



Additional Pre-App Studies

December 2025

Project:

162 Holloway Road,
London, N7 8DQ

Description:

Conversion of an office and retail building into mixed use, including office, retail and residential

Client:

Giorgio Gori & Ivan Ruggeri
Majesty Development Ltd
6 Corunna Court, Corunna Road,
Warwick, CV34 5HQ

Matteo Sarno Architecture Ltd – registered in England 15679028

M A T T E O / S A R N O
A R C H I T E C T U R E

PRE-APPLICATION RESPONSE



Development Management Service
Planning and Development

Our ref: P2025/1637/MIN
Date: 14 October 2025

Please reply to: **Euan Cheyne**

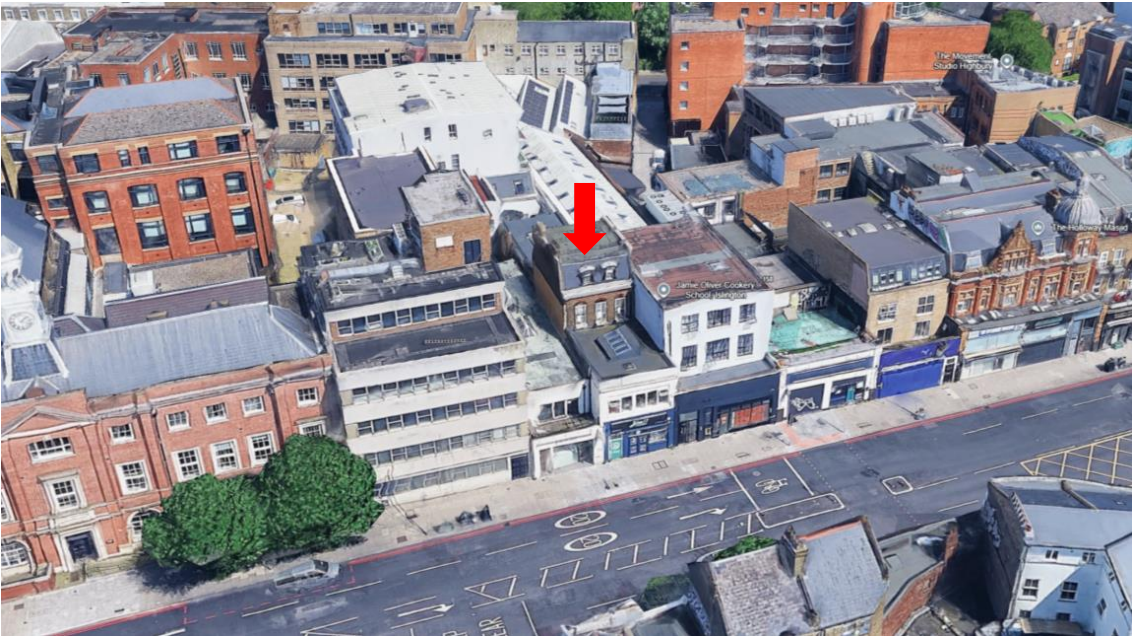


Image 1: Application Site Front (Red Arrow)

Dear Matteo Sarno,

TOWN AND COUNTRY PLANNING ACTS

Reference:	P2025/1637/MIN <i>quote on any reply</i>	Type:	Pre-application – Minor
Location:	162 Holloway Road, London, N7 8DD		
Proposal:	Conversion and extension of an office and retail building into mixed use, including office, retail and residential		

This response is given specifically in relation to the potential redevelopment of the site as suggested by your pre-application documentation submitted. Should your pre-application scheme be altered, this advice may become redundant; and this advice may no longer be considered relevant if adopted planning policies at national, regional or local level are changed or amended; other factors such as case-law and subsequent planning permissions may also affect this advice.

SITE AND SURROUNDINGS

The application site comprises a part two storey, part four storey mid-terrace building located on the north east side of Holloway Road. The site comprises of retail use at ground floor and office use at first, second and third floors. The site does not contain a Locally or Statutorily Listed Building, however it is located within the St Mary Magdalene Conservation Area. The site is located within the Lower Holloway Local Shopping Area. The site falls within the Central West Article 4 Direction (effective from 01/09/2025), removing permitted development rights for the change of use of offices (Class E) to residential (Class C3).

The building appeared to be vacant at first, second and third floor at the time of the site visit (there were no furniture as shown in the photographs included in the submitted DAS).

CONSTRAINTS

- St Mary Magdalene Conservation Area
- Lower Holloway Local Shopping Area (LSA)
- Nag’s Head and Holloway Spatial Strategy Area
- Critical Drainage Area
- Central West Article 4 Direction

RELEVANT LEGISLATION, POLICIES & GUIDANCE

National Policies

The National Planning Policy Framework (NPPF) (2024) attaches great importance to the design of the built environment. Paragraph 139 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Development Plan

The Development Plan is comprised of the London Plan (2021) and the Islington Strategic and Development Management Policies (SDMP) (2023), Bunhill and Clerkenwell AAP (2023) and Site Allocations (2023). The following policies of the Development Plan are considered relevant to this application:

Regional Policies

The London Plan (2021) – The Spatial Development Strategy for Greater London

- Policy D1 London’s form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D12 Fire safety
- Policy HC1 Heritage conservation and growth
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

- Policy T7 Deliveries, servicing and construction

Strategic and Development Management Policies (SDMP) (2023)

- Policy PLAN1 Site appraisal, design principles and process
- Policy SP5 Nag’s Head and Holloway
- Policy DH1 Fostering innovation and conserving and enhancing the historic environments
- Policy DH2 Heritage assets
- Policy DH3 Building heights
- Policy DH4 Basement development
- Policy DH5 Agent of change, noise and vibration
- Policy DH7 Shopfronts
- Policy H1 Thriving communities
- Policy H2 New and existing conventional housing
- Policy H3 Genuinely affordable housing
- Policy H4 Delivering high quality housing
- Policy H5 Private outdoor space
- Policy B1 Delivering business floorspace
- Policy B2 New business floorspace
- Policy B3 Existing business floorspace
- Policy R1 Retail, leisure and services, culture and visitor accommodation
- Policy R4 Local Shopping Areas
- Policy G1 Green infrastructure
- Policy S1 Delivering sustainable design
- Policy S2 Sustainable design and construction
- Policy S3 Sustainable design standards
- Policy S4 Minimising greenhouse gases
- Policy S5 Energy infrastructure
- Policy S6 Managing heat risk
- Policy S7 Improving air quality
- Policy S8 Flood risk assessment
- Policy S9 Integrated water management and sustainable drainage
- Policy S10 Circular economy and adaptive design
- Policy T2 Sustainable transport choices
- Policy T3 Car-free development
- Policy T4 Public realm
- Policy T5 Delivery, servicing and construction

Supplementary Planning Guidance (SPG) / Document (SPD)

- Urban Design Guide (UDG) (2017)
- St Mary Magdalene Conservation Area Design Guidelines (2003)
- Inclusive Design in Islington (2014)
- Environmental Design (2012)
- Recycling and Refuse Storage Requirements (2025)
- Planning Obligations (Section 106) (2025)

RELEVANT HISTORY

P2021/2282/PRA. Prior Approval application in relation to the following considerations arising from the change of use of the first, second and third floor offices (Use Class B1a) to provide 4x residential (Use Class C3) units under 'Class O' of Schedule 2 of the Town and Country Planning (General Permitted Development) Order (GDPO) 2016 (as amended): a) transport and highways impacts of the development; b) contamination risks on the site; c) flooding risks on the site; d) impacts of noise from

commercial premises on the intended occupiers of the development; and e) the provision of adequate natural light in all habitable rooms of the dwellinghouses. Prior Approval Required and Approved 11/10/2021.

EVALUATION

Land Use

The proposed development comprises the retention of the retail space at ground floor along with the ancillary basement floorspace, retention and reconfiguration of the office space at first floor and the change of use (to include two storey rear extension) of the second and third floors to residential in order to create 3no. flats. It is proposed to create an additional front entrance so the retail, office and residential uses have independent access as well as provide dedicated refuse and cycle storage space for the residential use.

There would be an uplift in 14sqm in retail floorspace, a reduction of 63sqm in office floorspace and 180sqm of newly created residential floorspace.

The key land use issues are the:

1. Retention of existing retail floorspace: Given the site’s LSA location, Policy R4(A) and the requirement for “all proposals to maintain and enhance the retail service function of the Local Shopping Area” is of direct relevance. Policy SP5 (H) highlights that new office floorspace will be encouraged to support diversity in the local economy. Conversion of upper floors above retail units to office floorspace will be considered appropriate where there are no adverse impacts on the ongoing operation of ground floor retail and safe, secure access is provided.
2. Loss of existing office floorspace: Policy B3 (A) highlights that the Council will protect existing business floorspace throughout the borough. Consistent with the site’s location within the LSA, as set out within Policy B3 (B), proposals resulting in the net loss of business floorspace will be refused unless there are exceptional circumstances which demonstrate:
 - (i) there is no demand for the use of the floorspace, unit, building and/or site for a business use appropriate to the role and function of the area. Evidence must be submitted demonstrating that such space has been vacant and continuously marketed for a period of at least 24 months, in line with Appendix 1. There is no requirement for business floorspace to be vacant before the start of the marketing period, however evidence of vacancy will be required at the time of application. For proposals for loss of Class E, this must include marketing for the current use as well as other Class E uses (where a particular element of Class E has been secured by condition Part C applies); and
 - (ii) the loss of business floorspace – either individually or cumulatively – would not compromise the operation of the wider area, and that the proposed nonbusiness use is compatible with existing uses (including consideration of amenity impacts on uses in the vicinity). Or
 - (iii) where it can be robustly evidenced that the existing building and/or site is no longer suitable for its existing business use and the existing building and/or site cannot reasonably be redeveloped for continued business use.

Given the LSA location, Policy R4 applies to the proposed loss of office floorspace. Policy R4 (E) highlights that any applications for new residential uses in a Local Shopping Area not involving change of use of existing main Town Centre uses must be located on upper floors. Proposals must address criteria set out in Part D (ii), (iii), (v), and (vi) of Policy R4.

Given the proposed introduction of residential development on the upper floors alongside a retained element of commercial (retail and office) floorspace at ground and first floors, in line with criterion (iii), it will be important to ensure that the two proposed uses can satisfactorily exist in line with the agent

of change principle as set out in Policy DH5 of Islington’s SDMP. This criterion alongside criteria (vi) and the requirement to provide high quality dwellings with a high standard of residential amenity is addressed in more detail below. As is criterion (iv) which seeks to prevent harmful breaks in the active frontage of LSAs being created and criterion (v) which seek to ensure that “access to the proposed residential use does not affect the operation of any continued main Town Centre use floorspace or impact on the street scene and the provision of an active frontage, especially where the loss of floorspace is proposed to facilitate access”.

Residential Use

In line with Policy H1(C) and H2(B)(v), development proposals involving new housing must have particular consideration to interaction with other policy priorities and the relevant site-specific context. As such, in addition to the need to justify the proposed change of use of the second and third floors in order to facilitate the proposed residential development as outlined above, any proposed redevelopment and intensification of the site will need to ensure that any residential development does not undermine the delivery of other policy priorities.

