants of Northview are predominantly young single people or couples, often students – there are very few families. The lack of accessibility will therefore make Northview less of a mixed community.

Green building

The lack of green building suggestions is a disappointment, given the amount of advice and information freely available on council and other official websites. Not a single reference is made to the Code for Sustainable Homes (CS 3.2.11).

Yet the design and access statement at 3.03(iv) says the additional storey will meet all criteria for sustainable development and at 3.06 that it will "meet and sustainability requirements".

The Core Strategy describes looking after the enviroment and tackling climate change as "key priorities" and goes into some detail about how new developments can minimise their carbon dioxide emissions. It considers, for example, energy efficiency water efficiency and sustainable drainage.

Despite London Plan and council policies supporting district systems such as combined heat and power (CHP) and combined cooling, heat and power (CCHP), the communal hot water system at Northview is gradually being taken out of use rather than extended.

There is no mention of using of eco-friendly materials, such as low-impact forms of concrete or sustainably sourced materials, as describe in the Core Strategy. Likewise, the application fails to how the developers will minimise construction waste.

Also omitted is how rises in CO_2 emission because of increased occupancy will be tackled. DM12 demands action to reduce $C0_2$ emissions in residential developments of one unit or more.

Water and drainage

The Design and Access statement says that waste and foul water will be carried by the existing sewerage/draining system. The application provides no evidence that the existing system will be able to cope with the extra demands on it, although drains become blocked regularly.

Water consumption and efficiency and use of grey water are not mentioned.

Waste and recycling

An opportunity to provide recycling facilities has been lost.

The Design and Access statement refers to a recycling/rubbish store. The store is used for rubbish only; there is no area for recycling. There is nothing tangible on waste reduction (Policy CS 11) or recycling in the application.

Currently, bags are left outside flats. This has led to problems with fly-tipping, which was confirmed by the Leasehold Valuation Tribunal this year. In addition, there have been problems with household rubbish being fly-tipped between tenancies. This could increase with more short-term tenants moving in.

How do the applicants know that the expansion of the bin shed will be adequate?

Trees and green spaces

Effects of light to garden spaces are considered elsewhere.

Northview has several mature trees in its grounds, a number of them protected.

One of our protected trees



Sustainable transport

It appears that the applicant has again merely ticked the "sustainable transport" box in much the same way as it has ticked those for security and accessibility, and failed to think the proposals through.

The application here is very disappointing – there are quite a few cyclists living here, who could have been consulted – and an opportunity has been missed.

Parking

While the statement says that no more cars will be parked on the estate (2.03), it accepts that more vehicles will be driving in and out of the car park and says this will not cause a material hazard (3.01 (viii)). However, it does not give any evidence to back this statement.

The Core Strategy says car-free developments have no parking provision on site but there is a car park at Northview.

There is no indication of how parking controls will be enforced. The enforcement of residents' parking has been woeful for a long time.

There is little to stop new residents from parking on the estate, which will increase demands on it, nor does the applicant say how it will prevent new residents from owning cars and obtaining council parking permits (CS part 3).

The assumption that no one in the new build will be able to own, hire or borrow a car is therefore spurious.

Cycle rack

The rack is inadequate for reasons of space, position and safety.

It blocks the fire exit from garden that also serves commercial occupiers on Holloway Road. There is no paved area shown on PL15 so the area will become churned up and muddy mess. It will involve the loss of a corner of the garden.

There are also privacy implications. Cyclists will be walking across a front lawn under bedroom and living room windows. No consideration has been given to other sites for it.

The UDP says that "secure parking or storage space for cycles" should be provided in all new developments; cycle parking should be "secure, sheltered, integrated, conveniently located, adequately lit and accessible". The proposed rack fails on most of these counts. An uncovered rack will tempt thieves; there have been problems with burglary and intruders at Northview.

Any serious cyclist would reject this design as grossly inadequate and not leave a bike there. The store is not lockable and secure. Even if the frame and both wheels of a bike were securely locked to the frame, anything detachable could be stripped from it.

In addition, the rack will create a dark recess that is hidden from public view, which could attract criminals and street drinkers.

The cycle store is adjacent to a door, which we understand is part of the means of escape in case of fire for commercial occupiers on Holloway Road. With the introduction of the cycle store, space here appears very tight: how this will be designed so the structure or cycles locked to it will not block this escape is not considered.

