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 P2013/1423/FUL (Islington)  
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Mr Murray,

**TOWN AND COUNTRY PLANNING ACT 1990  
 TOWN AND COUNTRY PLANNING (MAYOR OF LONDON) ORDER 2008**

**Re: Mount Pleasant Planning Applications (Section 2A Direction request)**

*Camden Planning Application (2013/3807/P)*

Site	Land to west of Royal Mail Sorting office bounded by Phoenix Place, Mount Pleasant, Gough Street & Calthorpe St. Camden WC1
Proposal	Comprehensive redevelopment, following the demolition of existing buildings, to construct four new buildings ranging from 5 to 15 storeys (above basement level) in height, to provide 38,724sqm (GIA) of residential floorspace (345 dwellings) (Class C3), 823sqm (GIA) of flexible retail and community floorspace (Use Classes A1, A2, A3, D1 or D2), with associated energy centre, waste and storage areas, basement level residential car parking (54 spaces), the re-provision of Royal Mail staff car parking (approx 196 spaces) cycle parking, residential cycle parking (431 residential spaces) hard and soft landscaping to provide public and private areas of open space, alterations to the public highway and all other necessary excavation and enabling works

*Islington Planning Application (P2013/1423/FUL)*

Site	Mount Pleasant Sorting Office
Proposal	Comprehensive redevelopment of the site following the demolition of existing buildings and structures to construct six new buildings ranging from 3 to 12 storeys in height to provide 38,015sqm (GIA) of residential floorspace (336 dwellings) (Class C3), 4,260sqm (GIA) of office floorspace (Class B1), 1.428sqm (GIA) of flexible retail and community floorspace, (Classes A1, A2, A3, D1 and D2) with associated energy centre, waste and storage areas, vehicle (65 spaces) and cycle parking (523 spaces), hard and soft landscaping to provide public (approx 5,124sqm) and private areas open space, alterations to the public highway and construction of a new dedicated vehicle ramp to basement level to service Royal Mail operations, construction of an acoustic roof deck over the existing service yard (encloses 14,150sqm at basement and ground floor levels) and all other necessary excavation and enabling works.

\* The Camden and Islington applications are accompanied by an Environmental Statement.

I write in response to the current call in request under consideration by the GLA. The letter setting out the request, made under Article 7 of the Town & Country Planning (Mayor of London) Order 2008, was submitted to the GLA on 10<sup>th</sup> January and forwarded to officers at Camden & Islington Councils on the 13<sup>th</sup> January, alongside an invitation to comment upon the request. For the avoidance of doubt this letter comprises the joint response of the London Boroughs of Camden & Islington, though please note that the same response will also be sent out separately from Islington Council. We are both strongly of the view that the call in request is premature and unjustified, and that the prompt conclusion of the borough's detailed assessment of the applications, prior to Stage 2 referral to the GLA, is in reality the most efficient and effective way forward.

### Significant Impact (Art 7(1)a)

The applications taken together are considered to be liable to have a significant impact on the implementation of the Spatial Development Strategy, both in regard to the quantum of development that may come forward, but also in regard to the harm upon delivery of Affordable Housing that would arise, where artificially low levels cited as being the maximum deliverable by the applicant are not sufficiently scrutinised in order to determine actual viable levels of provision.

### Sound Planning Reasons (Art 7(1)c)

#### *Background*

Both borough sites have, as you are aware been used in their current capacity for a significant period of time, and have also been subject of site specific allocations aimed at encouraging residential led mixed use redevelopment that took account of the operational needs of Royal Mail. The Boroughs are firmly committed to encouraging, enabling and supporting the proper development of the sites. The considerable effort expended by the Boroughs in developing and jointly adopting a Supplementary Planning Document for such a small, operational site is testament to that desire.