The proposal would need to comply with the ‘agent-of-change principle’ as set out in Policy DH5. The access to the proposed residential units should not affect the operation of the main Town Centre uses, or impact on the street scene and the provision of an active frontage. In this instance, there is existing separate access to the ground floor retail unit and upper floor office use. A new, separate residential access is proposed, and the ground floor would be reconfigured to accommodate this. Overall, this reconfiguration would result in a small increase in retail floorspace on the ground floor and is not likely to affect the operation of the retail use.

Consistent with the site’s location and as outlined above, in this instance any proposed development of the site will both need to ensure to protect and enhance the retail/service function of the site alongside the delivery of business floorspace which is a priority land use. If these other policy considerations can be addressed some residential development on the site may be appropriate subject to meeting other relevant policy requirements.

Land Use Conclusion

Given the location of the site, the overriding priority is to ensure that the retail/service function of the site is protected and enhanced, alongside this, there is a clear policy requirement to prioritise the provision of new business floorspace given the sites location within a Local Shopping Area. The proposed retention and improvement of the existing retail unit and office floorspace on the first floor of the building are supported by Policy R4 which requires the retail and service function of LSAs to be maintained and enhanced, and Policy B3 which protects existing business floorspace. However, if there is a net loss of office floorspace on the second and third floors this must be robustly justified through marketing and vacancy evidence in line with Policy B3 and Appendix 1.

This proposal in addition to proposing a change of use at second and third floors also involves the creation of a two storey rear extension. As such, any proposed redevelopment/intensification of the site will need to be assessed against relevant policy requirements.

Design and Conservation

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that special attention shall be paid by Local Planning Authorities to the desirability of preserving or enhancing the character or appearance of that area.

The National Planning Policy Framework (NPPF) (2024) attaches great importance to the design of the built environment. Paragraph 139 states that development that is not well design should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy PLAN1 of Islington’s Strategic and Development Management Policies (SDMP) (2023), amongst other objectives, aims to achieve development that represents a high quality of design that is sustainable and inclusive and that positively contributes to local character, legibility and distinctiveness.

Part A of Policy DH1 of Islington’s SDMP supports innovative approaches to development while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough. Part E states that the Council will conserve or enhance Islington’s heritage assets and their setting in a manner appropriate to the significance.

Policy DH2 of Islington’s SDMP requires development within conservation areas and their settings to conserve or enhance the significance of the area and be of a high quality contextual design. Proposals that harm the significance of a conservation area or listed building must provide clear and convincing justification for the harm and proposals that will cause substantial harm to the significance of a conservation area or listed building will be strongly resisted.

Paragraph 6.8 iv) of the St Mary Magdalene Conservation Area identifies that *between 140 and 164 Holloway Road an irregular building line exists with several main buildings of only 1 or 2 storeys and some shopfront extensions of 2 storeys. The Council will expect future proposals to conform to a building line with 3 storeys with mansard extensions set back to a line level with 146 - 150 and single storey shopfront extensions up to the rear of the pavement.*

The proposed two storey rear extension would have a depth of 11 metres at second floor level and 8 metres at third floor level. The design would effectively enlarge the existing second and third floor element, retaining the mansard roof profile, and would sit atop of the existing two storey rear flat roof of the building. It would not be highly visible from street level (by reason of its siting), however it would be visible within the private realm/neighbouring windows. There is some variance within the wider terrace of differing scaled rear extensions albeit in many cases these are on smaller plots, historical in nature and merely illustrate the visual harm that excessive developments can cause.

In this case the overall proposed depth, siting, scale, footprint and massing of the rearward proposals are considered to be entirely excessive in scale and scope such that they would overwhelm the rear of the building and strike a highly dominant feature within its context. It is not considered appropriate in design and visual terms to simply extend above the uncharacteristically deep ground floor level albeit with slight setbacks here. It creates a dominant and discordant addition and cannot be supported in principle. There may be limited scope for a much more diminutive rear first floor addition to better respect adjoining buildings upper floor building lines and to not subsume the host building itself.

There may also be scope to consider infilling the front void of the building at first and roof floor levels to better match the vast majority of the properties along this section of the road. The existing pronounced setback is not overly characteristic of the area in terms of context and plans to make better use and develop this area should be explored further rather than proposing excessively deeper and bulky rear additions to the building in this particular case.

Quality of Accommodation

Part C of Policy H4 of Islington’s SDMP states that residential development must meet or exceed space standards, and address other requirements for private internal space, as set out in the London Plan and relevant Supplementary Planning Guidance (SPG).

Policy D6 of the London Plan (2021) and the Technical Housing Standards - Nationally Described Space Standard (2015) also sets out internal space standards for new dwellings at a defined level of occupancy. The latter states that in order to provide one bedspace, a single bedroom has a floor area

of at least 7.5sqm and in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5sqm.

Flat	Number of Bedrooms (b) / Number of Bed Spaces (p)	Minimum Gross Internal Area (GIA)	Proposed GIA	Proposed Private Amenity Space
A	1b/2p	50sqm	48sqm	9sqm
B	1b/2p	50sqm	48sqm	8.5sqm
C	2b/4p	80sqm	70sqm	12sqm

The submitted DAS highlights that the Flats A and B would have a GIA of 50sqm, and Flat C would have a GIA of 75sqm, however when measuring the submitted plans it would appear that Flats A and B would be slightly under the minimum 50sqm requirement. Any future planning application should ensure that the GIA of all flats meets the minimum GIA requirements.

Policy D6 of the London Plan states that the minimum floor to ceiling height must be 2.5m for at least 75% of the GIA of each dwelling. The SDMP requires a minimum floor to ceiling height of at least 2.6 metres (between finished floor level and finished ceiling level), for at least 75% of the GIA of each dwelling. In residential conversions, including extensions, where the original ceiling height is maintained, a lower ceiling height may be acceptable where it can be demonstrated that overall a good standard of daylight, natural ventilation and useable floorspace can be provided.

The proposed floor to ceiling height would be 3.02 metres at second floor and 2.72 metres at third floor, therefore complying with Policy H4 of Islington’s SDMP.

Part C of Policy D6 of the London Plan (2021) states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. Policy H4 of Islington’s SDMP continues this approach and seeks to ensure that new dwellings have good circulation, daylight, outlook and provide functional, useable and comfortable spaces that caters for ages. It goes onto state that where single aspect units are provided, they should not front on to main roads.

The proposed configuration would result in the 2no. 1 bedroom flats being single aspect, with 1no. fronting Holloway Road, albeit noted that it would be set back by 9.4 metres. They would also have a deep floorplan, therefore you will need to ensure that the flats meet the required LUX level test for a habitable room.

Policy D6 of the London Plan (2021) states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. There are some exceptions where communal open space can replace this if private outdoor space would create adverse impacts, however this is not the case on this site.

The proposed flats would be provided with adequate private amenity space (from a space standard perspective) in the form of roof terraces.

Housing Mix

Paragraph 3.30 of Islington’s SDMP states that all development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2, as follows:

Tenure	Studio/bedsit	1-bed	2-bed	3-bed	4-bed
Social rented	None	Low/Medium	High	Medium	Low
Intermediate rent – at London Living Rent levels (or rents akin to social rent)	None	Medium	High	Medium	Low
Intermediate rent – other Discounted Market Rent products	None	High	Medium	None	None
Intermediate – shared ownership	None	High	Medium	None	None
Market	None	Low	High	Medium	Low

For market tenures the Council assigns zero priority to studios, a low priority to 1-beds, a high priority to 2-beds, a medium priority to 3-beds, and a low priority to 4-beds.

There is low priority for 1-bed units, and combined with the proposed units (Flats A and B) being single aspect, it is considered that any future mix should concentrate on providing 2-bed dual aspect units that the Council assigns highest priority to.

Inclusive Design

The proposed flats are required to satisfy Category 2 of the National Standard for Housing Design as set out in the Approved Document M 2015 ‘Accessible and Adaptable Dwellings’ M4(2).

Part B of Policy H4 of Islington’s SDMP states that residential development must be functional, useable and comfortable space that has good amenity for occupiers of all ages. Regard must be had to the surrounding local context as part of the holistic consideration of inclusive design. Housing must be built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development, and must provide 90% of dwellings to Category M4(2) ‘Accessible and Adaptable’ standard; and the remaining 10% of dwellings to ‘Wheelchair Adaptable Category M4(3)(2)(a)’ standard or, where Islington Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations.

The submitted DAS highlights that due to the constraints of the existing building, the introduction of a lift is not practical, as it would result in a significant loss of usable floor area and create complex and inefficient circulation. The absence of a lift would weigh negatively in the overall planning balance and every effort should be made to provide an alternative. It is noted that a stairlift could be provided for the commercial unit and the feasibility of a stairlift for the residential use is being explored.

General

The following information would be required with a formal submission in relation to all residential units:

- audiovisual entry phones with remote access control are required to be provided to all flats in line with Islington’s Inclusive Design SPD.
- dimensions for all rooms and corridors, and dimensions of all fixtures and fittings e.g., toilet, bath, kitchen counters, etc. Please mark all bedrooms with a 750mm transfer around all sides of the bed in principle bedrooms, and one side of the bed in other bedrooms.

- details of how windows are opened. They should be able to be opened from a seated position to align with Part M of the Building Regulations.
- utilities, including switches, sockets, ventilation and service controls, should be at a height useable by all i.e., between 450mm and 1200mm from the floor.
- details of how to access each balcony, as well as their dimensions.
- details of the strength of the walls and the ceilings. In WCs/bathrooms, they must be strong enough to support a load of 1.5kN/m2.

Please refer to the Islington's Inclusive Design SPD (2014) which provides further guidance on flexible home standards.

Neighbouring Amenity

Policy PLAN1 of Islington's SDMP (2023) applies to all new developments including alterations and extensions to existing buildings. Part B(i) of this policy requires compliance with contextual design principle and requires all development to provide a good level of amenity, including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution (such as air, light and noise), fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook.

Daylight and Sunlight

It is inevitable that by enlarging the existing building that the proposal will have some impact on the amenities of neighbouring properties. There are a number of windows that are in close proximity to the proposed two storey rear extension/roof terraces and these will need to be identified and examined through the submission of a daylight and sunlight assessment to ensure that the development would perform well against the BRE recommendations and achieves a high level of compliance.

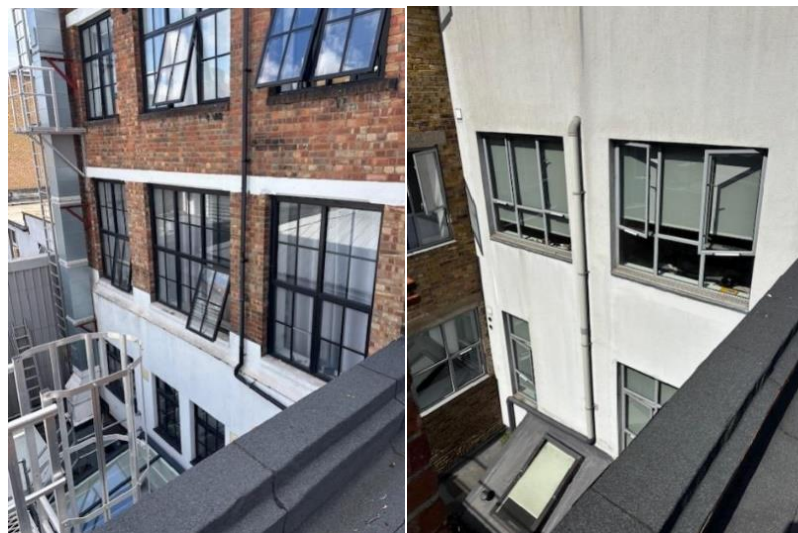


Image 2 and 3: Neighbouring Windows at 160 and Well House (?)

