



# ISLINGTON

## COUNCIL MEETING - 25 FEBRUARY 2021

Councillors of the London Borough of Islington are summoned to attend a virtual meeting of the Council to be held via Zoom on **25 February 2021 at 7.30 pm.**

Link to the meeting: <https://weareislington.zoom.us/j/95881417926>

A handwritten signature in black ink, appearing to read 'Ding Roper', written over a light blue horizontal line.

**Chief Executive**

## AGENDA

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| 1. Minutes<br>The Minutes of the previous meeting held on 10 December 2020.   | 1 - 28 |
| 2. Declarations of Interest<br>If you have a <b>Disclosable Pecuniary Interest*</b> in an item of business: <ul style="list-style-type: none"><li>▪ if it is not yet on the council's register, you <b>must</b> declare both the existence and details of it at the start of the meeting or when it becomes apparent;</li><li>▪ you may <b>choose</b> to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency.</li></ul> In both the above cases, you <b>must</b> leave the room without participating in discussion of the item.<br><br>If you have a <b>personal</b> interest in an item of business <b>and</b> you intend to speak or vote on the item you <b>must</b> declare both the existence and details of it at the start of the meeting or when it becomes apparent but you <b>may</b> participate in the discussion and vote on the item. |        |

- \***(a) Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.
- (b) Sponsorship** - Any payment or other financial benefit in respect of your expenses in carrying out duties as a member, or of your election; including from a trade union.
- (c) Contracts** - Any current contract for goods, services or works, between you or your partner (or a body in which one of you has a beneficial interest) and the council.
- (d) Land** - Any beneficial interest in land which is within the council's area.
- (e) Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) Corporate tenancies** - Any tenancy between the council and a body in which you or your partner have a beneficial interest.
- (g) Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

This applies to **all** members present at the meeting.

3.	Mayoral Announcements	
	(i) Apologies	
	(ii) Order of business	
	(iii) Declaration of discussion items	
	(iv) Mayor's announcements	
	(v) Length of speeches	
4.	Leader's Announcements	
5.	Petitions	
6.	Petition Debate	29 - 30
7.	Questions from Members of the Public	31 - 36
8.	Questions from Members of the Council	37 - 38
9.	Draft Local Plan - modifications for consultation	39 - 1054
10.	Constitution Report	TO FOLLOW
11.	Chief Whip's Report	TO FOLLOW
12.	Budget Proposals 2021/22	1055 - 1208
12a.	Proposed Amendment to Budget Proposals 2021/22	TO FOLLOW

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Despatched : 17 February 2021

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**LONDON BOROUGH OF ISLINGTON**  
**COUNCIL MEETING - 10 DECEMBER 2020**

**MINUTES OF PROCEEDINGS**

At the virtual meeting of the Council held via Zoom on 10 December 2020 at 7.00 pm.

**Present:**

Bell-Bradford	Hamitouche	Ozdemir
Burgess	Heather	Picknell
Caluori	Hull	Poole
Champion	Hyde	Poyser
Chapman	Ismail	Russell
Chowdhury	Jeapes	Shaikh
Clarke	Kay	Smith
A Clarke-Perry	Khondoker	Spall
Comer-Schwartz	Khurana	Turan
Convery	Klute	Ward
Cutler	Lukes	Watts
Debono	Mackmurdie	Wayne
Gallagher	Nathan	Webbe
Gantly	Ngongo	Williamson
Gill	O'Halloran	Woodbyrne
Graham	O'Sullivan	Woolf

**The Mayor (Councillor Janet Burgess MBE) in the Chair**

**114 MINUTES**

**RESOLVED:**

That the minutes of the previous meeting held on 24 September 2020 be agreed as a correct record and the Chair be authorised to sign them.

**115 DECLARATIONS OF INTEREST**

None.

**116 MAYORAL ANNOUNCEMENTS**

(i) Apologies

Apologies for absence were received from Cllr Hamitouche.

(ii) Order of Business

No changes were proposed to the order of business.

(iii) Declaration of Discussion Items

None.

(iv) Mayoral Announcements

The Mayor reflected on her first months as Mayor and how they had been impacted by the coronavirus pandemic. The Mayor was honoured to have taken part in Remembrance Day, albeit on a much smaller scale than normal and was pleased to have been able to attend a number of events, including judging the Clean Air competition with the Deputy Mayor, presenting the Caretaker Awards, visiting some community events, and to have virtually attended many others, including a number of events held as part of Black History Month.

The Mayor paid tribute to the community organisations supporting the local response to the pandemic and advised that she would be delivering Christmas hampers to some residents over the coming weeks.

(v) Length of Speeches

The Mayor reminded councillors to stay within the permitted length for speeches.

**117 LEADER'S ANNOUNCEMENTS**

The Leader was pleased to be able to join the Mayor at a number of events, including Remembrance Sunday and the incredible programme of events to mark Black History Month. Despite the challenges of the pandemic, the Leader was delighted that as a borough we had been able to mark those important occasions.

The Leader commented on the state of the pandemic, noting that London was at a critical moment. Infections were rising across the city and there Leader called on everyone to take the steps needed to protect themselves and to keep their friends, family and community safe. In particular, the Leader commented on the importance of the 'Hands Face Space' message, avoiding crowded areas, respecting the rules, and exercising common sense to prevent the spread of coronavirus.

The Leader welcomed that a vaccine would soon be available and said that Islington Council would support the NHS in the roll out of the vaccine. However, the vaccine was not an instant solution and we all must continue to stay safe over the Christmas

period. The Leader was concerned by confused messaging from national government was worried that relaxation of the rules over Christmas would contribute to the spread of the virus.

The Council's top priority was keeping residents safe and the Council was working with the borough's diverse communities to make sure that messages are spread and understood. The Council was supporting residents through the We Are Islington service, the Resident Support Scheme, and supporting businesses to keep trading safely. The Council was also working with schools to make sure they could open safely, operating the local contact tracing system, and supporting the provision of test centres in the borough. However, the Leader commented that local authorities needed more local control and less national top-down imposition, proper resourcing, and less confused messaging from the government to help keep people safe.

The Leader paid tribute to everyone who had lost loved ones to the virus and thanked everyone in Islington for their overwhelming community spirit over the past nine months. The Leader thanked the faith and community groups, local volunteers, local businesses, council staff and NHS heroes for everything they had done. The borough had united to keep everyone safe and supported.

The Council would continue to work in the new year to make sure that communities were supported and safe through the next wave of the pandemic. The festive period would be different this year, but the Leader hoped that everyone would have an opportunity for a break over the coming weeks.

#### **118 PETITIONS**

A petition objecting to the council's People Friendly Streets programme was presented by Zak Vora. As the petition had received over 2,000 signatures, the council would debate the petition at the next meeting.

#### **119 QUESTIONS FROM THE YOUTH COUNCIL**

Question (a) from Youth Councillor Rosie to Councillor Comer-Schwartz, Executive Member for Children, Schools and Families

We hosted a community engagement event with the Somali Community following the tragic death of 2 young Somali adult men. The event was attended by over 50 people including many young people and Council Leaders and the Borough Commander. What else can be done to reassure all young people in the borough who may be feeling unsafe that their safety is a priority?

Response:

Thank you for asking that important question. We were devastated to learn of the tragic deaths earlier this year. My heart goes out to their families, friends and the wider Somali community. I want to reassure young people that keeping them safe is a priority for me and for the Council. We have made significant steps forward in our

Youth Safety work over recent years, and the number of knife crime injuries for victims under 25 have fallen by more than 46% from 2017. However, one young person affected by knife crime is one too many, and we know we have more work to do. Prevention and early intervention is key. We are one of the first councils in the country to approach youth safety from a safeguarding perspective, recognising that many offenders have experienced childhood trauma, discrimination and exploitation. We see young people involved in crime as children first. Exploitation and county lines are all child protection issues and we know that family circumstances and school exclusion can often lead to contact with the youth justice system. We know there are viable routes out of crime and we must do more to make sure of that young people can access them. This is why we have our Youth Offending service, our Integrated Gangs Team, our Targeted Youth Service and Post-16 Progression Service, as well as third sector agencies such as Arsenal in the Community and Abianda to support vulnerable young people and wrap-around them to reduce the risk of school exclusion and to create opportunities for them. The Youth Strategy is the next step in the Council's work to keep young people safe. The strategy will help us to identify the young people who need more support, we are working with the violence reduction unit to help parents and carers to keep their children safe and to reduce inequality and disproportionality as part of this.

Supplementary Question:

You talked about trying to find the root of the problem and the amazing resources that are available to support young people. How would you make sure that you are getting to the right group of young people, or finding them at the right time? Could you please talk more about how you are going to engage with them?

Response:

You are correct, we need to do all we can to make contact with the right groups of young people as early as possible, as the consequences can be fatal as we know. We need everyone in the borough to do this work, which is why we need to work with schools, youth centres, and young people themselves so they can refer their friends and other young people they are worried about. It's why we need to work with parents and families to build their confidence in raising issues. We need a whole borough approach to keeping young people safe.

Question (b) from Youth Councillor Rosie to Councillor Comer-Schwartz, Executive Member for Children, Schools and Families

We have been working with Commissioning Managers from the Play and Youth service, regarding the future of universal youth work in Islington. This has included taking part in consultations and providing 2 researchers with a guided tour of the borough to show Islington through the eyes of you people. Will the council continue to invest in youth spaces and places which support young people's personal development and provision which helps young people to thrive?



Response:

Thank you for your question and your brilliant work on leading and supporting the review of our universal youth work. Over the last 8 weeks we have engaged with over 250 residents and held in-depth conversations with 65 young people, held a series of focus groups with 12 young people, both those engaged currently and those not engaged in our youth offer. This has helped to shape our plans for youth work going forward. We will be holding an event in January where we will share feedback from this work and I hope that the Youth Council will be able to attend. In the meantime, despite central government cuts, I want to assure you that we will continue to invest in spaces and services for our young people. As we learn from the review, I am confident that we will see even more young people benefitting from youth work in our borough. This is important as we continue to work to our aspiration to make Islington the best place to grow up.

Supplementary Question:

Youth clubs have been running activities around the Black Lives Matter movement and educating young people about black culture. What steps are being taken to incorporate that into schools in Islington?

Response:

I was really glad to join you and other young people to discuss the Black Lives Matter movement recently. This year has been a crucial year for our race equality work following the tragic deaths of George Floyd and Breonna Taylor in America. We have been working on race equality action plans across the council and reviewing our work, and this is also the case in Children's Services, from social care to education, and our youth justice system, reviewing if we can do more to support young people from Black, Asian and minority ethnic groups. We are looking to develop a strategy and action plans, which will include doing more in the education system. Our key concern in that area is the difference in attainment rates, disproportionate rates of exclusions, and the importance of having resilient and confident young people. We are also looking to develop a cultural curriculum so we can support all of our schools. Lots of schools have already done amazing work in this space, but we want to make sure that all schools are fully supporting all pupils, especially ethnic minorities in Islington.

Question (c) from Youth Councillor Rosie to Cllr Turan, Executive Member for Health and Care

It has been widely reported in the media that the Covid-19 pandemic and subsequent lockdowns have had an adverse impact on the emotional wellbeing of young people. We have been using our social media tools to promote mental health apps, and created videos to support young people. What plans does the council have in place to support young people's emotional and mental health both now and in the future?

This is particularly important as we could see mental health needs spike in the next 12 months and beyond.

Response:

Thank you for your question. This issue is very close to my heart, having worked in the NHS and mental health services for almost 22 years. As part of our commitment to make Islington the best possible place to grow up, we must do everything we can to support the wellbeing and mental health of young people in our borough. The Council works closely with health colleagues in the CCG and in CAMHS as well as with the voluntary sector to ensure there is good support for young people's emotional and mental health and to plan for future needs, both to maintain wellbeing and to ensure more help is available to those that need it.

Building awareness and understanding of mental health, and tackling the stigma around mental illness are vital to ensure that young people access support early and without embarrassment. Islington provides free mental health awareness training to anyone working with young people, including youth workers and school staff, to ensure that they can spot emerging problems and signpost to support.

Our work during the pandemic, as well as before and after it, includes working together with schools to meet the needs of young people at this time, the Social, Emotional and Mental Health central point of access continues to act as a first port of call, with referrals being passed on to the most appropriate service for support, and CAMHS continues to be funded to work in schools.

We have also established a new School Wellbeing Service which will provide additional capacity and be rolled out to work with all mainstream schools in early 2021. The Service provides early access to support for children and families experiencing mild to moderate mental health difficulties and offers CBT-based 1:1 and group work around anxiety and low mood, as well as psychoeducation for children, young people and parents.

Question (d) from Youth Councillor Kacper to Cllr Shaikh, Executive Member for Inclusive Economy and Jobs

The Covid-19 pandemic and lockdowns have resulted in the employment opportunities for young people being reduced, particularly within the retail and hospitality sectors which offer part time work to young people. What plans does the council have to help young people find employment during this time?