In addition, the capacity of the proposed rack is inadequate. The Design and Access statement says there will be one space per new flat, although drawings show five. The applicant has not provided any evidence or policy to support the provision of one space per flat.

Yet council policy on this is available: policy DM23 puts the standards as one space per person, based on bedroom size. The applicants anticipate that the new development of seven flats will house 20 people. There is no cycle parking space for visitors, as recommended in the London Plan.

If the flats are let along the same lines as other flats on the estate, is likely that the three-bedroom flat will be occupied by three or possibly four adults, and the two-bedroom flats by three people. Will they have to get one of those multi-person bikes like The Goodies had?

Had the applicant wished to support sustainable transport, they would have consulted with residents over a design and position, and given bike/car parking figures in the context of policy and existing and anticipated car/cycle use.



The bike store will be hidden from view of most flats in a corner that has attracted burglars; it could cause privacy problems for ground floor residents; and bikes could block the fire exit in the fence. Also, note loss of parapet details and changed stair window

Local housing

There has been considerable housing development around Northview, particularly student housing.

The Arsenal/Holloway area for intensification designation is likely to be removed, as development in this location has largely been completed. Holloway Nag's Head is not in an area for intensification, not is it designated an opportunity area.

Islington's completion rates remain "exceptionally high, and remain well in excess of the current target" (CS 3.3.39). Islington is the second most developed borough in the country and has gained more from the New Homes Bonus than comparable boroughs.

So this proposed development will not make up for any shortfall in provision.

In addition, the homes are unsustainable (see section on sustainability) and contravene standards in Policy CS 12.

Balance and the missing middle

Northview is home to a diverse community (CS 1.1.11), with a mixture of ages and backgrounds. This is a great source of strength to us as a community as we can all bring something to the estate as a whole.

Northview flats - typically selling for £200,000-£250,000 – attract middle income households. Many of us are the "missing middle", which the council wishes to attract, having here moved her as first-time buyers and elected to stay (CS 1.1.22; CS 3.3.18).

Because of their design, the proposed flats are likely to attract flat sharers, as with the so-called "family" flats at Tufnell Park Mansions. There are many students living here, as evidenced by voids over the summer holiday period, and Islington has already exceeded its targets for student housing.

The proposal provides mainly small flats on the fourth floor with no lift so are likely to be let to flat sharers. As can be seen from rents charged at new student housing on Carleton Road and Opal, letting to students is very profitable so it is understandable that our freeholders would want to be involved.

The proposed flats will not meet any identified need. They will not be suitable for families, older people or people with mobility difficulties. Nor will a single affordable home be provided.

Islington has recently seen a large proportion of smaller flats being built like those proposed here which do not necessarily match the housing need (CS 3.3.11).

Flat-sharers have been here for some time (although the leases stipulate that the flats are only let to whole households). Making the estate more unbalanced will make it less attractive to longer-term occupiers and eventually turn it into a multi-occupied ghetto.



Adding seven small flats that breach space and flexible homes standards will not help meet housing needs in Islington

Northview, like much of the area around it, is gradually becoming dominated by assured shorthold tenure and flat sharers, often students in the same age group – developments of the same tenure and predominance of age groups are both discouraged in the Core Strategy (3.3.19; 3.3.18).

We did not object to the building next door at Holbrooke Court for several reasons, one of which was because it would provide some much-needed affordable and permanent homes.

Adding seven flats will make little difference to overall housing provision in the local area, will address no identified need, will encourage the dominance of short-term tenure, while coming at a great cost to the small community at Northview, and damaging its unique 1930s character.



Hallway in 1-12 Northview, with stair rails echoing banisters

Character

Distinctive enclave

The London Plan highlights that successful neighbourhoods were created in the inter-war years but adds that many no longer exist.

Islington's policies support maintaining local distinctiveness (CS10) and highlight the borough's legacy of attractive domestic architecture. The distinctiveness of Northview and its feel as an enclave in its 1930s corner will be irretrievably damaged by the proposed extra storey.

Northview is not a well-known or high-profile scheme. Most of it is not on a street front. However, there is nothing like it in the area and it would be a disgrace if such a unique estate were damaged.