Sense of Enclosure/Outlook

It is considered that there would be clear detrimental visual impacts (loss of outlook) and increased sense of enclosure, therefore you will need to demonstrate that this impact would be within acceptable limits in order to safeguard neighbouring amenity. It would be useful to know exactly what the lawful use is behind each adjoining windows with more protection to residential uses over commercial being notable.

Overlooking and Privacy

Paragraph 1.67 [supporting text to Policy PLAN1] of Islington's SDMP states [inter alia] that *development proposals must respond to and enhance the existing site context, ensuring a minimum distance of 18 metres between windows of habitable rooms, to protect privacy for residential developments and existing residential properties.*

It is considered that the proposed rear roof terraces should be pulled in from the shared boundaries to help mitigate against any unacceptable overlooking and loss of privacy. The proposed roof terrace to the front would front the highway which would not constitute an unacceptable loss of privacy.

Noise and Disturbance

Further consideration will also need to be given to managing the potential mix of uses proposed e.g. detailed information regarding the proposed sound insulation between the proposed residential units at the second floor and the office floorspace below will need to be provided as part of any future application. The agent of change principle as outlined within Policy DH5 will need to be adhered to as part of this.

Highways, Transport and Servicing

The application site has an excellent Public Transport Accessibility Level (PTAL) of 6a (on a scale of 1 to 6b with 6b being the highest). The site is within walking distance of Holloway Road Underground Station with numerous local bus routes in the immediate vicinity.

Policy T1, Part D of Islington's SDMP (2023) states that all new development will be car-free, which will contribute to the strategic aim for a modal shift to sustainable transport modes. Private motor vehicles, including electric vehicles and motorcycles, will not be accommodated as part of new development in the borough and are not a priority form of transport.

Policy T2, Part E of Islington's SDMP states that all new developments in the borough must be designed to incentivise cycling by:

- ensuring safe, convenient and continuous routes for cyclists that follow desire lines and form networks;
- demonstrating that there are no road safety conflicts between pedestrians, cyclists and vehicles entering, parking and/or servicing the development. Cyclist entrances to buildings, cycle stores and parking must be safe and convenient for all and cycle lanes must be demarcated from other pedestrian and road traffic;
- providing cycle parking and associated circulation space for ease of use of cycle parking, in accordance with Appendix 4; and
- providing inclusive and accessible end-of-trip facilities for cyclists, at a level proportionate to the size of the development and the required level of cycle parking.

Table A4.1 within Appendix 4 of Islington's SDMP sets out the minimum cycle parking standards. You will need to ensure that there is an appropriate number of cycle parking for staff and visitors of the retail/commercial use as well as the proposed residential use.

Waste and Recycling

Policy ST2, Part A. of Islington's SDMP states that development proposals must provide waste and recycling facilities which:

- fit current and future collection practices and targets;
- are accessible to all;
- are designed to provide convenient access for all people, helping to support people to recycle; and
- provide high quality storage and collection systems in line with Council guidance.

Please refer to Islington’s Recycling and Refuse Storage Requirements: Planning Guidance (2025) for further information.

Sustainability

Policy S1 of Islington’s SDMP (2023) requires sustainable design to be considered holistically from the start of the design process and all development proposals are required to demonstrate how they will comply with all relevant sustainable design standards during design, construction and operation of the development in line with the energy hierarchy. Part F of Policy S1 requires all development proposals to adopt an integrated approach to water management and to reduce water demand and meet best practice water efficiency targets. Part H of Policy S1 requires all new development to be designed, constructed and operated to limit contribution to air pollution and to improve air quality as far as possible, as well as reducing exposure to poor air quality.

Policy S2 requires all development proposals to submit a Sustainable Design and Construction Statement (SDCS) to demonstrate that the proposal meets all relevant sustainable design policies.

Part A of Policy S3 requires major and minor residential developments involving refurbishment or extensions to achieve a final (post-refurbishment) certified rating of Excellent under BREEAM Domestic Refurbishment 2014 (or equivalent scheme) and must make reasonable endeavours to achieve an Outstanding rating.

Policy S7 states that all development proposals must mitigate or prevent adverse impacts on air quality. Consideration needs to be given to fair quality and pollution from the busy Holloway Road for any new resi units proposed.

Part A of Policy S9 requires all development proposals to adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site. Part B of Policy S9 requires all development proposals to ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy.

All minor developments, in accordance with Policy S2, are required to submit a SDCS to demonstrate that the proposal meets all relevant sustainable design policies. The SDCS would need to specifically address the sustainable design policies (S1-S10) in the SDMP (2023), but those which are not relevant to your case, please indicate that they are not proportionate or applicable to the scale of the development. Please refer to Policy S2, Part B for further information on what to include in your SDCS.

In accordance with the Council’s Zero Carbon Policy, the Council’s Environmental Design SPD states *after minimising CO2 emissions onsite, developments are required to offset all remaining CO2 emissions (Policy CS10) through a financial contribution.* The Environmental Design SPD states *the calculation of the amount of CO2 to be offset, and the resulting financial contribution, shall be specified in the submitted Energy Statement.*

A carbon offset contribution of £3,000 would be required, based on the net gain of 3 additional flats, in accordance with the Environmental Design SPD.

Construction Management Plan

Policy T5 Part G requires developments which have the potential to cause disruption during construction (particularly major developments) to adhere to best practice construction techniques to limit impacts on air quality and reduce noise and vibrations from construction and the transportation of construction waste. Information must be provided to identify and mitigate impacts, including a Construction Logistics Plan.

An Outline Construction Management Plan should be submitted alongside any future planning application.

Fire Safety

A Fire Statement is required for minor developments providing two or more dwellings. It would need to be consistent with the requirements of the London Plan Policy D12 (Fire Safety) and contain the following information:

- The principles, concepts and approach relating to fire safety that have been applied to each building in the development,
- The site layout,
- Emergency vehicle access and water supplies for firefighting purposes,
- What, if any, consultation has been undertaken on issues relating to the fire safety; of the development; and what account has been taken of this,
- How any policies relating to fire safety have been taken into account.

Affordable Housing

Policy H3, Part K of Islington’s SDMP (2023) states that sites delivering fewer than 10 residential units (gross) and/or which propose less than 1,000sqm (GIA) residential floorspace are required to provide a financial contribution to fund the development of affordable housing off-site. The level of contribution required will be £50,000 per net additional unit, except for the area south of Pentonville Road/City Road where the contribution required will be £60,000 per net additional unit. In this instance, a contribution of £150,000 is required for the additional residential units proposed towards the costs of providing affordable housing units elsewhere in the Borough.

CONCLUSION / WAY FORWARD

Principally, given the location of the site, the overriding priority is to ensure that the retail/service function of the site is protected and enhanced, and alongside this, there is a clear policy requirement to prioritise the provision of new business floorspace given the sites location within a Local Shopping Area. Any net loss of office floorspace on the second and third floors must be robustly justified through marketing and vacancy evidence in line with Policy B3 and Appendix 1. At present there is a clear focus on intensifying the residential use of the site which is not fully in compliance with this policy and needs reconsideration.

The overall design, scale, siting, footprint and massing of the proposed rear extensions are considered to be clearly harmful in design and visual terms. They would subsume the host building and have a clear detrimental impact on the character and appearance of the host building, wider terrace and CA setting.

There are some concerns relating to the housing mix, layouts and single aspect units, therefore alternative options should be explored such as providing a larger dwelling on the second floor that might have the potential to overcome these concerns. Further information and consideration with regards to amenity impacts is needed for neighbouring occupiers to ensure that any impact would be within acceptable limits. On the face of the proposed plans the development is considered to cause clear and detrimental harm to adjoining occupiers/users in terms of real and material loss of amenity levels including sunlight/daylight, outlook and undue enclosure levels. A number of inclusive design and sustainable design measures need to be addressed.

DOCUMENTS REQUIRED IN ORDER TO VALIDATE A FUTURE PLANNING APPLICATION

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

Please note that the list below forms an initial list and may be altered / added to depending on the nature of the submission made:

- Completed Full Planning Application Form
- Site Location Plan
- Planning Application Fee
- Block Plan
- Existing and Proposed Drawings (Elevations, Floor Plans, Sections)
 - all drawings must carry a number unique to each drawing and a title
- Planning Statement
- Design and Access Statement
- Heritage Statement
- Daylight/Sunlight Assessment
- Sustainable Design and Construction Statement
- BREEAM Pre-Assessments
- Operational Management Plan
- Noise Impact Assessment
- Outline Construction Management Plan
- Fire Statement
- Affordable Housing Statement
 - either viability assessment or form agreeing to pay off-site affordable housing contribution and associated legal fees

CONSIDERATION OF THIS PRE-APPLICATION RESPONSE

Please be advised that this response is given at officer level and does not form a formal response or decision of the Council with regard to future planning application(s) or other formal approaches. The views expressed above are given in good faith, to the best of ability, and without prejudice to the formal consideration of any future planning application, which will be subject to formal consultation and ultimately decided on by the Council.

PRE-APPLICATION DOCUMENTS: Pre-application Statement & Drawings [June 2025]

Yours sincerely

Euan Cheyne
Planning Applications Team

Planning Application Documentation Table

Document	Required at Validation?	Can It Be Conditioned?	Who Prepares It?	Notes
Full Application Form	Yes	No	Architect	Mandatory for registration
Planning Fee	Yes	No	N/A	Client Standard requirement
Site Location Plan	Yes	No	Architect	Must be OS-map based
Block Plan	Yes	No	Architect	Required for validation
Existing & Proposed Drawings	Yes	No	Architect	Must be fully numbered and titled
Planning Statement	Yes	No	Architect	Core justification document
Design & Access Statement	Yes	No	Architect	
Heritage Statement	Yes	No	Architect (or Heritage Consultant)	In a Conservation Area
Daylight/Sunlight Assessment	Yes	No	Daylight consultant	Explicitly requested due to amenity impact
Sustainable Design & Construction Statement (SDCS)	Yes	No	Sustainability consultant	Always required in Islington
BREEAM Pre-Assessment	Maybe	Maybe	BREEAM assessor	Islington always requires this at validation
Affordable Housing Statement	Yes	No	Viability consultant	Required to justify reduction in contribution
Fire Statement (D12)	Yes	No	Fire engineer	Required for any scheme with 2+ dwellings
Operational Management Plan	Usually Yes (simple version)	Often Yes	Architect	A light version can be submitted now
Noise Impact Assessment Usually	Yes	Sometimes	Acoustic consultant	Could be conditioned if no plant is added
Outline Construction Management Plan	Usually Yes	No	Transport consultant	On A1 (TfL road), critical that deliveries bay on Holloway Road is agreed in advance

PLANNING PROPOSAL

Existing (m2)