Response:

Thank you for your question and for highlighting this important issue. Supporting young people into decent jobs and training opportunities is a top priority for Islington Council, and is more important than ever, as the impact of the pandemic on local job opportunities, and how young people are disproportionately affected, means we are

facing a scale of youth unemployment that is unprecedented in recent years. Young people claiming unemployment benefits has more than doubled since lockdown started.

The Council is responding to this situation by providing direct support to young people in a number of ways. Firstly, the council is providing support through the new youth employability and skills programme. This is a new programme of work that aims to support young people aged 18 to 25 who are either care leavers, have experience of the youth justice system, or who have been identified by our partners as being vulnerable to unemployment. It's going to provide 1:1 coaching, skills tuition and work experience. Secondly, our Progress Team are expert career advisers who can provide 1:1 support for young people who aren't in education or employment. Another way is through our iWork employment support service. This offers coaching for any resident who is over 18, as well as general advice on how to find work and make a job application. The iWork team has strong links with health and social care and construction employers and over the past couple of years has strengthened our relationships with tech, digital, fashion and garment making sectors. Those sectors have been less impacted by Covid, are still recruiting, and really want to work with young people to make those sectors more attractive for them. The iWork team also runs virtual job fairs, we also have an online jobs portal where we connect with employers and direct young people to those vacancies.

We are also using the government's Kickstart programme. The Council is creating twenty 6 month paid work placements for 16-24 year olds on Universal Credit. We are going to strengthen our apprenticeship programme for young people. We also convene borough-wide to engage with our partners that provide employment support for young people. It's a team Islington holistic approach. I'd offer to meet with the youth councillors, I'd welcome the opportunity to give you a far more detailed update and I think we'd really appreciate some feedback on what we may be missing out on and how we can improve our service. Thank you again for this important question.

## **120 QUESTIONS FROM MEMBERS OF THE PUBLIC**

Question (a) from Nick Clarke to Cllr Champion, Executive Member for Environment & Transport:

As we welcome the Council's carbon net zero 2030 and biodiversity plans we recognise that at this moment in history we truly must act locally and think globally. For example every minute an area the size of a football pitch is cleared in the Amazon - most of it to be used for cattle or crops to feed animals. 8% of global CO2 emissions come from the production of concrete.

We cannot achieve net zero if we do not change our diets and change our use of concrete.

Therefore, will the Council take account of the carbon emissions and biodiversity impacts of the food it serves in the schools it controls and the events it hosts, and of

the construction processes of the buildings being erected in the borough (e.g. including the CO2 used in the production of the cement and transport)?

In particular, will the Council follow Enfield and make all meals at Council events vegetarian or vegan and include school meals in its calculations of its CO2 emissions and biodiversity impacts, and measure the CO2 emissions involved in construction and require that they be offset by developers?

Response:

Thank you very much for your questions Nick. I think the point you are making is about behaviour change and how that affects the global impacts of climate change and in particular our food choices.

You ask if we would make meals vegetarian or vegan. I am very happy to confirm that, with the exception of meals at the Assembly Hall which you will appreciate is a very different section of the council, we will do that. We have to make the exception as the Assembly Hall is used by different people for different events, weddings parties and so on, and they provide their own refreshments.

You also ask the question about school meals. Schools decide what they wish to serve, but we do work with schools to reduce their carbon emissions and what we can say is that, for school meals prepared within Islington, we will be accounting for the emissions in the calculations we make about our targets.

You ask about sustainable development and building materials. We have an ambitious draft local plan that includes information on reducing emissions and encouraging more sustainable development. In addition to requiring all major new developments are net zero carbon, to fully capture a development's carbon impact we will also require such proposals to calculate and reduce whole life-cycle carbon emissions. This captures not only a building's operational emissions from energy consumption, but also captures its embodied emissions (such as those associated with raw material extraction, manufacture and transport of building materials, and construction) and emissions associated with maintenance and eventual material disposal.

We also have new policy developments to adopt a circular economy approach to design and construction to keep materials in use for as long as possible, minimise the environmental impact of the materials used, require a minimum amount of construction materials to be from recycled/re-used content and minimise construction waste.

Supplementary question:

Thank you that was very encouraging. One thing I'd want to check, is the draft local plan available to the public? And on construction emissions, accounting is one thing, but who will pay? Will the developer be required to offset their emissions? And who in the council at director level is responsible for reaching Net Zero by 2030? And will

the Council be providing training and information to staff so they can be partners on this journey?

Response:

The Draft Local Plan is out for consultation, I'm not sure if it's available in public at the moment, but I will check that. In terms of the offset, we have an offset fund and developers are required to pay a sum of money to offset carbon emissions that we use for environmentally sustainable projects. The Corporate Director of Environment and Regeneration is responsible at director level, however everyone throughout the Council is involved in this, including the Chief Executive.

Question (b) Talia Hussain to Cllr Champion, Executive Member for Environment & Transport:

The pandemic has precipitated a significant increase in online shopping, with an attendant increase in the amount of packaging and waste for the council to handle. Before the pandemic, Islington's recycling rates were lower than the London average and going down. What steps is the council taking to improve recycling rates in the borough?

Response:

Thank you for your question. Islington has the second lowest rate of residual waste per household in London. This is incredibly important as we want to generate as little waste as possible in the first place.

Islington Council has continued to offer a full recycling collection service for all households throughout the pandemic period. The service has done a really good job despite some difficult circumstances. That includes a full range of materials including much of the packaging material mentioned in your question, but I agree it is very worrying the amount of waste still generated.

Our latest figure for our recycling rate is 31%, which is an increase from 29% last year. Islington approved its Waste Reduction and Recycling Plan this time last year which sets out a range of actions for increasing recycling, and this has been incorporated into our Vision 2030 Net Zero Carbon strategy. There are a number of initiatives that are either new or we are continuing to do, including improvements in communal recycling, as we know that's really important. We are also going to expand food waste services to all of our main estates. We do a lot of communication with residents particularly around food waste and the use of single-use plastics. I would say, in terms of packaging, there is an awful lot the government should be doing with industry to make sure that packaging is reduced and is recyclable.

Supplementary question:

My question notes that Islington has some of the lowest recycling rates. I appreciate they have gone up. I wonder how you feel about how we are doing. Do you think we are doing well enough?

Response:

I think we all need to do better. There are certain challenges we have in the borough, but absolutely we need to do better. It isn't easy though. It's not that we have a bad service, but we have a lot of challenges that we are trying to work through and address.

Question (c) from Jeremy Drew to Cllr Champion, Executive Member for Environment & Transport:

The recently agreed Transport Strategy has the objective of limiting car journeys to essential ones. Does the council have a view on what types of car journeys are essential?

Response:

Thank you for your question Jeremy. On the issue of if we define essential journeys by car, no we don't. It will very much depend on individual circumstances, and I think it's very much self-defining. Some people will always need to use vehicles, if you have a particular disability that requires that, or if you are moving around for work, or another reason. But we can also change people's perception of what is essential. We know that people feel they have to use cars because they feel it is unsafe to cycle or walk. What we have to do is make our streets safer, healthier, more attractive, and that will change what people feel they can do. That may help to redefine what people see as essential.

In a way, we are very lucky in Islington, as we are well suited to changing to more sustainable ways of travelling. The borough is largely flat, and very dense, so we have amenities very close to people. In many cases people only need to make short journeys. So if we can make those journeys attractive, encourage people to use local shops perhaps, then we can help people to reassess their journeys, rather than us as a council defining it for them.

Supplementary question:

Thank you. The Transport Strategy has a target of reducing vehicle kilometres by 15.7% by 2041. Does this reflect on what different types of journeys are essential? This seems like a very modest reduction. It would seem that you need to be more ambitious to reduce the number of vehicle kilometres on the road.

Response:

We are trying to give people the options of safer travel, so they reduce their car journeys and what they see as essential. We've looked at it and decided what we think is possible. If we can reduce it by more, then that would be an incredible achievement. I take your point though, we need to get as many people using sustainable transport as we possibly can. It's a really important thing to do.

Question (d) from Susan Lees to Cllr Champion, Executive Member for Environment & Transport:

I am pleased to learn that the Council is very keen to assist local residents in accessing the Green Homes Grant Scheme, and that the Council will develop and adopt a Supplementary Planning Document (or SPD) setting out detailed planning guidance on the installation of measures to reduce carbon emissions and promote energy efficiency. Will this cover retrofitting in conservation areas?

Response:

Thank you for your question Susan. We are very committed to doing what we can on sustainable development, the SPD will cover a range of topics, including guidance and examples of energy efficiency measures. Yes, we have conservation areas, but we must find a way to do both. We are subject to lots of legislation and case law, but the purpose of the SPD will look at how we can maximise energy efficiency.

Supplementary question:

Thank you. I'm wondering whether the council will help local contractors to get accredited under the Green Homes Grant Scheme, thereby actively supporting local environmentally positive jobs?

Response:

I know that Cllr Shaikh and her team are very keen on looking at green jobs. I will look into this further.

Question (e) from Ernestas Jegorovas to Cllr Comer-Schwartz, Executive Member for Children, Schools and Families

What support has Islington Council provided to students in Islington to overcome the digital divide?

Response:

Thank you for your question Ernestas. We are acutely aware of the impact that a lack of access to digital devices and the internet can have on some of our least well-off families. This has only been made worse during the pandemic and as a Council, we are determined that the pandemic must not lead to a widening of the achievement gap between those who have access to digital devices and those who do not.

Since lockdown in March we have been working on a rolling programme of issuing devices to children and young people through the Local Authority. This has been in addition to the provision some schools have also made for their pupils. By the end of the year, approximately 3000 devices will have been issued to children and young in the borough. These have been funded from a range of sources including grants from local charities, the Department for Education and the council itself. Devices have been targeted for disadvantaged pupils in priority year groups and vulnerable children.

The School Improvement team has been working very closely with schools and settings to develop remote learning provision this year. This has included the development of online resources to support those who can access it from home and learning packs for children who cannot access their work remotely but can't go to school for a variety of reasons. A series of meetings have been held for schools in the borough to share best practice. Tackling the digital divide and education priorities is a fundamental priority to minimise the inequalities compounded by the current pandemic and to make our borough the best place for our children to grow up.

Supplementary question:

Thank you. In 2016 the United Nations declared internet access to be a human right. In fact, in 2005 free Wi-Fi was provided on Upper Street. In the 2019 Labour Manifesto there was the promise of free internet. When can our students who need internet access expect to receive it?

Response:

Thank you. You make a really valid point, as well as devices, we have been looking to provide internet routers for those who need them. We have undertaken several surveys with the help of schools to understand what the picture looks like in the borough. We have had significant stumbling blocks, as we have tried to access the government Wi-Fi router scheme repeatedly, having been promised this would be provided London-wide, but this has not been delivered, so we are looking at a variety of different sources. Please be assured we are looking at the problem and we are committed to making sure our young people get access as soon as possible.

Question (f) from Emily Tims to Cllr Tuan, Executive Member for Health and Social Care

I understand that several UK councils (and countries) have paused the roll-out of 5G until the potential health implications are more clear. Under what circumstances, if any, would Islington Council pause the roll-out of this untested technology?

As Emily Tims was not present in the meeting, the following written response was sent:



The roll-out of 5G technology is covered by Central Government policy (National Planning Policy Framework, established by the Digital Economy Act 2017). As a Council, we can only make decisions on the rollout of 5G technology based on planning legislation and cannot make health-based decisions that are different to the international and national guidelines.

The Council has looked into this important issue and the following bullet points provide additional information and assurances:

- The masts on Braithwaite house and Michael Cliffe House are Wifi masts, not 5G
- The Council has approved permission for 5G masts on Widnes House. This was a planning decision but all public health advice shows that they are completely safe.
- Public Health England issued its most recent guidance specific to 5G in October 2019. As 5G is rolled-out, exposure to radio waves is expected to remain well below the safety limits set out in guidelines. As such, there should be no consequences for public health.
- Ofcom regularly monitor radio wave emissions near 5G base stations. In its most recent report on 5G-enabled mobile phone base stations, it found that the highest level of electro-magnetic fields from 5G recorded was approximately 1.5% of the relevant safety threshold, and 5G contributes a smaller amount of electro-magnetic emissions than previous generations of mobile technology 2G, 3G, and 4G.
- Be assured that we work with our local Public Health teams and Public Health England to monitor the effects of all new technologies.

## 121 **QUESTIONS FROM MEMBERS OF THE COUNCIL**

Question (a) from Cllr Convery to Cllr Watts, Leader of the Council:

What is the purpose of the Council's Twitter account? Whilst it is self-evidently an "outbound" communication channel from the Council to the public, is it also an "inbound" channel for our residents to speak to the Council?