Most people think of Islington's famous Georgian terraces when asked about the area's heritage. As a result, small, more modern schemes can be overlooked. While small scale, Northview is unique and certainly of architectural and historical interest, and deserves to be preserved.

The 1930s architecture in the area tends to be large blocks of flats, houses, rather grand shops (eg Marks & Spencer) or churches – plus there is the spectacular Odeon opposite.

The buildings have pleasing proportions with a restful rhythm, provided by the tall windows lighting the stairwells and the detailed, curved rendering between windows. The proposals themselves acknowledge that the estate is an enclave (1.02), yet its very appeal as an enclave is being threatened.

Official recognition

Northview's architecture received official recognition this year when we were invited to take part in this year's Open House London.

Its heritage has been recognised by people from modern architecture expert James Dunnett to the commercial manager at Crittall windows. Its distinctiveness has been recognised by, for example, SAVE Britain's Heritage and CABE.

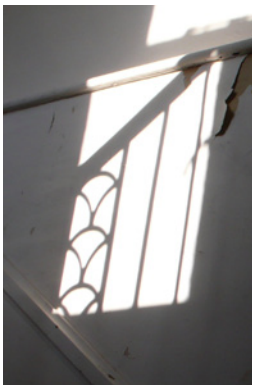
1930s corner

One objective of Islington's Housing Strategy is safeguarding the heritage of homes and neighbourhoods. The council's policies state that "a high standard of design" includes context as a key issue.

There is an unusual consistency in 1930s architecture at this end of Tufnell Park Road, providing considerable group value. 1-12 Northview has a sharper, more extrovert design than 14-43, providing an effective stepped bridge in design between the latter's lower-rise, gentle domestic architecture and the flamboyant Holloway Odeon. Continuity is provided in architectural detailing.



The overbearing and ugly extra floor on Tufnell Park Mansions



It has always seemed a strange omission to us that the 1930s corner at the bottom of Tufnell Park Road is bisected by the Mercers Road/Tavistock Terrace border. It would be logical to include Northview – which, after all is nearly intact and built in the same year as the Odeon – in this.

When phone company 02 used images of the Odeon for an advertising campaign, they kept 1-12 Northview in the background – it wasn't substituted or Photoshopped out.

The estate's various features mean it provides a tangible record of social history. The front block has two special designations.

The extra storey will just clash with this.

We are not saying that Northview is a museum piece – it continues to works very well



Right: group value, Holloway style – a similar view was used by a cinema promotion in an O2 advertisement. Above: papyrus shadow

as a sustainable community, contributing to place-shaping, over 70 years after it was built. Such matters are highlighted in government policy (PPS5; HE7.4).

Height and a local example

The existing block is designed and works as a complete structure – it is not several rows of flats just plonked on top of one another. The proposed storey will jar.

Adding a storey has not been successful in this part of Holloway.

A fourth storey was recently added to Tufnell Park Mansions. The photograph (opposite) shows how its excessive size for the setting has not been relieved by pale yellow paint. The proposed works will exacerbate this and make the place look crowded and overdeveloped. As CABE points out, only a small proportion of recent schemes have been "good" or "very good".

This shows that it would not be a good idea to make Northview the same height as Tufnell Park Mansions. (Northview's four-storey front block is considerably smaller than Tufnell Park Mansions, and is in keeping with back block.)

It was proposed by the same people now proposing the build on top of Northview. With their description of "render" it is likely we will get something the same, only with the addition of commonplace and boring glass balconies of a design that looks dated already.

Neighbouring houses on Tufnell Park Road and Parkhurst Road are low rise.

Bulk

While the additional floor is slightly set back, the roof will come over the balconies, which will put it in line with existing elevations and negate the effect of the setback.

The extension will therefore increase the bulk of 14-43 Northview by one-third and draw attention to itself, especially with its line of glass along the front.

The bland, heavy design will emphasise its bulk. This type of plain roof style has been likened by architecture firm to a pig sty design.