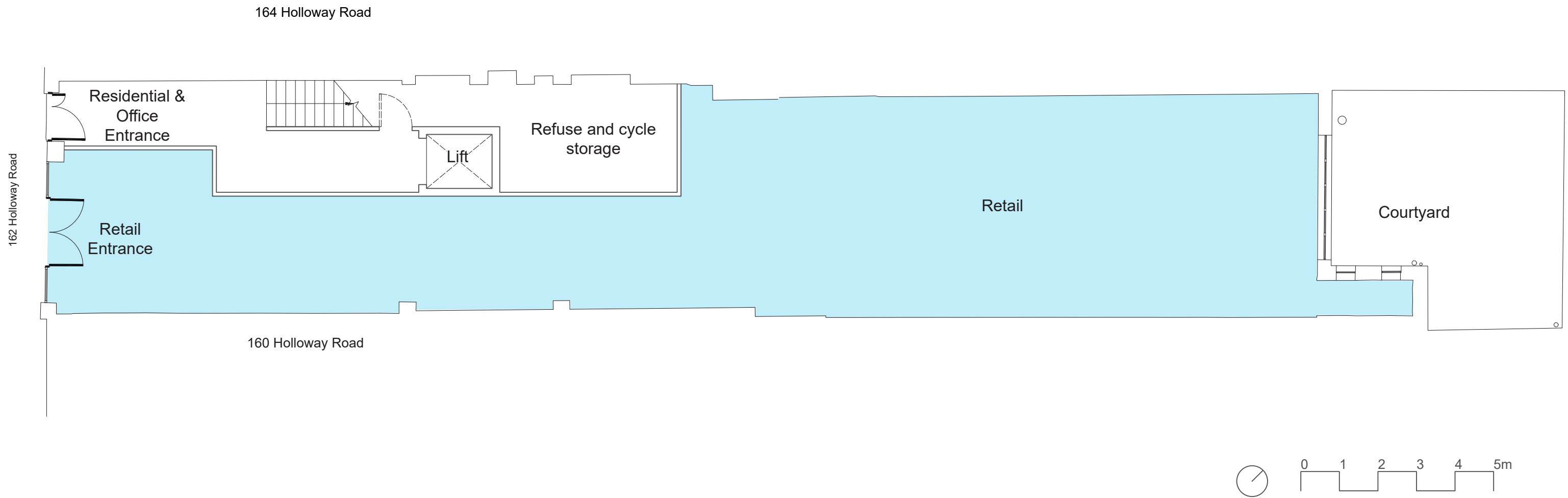
GF: Commercial (Retail)	143.6
F1: Office	174.5
F2: Office	34.14
F3: Office	35.12
All Areas	
Commercial	144.9
Office	243.76
Total:	388.66

Proposed (m2)

GF: Commerical (Retail)	149	
F1: Office	177.8	
	FLAT 1 - 1-bed	FLAT 2 - 1-bed
F2: Residential	51.6	52
	FLAT 3 - 1-bed	FLAT 4 - 1-bed
F3: Residential	51.6	52
FLAT 5 - 2-bed		
F4: Residential	88	
All Areas		
Commerical	149	
Office	177.8	
Residential	295.2	
Total:	622	