Response:

Thank you for your question. It is both, inbound and outbound. The outbound speaks for itself, sending key messages, promoting events, promoting services and relaying important information on behalf of others such as the emergency services. As an inbound service, we answer questions, take complaints about services, and those elements of the service are handled by Contact Islington. We try as far as possible to refer people back to the relevant service. I can talk to you offline if there are elements of this you'd like to see changed. I think two-way communication is really important and even on this pandemic we've carried that on through virtual Leader's Question Time sessions on Facebook Live, many wards have had online Ward Partnership meetings, virtual council meetings like this too. It is important that we carry that on at all times.

Question (b) from Cllr Poyser to Cllr Shaikh, Executive Member for Inclusive Economy and Jobs:

I would like to thank the Heritage Team for finding the 'Upon Reflection' sculpture, thought to be lost, in the basement of the Town Hall, and Cllr Shaikh, for organising meetings, despite lockdown, of all the many interested parties, including our local MP, to get the sculpture 'resurrected' in our local Peace Park, part of Elthorne Park, N19. I would also like thank Parks and Heritage for getting a quote to resurrect the statue in a way that makes it less likely to be stolen for a third time.

Hillrise has far, far lower S106 funds than most Wards but, for our part, the local councillors are happy to put money aside for 'resurrecting' this sculpture as it helps our Philip Noel-Baker Peace Park maintain its atmosphere as a place for meditation and reflection - particularly on Peace.

When can we expect the sculpture back in its rightful place, at the end of the fountains, rather than lurking, unloved, in the basement of Town Hall? Thanks to all concerned, particularly our MP Jeremy Corbyn who was present when the statue was unveiled in the 1980s.

Response:

Thank you. I'd like to commend you for your excellent work on the missing Peace Statute and for your tenacity and perseverance in making sure we move forward positively to return the statute to its rightful place in the Peace Garden.

The garden was opened in 1984 and is dedicated to peace in the memory of Philip Noel-Baker who was a British politician, a campaigner for nuclear disarmament, and Nobel Peace Prize winner. Five cherry trees were planted in the garden in memory of the 1945 atomic bombing of Hiroshima and Nagasaki. The endeavour to replace the statute has been a whole council and community effort and I want to thank our Heritage Team for tracking down the statute in the basement of the Town Hall. Once this was done, it's been a concerted effort between Heritage and Parks departments, the whole community, local councillors, and our local MP Jeremy Corbyn, whose strong connection to the history of the statue, together with his long and well documented record of working for peace, social justice and nuclear disarmament, has meant that he has been a strong supporter of our efforts to restore the statue to its rightful place. In fact as Cllr Poyser mentions, Jeremy Corbyn was present at the unveiling, along with Bruce Kent, who is another resident of the borough. The Heritage Team have tracked down a wonderful photograph showing the unveiling as well. I am delighted to report that the Parks Department are ready to start work in January to return the statue to its rightful place by the pond in the garden. We hope it will be ready for a spring unveiling, bringing together the local community, councillors, Jeremy Corbyn, Bruce Kent and artist Kevin Atherton so again we can

celebrate the council and community coming together to reiterate our commitment to supporting peace in the world.

Question (c) from Cllr Heather to Cllr Ward, Executive Member for Housing:

At a Council Housing Scrutiny Committee meeting, Partners for Improvement indicated that the Council could propose changes to them regarding their housing services performance reporting system and its measures, including their Key Performance Indicators.

In my view the current system of KPIs used by Partners does not allow for adequate scrutiny of their housing services performance, and consequently this detracts from achieving service improvement for tenants; and this is especially the case in relation to their housing repairs service.

Therefore, do you agree with me that the Council needs to approach Partners to adopt a revised performance measurement system whereby they learn from job failures in order to improve the housing repairs service that they provide to tenants? This would include deeper qualitative analysis of the population of repair jobs that they fail to fix first time, so as to identify the causes of failure and solutions, in order to improve their housing repairs service to tenants.

Response:

Thank you for your question, Gary. I share your frustration with the current KPI's provided by Partners and the need to ensure that their performance can be fully scrutinised by the council, so local people can see repairs fixed first time.

It would be possible to change the KPIs in the contract by agreement with Partners, but any change could lead to increased financial penalties for the company if the KPIs are not met, which means they are less likely to agree. Staff from the housing needs service are now speaking to Partners about performance measures and how they may be reported to the council in future and, in particular, they are looking at measures which give greater understanding of how many repairs were able to be fixed the first time. There is an opportunity with the contract to negotiate the provision of non-contractual performance data.

The recent social housing White Paper suggests 'first time fix' as a new measure of tenant satisfaction and this may be a requirement for all landlords in future. We can use this as an opportunity in our discussions with Partners as we prepare with them for the forthcoming changes. I have also raised the issue of a more qualitative approach with the Partners Chief Executive several times and have asked that in future reports to Housing Scrutiny explain how difficult repairs are dealt with, showing communication with residents and satisfaction. We want more on first time fix, but also a more qualitative approach on the most difficult cases, and how residents are informed throughout. I will report back on progress at a future meeting.

Supplementary Question:

Thank you. I anticipated the answer on financial penalties, and I would hope that they wouldn't issue penalties. At the last Housing Scrutiny meeting they seemed to be willing to engage on this, I know I can rely on you to progress this with them, and it would be to their advantage. It would lead to an increase in satisfaction from residents and everyone would benefit. The question is, if we do get to that stage, would you be able to argue that a qualitative approach would include involvement from councillors and from Partners residents?

Response:

I think that's a really good idea. I've been working with Partners on how they present to Housing Scrutiny, you may remember that the last time they attended the Town Hall we had partners staff in the room next door who would be able to deal with individual longstanding casework. I want to see more creative approaches like that in all future engagement. I think that's a good idea.

Question (d) from Cllr Ismail to Cllr Lukes, Executive Member for Community Safety:

Metropolitan Police figures from 2019 showed that half of all knife crime offenders in London are teenagers or even younger children. As knife crime continues to rise consistently, the number of young people directly or indirectly involved in violent knife crime will only continue to grow sadly. Islington is not immune to this trend, as we have lost far too many young people, there has been tragic example in September in my ward Holloway.

My question is, as a newly appointed Community Safety Executive member, what are your priorities and how are you going to engage young black and brown boys, who are often marginalised, misunderstood and far too often this Council ignored parents crying out for support?

Response:

Thank you for your question. I wanted to correct one thing in your question, you say that Islington is not immune from the trend of increasing knife crime across London. In fact, the figures show the opposite. We have made substantial improvements in youth safety in recent years. Since 2017 the number of knife crime injuries of those under 25 have fallen by 46%. The number of first time entrants into the youth justice system has reduced by 24%. We are very proud of the improvements we have made, but we have made them in spite of the government making it far more difficult for us. They have made cuts to local government, cuts to community safety, cuts to police budgets over the last decade, and despite that we have made those improvements.

I am proud that we have made those improvements, but every time I receive a message about an incident in our borough, I worry that it will be another young person who is injured or has lost their life. One victim of knife crime is one too many,

and we have to engage with what is causing knife crime and how we can change that. It's a complicated problem. It's a systemic problem and it also involves racism. We know you are 10 times more likely to be stopped and searched if you are black. We know that 40% of young people in custody are black. A quarter of adult prisoners are black, but only 12% of the population. There is clearly a massive disproportionality and we want to work with the Mayor of London to resolve the lack of confidence and trust in the police by many of our black populations. I am engaging as you know with those communities. We have both been in meetings with the Somali community, and this is resulting in an action plan we are discussing with community groups. I hope you will join me and other councillors will also work with us to keep our communities safe.

Supplementary Question:

Thank you. I would be very interested to see those figures as the figures I have are slightly different. However, I'd like to ask a further question. Islington Council has made a £2million commitment to tackling the root causes of serious youth violence in the borough and has commissioned two charities to work on this. With such a huge amount spent over the last four years, and with youth violence being such a significant ongoing issue, what has been achieved with the £2million and why has the council not worked with local organisations that know Islington and young people on this?

Response:

As I explained earlier, we have succeeded in reducing knife crime incidents and the number of entrants into the youth justice system. We have done that by diverting them away from the sorts of activities that get them involved in crime. We have invested and we have seen results. In terms of who we work with, we are working with many locally based organisations, some of them funded by the council, some funded elsewhere, some not funded at all. As executive member, I will always start with our local communities, look to define what community safety is, and we start from the assumption that no-one is safe unless everyone is safe. Knife crime affects us all, it doesn't just affect the friends and family of the victims. It affects everyone and I hope that by working with our communities we get to a place where none of us have to worry about knife crime and we will not see any more victims of this sort of crime. It is a huge ambition but is one shared by all of our communities and I hope we get there.

Question (e) from Cllr Ismail to Cllr O'Halloran, Executive Member for Community Development:

Since 2010 this Council has been supporting and funding our voluntary organisations who do some excellent work in Islington. Has the Council made a proper review of tangible outcomes holistically to see what has been achieved and the gaps to improve future Council services and Voluntary Community sector delivery for Islington residents?

Response:

Thank you for your question Cllr Ismail. I am immensely proud of our ongoing commitment to Islington's voluntary sector through our VCS Partnership Grants Programme, our Local Initiatives Fund and Community Chest. The response of Islington's VCS to the current crisis has been incredible and indicative of the value of the sector to life in the borough. I'd like to thank all partners, their work is incredible.

We have recently agreed £2.7 million per-annum of core grant funding for Islington's voluntary sector through our VCS Partnership Grants Programme 2021 to 2024. We have continued providing this funding, despite being forced to make significant cuts to our budget each year since 2010 as a result of Government austerity. Throughout the assessment, recommendations, and decision-making process, an ongoing assessment of all funding applications is made considering equalities impacts and the even spread of initiatives across the borough. Details of this are included in the Equalities Impact Assessment of the report to Islington's VCS Committee in September 2020.

Through this grants programme we undertake detailed and in-depth monitoring visits, which assess the tangible impact of each organisation as well as taking an overview of each organisation's contribution to the Council's priorities. This work includes a holistic assessment of each funded organisation, including the services delivered, governance, financial viability, safeguarding, communications and staff and volunteer development. This approach has helped develop a strong and vibrant voluntary sector that responds flexibly to resident need. We are always keen to work with our increasingly diverse voluntary sector to ensure funding is evenly distributed across the borough and encourage all organisations to apply for funding and support.

But, after a decade of government cuts to local services, this is becoming ever more challenging. I'm sure you will join me Cllr Ismail in calling for more funding from central government to ensure we can better support our wonderful VCS organisations across Islington.

Supplementary Question:

Thank you. Part of my question was if there has been a review done in the last ten years, and I don't think that has been answered. Of course I support the voluntary sector and I have been working for a long time in the field. In the last ten years has there been a review, and in the last four years of funding to make organisations sustainable, has any organisation become sustainable? What have we achieved as a council in those four years? The council must be accountable. Have you done that review in terms of accountability, are they sustainable or are they dependent on the council?

Response:

Thank you. We have done a review, we have lots of organisations that bring money into the borough and stand on their own. I am proud of our voluntary sector. I'd be

happy to meet you and discuss this. We are aware of the gaps that we are still working on, but I assure you, every single voluntary organisation is assessed and we are very proud of the sector. We have strict monitoring procedures. I visit every organisation and meet and understand their problems. But we have been cut year on year by the government, I would welcome your support to get more government funding so we can do more.

Question (f) from Cllr Russell to Cllr Champion, Executive Member for Environment and Transport:

The newly adopted transport strategy policy 1C committing "to provide alternatives to car ownership" is welcome. The policy commits to reduce the number of privately owned cars in the borough by 6.9% from a baseline of 37,372 cars by 2041. That is a reduction of just 2,578 cars over twenty years to 2041 leaving 34,794 cars still being parked in Islington in 20 years time. The policy states you expect car ownership to be down by 3.7% by next year, that's 1,382 fewer cars parked in Islington compared to the baseline. Do you expect to meet this target?

Response:

Thank you. The answer is yes, we do.

Supplementary Question:

Thank you. My supplementary question is that, why is the 2041 target only for a 6.9% reduction when we can achieve 3.7% by next year. Especially when reducing car ownership is so vital to achieving the other targets in the transport strategy. Will you review that target?

Response:

My understanding is that the targets in the strategy are in line with the Mayor of London's strategy, but I agree we can do better than that. I think we will be standing by our figures, but that doesn't mean we can't do better.

Question (g) from Cllr Russell to Cllr Gill, Executive Member for Finance and Performance

Over recent years council tax arrears have increased year on year for the cohort of residents eligible for council tax relief. The number of cases of arrears has increased, the amount these households owe has increased and the council's overall net liability has increased. How many open cases are there for council tax relief arrears for the year 2019/20 and what is the value of the open cases?