The same positive approach has been employed throughout the pre-application submissions of 2012 and the planning applications, regarding which this request has been made. In regard to the schemes within both boroughs, significant progress has been achieved in shaping and refining development which could, with limited modifications, be seen to accord with the relevant planning policy considerations. Where this has occurred, it has been as a result of the open exchange of ideas and considered and evidenced conclusions leading to either the form of development proposed, or to subsequent modifications deemed necessary to that form.

#### *Development Principles*

The statements in this regard as set out within the call-in request letter are correct that the principle of a mixed use development at this site is supported by way of:

- The comments within the Mayor's Stage I response to this application;
- Farringdon / Smithfield Area for Intensification objectives;
- Islington Finsbury Local Plan (Site Allocations and Area specific policies); and
- Mount Pleasant SPD (jointly adopted by Camden and Islington in Feb 2012).

The applicant contends that the proposals broadly comply with the adopted SPD, and while this is not disputed, there are a range of outstanding matters, including impacts upon amenity, quality of accommodation, detailed massing issues, an unresolved objection relating to

subterranean impact and detailed highways concerns that have been largely disregarded by the applicant, or acted upon in an unusually drawn out manner which have prevented their prior resolution. The boroughs consider these matters to be most effectively and efficiently considered at a local level.

### *Financial Viability*

It is evident however, that the same approach from the boroughs has not been reciprocated from the applicant in regard to the financial viability of the developments. I make specific reference to this matter as it is considered to have contributed overwhelmingly to the time taken for the boroughs to reach a conclusive view of the application.

In the interests of identifying the appropriate range of inputs and considerations, as well as the outstanding areas (where substantial deficiencies in the range and quality of supporting information); the borough's views were provided to the applicant at the earliest possible stage in early meetings in 2013. A summary of views from the boroughs provided in a letter dated 31<sup>st</sup> May to the applicant's viability advisor, Robert Fourt (Gerald Eve). This letter and subsequent advice and input (provided in the following months) aimed at identifying what additional work was considered to be required, in order to arrive at a place where an accurate picture could be provided of the viability of the development. The letter, which has previously been provided to the GLA, specifically set out the already identified (and significant) concerns regarding the approach to matters including:

- Enabling costs;
- Site Value;(
- Existing Use Value;
- Gerald Eve interpretation and lack of application of affordable housing policies considered incorrect by both boroughs;
- Market transactions "comparable sites". The sites identified were not thoroughly reviewed considered by the two LPAs to have very limited significance to the emerging development.

Responses referring mainly to the work that had already been identified as lacking in robustness and evidence were provided, along with pleas to not prejudge the outcome of the work then being undertaken by DVS, as independent viability assessor. The responses to our letter of 31<sup>st</sup> May included a statement that 'We will deal more fully with these and other points as necessary at the appropriate time' (letter from Oliver Sheppard, dated 5<sup>th</sup> July 2013). This response was prepared by DP9, to date Gerald Eve have not provided a detailed response to that letter.

Following the receipt of a summary preview of the DVS expected conclusions on 31<sup>st</sup> July, it became apparent that no meaningful response nor provision of further evidence or justification in response to – and in the space of 2 months following - the 31<sup>st</sup> May letter had been carried out. At this point it was considered to be necessary for additional resources to contribute to the assessment of development viability matters. The need for such work, in order to provide full confidence in the outcome of the viability assessment was clearly conveyed at this point, as was the short turnaround period for the additional work and the overall benefit it would have to the conclusion of the boroughs assessment of the applications.

Following an attempt to explain this matter to the applicant at the meeting of 13<sup>th</sup> August, a prompt refusal to cooperate with the engaging of additional resources was provided on 16<sup>th</sup> August. The decision to independently engage said additional resources, in the form of BPS, was then only able to be made following the receipt of external advice.

It is important to note that the decision to engage BPS (15<sup>th</sup> October) was only reached after the receipt of the first draft DVS report on 9<sup>th</sup> September, and following a number of meetings between DVS and council officers, where the failure of either the applicant or DVS to provide a meaningful response to the issues raised prior to and within the May 31<sup>st</sup> letter was apparent.