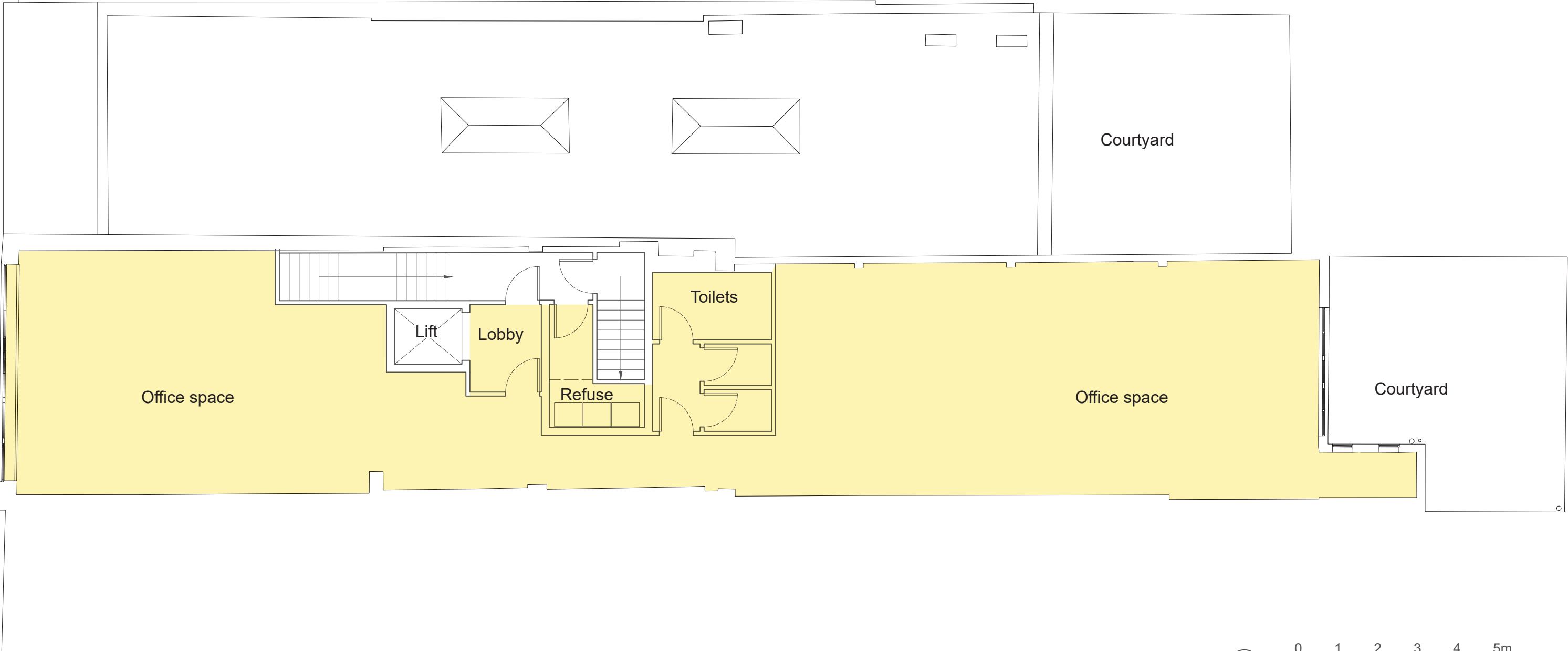
Proposed Ground Floor 1:100

- Retail
- Office
- Residential



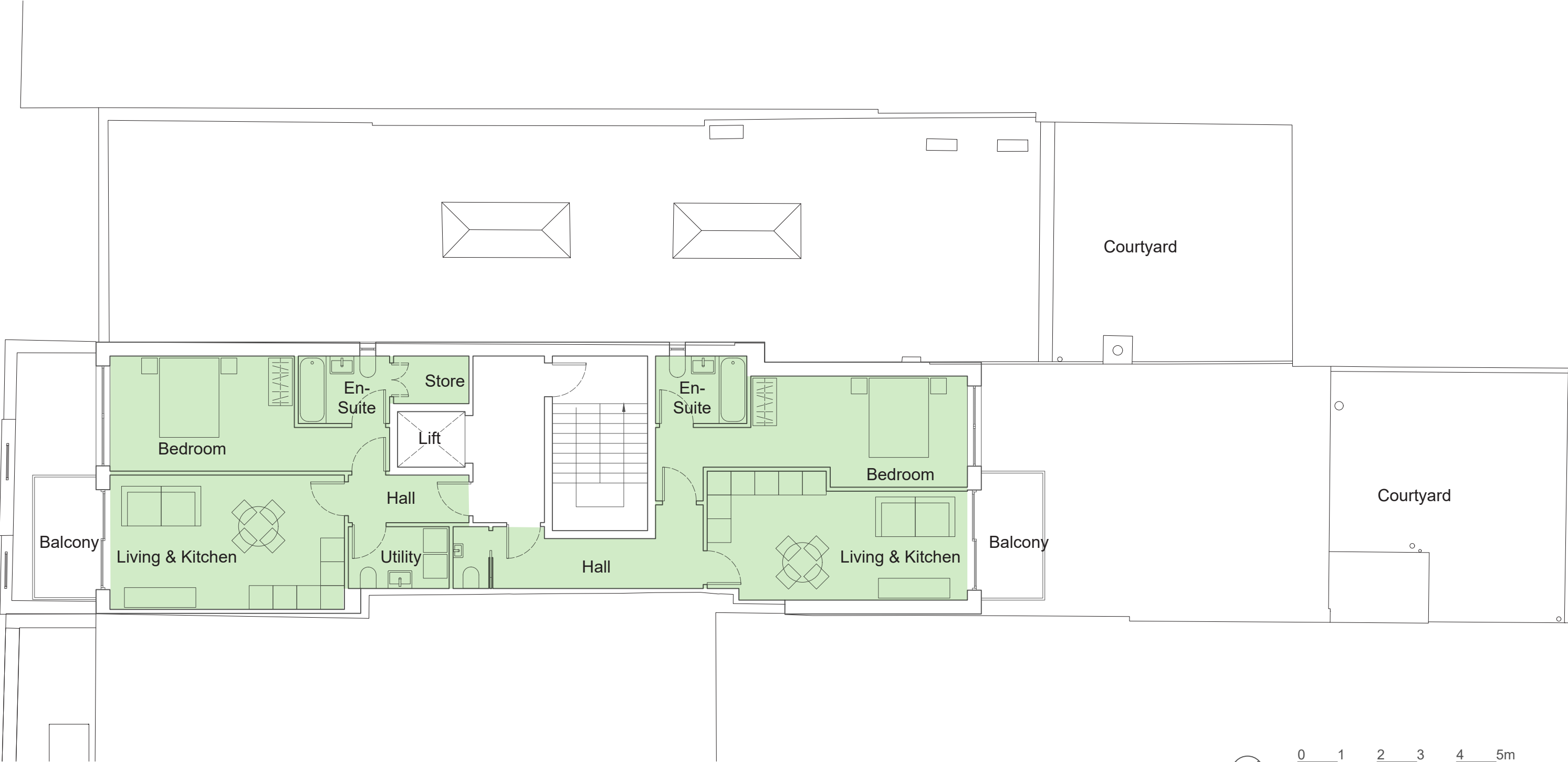
Proposed First Floor 1:100

- Retail
- Office
- Residential



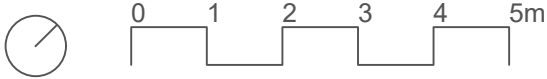
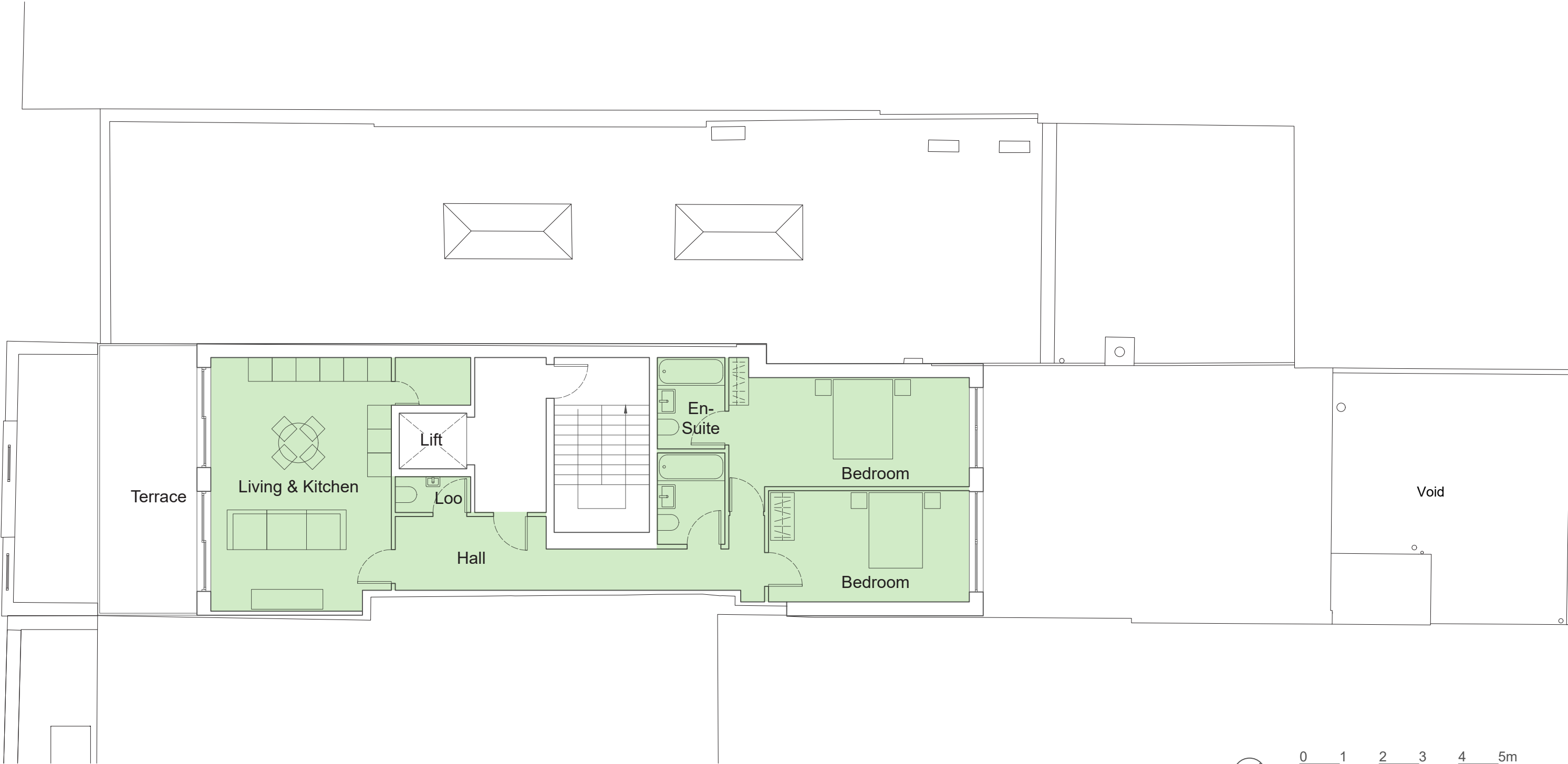
Proposed Second & Third Floors 1:100