Response:

Thank you. The total value of 2019/20 arrears in relation to households in receipt of Council Tax Relief is £900,264 consisting of 3,162 open cases as at the 30<sup>th</sup> October 2020.

Supplementary Question:

Thank you. I've been speaking to officers today about these figures and I realise that the numbers of the year we are different to what they would be, as the government has been providing support as part of the Covid response. What I'm worried about is these arrears growing year on year amongst a cohort of people who are eligible for working age benefits and we know that as we come out of the pandemic we will be in a very different and difficult economic situation. Will the council have a good look to see if it is possible to find a way to relieve this cohort of residents of the burden of paying that 8.5% council tax they are expected to pay, when in a normal year those arrears would have grown year on year?

Response:

Thank you. I think the real problem is not that we are not prepared to look at ways to alleviate the difficulties our residents face, we are happy to look at it and try to help them in any way we can. The difficulty is the government will not provide us with the money required to fully fund council tax support and they have refused to provide it for seven years now. Every year we have to increase the amount we put into the resident support scheme. What we need to do is support the most vulnerable, those who are in the most difficulty, and that's what we will do. Even if the government were to come up with a 2% increase I would happily allocate it to providing additional support. If there is any way of finding the extra money I'd be happy to look at it.

Question (h) from Cllr Smith to Cllr Gill, Executive Member for Finance and Performance

This year, more than any other, public sector workers have been the everyday heroes keeping our borough running. From carers looking after those in need, to paramedics keeping people safe and refuse collectors keeping our street clean, they have all played their part throughout the pandemic.

In light of this, will the Council condemn the Government's shameful public sector pay freeze, putting the burden of paying for the pandemic on those everyday heroes?

Response:

Thank you for your question Paul and I completely agree that the Government's decision to freeze public sector pay next year is utterly shameful. Throughout this pandemic, the Government has handed out public money to their mates in the



private sector. In September, it was estimated that the UK had spent £2.5bn on procurement contracts related to Covid-19, with at least £1bn of Covid-19 contracts awarded without a competitive process. That figure is only likely to have increased in the months since.

During this time, as you say, it has been the public sector workers keeping our borough safe, healthy and clean. It is simply wrong that refuse collectors and carers will be left with less money next year than this year. Rather than clapping for them each Thursday and then announcing a real-terms pay cut, they should be receiving a pay rise, fully funded by government, to reflect the hard work and dedication they have undertaken this year. This just goes to show how useless this government is and that austerity is still very much alive for our public sector workers. We will do everything we can to fight this government and stand up for our public service heroes in Islington.

Question (i) Cllr Ozdemir to Cllr O'Halloran, Executive Member for Community Development

The Windrush scandal was a racially-motivated Government-led disaster on our Black community. People who had lived their whole lives here were put through misery and some deported to places they had never lived in their lives. That was bad enough but the fact that the Government's supposed compensation scheme is delaying payments and then offering derisory amounts of money rubs salt in the wounds for those who suffered so much.

Will the Council agree to write to the Home Office, expressing its dismay with this process and calling on the Government to immediately provide adequate funding for those who have been wronged?

Response:

Thank you for this important question Gulcin and for the work you do as Migrants Champion. I completely agree with you regarding the tragedy of the Windrush scandal and the impact it has had on the lives of many local people. When the Government consulted on the Windrush Compensation Scheme, the Council responded expressing our view that the proposed eligibility criteria did not stretch far enough and the compensation would not cover all of the losses felt by the victims. Since then, this has been proven to be the case. These are people who have every right to be here, some who have lived in the UK their whole lives – they are part of our wonderful community and it is completely unacceptable that they have been put through misery by the Government in recent years. This is shameful.

I agree to write to the Home Office to express the Council's opposition to the process and restate our recommendations for improving the scheme that we included in our consultation response. This whole scandal has made people a misery and we need to do all we can to support people. It's a disgrace.

The Mayor advised that the time allowed for questions had expired and the following question would receive a written response.

Question (j) from Cllr Graham to Cllr Ward, Executive Member for Housing

As the Government's policy which requires leaseholders to get an EWS1 form is clearly not fit for purpose, what is the Council doing to support leaseholders in this?

Written Response:

Resident safety is our top priority. All Islington homes meet current fire safety regulations and up to date assessments are available on our website.

The EWS1 form, which is used by mortgage lenders to assess their preparedness to lend on buildings with external wall systems, such as cladding, has caused a range of issues for leaseholders. Despite being created in an attempt to simplify the system, it has caused problems for many leaseholders who have been unable to secure a mortgage.

There are a number of fundamental issues with the form and its application, including clarity on the size of building which needs the form, a national shortage of independent professionals that are both suitably technically qualified and have a suitable level of professional indemnity insurance, and issues with the costs associated with the form and who should pay them.

The council is not planning to complete any EWS1 forms until further guidance is received from central government. In the meantime we will assist leaseholders where possible by providing fire risk assessments, providing information relating to completed and planned fire safety works, advocating for leaseholders with their lender and campaigning through local members to petition parliament to make the system work.

**122 COUNCIL TAX SUPPORT SCHEME FOR 2021/22**

Councillor Gill moved the recommendations in the report. Councillor Watts seconded. Councillor Russell contributed to the debate. Councillor Gill exercised his right of reply.

The recommendations in the report were put to the vote and CARRIED.

**RESOLVED:**

- (i) That the Council Tax Support Scheme for 2021/22, as contained in Appendix A to the report, be adopted.
- (ii) That the Council is retaining a cap of 8.5% for council tax support – despite unprecedented central government funding cuts both for this scheme and for the council generally – as part of our ongoing commitment to provide support throughout the different stages of residents’ lives, where it is needed (paragraphs 5.8 to 5.12 of the report), be noted.
- (iii) That the amendments to council tax agreed at full Council on 5 December 2019 be retained. To be clear, this means that, from 1 April 2021, the following will continue to apply:
  - 1) council tax exemption classes A (unoccupied and unfurnished property that requires or is undergoing major repairs) and C (unoccupied and unfurnished property) will have a discount of 0% for all cases;
  - 2) council tax discount for second homes will be 0% in all cases;
  - 3) council tax discount for empty furnished lets will be 0% in all cases; and
  - 4) a premium will be charged at the maximum percentage allowed of 100% on the council tax of all properties that have remained empty for over 2 years in all cases.

**123 CHIEF WHIP'S REPORT**

The Mayor advised that the Chief Whip’s Report had been circulated in the second despatch of papers.

Councillor Hyde moved the recommendations in the report. Councillor Khurana seconded.

The recommendations in the report were put to the vote and CARRIED.

**RESOLVED:**

- (i) That Jim Beale be appointed to the Health and Wellbeing Board for the remainder of the municipal year or until a successor is appointed.
- (ii) That Jonathan O’Sullivan be appointed to the Health and Wellbeing Board for the remainder of the municipal year or until a successor is appointed.
- (iii) That Cllr Williamson be appointed to the Grievance Committee for the remainder of the municipal year or until a successor is appointed.
- (iv) That Cllr Ngongo be appointed as Equalities Champion for the remainder of the municipal year or until a successor is appointed.
- (v) That Cllr Poyser be appointed as Arts Champion for the remainder of the municipal year or until a successor is appointed.

**124 NOTICES OF MOTION**

Motion 1: Universal Basic Income

The Mayor advised that a proposed amendment had been circulated in the second despatch of papers.

Councillor Russell moved the motion. Councillor Watts moved the amendment. Councillor Russell exercised her right of reply.

The amendment was put to the vote and CARRIED.

The motion as amended was put to the vote and CARRIED.

**RESOLVED.**

- i. To write to the Secretary of State for Work and Pensions and the Chancellor of the Exchequer calling for a fully evaluated and fully-funded trial of basic income in our borough, as a result of the effects of the Covid pandemic
- ii. To lobby Government for research and possible investment into a programme of Universal Basic Services for local people, including housing, transport, childcare and adult social care;
- iii. To continue rolling out the Council's joint campaign with the TUC encouraging local people to join a union, as to increase their bargaining power at work and secure better pay and conditions;
- iv. To call for increased research and analysis of the effects of UBI on wages, union membership and bargaining power, and protected characteristics;
- v. To work with other local authorities to help test UBI in London;
- vi. To lobby Central Government to maintain the £20 per week uplift in Universal Credit that many local people rely on.

Motion 2: Making misogyny a hate crime

Councillor Clarke-Perry moved the motion. Councillor Williamson seconded. Councillors Russell and Woodbyrne contributed to the debate.

The motion was put to the vote and CARRIED.

**RESOLVED:**

- i. To make a submission to the Law Commission's Consultation at the earliest opportunity in favour of strengthening hate crime legislation and making misogyny a hate crime;
- ii. To call on the Government to listen to the lived experience of women and girls across our country and to urgently act on any recommendations the commission makes to strengthen the law on hate crime, and to reform legislation around harassment to recognise as hate crime that which targets women and girls in their community;
- iii. To call on the Government to provide the resource and funding for police forces across the UK to effectively tackle harassment, misogyny and domestic abuse;
- iv. To call on the police force in Islington to record harassment of women as a hate crime, following successful trials in Nottingham and elsewhere.

### Motion 3: Reducing School Exclusions

Councillor Comer-Schwartz moved the motion. Councillor Cutler seconded. Councillors Russell and Hull contributed to the debate.

The motions was put to the vote and CARRIED.

### **RESOLVED:**

- i. To campaign for education policy development in support of:
  - o More funding for schools, to adequately address the needs of all children;
  - o The promotion of approaches to behaviour management that are trauma informed, humane and respect the rights of the child;
  - o The overhaul of official exclusion practice and outlaw unofficial practice (known as Off Rolling);
  - o Exclusion being used only as a very last resort, if all else fails;
- ii. To work with local schools on approaches to behaviour management that are trauma informed, humane and respect the rights of the child;
- iii. To work with schools, voluntary sector, health practitioners and police to provide long-term diversionary pathways away from exclusions;
- iv. To continue the work initiated by the Children's Services Scrutiny Committee to implement recommendations to help our schools to prevent exclusions and support young people at risk of exclusion;

- v. To lobby for national policy changes that would support children to remain in mainstream education.

Motion 4: Opposing the Government's planning reforms

Councillor Klute moved the motion. Councillor Khondoker seconded. Councillors Russell and Graham contributed to the debate. Councillor Klute exercised his right of reply.

The motions was put to the vote and CARRIED.

**RESOLVED:**

- i. To write to the Secretary of State for Housing, Communities and Local Government expressing our significant and valid objections to the Government's proposals as set out in the Council's comprehensive formal response to the proposals, and seeking a meeting to discuss this as a matter of urgency.
- ii. To work with local developers to maintain the current supply of genuinely affordable and Council Rent homes built in Islington
- iii. To continue building much needed, Council-led genuinely affordable and council homes for local people.

Motion 5: Motion in support of Islington's Council's Low Traffic Neighbourhoods

The Mayor advised that a proposed amendment had been circulated in the second despatch of papers.

Councillor Russell moved the motion. Councillor Champion moved the amendment.

The amendment was put to the vote and CARRIED.

The motion as amended was put to the vote and CARRIED.

**RESOLVED:**

- i. To seek opportunities to make streets as accessible as possible with well-maintained pavements, dropped kerbs and tactile paving in the right places;
- ii. To seek funding from TfL for main road mitigation measures like new pedestrian crossings, pavement widening, greening, new seating and protected cycle routes;

- iii. To work with local people to amend and improve the People-Friendly Streets measures where appropriate;
- iv. To continue to create people friendly streets across the borough.

The meeting closed at 9.45 pm

**MAYOR**

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## **COUNCIL MEETING – 25 FEBRUARY 2021**

### **PETITION DEBATE**

#### **Motion to debate the petition: 'Reverse the Road Closures'**

Motion moved by: Cllr Rowena Champion, Executive Member for Environment & Transport

This Council notes that:

- In October 2014 this Council agreed to introduce measures to encourage members of the public to actively participate in Full Council meetings, including allowing questions without notice to be asked of members of the Executive and the Chairs of Scrutiny committees, making it easier for members of the public to set up petitions by introducing e-petitions, and allowing a debate at an ordinary meeting of full Council if a petition attracts 2,000 signatures or more.
- A petition was received at the Council meeting on 10 December 2020 which had over 2,000 signatures.

This Council resolves to:

- Continue to encourage residents to participate in local democracy by carefully considering the concerns raised in the petition and to undertake the debate in a spirit of openness and transparency.

**The text of the petition is set out overleaf.**

**Petition received at the 10 December 2020 meeting of the Council**

**Petition to Reverse the Road Closures**

We, the undersigned Islington residents, request the council reverse the road closures immediately and allow for an independent review. (2,406 signatories)

We are objecting to road closures because of:

- A lack of proper consultation.
- Restricts quick access for emergency vehicles; and
- Forces traffic onto main roads causing more pollution and congestion.