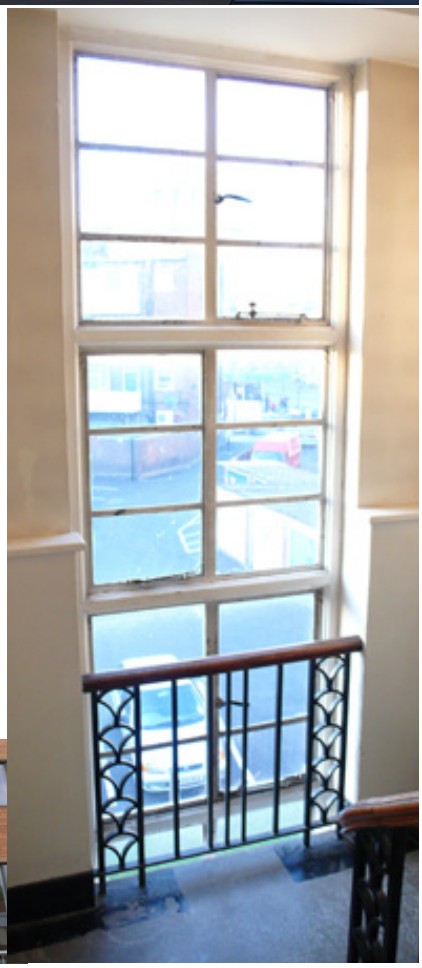
The roof extension will be visible from the gate and from across the road by the Odeon (see photo opposite). As pointed out above, this is a unique 1930s corner. The extension will therefore be detrimental to the appearance and character of the area (policy D25).

The UDP points out that market pressures are forcing buildings that are out of character and scale. We do understand that companies are feeling commercial pressures, but it would be a mistake to these to overrule a unique piece of history.





Above: Imagine the top floor of the above building on top of Northview. Immediately above is Tufnell Park Mansions, showing the roof extension built a few year ago. Given that the same companies are involved and the same or similar building materials are to be used, we would expect the proposed development to look like that, but with glass balconies similar to that below (which are on a modern building)



Right: original Crittall window from top floor of back block. Above this will be glass balconies over heavy looking render



Stairwells and parapets

The UDP says the extensions and alterations should respect the architectural character and detail of the original buildings. We are using the example of the stairwells.

The stairwells boast original deco steel balusters with a papyrus motif – very fashionable at the time – turned wooden banister rails and full-length original Crittall windows.

The staircases are to be extended for a further storey, as are the windows that light them. Stepped features on the parapets above the stairwells – a typical feature of 1930s housing – will be lost. Where window replacement is mentioned, it refers to "double glazed windows to match existing".

Islington's urban design guide says that window replacement "should normally be done in the original style and materials, for example … Crittall windows on interwar buildings."

It also says that: "Replacing timber or Crittall windows with modern alternatives such as uPVC windows, and to a lesser extent, powder coated aluminium windows are usually unacceptable not only because they are an unsympathetic material but also because glazing bar profiles are usually substantially bigger."

In addition, the freeholder has had double glazed windows installed without building control permission.



Deco banister with turned handrail and papyrus motif – these banisters are on all staircases on the estate, except for one flight in 1-12 Northview's hallway on page 15

Sources

In making our comments, we have drawn on a number of documents and sources. Some are referenced within the main text.

Islington Council

Core Strategy 2011
UDP 2002
Islington Urban Design Guide
Local Housing Needs Assessment 2008
Islington's Local Development Scheme, October 2010
Housing strategy 2009-2014
Planning – Statement of Community Involvement
Accessible Housing in Islington
Nag's Head Town Centre Strategy
Our Vision for 2020 – Islington's Sustainable Community Strategy
Development Management Policies Direction of Travel Draft, November 2010 (part of local development framework) – while this is a consultation, it gives a useful guide to the standards the council wishes to achieve



Department for Communities and Local Government (and its predecessors)

Better Places to Live
Code for Sustainable Homes
Houses in Multiple Occupation in the Private Rented Sector,
Tree Preservation Orders: A Guide to the Law and Good Practice
Planning Policy Statement 1: Planning for the Historic Environment
Planning Policy Statement 5: Planning for the Historic Environment

London Mayor's office

The London Plan
Housing Design Standards
London Housing Design Guide, Interim

Academic

Davies H, Nutley S (2002) Evidence-based policy and practice: moving from rhetoric to reality. Research Unit for Research Utilisation, University of St Andrews

Consultation

Consultation on this has been inadequate.