- Retail
- Office
- Residential

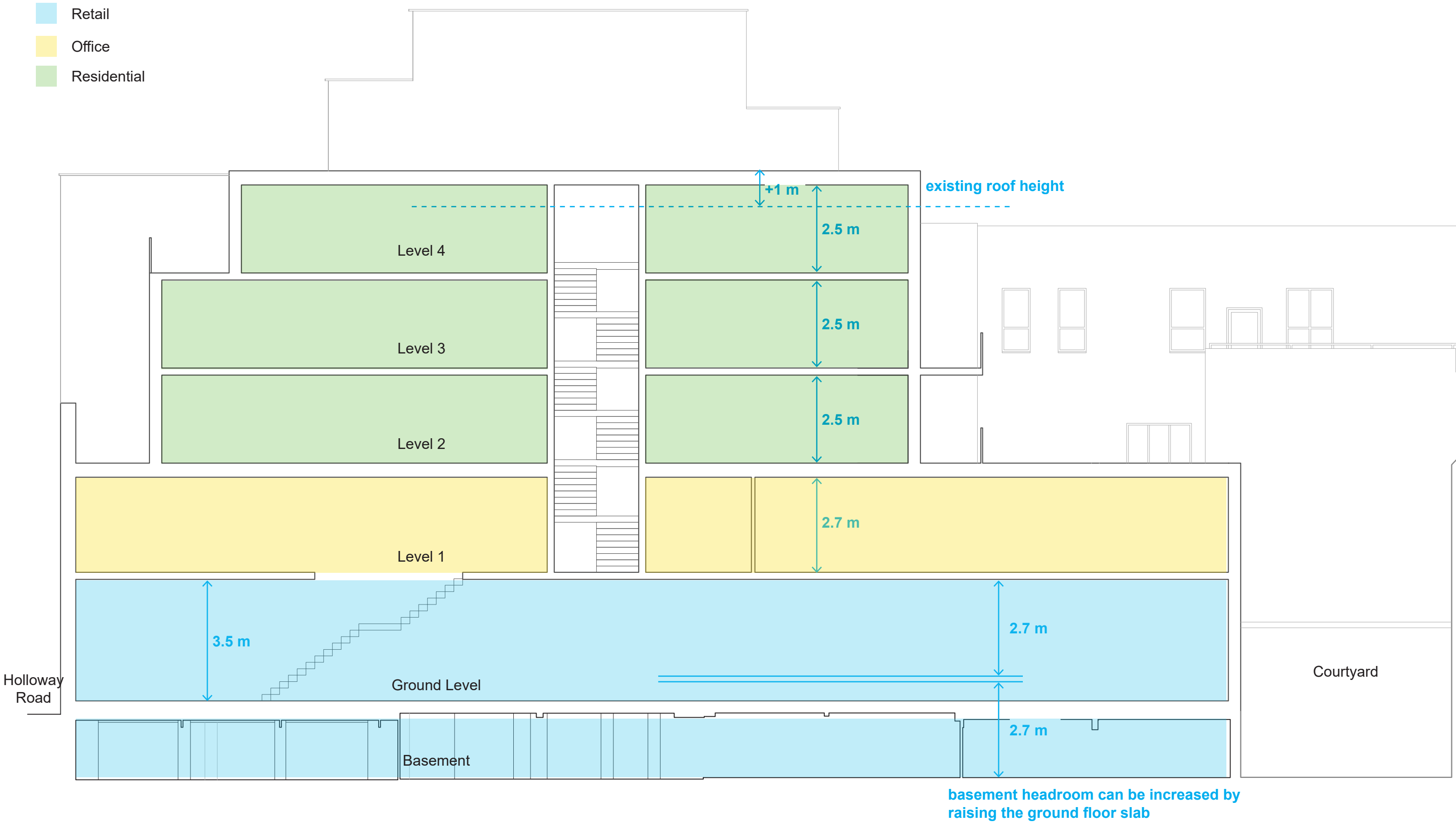


Proposed Fourth Floor 1:100

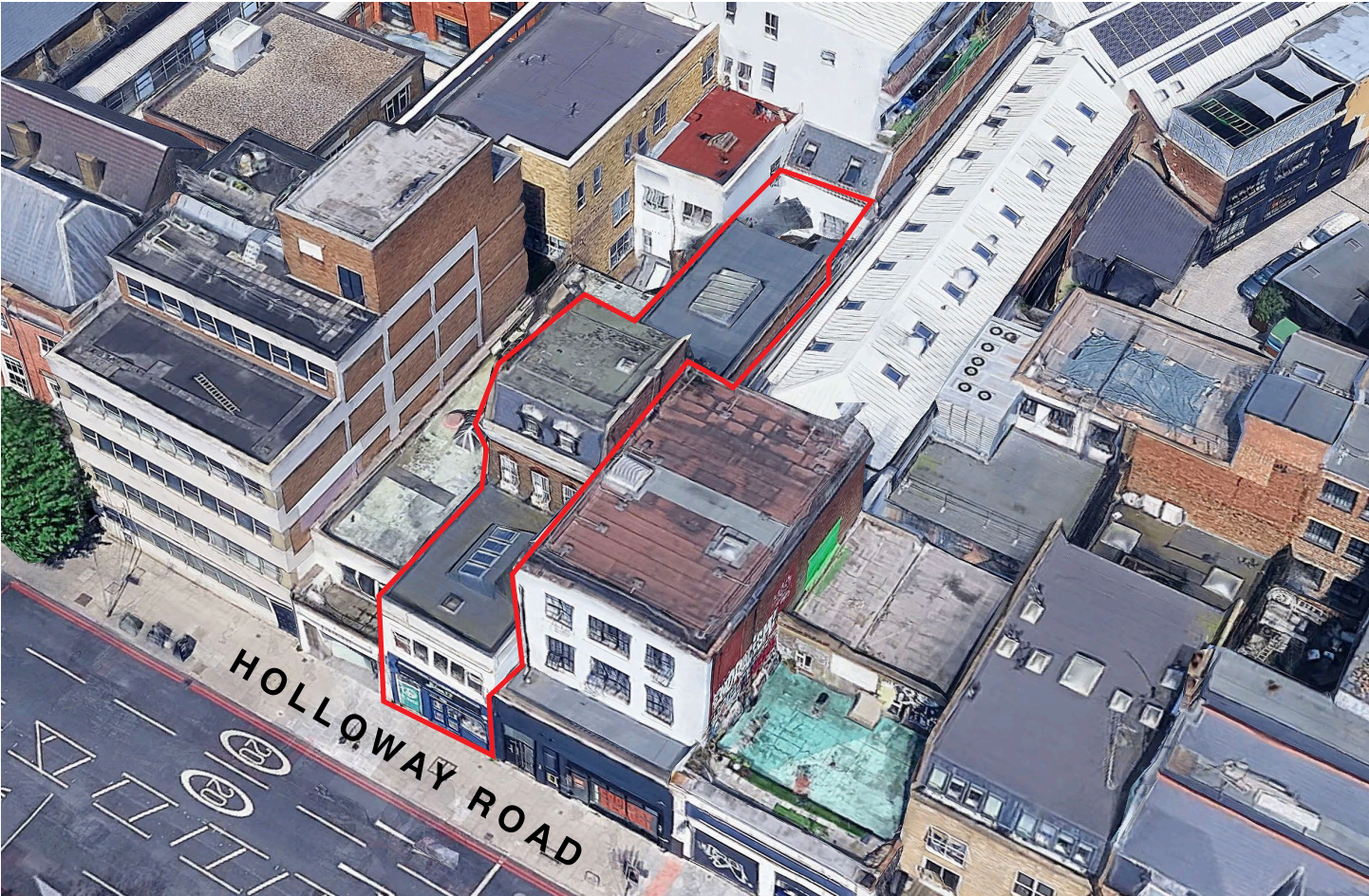
- Retail
- Office
- Residential



Proposed Section 1:100



TOWNSCAPE VIEWS

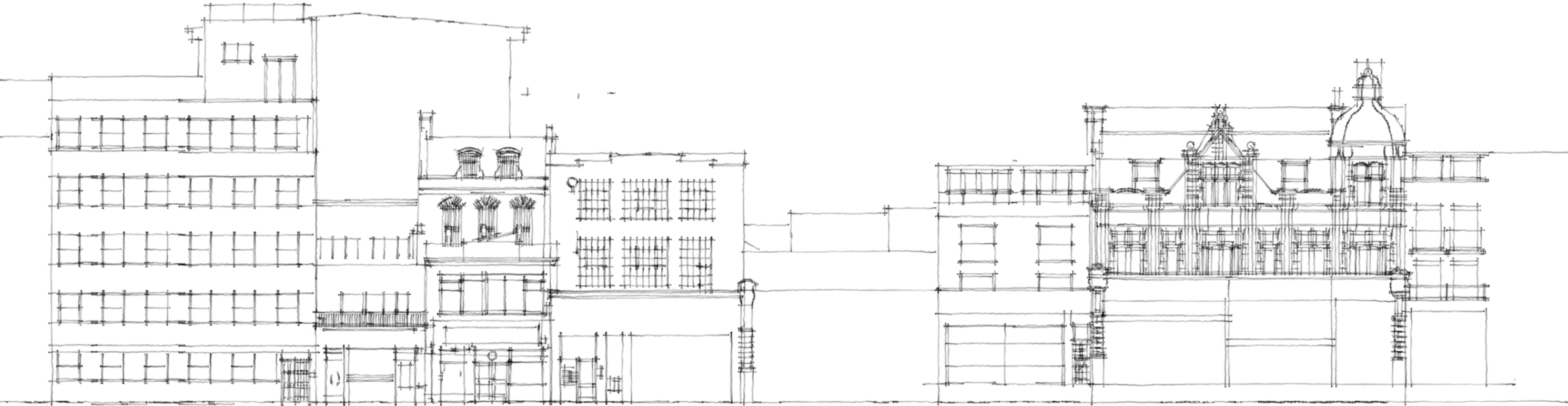


Site - Street views

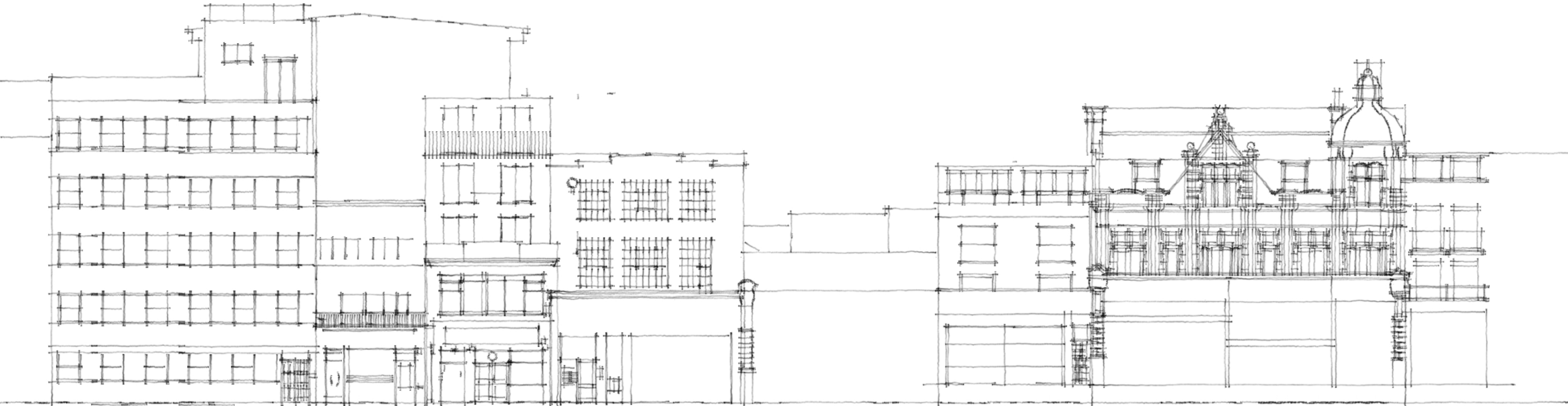


The second and third floors are considerably set back from the street and are only visible from limited vantage points, such as directly opposite the building on the other side of Holloway Road. The proposed extension is highlighted in red.