Therefore, following the engagement of BPS, which had been in large part necessitated by the failure to provide said meaningful response, and delayed through the applicant's refusal to cooperate by some 2 months, a prompt and focussed range of matters not fully addressed by the applicant or DVS was identified. A list of 44 specific questions was thereafter identified and provided to the applicant some 3 weeks (on 7<sup>th</sup> November) later. A response providing a handful of the basic corrections and first evidence of any reply to other minor points, having been outstanding since the May 31<sup>st</sup> letter was then provided on 15<sup>th</sup> November.

Disappointingly, despite the BPS list having been drawn together following the review of the applicant's Position Notes and of the DVS report, no meaningful response was provided on the substantial issues, with reference generally only given to those same Position Notes and DVS report, the shortcomings of which had prompted those 44 questions.

Following this further refusal to cooperate, a meeting was held with representatives of the applicant, the boroughs and the GLA. Despite the boroughs grave misgivings regarding the approach having recently been displayed by the applicant, as a commitment was then made to enter into a meaningful dialogue regarding viability matters, including addressing the queries raised by BPS. The boroughs then sought to refine the scope of outstanding areas of investigation and worked with DVS and BPS prior to meeting and agreeing a way forward at the meeting of the applicant, the boroughs and BPS on 4<sup>th</sup> December.

At this meeting a further commitment was made by the applicant to where appropriate consider, test and investigate the matters raised within a more focussed and specific set of queries that would be provided by BPS. Upon receipt of these queries, on 6<sup>th</sup> January, given the protracted nature of recent exchanges, the applicant was clearly advised that:

*'We continue to work towards taking reports to early February meetings, and this would require a response by mid-January at the latest. Please note that we will, at that point, need to make a judgement as to whether your response raises the genuine prospect of arriving at an agreement in relation to viability matters, and will take the applications forward on this basis'*

Although a commitment to respond to those queries had been made at the 4<sup>th</sup> December meeting, and I understand the applicant had conveyed to the GLA an ability to respond to those queries in only a marginally longer timeframe than was sought, indirect confirmation has now informed us that no response is intended to be provided.

Essentially, the greater part of the borough's efforts in recent months have been dominated by viability matters. No meaningful response has been provided to issues raised as far back as May 2013 and earlier. The applicant's refusal to cooperate with the borough's desire to ensure that the proper degree of scrutiny of the actual viability of the development is achieved has allowed very limited progress to be achieved in this area since August 2013. The goodwill shown to the applicant in allowing for additional time for them to cooperate with BPS in order for all parties to arrive at an up to date, accurate and well evidenced picture of development viability, has been sadly disregarded.

Although there can be no doubt that there are always going to be differences in interpretation and the weight afforded to the multitude of considerations necessary within a viability appraisal of a development of this site, it is imperative that sufficient information be provided in order to, 'evaluate (the) proposals rigorously' (London Plan, para 3.71). The applicant has failed to cooperate with the boroughs in their attempt to discharge that responsibility, and the extra time afforded by us, in response to clearly given assurances of cooperation, has caused us to find ourselves beyond the period set out at Article 7(5)a, thus allowing for a call in request to be made.

It is important to highlight the preliminary conclusions of the BPS work, which have focussed on the following areas:

- Private residential sales values and growth rates (for example, postcode analysis shows growth of 36% occurred in 2013, as opposed to 1% growth forecast in material submitted by the applicant)
- Development programme (i.e. timings of costs and values input);
- Affordable housing values;
- Application of sales (including pre-sales) growth (as distinct from the growth forecasts themselves);

BPS have adjusted the above inputs put forward by the applicant, using their own model (as Gerald Eve despite positive written assurances, has failed to provide BPS access to their model). The results of the adjusted inputs show that a significantly increased and potentially target compliant affordable housing provision could potentially be delivered on site. The refusal of the applicant to enter into this process has prevented further analysis of this outcome and refinement of the conclusions.