*The petition was accompanied by a supporting statement that has been circulated to councillors separately.*



## COUNCIL MEETING – 25 FEBRUARY 2021

### QUESTIONS FROM MEMBERS OF THE PUBLIC

a **Helena Farstad to Cllr Champion, Executive Member for Environment & Transport:**

At the Full Council on the 27th June 2019 when Islington Council declared a Climate and Ecological Emergency, I asked the Executive Member for Transport and Environment at the time, Cllr Webbe, about Islington Council's plans with regard to communicating this important decision of reaching Net Zero by 2030. The answer was satisfactory and promising, however, nearly 20 months later it is deeply disappointing that so little seems to have been done to inform the residents of Islington that we find ourselves in an emergency. An emergency that has in fact caused, and will have even greater implications than, the Coronavirus pandemic. It is of course understandable that a communication campaign setting out in detail what the council is planning to do to achieve net zero carbon by 2030 would need time to develop, however, communicating the basic, why we are in an emergency, why it matters and why the council needs to take new measures, would not be dependent on a plan. Other than a two page spread in Islington life promoting a shift to EV and calling for more recycling, I cannot recall seeing anything meaningful or comprehensive.

I wonder whether Cllr Champion thinks it is about time Islington Council and the current Labour administration starts telling the truth, unpalatable as it may be, about the Environmental Emergency we are all facing?

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b **Lucy Facer to Cllr Ward, Executive Member for Housing & Development**

The Islington Council draft transport policy shows the Councils' commitment to reducing air pollution through greening initiatives such as 'Seek opportunities to use trees and planting to separate residents, pedestrians and cyclists from motor traffic'. The removal of mature trees at Dixon Clark Court at Highbury Corner, where there are illegal levels of air pollution, will remove this important barrier of trees for council tenants and Canonbury primary school. In addition, new homes will be built directly onto the road, exposing these residents to dangerous levels of pollution that cause chronic health risks.

Why is the council continuing to allow the removal of mature green barriers, in a particularly toxic location in the borough, when your transport policy highlights the importance of improving the green environment in Islington in order to reduce air pollution and protect the health of its residents? New homes are needed in the borough but is it acceptable to implement new schemes that will have long lasting detrimental effects to residents health caused by increased exposure to illegal levels of air pollution?

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**c Harry Nugent to Cllr Lukes, Executive Member for Community Safety:**

With yet another increase of knife crime in Islington recently, what have the council done in the budget to help educate people of the realities and effects knife crime has?

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*Questions (d) and (e) will receive a combined response*

**d John Hartley to Cllr Champion, Executive Member for Environment & Transport:**

The recent report from Transport for All, "Pave the Way", rightly made the case that any changes to road infrastructure should always be designed with people with disabilities in mind. People can be disabled in many different ways: not all drive and not all use mobility scooters. The designers need to speak to the disabled to discover what works and doesn't work for them. What is the Council doing to ensure that People Friendly Streets delivers the most benefit to people with disabilities?

**e Pierre Delarue to Cllr Champion, Executive Member for Environment & Transport:**

Will the Executive Member list all the Disability Equality Impact Assessments that were carried out before the implementation of Low Traffic Neighbourhoods (LTN) schemes over the last year? How did those assessments affect the design of the schemes and improve the mobility of those residents who because of age, illness or disability find active travel more difficult?

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*Questions (f), (g) and (h) will receive a combined response*

**f Rachael Swynnerton to Cllr Champion, Executive Member for Environment & Transport:**

It is fantastic that the Council have committed to reducing traffic across the borough to improve road safety and air quality through with the introduction of the People Friendly Streets scheme. We are very much in support of these measures. The council have confirmed they are monitoring the impact of these schemes as they go in. Please can they provide details of their monitoring process and confirm when data will be made available for public consumption?

**g Helen Redesdale to Cllr Champion, Executive Member for Environment & Transport:**

In Tufnell Park, barriers were installed some years ago on Huddleston and Dalmeny Roads to exclude through traffic. Residents now enjoy quieter, less polluted streets. Collecting and sharing data on new Low Traffic Neighbourhoods (LTNs) will help residents understand the environmental benefits of these schemes. What data has been used to design the recent schemes - and what metrics are being used to monitor impact on for example, air quality and traffic volume in the surrounding area and will the Executive Member commit to publishing all data the Council holds on air quality and traffic levels in and around LTNs?

**h Jeremy Drew to Cllr Champion, Executive Member for Environment & Transport:**

When does Council expect to release its first report on monitoring of the St Peter St People Friendly Street, which ended its first 6 months on January 3rd?

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**i Kate Pothalingam to Cllr Champion, Executive Member for Environment & Transport:**

Islington Liberal Democrats welcome the news that the Council will be consulting residents in Mildmay about the proposed new Low Traffic Neighbourhood (LTN) in that area, as we have proposed. Will the Executive Member confirm that Islington Council will take a consistent approach and will commit to consulting residents and community groups, for example by using Citizen's Assemblies, before any other new LTNs are implemented, e.g. in Barnsbury?

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j **Maria Gallastegui to Cllr Ward, Executive Member for Housing & Development:**

We are very alarmed at the persistent tree felling program that appears to be spreading, not just in Islington, but all over London and beyond. This seems to be driven by the lack of social housing ....or is it? I feel that the council are acting in a reckless manner as we are in a confirmed Climate Emergency. The very poor re-modelling of the Highbury Corner roundabout has left it 17 trees less, and a higher pollution level. This lack of planning is unacceptable. Dixon Court stands to lose 7 trees, which is on a school run.

We say HOMES AND TREES! There is huge empty capacity in London to rehouse everyone. Many Europeans are returning home and Londoner's leaving London. With Covid, so many buildings will become disused. Why destroy what little open space we have left and fell trees for no REAL reason?

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k **Dominic Martin to Cllr Champion, Executive Member for Environment & Transport:**

Successful Low Traffic Neighbourhood (LTN) schemes require the support of the people who live in the LTN area. The Council plans to consult residents about the recently rolled-out LTN schemes in St. Peter's, Canonbury and Highbury within 12-18 months of implementation. If the feedback from that consultation indicates that residents would like to see exemptions to camera filters using Automatic Numberplate Recognition (ANPR) technology, and/or if Disability Groups request this, will the Executive Member commit to (a) introducing ANPR technology in existing LTNs and to (b) using ANPR technology in future LTN schemes in Barnsbury and elsewhere, as Islington Liberal Democrats have proposed?

-----

l **Zak Vora to Cllr Champion, Executive Member for Environment & Transport:**

The ill-planned Highbury Corner road system has seen continual road works for several years leading to no improvement in traffic flow. With the intended new flats being built on the corner, where currently stand much loved trees, leading to further traffic disruption and congestion, what assurances will the Council make regarding the building work and its impact on local residents and businesses along with traffic flow?

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m **Ernestas Jegorovas-Armstrong to Cllr Gill, Executive Member for Finance & Performance:**

How has the council supported its employees who are working from home?

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n **Devon Osborne to Cllr Champion, Executive Member for Environment & Transport:**

In line with the Mayor of London's 2017 initiative and with special reference to the pollution benefits of mature verses sapling trees, what are the councils current plans to improve Islington's tree canopy?

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o **John Ackers to Cllr Lukes, Executive Member for Community Safety:**

There have been reports on nextdoor about bikehangars being broken into e.g. Battledean Road on Nov 18th, 2020 and also Aberdeen Road on Mar 19th 2019, Arlington Square. I believe that bikes are being removed by thieves using cordless grinders to cut the owners D locks. How many bikes have been stolen from bikehangars?

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p **Eilidh Murray to Cllr Champion, Executive Member for Environment & Transport:**

Can the council explain how chopping down mature frees in different locations in the borough delivers to their declaration of a climate emergency delivered publicly with such conviction in June 2019 on the steps of the Town Hall with our two MPs in attendance ?

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q **Meg Howarth to Cllr Ward, Executive Member for Housing & Development:**

How can the loss of the Dixon Clark Court 'little forest' of 52-year-old mature trees - a Highbury Corner public-realm amenity - be justified for a maximum additional 25 council homes on the estate, a number likely to be further reduced by the Right to Buy?

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## COUNCIL MEETING – 25 FEBRUARY 2021

### QUESTIONS FROM MEMBERS OF THE COUNCIL

**a Cllr Heather to Cllr Watts, Leader of the Council:**

The pandemic has highlighted the “digital divide” in the UK and in Islington. In schools, to assist children with remote learning, the Council has done its best to facilitate the provision of both computer hardware and connectivity to the Internet. Meanwhile the Tory Government’s strategy and record on digital inclusion is one of dismal failure. Their scheme to roll out computer devices to schools was paused in October 2020. And the UK will miss its latest target for the roll-out of full-fibre broadband by 2025 – just another in a long line of failures caused by relying on a strategy of private enterprise and completion to deliver the telecommunications broadband network that we need to assist digital inclusion and equality of opportunity.

The Covid-19 crisis has highlighted the need for universal access to broadband services to end the digital divide. Working and learning at home saves lives. And only a publicly funded, owned and accountable service will get the job done and also boost other public services and the economy.

Would you therefore agree with me that it is the right time to push for a Government policy more akin to the Labour Party’s publicly owned free full-fibre broadband pledge?

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**b Cllr Ismail to Cllr Champion, Executive Member for Environment & Transport:**

Islington has a target of zero net carbon by 2030, What is the plan going forward and how is it going to benefit my residents who are on low-income?

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**c Cllr Ismail to Cllr Champion, Executive Member for Environment & Transport:**

Islington has frozen energy costs for 700 homes from the award winning Bunhill Heat and Power Network, which means that each household connected to the Bunhill network will make a saving of £321 less than the average costs for heating in London.

Can you demonstrate and confirm the savings Bunhill residents made in 6 years total and are they still making this saving?

d **Cllr Russell to Cllr Champion, Executive Member for Environment & Transport:**

How many insurance company requests for tree felling in Islington have been refused by the council in 2015/16, 2016/17, 2017/18, 2018/19 and 2019/20 and how many trees have been felled each year?

-----

e **Cllr Russell to Cllr Ward, Executive Member for Housing & Development:**

2,700 of Islington's 4,500 defective front doors were replaced with glass reinforced plastic (GRP) fire doors between 2014 and 2018, when serious defects in the GRP doors were exposed.

Last year you told me it will take up to two years before the 1,800 remaining defective doors and the 2,700 GRP doors are all replaced. Is the roll out of compliant front doors on track or has it been delayed by the pandemic?

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**Report of: Executive Member for Housing and Development**

<b>Meeting of:</b>	<b>Date</b>	<b>Ward(s)</b>
Full Council	25 February 2021	All

<b>Delete as appropriate</b>	<b>Exempt</b>	<b>Non-exempt</b>
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**SUBJECT: Draft Local Plan – modifications for consultation**

**1. Synopsis**

- 1.1 The purpose of this report is to provide an outline of proposed changes (known as modifications) to the Draft Local Plan to be consulted on.
- 1.2 Following several rounds of consultation from 2017 to 2019 the Draft Local Plan was submitted to the Secretary of State for Independent Examination in February 2020. This process - conducted by Planning Inspectors - establishes whether the Draft Local Plan is considered 'sound', meaning it is compliant with planning legislation and guidance. A Local Plan must be considered 'sound' in order for it to be formally adopted and then used to determine planning applications.
- 1.3 Following correspondence with the Planning Inspectors as part of the Examination, concerns were raised by the Planning Inspectors in relation to housing supply and the Sustainability Appraisal (part of the Integrated Impact Assessment (IIA)) accompanying the plan. Changes are proposed to the Draft Local Plan and accompanying documents to address these issues. In addition, significant changes to the Use Classes Order were introduced in September 2020, which require a number of policies to be redrafted and updated. Subject to approval by Full Council in February 2021 it is proposed that there is consultation on these proposed changes to enable the Examination process to progress.

## **2. Recommendations**

- 2.1 To approve the modifications that are proposed to the following Draft Local Plan and supporting documents for consultation:
- Strategic and Development Management Policies schedule of modifications (at Appendix 1)
  - Site Allocations schedule of modifications (at Appendix 2)
  - Bunhill and Clerkenwell Area Action Plan schedule of modifications (at Appendix 3)
  - Integrated Impact Assessment (IIA) examination addendum (at Appendix 4)
  - Proposed changes to the Policies Map (at Appendix 5).
- 2.2 To authorise officers to make minor changes to the consultation documents and to delegate authority to the Corporate Director of Environment and Regeneration (in consultation with the Executive Member for Housing and Development) the power to authorise other changes.
- 2.3 To note that public consultation on the modifications to the Draft Local Plan and associated documents (subject to feedback from the Planning Inspectors examining Islington's Local Plan) is provisionally scheduled to take place for a minimum of six weeks starting in March 2021. Following this, all revised documents including responses (known as representations) received will be submitted to the Planning Inspectors examining the Local Plan.
- 2.4 To authorise the Corporate Director of Environment and Regeneration, in consultation with the Executive Member for Planning and Development, to approve appropriate changes to the Draft Local Plan during the rest of the Independent Examination process.