Applicant

The applicant says it has consulted with residents of five flats, which works out fewer that one in three owned by independent leaseholders. A current application form was not provided, so we took this information from the previous one dated July 2010.

There is no indication that the occupiers of neighbouring properties or Homes for Islington have been consulted.

Council consultation

We have been advised by Planning Aid for London that the council has failed to consult completely.

The Planning – Statement of Community Involvement says the council will "give 21 days for people to submit written comments on an application".

While letters were sent out in time, at least five sets of documents were posted online.

On 22 June – the day before consultation closed - there was still no application form or location plan. Both of these in previous applications contained relevant information -for example, on environmental matters, applicants' consultation and how the applicants viewed the site's context. So we have assumed these are the same. This is unsatisfactory.

While we have an idea of what the proposal looks like, we are not confident that we are in full possession of the facts. It appears that the documents were still incomplete on 22 June, with several drawings, including the 3D view of the whole estate, absent. Are they no longer relevant? No one told us. The lack of this 3D view is of particular concern.

As we've resisted variations on this application before, we could see the first set of documents were incomplete – the Design and Access Statement was missing, for example. We raised this with the case officer and asked what had changed.

On 2 June, the case officer said that all documents were online. There were some major inconsistencies between drawings, and our first response was based on these.

Further changes were only noticed when a resident checked again half way through the consultation period on 12 June – the inconsistent documents had been removed. The website now included five documents – including a proposed 3D layout, proposed elevations and proposed roof plan and details, all of which have major implications for us – that were not there on 2 June when we were given to understand that all plans were online.



Drawings downloaded on 2 June, including proposed sections, elevations and 3D views were not marked superseded but were later removed.

The website was checked again on 14 June. The old location plan had reappeared, as had other documents, including the daylight and sunlight assessment for a previous design.

They were different again on 22 June (we have copies of the more recent web pages).

No one told us that the online documents had changed. Had it not been for a resident's vigilance, we would still be responding to inaccurate, outdated information about an application that proposes major changes to our homes. We would have had no credibility and our comments struck out as irrelevant.

Promises by chair of planning Councillor Robert Khan last summer that applications would be clearly set out and available have proved empty (Islington Tribune, 20 August 2010). Systems to support officers and ensure fairness to residents are inadequate.

While it may seem trivial to include "existing" drawings, they have a bearing on the daylight and sunlight reports. In addition, council policy demands accuracy in drawings and plans.

The secretary sent copies of the documents listed on the website on 13 and 14 June to the case officer on Wednesday 15 June. She requested a list of all the documents to circulate to residents' association members so we would know what to work from. She also suggested circulating such a list to other consultees.

Consultation does not just mean sticking a notice on a lamp post and sending out some letters. It means providing those affected with the full facts.

Summary



The proposed floor will be seriously detrimental to Northview, both socially and architecturally.

● Northview is a distinctive enclave of 1930s domestic architecture – the only survivor of its type in the borough. Council policies support maintaining local distinctiveness but the proposed changes will irretrievably damage this.

● The proposed development is ugly and awkward and takes no account of its surroundings immediately and as part of a neighbourhood.

● Northview is designed as an entity, its architectural design and layout acting physically to provide a natural community. This, along with its restful, welcoming feel, could be seriously disrupted.

● The proposals will compromise residents' safety and security.

● The proposed development fails to meet sustainability standards, in terms of both environmental concerns as well as in providing homes that will last.

● The new storey will cut natural light and direct sunlight to people living here.

● The proposed layout, with kitchen/living/dining areas over bedrooms, will result in noise nuisance. These rooms are cramped and smaller than minimum London Plan standards.

● The drawings are misleading and inaccurate, making our homes look unattractive and unwelcoming.

● The application is badly thought out, shows an appalling lack of attention and contains multiple errors. Some structures have been omitted, window frames appear as masonry and a plan showing a layout that has not existed for years has been used.

● The Design and Access Statement is peppered with claims that are not substantiated and some that are not true, such as some claims that the proposed scheme complies with policy.

● Sustainable homes, transport and security are hardly addressed – a "tick box" attitude has been adopted. Proposed flats do not meet flexible homes standards. National, London and council planning policies are contravened.

● The area is already heavily developed, with new or proposed housing on all sides of Northview. Adding this extra storey will add little to Islington's housing stock while coming at great cost to the existing community.