Development Plan Housing & Affordable Housing Delivery (Art 7(3)b)

The Camden Monitoring Bulletin 1: Housing & Employment Space (2012/13) sets out (page 6) that the London Plan housing target has been met for the preceding 5 years, and for the reporting year the self-contained target for housing (500 units) was met (566 units provided). Bulletin 1 also sets out that Camden's 5 year supply (2014/15 – 2018/19) of deliverable sites will provide 7,072 homes (1,414 homes per year) which significantly (more than double) exceeds the total annual housing target of 665 self and non-self contained homes per year. A contribution from the Phoenix Place site of 290 homes within this total does not significantly impact upon this total.

The DP9 letter states that the London Plan targets for housing delivery for Islington is 1,170 residential units per year. Actually the targets are:

	Conventional housing	Non-self contained
Annual Target	992	250

The application proposals offer a total of 336 residential units within Islington. With the above in mind, these proposals account for: 33.9% of the conventional housing target 28% of the total target. This is different to the figures set out in the applicant's request for call-in.

### *City Forum:*

The DP9 letter makes reference to Islington failing to achieve its housing delivery targets (as set out within the GLA Stage II report for City Forum, paragraph 43 specifically) and states that this is also the case for Camden. This is in fact incorrect and a detailed summary response to this issue is appended to this letter. The DP9 letter went on to state that those proposals (City Forum) not only represented a significant housing offer but also a significant affordable housing offer. The City Forum proposals are clearly very different to the Mount Pleasant proposals. City Forum offered 30% affordable housing units (by habitable rooms) and the Mount Pleasant application now offers just 12%.

The City Forum affordable housing offer was accepted by Islington Council (subject to a viability review mechanism due to the understated growth forecasts), equating to approximately 300 affordable housing units. However this Mount Pleasant 12% affordable housing offer is not accepted by either borough as having demonstrated to be the maximum reasonable amount that the site can afford to deliver. It should be noted that this view is informed by independent financial viability consultants BPS. The 12% affordable housing offer does not constitute a significant contribution towards affordable housing targets within the boroughs, delivering a total of 71 affordable housing units across the two boroughs (35 in Islington and 36 in Camden). Whilst we are aware that schemes offering similar, extremely low levels of affordable housing have, in recent years been proposed and accepted, the view of BPS is that such a level is significantly less than the current schemes are capable of providing. As is referred to in greater detail below, the applicant has been provided every opportunity to provide an evidenced rebuttal of the specific areas of their assessment identified to be deficient, but has again refused to even provide a response in the most instance to these issues.

### *Summary Housing delivery:*

Both Camden and Islington Council have exceeded and have identified capacity to continue to exceed the London Plan Housing delivery targets and it must be noted that Islington in particular contributes a disproportionately high number of affordable and non-affordable dwellings given the size of the borough and the scarcity of land supply. Whilst an anomaly occurred in Islington in 2010/11 the overall trend is for significant over delivery of the Mayor's target.

The Mayor has recently called in the Islington City Forum application. The granting of that application would deliver 100.1% of Islington's annual conventional housing target. Islington did not ultimately raise objections to the inputs to and conclusions from the financial viability of that scheme (with the exception of seeking a review mechanism in the event that forecast growth levels not accounted for in the applicant's appraisal were to come to fruition). This is very different to these Mount Pleasant applications as both Islington and Camden Council's hold significant concerns regarding the financial viability evidence submitted by Gerald Eve, and the refusal to even engage into meaningful dialogue regarding its shortcomings is particularly disturbing.

Additionally, Islington continues to consider a high number of planning applications for new dwellings; is in the top quartile for delivering its own new housing delivery projects and has a very high number of schemes that sit below the 10 unit on-site delivery threshold (that contributes towards lowering the percentage affordable housing delivery against total new housing schemes). The detailed performance of Islington is set out within Appendix 1 to this letter.

This planning application therefore may represent an opportunity to deliver 33.9% of Islington's annual conventional housing target, however its level of affordable housing units against the backdrop of a contested financial viability approach would significantly harm the boroughs capacity to achieve its strategic affordable housing delivery targets.