## **3. Background**

- 3.1 Each Local Planning Authority (LPA) is required to produce a Local Plan setting out the strategic planning priorities for its area, opportunities for development and clear policies on what will or will not be permitted and where. The Local Plan provides the basis for making decisions on planning applications, and both it and the evidence behind it need to be kept up-to-date to ensure that it can help the Council to better deliver on its objectives including through its Development Management functions, as well as reflect relevant changes in national and London Plan policy. Islington's current Local Plan includes the Core Strategy (2011), Development Management Policies, and Site Allocations and Finsbury Local Plan Development Plan Documents (DPDs) (all 2013). All these documents are in the process of being reviewed in light of new evidence, and national and regional planning policy changes.
- 3.2 The Draft Local Plan was submitted to the Secretary of State on 12 February 2020. The Council received preliminary questions from the Planning Inspectors appointed to examine the Draft Local Plan on 20 February 2020. This requested additional information on the housing trajectory, the Council's views on housing supply and the deliverability of a number of sites which form part of the five-year land supply. Clarity was also sought in relation to different aspects of Site Allocations. Following the Council's response to this preliminary letter, two further letters were received from the Inspectors seeking further clarification on housing supply, the housing trajectory and site deliverability.

- 3.3 The Inspectors letters dated 30 April and 24 June sought further clarification and justification in relation to a number of matters associated with the Sustainability Appraisal. This included seeking clarification on the assessment of reasonable alternatives, requesting the assessment of specific alternatives and the review of assessment tables and cumulative assessments in order to ensure that all effects are documented. In addition the Inspectors requested that the Council should review all allocations and consider whether different uses or a mix of different uses could feasibly be delivered on a site as part of the IIA and assess these as reasonable alternatives.
- 3.4 In their correspondence the Inspectors also sought further clarification on the issue of housing supply, both in respect of the five-year housing land supply and the housing supply over the full 15 year plan period. Following the Council's initial response on this issue, the Inspectors considered significant concerns remained and sought additional work from the Council to address both shortfall issues. The Inspectors identified that there would need to be additional consultation on the IIA and in relation to the housing matters.
- 3.5 On 1 September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force significantly changing aspects of the Town and Country Planning (Use Classes) Order 1987. The Inspectors wrote to the Council requesting the Council's view on the potential soundness implications that the changes to the Use Classes Order will have on the Plan's policies and allocations and the Council responded to confirm that policy changes are necessary to address these and that the IIA will consider them holistically. The changes to the Use Classes Order are significant, particularly the introduction of Class E, because previously fine grain policies which sought to control development within specific separate uses now no longer apply in many cases. The changes in relation to class E are summarised below:

<b>Use class before 31 August 2020</b>	<b>Use Class after 31 August 2020</b>	<b>Note</b>
A1 – shops up to 280sqm selling essential goods, and no other such use within 1 km	Class F.2	Not likely in Islington and most of London
A1 - shops	Class E	Can change to any of the activities within new Class E without planning permission.
A2 – financial services eg. bank, estate agents	Class E	
A3 – cafes and restaurants	Class E	
B1a - offices	Class E	
B1b – research and development	Class E	
B1c – light industrial	Class E	
D1 – clinics, health centres, crèches, day nurseries	Class E	
D2- gyms, indoor recreation	Class E	

3.6 On 7<sup>th</sup> October the Council responded to the Inspectors, setting out the progress made on addressing the issues raised and indicating a future timetable. Given the extent of the necessary changes, it is considered that approval for these changes should be sought from Full Council before consultation. The Inspectors in their letter of 9<sup>th</sup> October confirmed their view that the proposed approach of the Council is appropriate but emphasised that they are keen that there is no further slippage beyond the dates set out and further delays may mean that the evidence behind the plan would become out of date.

- 3.7 The documents proposed to be consulted on are:
- Tables of modifications to the Local Plan (at Appendix 1, 2 and 3)
  - Updates to the Sustainability Appraisal/Integrated Impact Assessment (at Appendix 4) requested by the Inspectors.
  - A document detailing changes to the Local Plan policies maps (at Appendix 5) (e.g. changes to site allocations).

## **Modifications to the Draft Local Plan**

### Housing

- 3.8 In order to address the issues raised in relation to housing supply, changes are proposed to the Site Allocations document to allocate 9 additional sites for housing, this includes:
- Six Council owned sites (Drakeley and Aubert Court, Bemerton Estate South, Kerridge Court, New Orleans Estate, Clude Court, and Hillside); and
  - Three other sites (Barnsbury Estate, York Way Estate and Highbury Quadrant Congregational Church).
- 3.9 Changes are also proposed to a number of existing site allocations to increase flexibility to facilitate greater housing delivery – this includes, for example:
- Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6A (site reference NH1): changed from retail-led mixed use to mixed-use development, with a greater proportion of housing.
  - 1 Prah Road, N4 2RA (site reference FP5): changed from business use to residential use
  - 161-169 Essex Road, N1 2SN (site reference AUS8): changed to recognise the opportunity for residential use on the car park to the rear of the site rather than business use.
  - Archway Campus site allocation (policy ARCH5): the proposed change would allow an element of student accommodation on this site and some commercial use on the ground floor.
  - 500- 502 Hornsey Road and Grenville Works, 2A Grenville Road (site reference OIS10): changed from business-led redevelopment to mixed-use office and residential development. This reflects the recent grant of planning permission for the site on appeal.

### Modifications to respond to the Use Classes Order changes

- 3.10 A number of changes are proposed throughout the Local Plan to update references to use classes and Main Modifications are also proposed to several policies to take into account changes to the Use Class Order.
- 3.11 The most significant changes are in relation to retail, leisure and services policies. These policies have been updated to retain a degree of control in some circumstances whilst recognising the flexibility of Class E. The changes also set out how proposals for Class E should be considered in different designations. Changes to the retail and leisure policies include taking a proportionate 'tiered' approach to development involving Class E proposals, recognising the flexibility provided by Class E in many circumstances, whilst also setting out how potential impacts can be considered and mitigated depending on the location and scale of proposals. The changes recognise the importance of maintaining the retail function of Primary Shopping Areas and Specialist Shopping Areas within town centres within the context of Use Classes Order changes and to appropriately condition new development to achieve this, whilst recognising the benefits of flexibility provided by new use Class E elsewhere in Town Centres and Local Shopping Areas.
- 3.12 Updates to other policies have been made to reflect the changes to the Use Classes Order. These include:
- Business floorspace and affordable workspace policies B1 to B3 have been updated to acknowledge the context of Class E and confirm the approach to securing new office, research and development and industrial uses in key employment locations.
  - Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS) Policy SP3 has been changed to clarify that B2 and B8 industrial uses alongside the light industrial element of Class E will be sought from new development, with light industrial uses secured through condition.
  - The Affordable Workspace policy B4 has been updated to reflect changes to the Use Classes Order in order to maintain the current approach. Further clarifications around the approach to viability have also been made in the supporting text.
  - The Social and Community Infrastructure policy SC1 has been updated to recognise the reclassification of health centres, nurseries and day centres into Class E. Clarification has been added that where flexible uses are proposed but the retention/re-provision of a specific social and community use is necessary (e.g. a health centre) that specific use will be secured.
  - Cycle Parking Standards/Transport Assessments have been updated to clarify how these should be applied to Class E with additional clauses to deal with what should happen if general Class E is applied for.
  - Site Allocations (policies SA1 and AAP1) have been updated to clarify that where specific uses are mentioned these should be secured at planning stage to ensure development contributes to meeting development needs.
  - The Bunhill and Clerkenwell Area Action Plan has been updated to updated to reflect the changes to the Use Classes Order, this includes a clarification to policy BC2 that new retail and leisure uses are encouraged in Local Shopping Areas (LSAs) specifically.
  - Key glossary definitions have been updated to reflect changes to Use Classes.

### Other modifications

- 3.13 In addition to the changes identified above, other modifications changes are proposed, including:
- Changes to respond to issues raised by representations at Regulation 19 stage, including those identified as part of Statements of Common Ground.
  - Updates and clarifications to specific policies and/or supporting text to help with their effectiveness or where there has been a change in circumstances, for example for an element of energy Policy S5 has been updated to recognise the changing role of gas boilers in the context of achieving reductions in carbon emissions.
  - Further changes have also been included in response to the latest draft of the London Plan, this includes changes related to the definition of Gypsies and Travellers for the purpose of assessing needs for Gypsy and Traveller accommodation.
  - Changes have also been made in relation to the promotion of non-motorised modes of transport for deliveries in Policy T5.
  - Corrections to address errors or inconsistencies identified.

### Sustainability Appraisal/IIA update

- 3.14 In order to address the issues identified by the Inspectors a number of updates are proposed to the IIA. This includes:
- Updated assessments of all site allocations against all the Sustainability Appraisal objectives (this was previously focused on some objectives).
  - An update to the assessment of cumulative effects of policies.
  - The consideration of policy alternatives has been expanded and where necessary the assessment of additional alternatives has been included.
  - The policy assessments have been reviewed for minor effects not previously mentioned as well as to take into account modifications made to the plan.

### **Policies Map changes**

- 3.15 This document sets out changes to the Local Plan Policies Map, including those that are required as a result of proposed modifications to the plan.

### **Next Steps**

- 3.16 Following the public consultation on Modifications to the Draft Local Plan, comments received will be compiled and submitted to the Planning Inspectors examining the Local Plan. The modifications will then form part of the Draft Local Plan that is being examined. It is anticipated that the examination hearings will take place in summer/autumn 2021. The Planning Inspectors will then write a report determining whether the plan is 'sound' and can be adopted. This report is binding and the Local Plan can only be adopted in line with the findings of the report. Commonly, the Inspectors will suggest modifications to the plan to resolve issues. Such modifications would be subject to public consultation prior to the final Inspectors' report being issued. Any subsequent decision to adopt the Local Plan requires the approval of Full Council.



## **4. Implications**

### **4.1 Financial implications:**

The cost of producing the Local Plan and the associated consultation costs will be met through existing budgets within the Planning and Development division.

### **4.2 Legal Implications:**

The draft Local Plan has been prepared in line with relevant planning regulations. The consultation will comply with Islington's Statement of Community Involvement, which sets out how stakeholders with an interest in development in the borough can be involved in developing planning policies.

### **4.3 Environmental Implications and contribution to achieving a net zero carbon Islington by 2030:**

The draft Local Plan is subject to an IIA. This brings together into a single framework a number of assessments of the social, environmental and economic impact of planning policies. The IIA follows the prescribed structure for the Sustainability Appraisal process as the basis of the framework while incorporating the requirements of the Equalities Analysis (EqA) and the Health Impact Assessments (HIA). The IIA has been updated to address the issues raised by the Inspectors and take into account modifications to the plan. The IIA process is iterative and the IIA will continue to consider the sustainability of the Local Plan and its potential environmental impacts up to final adoption. The draft Local Plan proposes a number of policies to mitigate and prevent climate change, including policies which seek specific energy efficiency standards and which promote decentralised energy networks.

### **4.4 Resident Impact Assessment:**

The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding.

A Resident Impact Assessment (RIA) has been completed. The RIA refers to a contemporaneous process (the IIA, see above) which the Local Plan must undertake to assess environmental and equalities issues. The RIA will be informed by the IIA. The IIA previously completed for the Draft Local Plan included an Equalities Impact Assessment. The update to the IIA includes an Equalities Impact Assessment of the proposed modifications.

The outcome of the completed RIA is positive. The draft Local Plan policies, taken together and including proposed modifications, are not considered discriminatory for people with any of the protected characteristics, overall there are unlikely to be negative impacts in relation to equality of opportunity and they are unlikely to have a negative impact on good relations between communities with protected characteristics. The intention of the draft Local Plan is to address inequality within the boundaries of national and regional planning policy. For example, a key priority of

the draft Local plan is the delivery of genuinely affordable housing with a strategic target of 50% of all new housing developed in the borough to be affordable. This is intended to go as far as possible within the boundaries of national and regional planning policy to address the serious affordability issue of housing in the borough.

## 5. Reason for recommendations

5.1 The modifications to Islington's Local Plan review and associated documents are proposed to address the issues raised by the Planning Inspectors as well as provide updates to policies including to address where circumstances have changed including the changes to the Use Classes Order. The consultation and subsequent submission of responses to the Planning Inspectors is required to enable the examination to continue to its next stage.