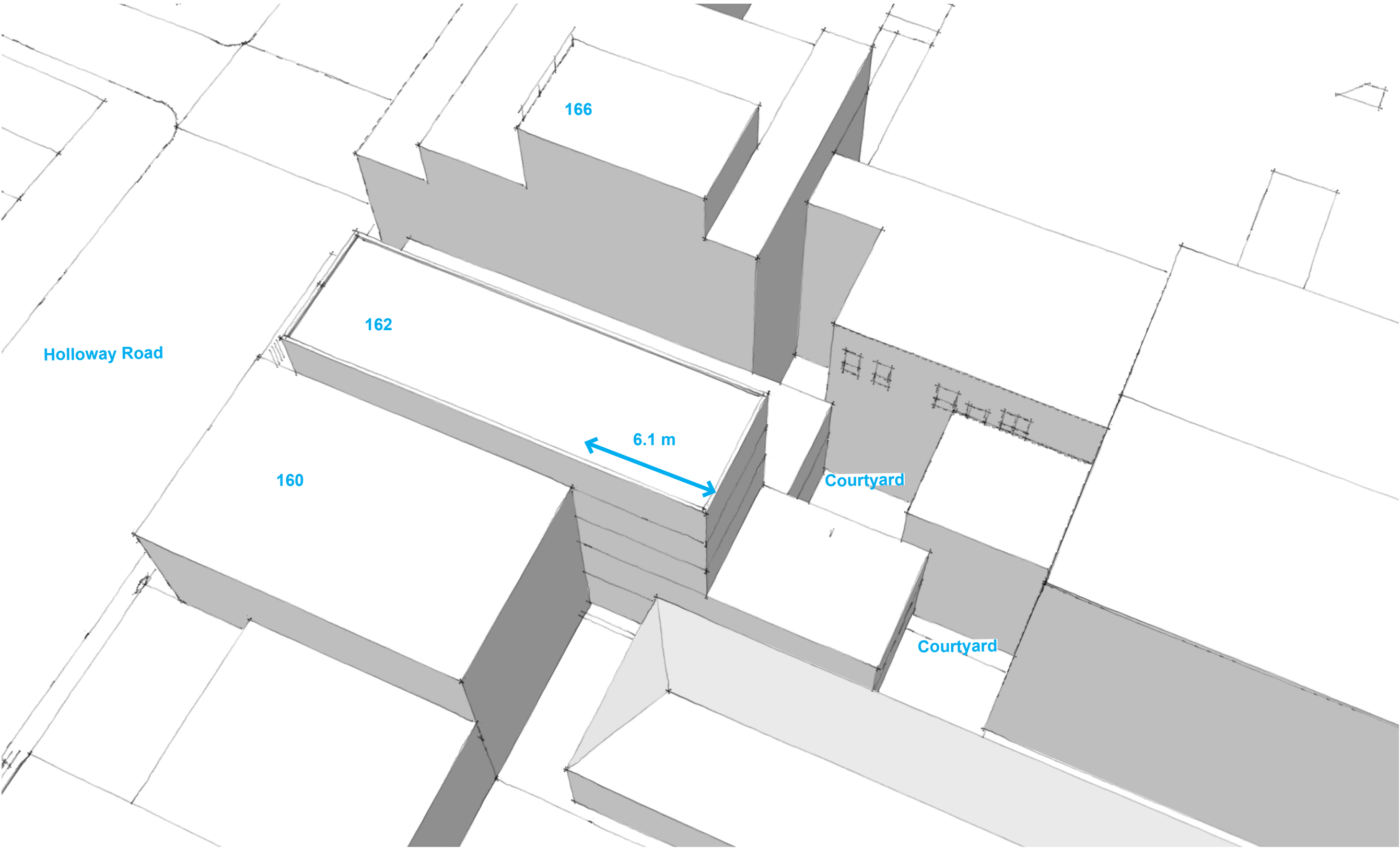
Street Elevations

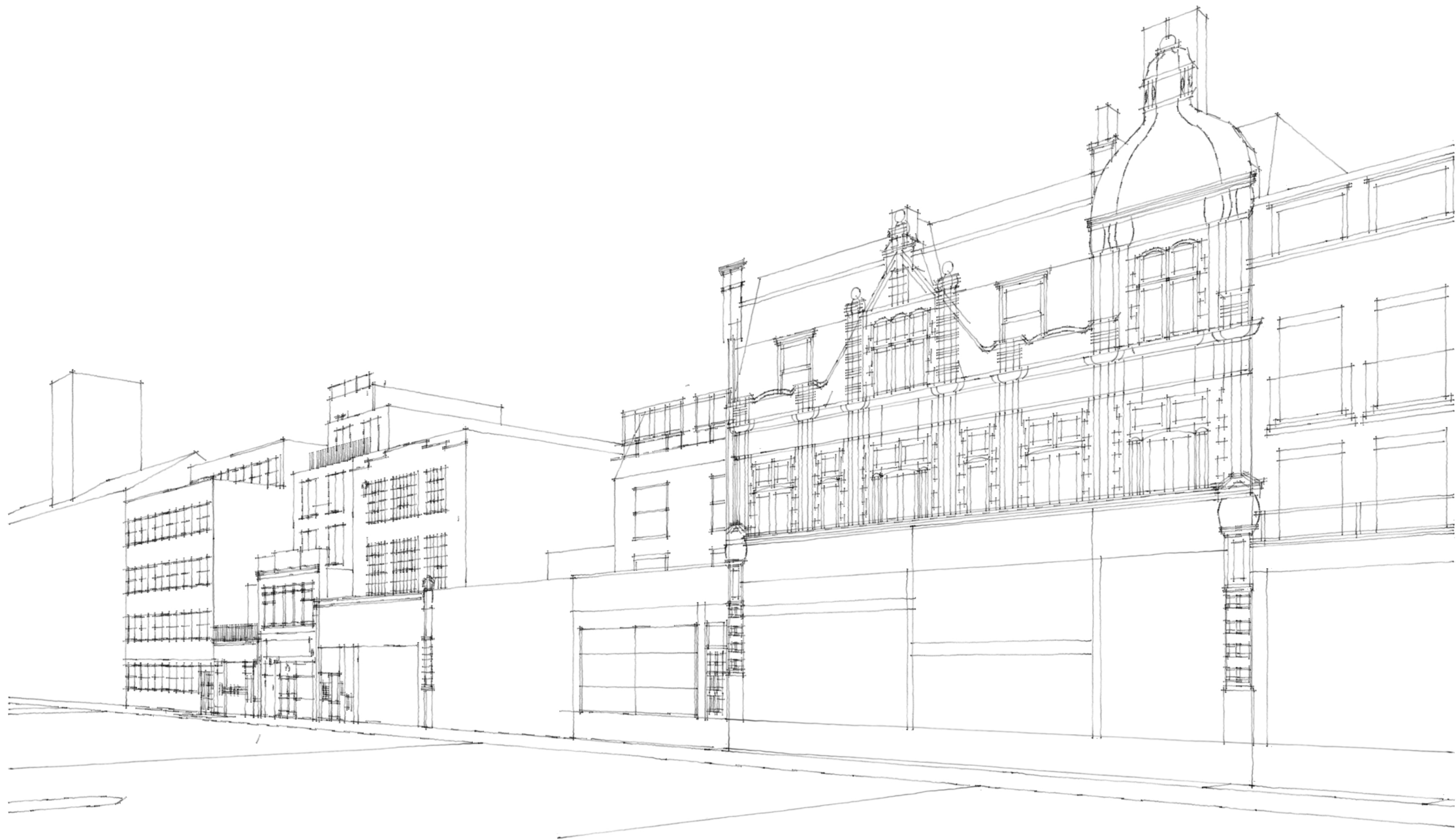


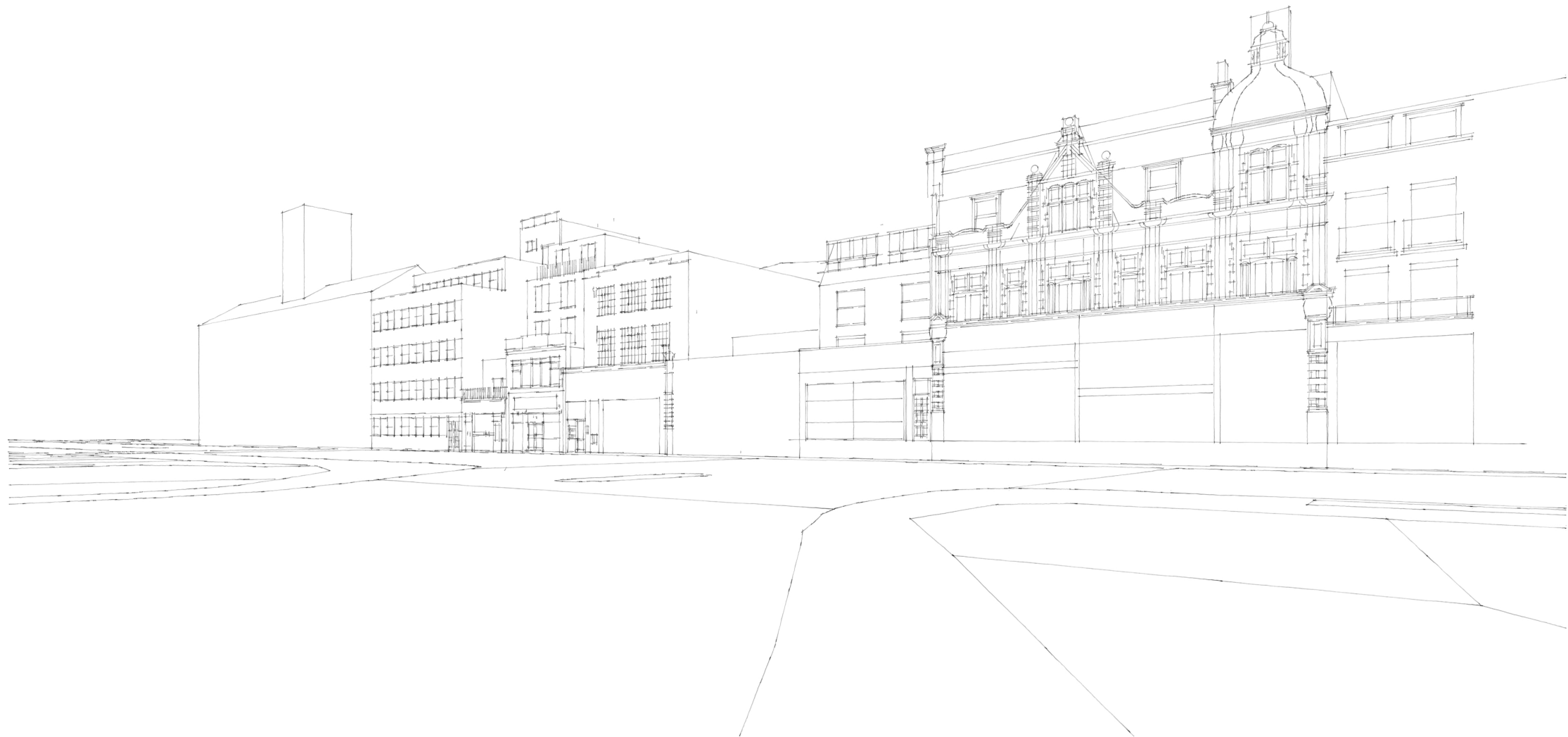
Existing

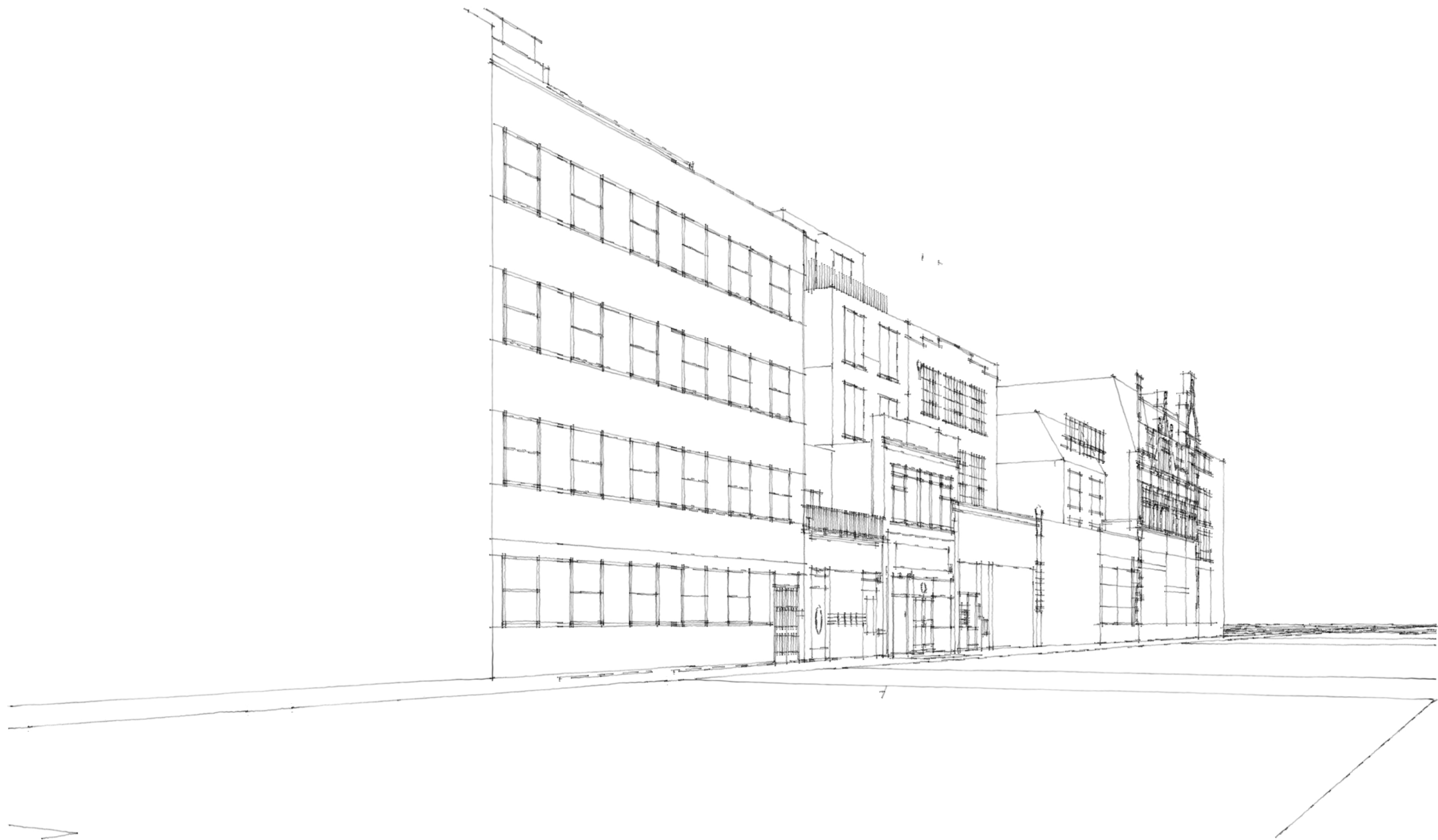


Proposed Rear View

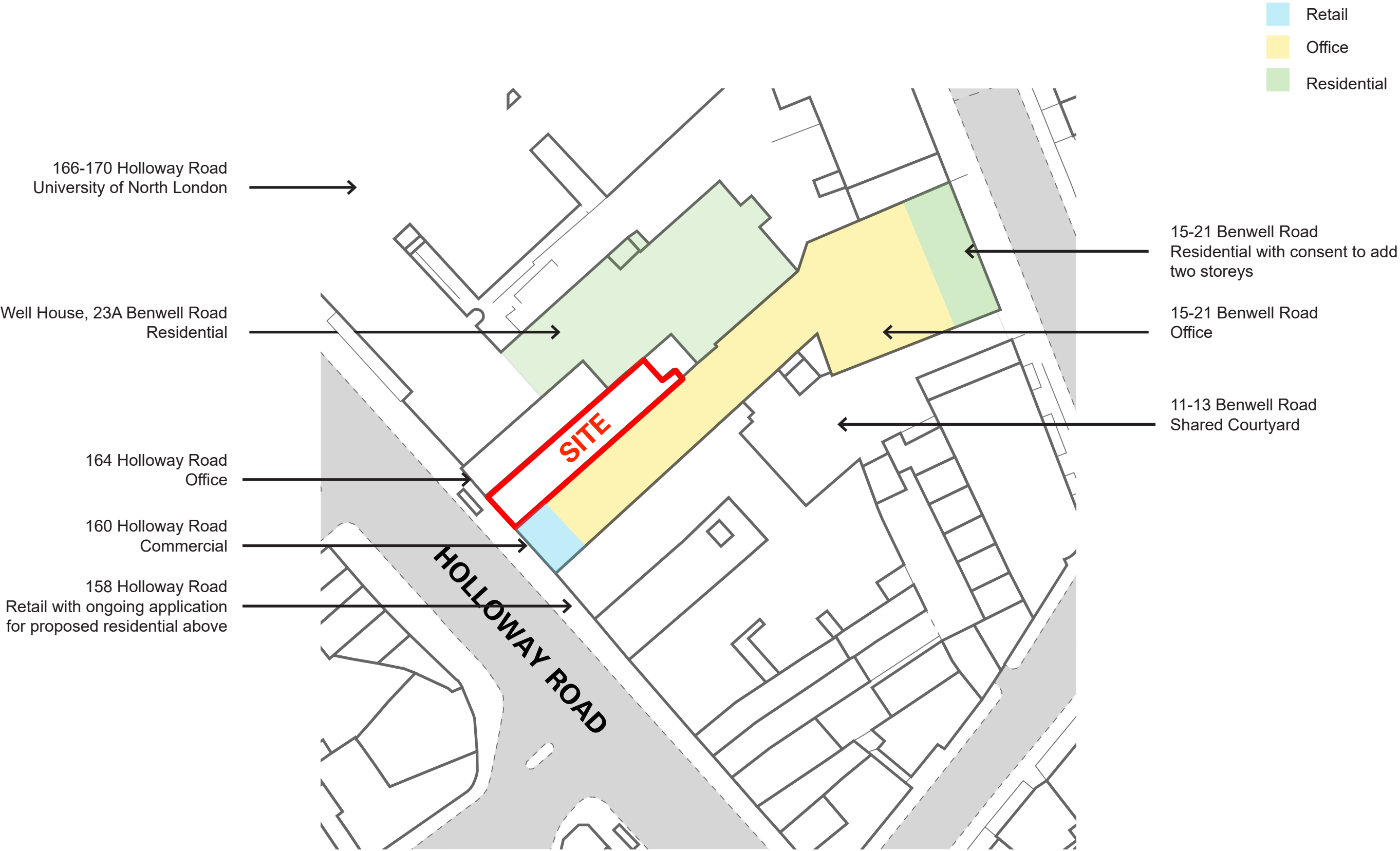