In housing delivery terms, it is the view of both boroughs that there are no housing delivery reasons for the Mayor to call in this application.

### Employment

The boroughs consider that the intensification of the Royal Mail operations at this site, which has already occurred, and would subsist in the absence of further works relating to the proposed development sit separate to these planning applications. Thus whilst the number of jobs at Mount Pleasant Royal Mail has recently increased, this is entirely separate to the consideration of the current planning applications.

#### *Employment Creation:*

The planning applications (taken together) would comprise office (B1 use class) of 4,260sqm delivering some 355 jobs and retail / community uses (A1/A2/A3/D1 use classes) of some 2,250sqm delivering between 113 and 133 jobs.

The total employment capacity of the proposed commercial uses (including community) would be between 468 and 488 jobs. The proposal would therefore contribute towards the London Plan employment capacity target of 2,500 jobs for the Farringdon /Smithfield Intensification Area by between 18 and 19.5%. The Islington proposal (office floorspace) would contribute 19% provision of the Finsbury Local Plan (North Clerkenwell and Mount Pleasant) business floorspace target (22,000sqm).

Whilst these additional jobs are a benefit of the proposals, they do not overly affect the delivery of strategic targets within the London Plan to warrant the calling in of this application.

#### *Other issues impacting on reporting timeframe:*

As is referred to above, reflective of the delay in providing comprehensive or prompt engagement with outstanding issues in regard to viability, unusual delays to, on occasion, wholly straightforward queries have characterised both borough's interaction with the applicant's representatives. These, though certainly secondary in scale and impact to outstanding viability issues, have prevented prompt conclusion of matters identified at various stages in the assessment of the applications.

Of greater significance has been the inability to produce evidence to support the applicant's contention that s106 linkages between the latest parts of the Camden scheme and later Islington phases would be fatal to the disposal and redevelopment of the site. Officers have most recently been advised that such information (in the form of a note prepared by Gerald Eve) would be 'issued following the outcome of tomorrow's meeting' (email from Hugh Sowerby (DP9) of 3rd December). Given the apparent confidence held by the applicant of the impact that such a linkage would have, the ongoing inability or unwillingness to disclose the evidence behind this belief is curious.

## *Decision Making Timescales & Outstanding Issues*

As is set out above, the principle cause for the delay in reaching a conclusion in their assessment of the applications has arisen through the failure of the applicant to respond to detailed queries from the boroughs, from the external consultants engaged to provide additional viability expertise, and the more recent delays incurred as the boroughs delayed our conclusions to allow the applicant further opportunities (explicitly sought by the applicant) to correct this approach.

Despite this repeated willingness to continue to engage in constructive dialogue, the applicant, in again failing to meet given commitments are now refusing to provide sufficient information to enable the rigorous evaluation of the application. They have provided a clear indication that further attempts to engage with the applicant on viability matters will bear little chance of enabling a positive outcome to be reached.

Whilst it is unfortunate that despite the significant efforts made by the boroughs, the applicant has now effectively removed any possible path to completing our assessment, by denying the ability to complete the assessment that as the local planning authority, we are required to make.

I note that a request was made to set out the range of outstanding issues within this response. The standard path of progress for such an application is for a full and proper conclusion to be reached on all relevant matters relating to the application at the appropriate identified decision level. This level has been agreed by the boroughs to be the main Planning (Islington), or Development Control (Camden) Committees. In addition to completing a thorough and complete report and recommendation on the subject developments, the resolution reached through the democratically elected bodies is considered to be the necessary manner through which the borough's views are summarised. This is certainly the case in regard to significant applications where an appeal against non-determination has been lodged.

To attempt to provide a truncated, officer level summary of issues affecting applications of this complexity, particularly in regard to conclusions where committed to responses will now not be delivered, is not considered to be an acceptable manner in which to relay the boroughs views regarding the applications. To require or subsequently rely upon such a compromised output would be to unfairly impair the boroughs ability to fully set out their views. The Boroughs would thus have our patience and good intentions in regard to our approach to the application penalised through being prevented from reaching this proper view by the actions of the applicant.