### Appendices

Appendix 1: Strategic and Development Management Policies schedule of modifications

Appendix 2: Site Allocations schedule of modifications

Appendix 3: Bunhill and Clerkenwell Area Action Plan schedule of modifications

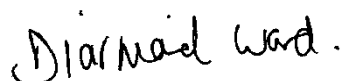
Appendix 4: IIA/Sustainability Appraisal examination addendum

Appendix 5: Proposed changes to the Policies Map

Appendix 6: Resident Impact Assessment

Final report clearance:

### Signed by:



Executive Member for Housing and Development

Date 16/02/2021

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# Strategic and Development Management Policies

## Modifications for consultation

# Local Plan – Strategic and Development Management Policies Modifications

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# Local Plan – Strategic and Development Management Policies Modifications

## 1 Introduction

- 1.1 This document contains all the changes (known as modifications) to the Strategic and Development Management Policies document proposed since the document was submitted to the Planning Inspectorate for Examination in February 2020.
- 1.2 Modifications are identified as being ‘Main’ or ‘Minor’. The Minor Modifications do not materially affect the substance of the plan, its overall soundness or the submitted sustainability appraisal. The Minor Modifications relate to points of clarification, factual updates and typographical or grammatical errors. The reasons for making each of the changes are clearly set out.
- 1.3 The modifications are structured by chapter of the document for ease of reference. This document is accompanied by schedules setting out relevant changes on the Site Allocations and Bunhill and Clerkenwell Area Action Plan. An update to the Sustainability Appraisal/IIA and relevant changes to the Policies Map have also been published.

### Format of changes

The following format has been used to set out what the changes are and distinguish between existing and new text

**Blue** – new text proposed

~~Red~~ – text proposed for removal

Changes to diagrams, tables etc described in *italic text*

## 2 Area Spatial Strategies

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO1	29	Paragraph 2.19	Amend text as follows: “There is a long term <b>Council</b> aspiration <del>Council</del> to see ...”	Correction	Minor
SDM-MO2	27	Policy SP2: King’s Cross and Pentonville Road	Amend text as follows: B. The Knowledge Quarter refers to the area around King’s Cross where many important institutions spanning research, higher education, science, art, culture and media are based. Maximisation of <del>B4</del> <b>office, research and development and light industrial</b> floorspace in the King’s Cross Spatial Strategy area could support the expansion of the ‘Knowledge Quarter’ in Islington, and advance the development of a commercial corridor along Pentonville Road/City Road.	Update to reflect change to Use Class Order	Main
SDM-MO3	27	Policy SP2: King’s Cross and Pentonville Road	Amend text as follows: I: Proposals for <b>boater facilities and</b> residential moorings, including those which meet an identified housing need for boat dwellers, will be permitted where:  <del>(i) they are located on the south of the canal (off-side);</del> <del>(ii) supporting uses and facilities are in place from the first use of the mooring;</del> (iii) public access to and along the towpath is not impeded; (iv) they do not hinder navigation along the waterway; (v) there is no impact on leisure provision; and <del>(vi) there is no detrimental impact on air quality, nature conservation/ and biodiversity value of the and the character and amenity of the waterway.</del> <b>corridor including its function as public open space.</b>  <b>J: In addition to part I above:</b>  (i) <b>Development of boater facilities will only be acceptable where there is an identified need, which may include being identified in the London Mooring Strategy.</b> (ii) <b>Development of residential moorings must be located on the south of the canal (off-side) and supporting uses and facilities must be in place before the first use of the mooring.</b>	In response to representations from the Canal and River Trust	Main
SDM-MO4	30	Policy SP2: King’s Cross and Pentonville Road  Supporting text, new paragraph	Add new paragraph after paragraph 2.23 as follows:  <b>Residential Moorings including those which meet an identified housing need for boat dwellers. Boater facilities for the canal corridor includes infrastructure such as mooring points, water and electrical supply, and waste collection and does not include the</b>	In response to representations from the Canal and River Trust	Main

# Local Plan – Strategic and Development Management Policies Modifications

			<p>development of buildings, which in accordance with policy G2 should not be developed on significant private open spaces including the canal corridor.</p>		
SDM-MO5	31	Figure 2.3: King's Cross and Pentonville Road Spatial Strategy diagram	<p>Replace Figure 2.3 with the updated map below:</p>	<p>To reflect the inclusion of new site allocations, KC8, OIS27, and OIS28 and the amended boundary for site allocation OIS24.</p> <p>Please see Site Allocation modifications for further details.</p>	Minor
SDM-MO6	32	Policy SP3: Vale Royal/Brewery Road	<p>Amend text as follows:</p>	<p>To clarify the Council's approach following the 2020 amendments to the</p>	Main

## Local Plan – Strategic and Development Management Policies Modifications


		Locally Significant Industrial Site, part A	A. The Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS) will be retained and strengthened as the borough's most significant industrial location. The principal objective in this area is to retain industrial land and intensify <del>B1(e)</del> light industrial, B2 general industry and B8 storage and distribution uses, <b>including Sui Generis uses akin to these industrial uses. Light industrial is now part of Class E and continues to be sought in the LSIS. For proposals involving light industrial floorspace, the Council will use conditions to limit Class E for this specific purpose and to protect the primary industrial function of the LSIS.</b> To ensure an adequate supply of industrial land and floorspace in Islington, proposals that would result in a loss of industrial land or floorspace, either through change of use or redevelopment, will not be permitted. In addition, encroachment of non-industrial uses (especially office and residential uses) over time, which would jeopardise long term sustainability, economic function and future economic growth of the LSIS as an industrial area will not be allowed.	Use Classes Order and the introduction of Class E.	
SDM-MO7	33	Paragraph 2.29	<i>Amend text as follows:</i>  The retention and intensification of industrial uses in the Vale Royal/Brewery Road LSIS is a key priority. The Council considers industrial uses to be those which fall within <del>B1(e)</del> light industrial, B2 general industry and B8 storage and distribution, as well as certain Sui Generis uses with a clear industrial function. The LSIS must be protected and nurtured for a range of industrial uses, including the provision of hybrid workspace, which is particularly supported. The Council's evidence also suggests that the LSIS is an appropriate location for providing space for start-up companies and SMEs, in particular older, lower value stock which remains perfectly functional.	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Minor
SDM-MO8	33	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site  Supporting text, new paragraphs	<i>Add new paragraphs after paragraph 2.30 as follows:</i>  <b>On 1 September 2020, the Government introduced new Use Classes Order changes, including the new commercial, business and services Class E. Class E now includes light industrial alongside a broad range of other commercial activities such as offices, retail, cafés, indoor leisure activities and health facilities. The additional flexibility this can bring to the commercial market is recognised however, given the particular circumstances of Industrial Land in Islington and the Brewery Road/Vale Royal LSIS in particular, it could have a significant negative impact.</b>  <b>Islington's economic success relies on the diversity of its business clusters and the Brewery Road/Vale Royal LSIS is an example of this. In recent years, there has been an increase in "cleaner" industrial activities driven by market demand. Light industrial activities, particularly in the LSIS, have an important function in complementing and supporting general industrial and storage and distribution uses in the area. The LSIS has also an important role in supporting Central London's economy due to its proximity to the CAZ. The introduction of Class E means that light industrial floorspace can change to other uses, including offices, without the need for planning permission. It is expected that some of the existing light industrial floorspace in the LSIS will be lost to other uses within Class E. The Council recognises the important economic function that the LSIS has and the need to safeguard existing and new industrial floorspace in the borough. Existing B2 general industrial and B8 storage and distribution will continue to be protected from change of use to non-industrial. New light industrial floorspace will be protected through the use of conditions to avoid further losses of industrial floorspace to other Class E uses. This will help</b>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main



## Local Plan – Strategic and Development Management Policies Modifications

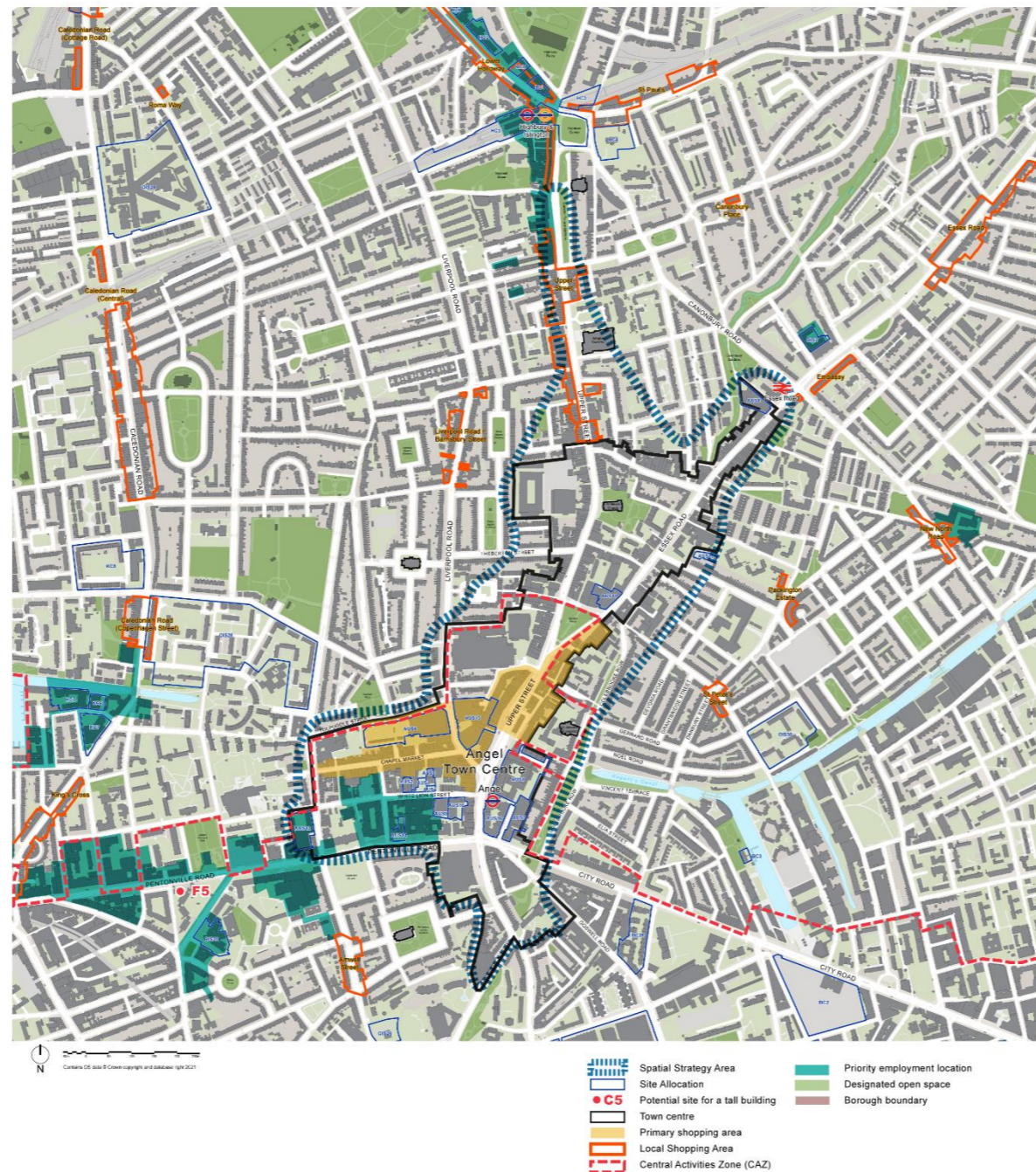
			to ensure that the LSIS can continue to provide strategic support to the borough's economic growth and to the CAZ.		
SDM-MO9	34	Paragraph 2.31	<p><i>Amend text as follows:</i></p> <p><del>B1(a) e</del> Office space is sought elsewhere in the borough – particularly in the CAZ and other designated employment areas – due to its contribution to jobs growth and employment floorspace. However, in the LSIS specifically, other forms of <b>industrial</b> business floorspace are prioritised. <b>Proposals involving stand-alone office floorspace will be refused. Office floorspace will only be considered if it is included as part of primarily industrial workspace and clearly complements the primary industrial function of the development.</b> <del>and proposals involving additional floorspace must not result in the overall building being in more than 20% office use.</del> The predominant land use must be industrial use (<del>B1(e)</del><b>light industrial</b>, B2 and B8, or Sui Generis use akin to an industrial use). Office uses may be acceptable as part of a hybrid workspace scheme where it is clear that <del>it is not the predominant use</del><b>it is only a small proportion of the development.</b> The introduction of other uses which could compromise the economic function and future economic growth of the LSIS (especially residential uses) will not be allowed, either stand-alone or as part of mixed-use or co-location schemes.</p>	To align with the text in the policy itself and clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main
SDM-MO10	34	Paragraph 2.32	<p><i>Amend text as follows:</i></p> <p>Notwithstanding this clear priority for industrial uses and the resistance <del>of B1(a) and/or B1(b) and/or general B1 floorspace and/or Sui Generis use floorspace akin to B1(a)/B1(b) within the</del> <b>to other non-industrial business floorspace such as offices and research and development in the</b> Vale Royal/Brewery Road LSIS, if such floorspace is permitted within the LSIS, affordable workspace must be provided in line with policy B4 Part B.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Minor
SDM-MO11	34	Paragraph 2.35	<p><i>Amend text as follows:</i></p> <p>All development proposals in the LSIS must maximise the provision of industrial uses, including the delivery of hybrid workspace in the LSIS. Where new <b>B-industrial</b> uses are provided, conditions will be attached to the permission to remove any applicable permitted development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that specific industrial use(s) are retained and that any future loss is assessed against Local Plan policies via a planning application. By maximising these appropriate industrial uses, the LSIS can be developed without harming the delicate balance of existing industrial uses (including lower value uses) that are vital in sustaining economic diversity in the borough, and in supporting the wider economy.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Minor
SDM-MO12	35	Paragraph 2.38	<p><i>Amend sentence as follows:</i></p> <p>The LSIS is characterised by narrow streets. Private forecourts and the limited height of industrial units currently alleviate the impact on the scale of the street. To avoid an overbearing scale of the street – a canyon effect – and allow light penetration, new development should ensure that the width to height ratio of street does not exceed 1:1.35 and optimally stays below 1:1. This can be achieved by the stepping back of development above a certain height on the building line or by sufficiently</p>	Clarification	Minor