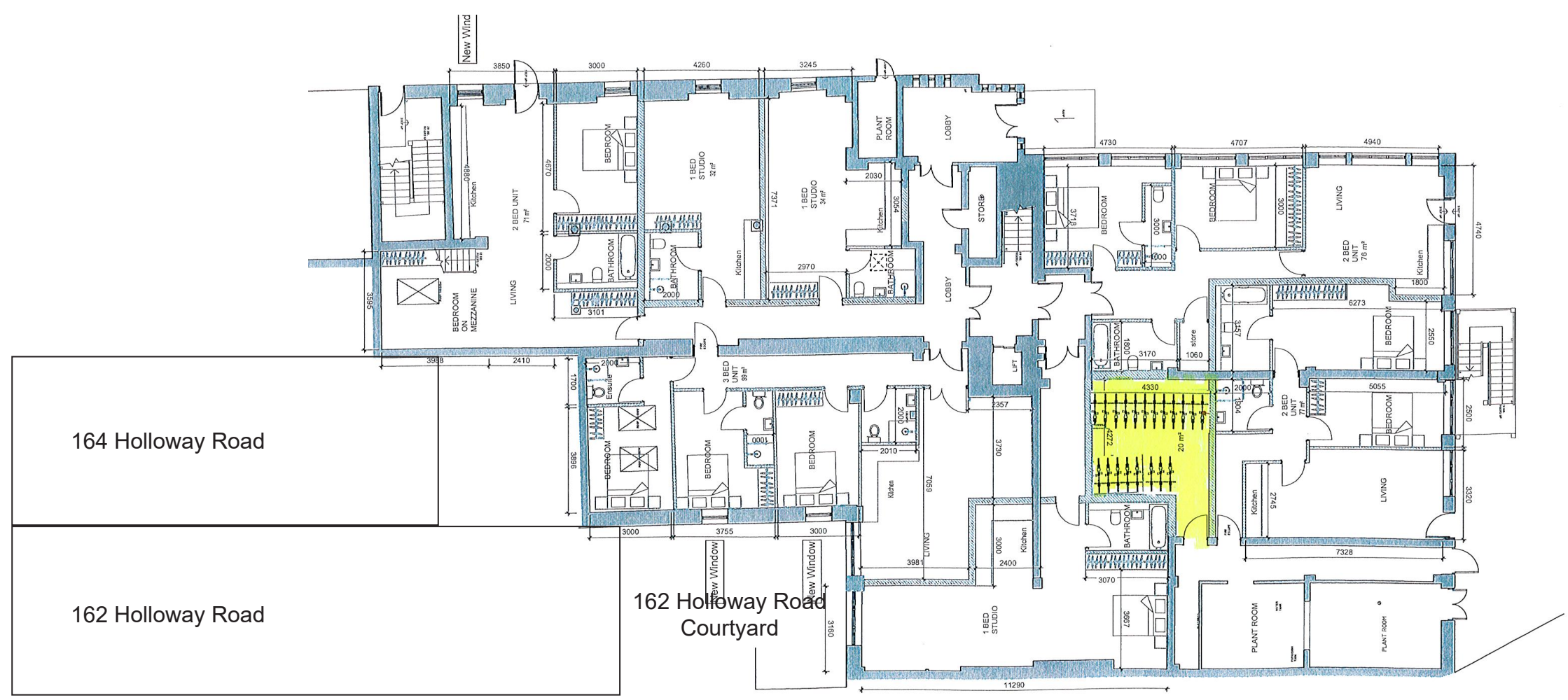




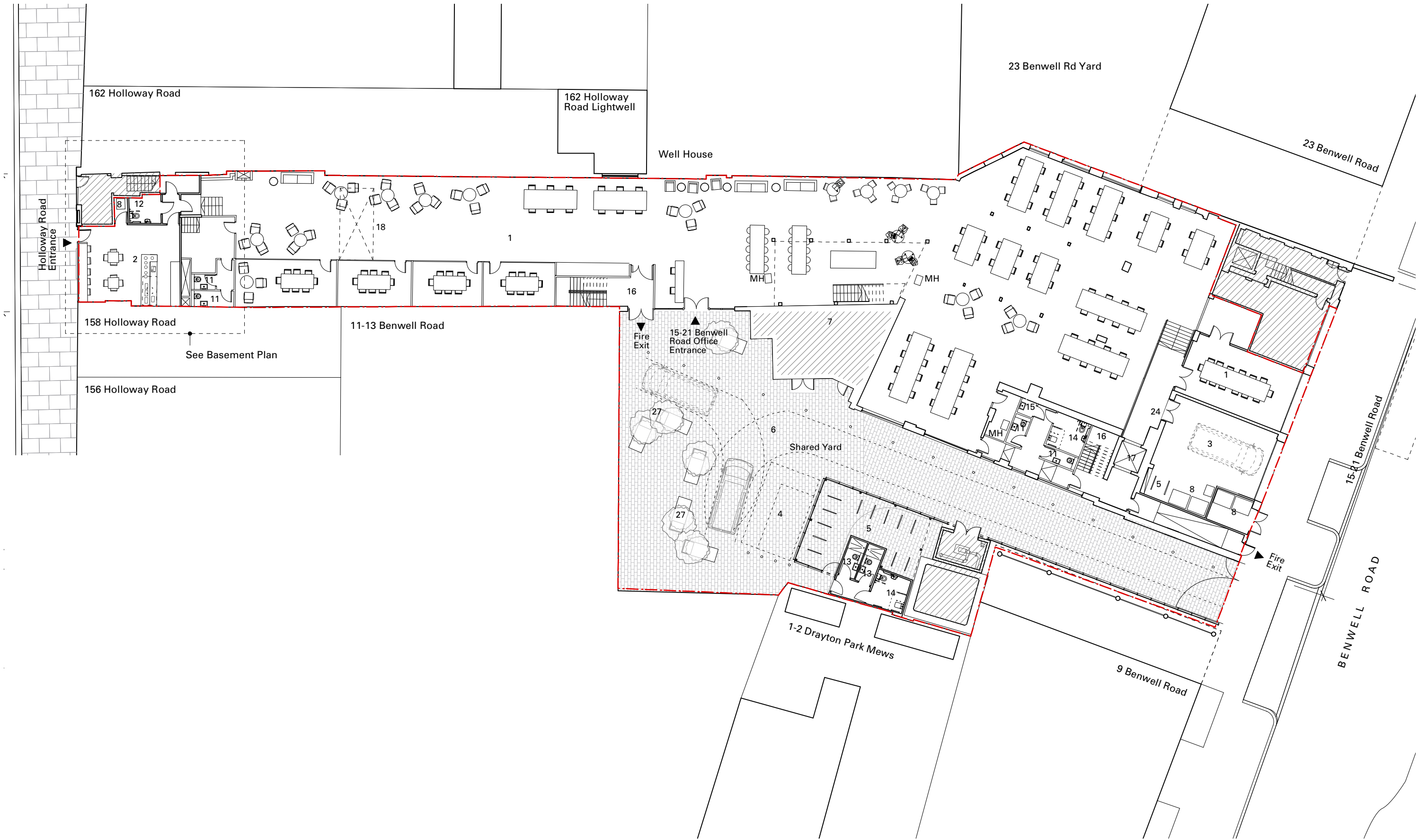


SURROUNDING APPLICATIONS

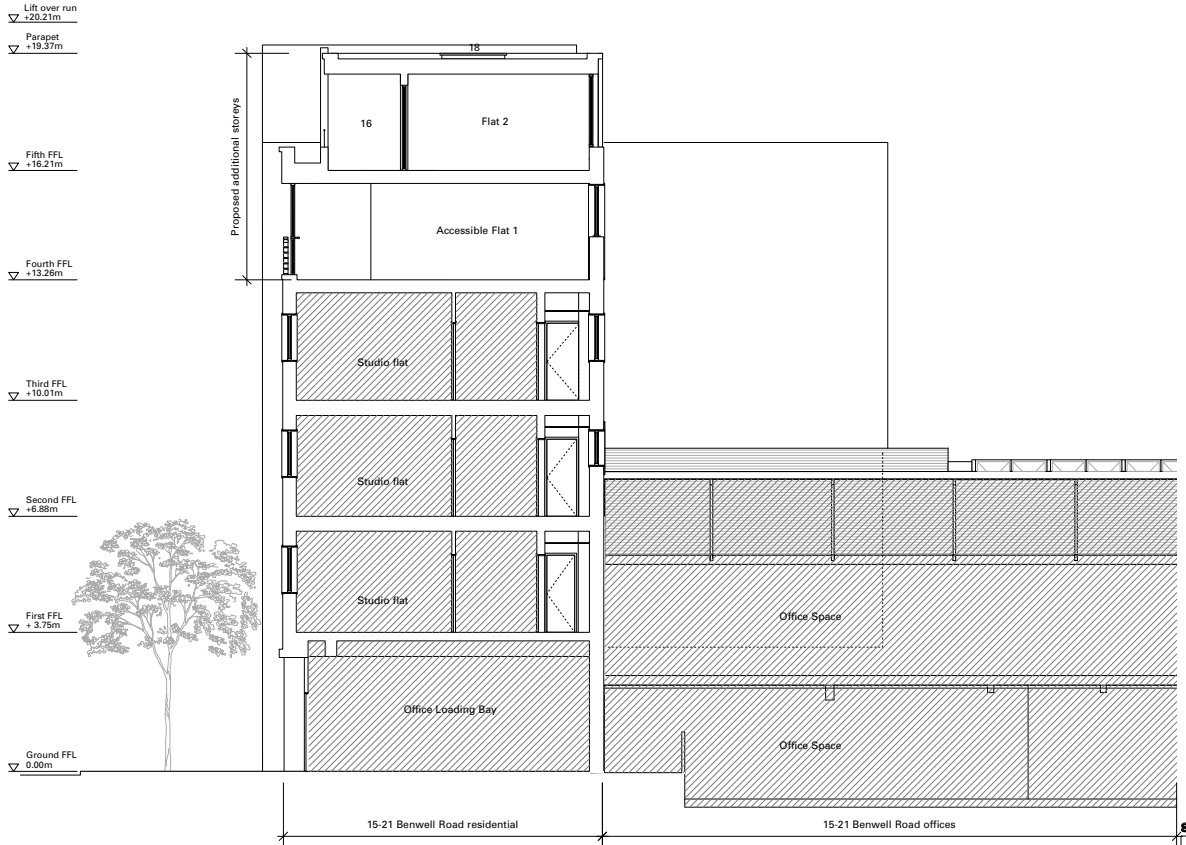




15-21 Benwell Road
Office



15-21 Benwell Road
Residential



158 Holloway Road
Retail with ongoing application for proposed
residential above