The boroughs therefore wish to commit to reaching a recommendation based upon the information as submitted to date. Despite the comments of Mr Sheppard on behalf of the applicant, a 'firm commitment' was in fact made to determine the applications 'within a reasonable timescale' (page 3 of call in letter). The commitment was made in an email from the boroughs to Mr Sheppard on 6<sup>th</sup> January (and has already been forwarded to the GLA). It is thus unclear why the call in letter (dated 10<sup>th</sup> January) makes a contrary allegation.

An officer's recommendation will therefore be taken to the next available committee date (subject to the delay in reporting period arising through the need to respond to the call in request and to overcome the applicant's failure to undertake the outstanding work including in particular the necessary testing of modified and updated viability model inputs. The applications will therefore be taken to scheduled committees on 27<sup>th</sup> February (Camden) and 10<sup>th</sup> March (Islington).



As is set out within this call-in request, the applicant's representative clearly states that the principle reason for making the request is to achieve the 'prompt determination of the applications on the basis of the proposal as it stands' (page 3). I think it is of crucial importance to note the last 3 words of that statement, 'as it stands'. Such a determination of the schemes as they stand can and will now be undertaken by the boroughs, now that the applicant has definitively abandoned real cooperation with the boroughs.

The prompt conclusion of the assessment and the presentation of the boroughs - fully considered - views of the schemes in the form of committee resolutions will thus now be undertaken. The subsequent resolution will be then be referred promptly to the GLA (we are happy to commit to providing the Stage 2 referral within 3 working days of the committee resolution). Such a conclusion is considered to be the most appropriate, democratic and time efficient manner to set out our views and provide a comprehensive conclusion on the boroughs views of the scheme, the identification of issues in the following 14 day call in period will be significantly simplified. Should the resolutions be to refuse planning permissions, the GLA will then already be furnished with a properly considered, conclusive and exhaustive review of the scheme, already subject to the very significant degree of local community interest in the development.

Borough officers are well aware that even schemes called in by the GLA following local resolutions can be significantly protracted, with the 2 years taken to determine the Eileen House scheme being a case in point. As the boroughs, despite the unproductive approach now being adopted by the applicant, retain a strong desire to bring forward a positive redevelopment of the sites and would be disappointed if a significantly extended period of time passed before the outstanding issues could be resolved and an acceptable scheme brought forward at Mount Pleasant.

Yours sincerely,



Ed Watson  
Assistant Director Regeneration and Planning  
London Borough of Camden

Cc: Samantha Wells, GLA  
Karen Sullivan, LB Islington

## Appendix 1: Islington's Housing Delivery – Factual errors within City Forum GLA stage II response.

Paragraph 43 of the Stage II City Forum GLA Response refers to Islington failing to meet its housing targets over the period 2008 – 2012. This is factually incorrect. Borough housing targets refer to conventional dwellings and non-self-contained housing, and when both are taken together, **Islington exceeded its overall housing targets over this five year period by 92%**, as shown in the table below:

Year	Completions	Target
2007/8	3,287	1,160
2008/9	2,708	1,160
2009/10	2,230	1,160
2010/11	1,402	1,160
2011/12	1,548	1,172
<b>Total</b>	<b>11, 175</b>	<b>5,812</b>

Paragraph 43 of the City Forum GLA Stage II call-in report also referred specifically to Islington delivering only 81% of the annual target in 2012 (financial year 2012/13). This is also factually incorrect for the same reasons as above (and illustrated in the table).

Presumably the report refers to delivery of 958 conventional homes (based on completions data held by the GLA) against the *overall* target of 1,172. Islington's target/monitoring benchmark for *conventional* dwellings is actually 922, thus delivery of 958 equates to 104% of the target. However, when looking at the overall target of 1,172, which includes non-self-contained units, Islington's delivery has significantly exceeded targets.

The total housing completions for 2012/13 have not yet been confirmed fully (Islington's AMR is currently in preparation), but the survey undertaken in summer 2012 recorded 409 non-self contained units that were completed in the 2012/13 monitoring year (that is they were completed between April and July 2012). Therefore, the total housing completions in Islington for 2012/13 are expected to be at least 1,367 units against a target of 1,172.

The period in question includes one year when there was a "lull" in the delivery of conventional housing. However, even during this down year for completions, Islington exceeded its overall target, delivering 1,402 units of conventional and non-self-contained housing, against an overall target of 1,160.

In the same year Islington recorded a net loss of 69 social rented units which affected conventional delivery overall. The net delivery was actually diminished significantly through an anomaly in data recording. One relatively large scale site recorded a negative amount of net completions in 2010/11 due to a peculiarity of the way that the loss of existing homes to make way for new homes in a phased redevelopment is recorded (i.e. a redevelopment of a large housing estate).

Although the development in question has resulted in a significant net gain of homes over the combined years in which phases have been completed, the loss of existing units was recorded against 2010/11 when the particular phase of development was completed. As most of the completions associated with the phase of development occurred in other years, this resulted in

a net loss of 145 units against the scheme in 2010/11. It is an unfortunate coincidence for the monitoring year result that this occurred in an isolated year of generally low delivery, which could not absorb the loss as other years of general high delivery would have.

Paragraph 45 of the call-in report quotes the figure of 23% affordable housing rate over the five years to 2012 as per the 2011/12 London Plan AMR, Figure 2.1. It is vital to see these numbers in a wider context, as set out below.

The report refers to Islington being in 'the lower quartile of affordable housing performance'. Examining the proportion of affordable housing in total conventional housing delivery is only one way to analyse performance. According to the GLA AMR (March 2013) which shows performance over a three year period from 2009/10 to 2011/12, Islington delivered 848 affordable units, which was the 12<sup>th</sup> highest total number of affordable units across the three years, comfortably in the second quartile of the 33 local authorities in London. It is worth stressing that, unlike is the case in many other boroughs, in Islington a large proportion of housing delivery comes from sites of fewer than 10 units which do not trigger the threshold for on-site provision, which further dilutes this significant affordable delivery as a percentage of the total.

A look at the simple percentage rate of affordable housing is misleading when looking at delivery of affordable housing in absolute terms. For example, during the 2009/10 to 2011/12 period Havering has a 57% affordable housing rate, but has delivered only 411 units, under half of Islington's total. 50% of Bexley's total delivery has been affordable, but this equates to only 423 actual dwellings. Kingston-upon-Thames delivered affordable homes at a rate slightly above Islington, at 30%, but contributed only 176 affordable homes which amounts to about 21% of the number delivered in Islington, despite our constraints in terms of land availability.

The Mayor's call-in letter paints a misleading picture about Islington's contribution to housing and affordable housing in London. The reality is that, despite taking up only 0.93% of London's land area, Islington has a 3.09% share of London's total conventional housing monitoring benchmark, and delivered 3.4% of affordable completions between 2009/10 and 2011/12 recorded in the 2013 London Plan AMR. Islington has contributed 4.5% of London's total overall housing delivery over the period 2007/8 to 2011/12, succeeding in making a disproportionately high contribution.

Additionally, for information purposes relating to the delivery levels of affordable housing within Islington, the 2014/15 Provisional New Homes Bonus allocations are as follows:

For total payment in this year we are 5th overall, 3rd in London with £12 million (behind Tower Hamlets and Hackney)

- Total units for reward: 15th in country; 4th in London
- Net additions: 11th in country; 5th in London
- Empty homes brought into use: 54th in country ; 5th in London
- Affordable units rewarded: 16th in country; 7th in London
- Affordable homes premium per unit; 16th in country; 7th in London
- Year 4 Payments (£): inc. empty homes. Inc AH premium: 9th in country; 4th in London