# Local Plan – Strategic and Development Management Policies Modifications

			<p>pulling the building line back from the street. Any development in the western edge of the LSIS, along York Way, will need to be clearly sub-ordinate in height <b>to the adjacent Maiden Lane tower</b> as, due to the narrow street profile, there is a risk of creating an adverse canyon effect. This can be avoided through appropriate scaling and setting back development in relation to the streetscape. <b>Height of development proposals should be assessed in conjunction with Policy DH3.</b></p>		
SDM-MO13	37	<p>Figure 2.4: Vale Royal/Brewery Road Locally Significant Industrial Site Spatial Strategy diagram</p>	<p>Replace Figure 2.4 with the updated map below:</p> 	<p>To reflect the inclusion new site allocation OIS27 and the amended boundary for site allocation OIS24.</p> <p>Please see Site Allocation modifications for further details.</p>	Minor
SDM-MO14		<p>Policy SP4: Angel and Upper Street, part I</p>	<p>Amend text as follows:</p> <p>Consistent with the CAZ/CAZ fringe location, business use is a priority land use in Angel Town Centre, and on upper floors in the rest of the Spatial Strategy area. Existing <b>B4 office, research and development and light industrial</b> use will be protected and proposals for new business floorspace must maximise the provision of business floorspace, particularly in White Lion Street,</p>	<p>Update to reflect change to Use Classes Order</p>	Main

## Local Plan – Strategic and Development Management Policies Modifications

			Pentonville Road and upper floor locations across the Town Centre. The Sainsbury's site is a key strategic site which could deliver a significant amount of new business floorspace.		
SDM-M015		Paragraph 2.52	<p><i>Amend text as follows:</i></p> <p>Crossrail 2 is a proposed <del>North-South</del> <b>South-West – North East</b> rail link across London, with a station planned at Angel. <b>Following the TfL funding settlement in November 2020 the project is ready to be restarted when the time is right. Crossrail 2 will still be needed in the future to support London's growth and TfL has demonstrated the case for the scheme. The route is not yet funded and will not be delivered before until the end of the plan period at the earliest.</b> Any associated development must be in-keeping with the character and function of the area and must prioritise public realm improvements in order to positively improve the experience of the centre. A number of sites within Angel Town Centre are safeguarded to protect land needed to build and operate Crossrail 2, including land for the Crossrail 2 station itself. These sites are allocated in the Site Allocations DPD. Crossrail 2 should improve pedestrian permeability in the area and create a 24-hour pedestrian access between Islington High Street and Torrens Street through RBS building (site allocation AUS1).</p>	TfL Statement of Common Ground	Minor
SDM-M016	42	Figure 2.5: Angel and Upper Street Spatial Strategy diagram	<i>Replace Figure 2.5 with the updated map below:</i>	<p>To reflect the inclusion of new site allocations, KC8, OIS28, OIS30 and the amended boundary for site allocation OIS24.</p> <p>Please see Site Allocation modifications for further details.</p>	Minor



SDM-MO17 43 Policy SP5: Nag's Head and Holloway, part E

*Amend text as follows:*

Morrison's supermarket and its adjacent car park is the key opportunity site ~~to~~ **for the maximise retention and enhancement of retail floorspace provision** in the Town Centre in the longer term, as well as **for the delivery of** a significant amount of **residential and** office floorspace **on the upper floors, subject to amenity issues being addressed in line with the agent-of-change principle.** Other Town Centre uses may be appropriate as part of redevelopment of the site, including night-time economy uses such as restaurants. ~~Conventional residential accommodation will be acceptable on the upper floors, subject to amenity issues being addressed in line with the agent-of-change principle.~~ Existing site permeability through to Seven Sisters Road and the Nag's Head market must be maintained and retail user amenity should be improved. Enhancements to the

Clarification for consistency with modification to Site Allocation NH1.

Main

## Local Plan – Strategic and Development Management Policies Modifications

			covered market are encouraged where they fit with the wider function of the area and do not lead to adverse amenity impacts. Public open space should be provided to act as a focal point for the Town Centre.		
SDM-MO18	43	Policy SP5: Nag's Head and Holloway, part I	<p><i>Amend text as follows:</i></p> <p>Additional accommodation for students will <del>not only</del> be allowed <b>where consistent with policy H6 other than on sites allocated for student accommodation in the Spatial Strategy area.</b></p>	Clarity. In response to iQ student accommodation	Minor
SDM-MO19	45	Paragraph 2.58	<p><i>Amend text as follows:</i></p> <p>The Nag's Head Shopping Centre is at the heart of the Town Centre and is occupied principally by Morrison's supermarket alongside a number of smaller retail units. The western part of the site fronting Seven Sisters Road includes the Nag's Head covered market, which contains a variety of retail, café and takeaway uses and adds vibrancy to the Town Centres retail and leisure offer. The shopping centre is a key development opportunity in the longer term, which could contribute towards <del>enhancing the improved</del> retail provision in the Town Centre <b>alongside significant residential and also intensifying office provision floorspace, pending consistency with relevant Local Plan policies including agent-of-change.</b> The existing centre could be improved; with reconfiguration to provide a better use of space with additional planting, pop-up stalls and events. The opportunity to create a significant public open space fronting Holloway Road should also be explored. <del>Some residential uses on upper floors of any redevelopment may be acceptable, pending consistency with relevant Local Plan policies including agent-of-change.</del></p>	Amended to be consistent with the modifications to policy SP5 part E and Site Allocation NH1.	Main
SDM-MO20	47	Figure 2.6: Nag's Head and Holloway Spatial Strategy diagram	<p><i>Replace Figure 2.6 with the updated map below:</i></p>	<p>Updated map to reflect the removal site allocation FP10.</p> <p>Please see Site Allocation modifications for further details.</p>	Minor

# Local Plan – Strategic and Development Management Policies Modifications



SDM-MO21 49 Policy SP6: Finsbury Park, part D

*Amend text as follows:*  
 Finsbury Park has potential to develop as a CAZ satellite location for additional business uses, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In order to realise this potential, diminution of **office, research and development, light industrial B4**, B2 and/or B8 uses will be resisted and further intensification of these uses, particularly units suitable for SME occupation and **light industrial B4(e)** 'maker space', will be strongly encouraged.

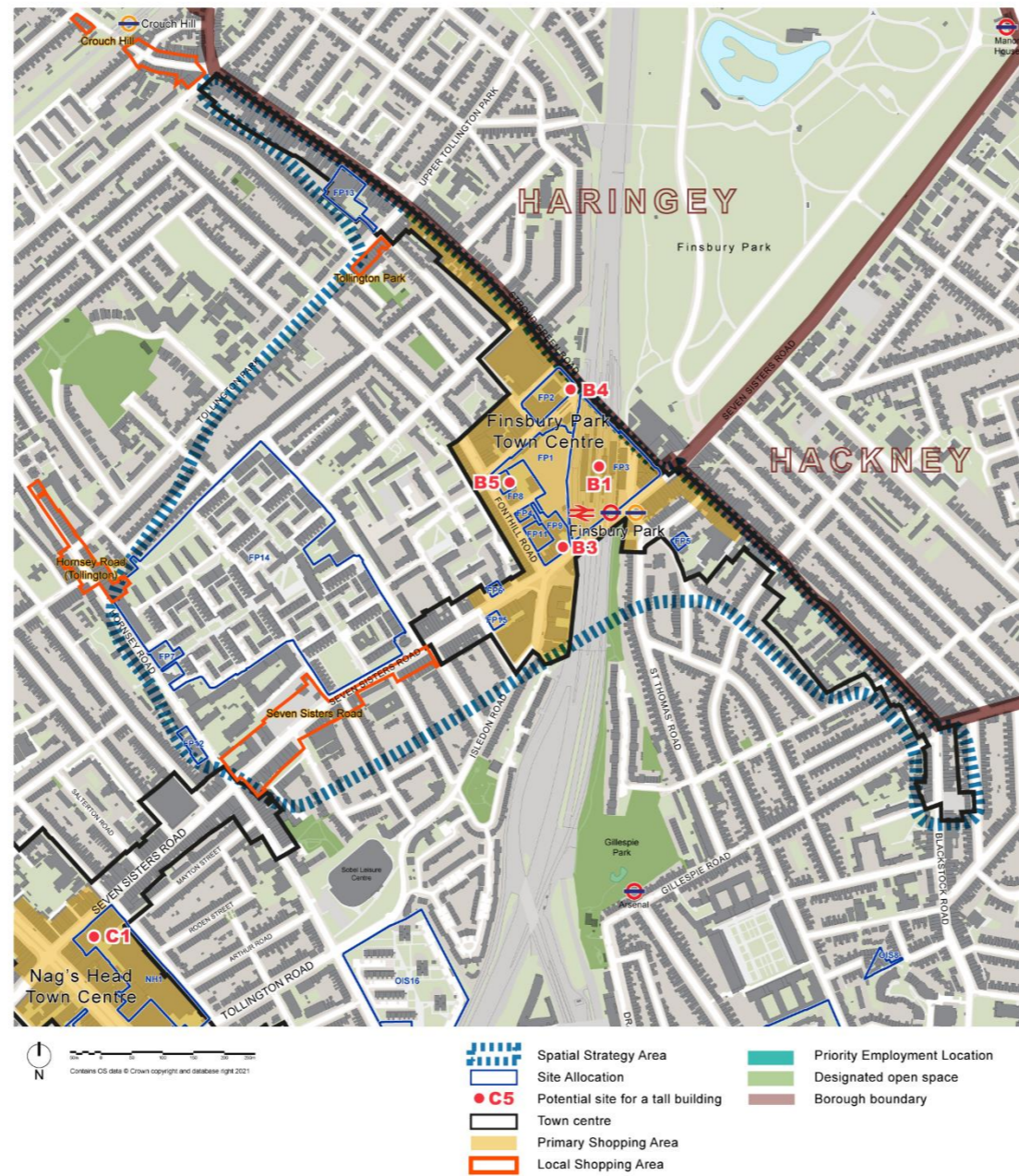
Update to reflect change to Use Classes Order

Minor

## Local Plan – Strategic and Development Management Policies Modifications

SDM-MO22	49	Policy SP6: Finsbury Park, part M	<p><i>Add to the end of criterion M:</i></p> <p>The area's key heritage assets include the Grade II* listed former Rainbow Theatre and the Grade II listed Church of St. Mark with St. Anne, which contribute significantly to Finsbury Park's character and townscape and will be protected and enhanced. <b>Development proposals must also conserve or enhance heritage assets including those in neighbouring boroughs where impacted.</b></p>	Modification resulting from Statement of Common Ground with London Borough of Hackney	Main
SDM-MO23	49	Paragraph 2.66	<p><i>Amend text as follows:</i></p> <p>Finsbury Park is a District Town Centre and its predominant commercial role must be maintained. A diverse range of shops within the area is essential, so that the overall retail offer can cater for the needs of different sections of the community, including the least well off residents in the area. The Primary Shopping Area seeks to secure a vibrant and viable <del>A1-use</del> retailing core. However, the overarching commercial role of the area is changing from traditional retailing to more leisure and experience-based retailing.</p>	Update to reflect change to Use Classes Order	Minor
SDM-MO24	50	Paragraph 2.70	<p><i>Amend text as follows:</i></p> <p>Finsbury Park has significant potential to develop as a unique satellite location, outside the CAZ, for additional business uses, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In developing this potential location, the focus should be on promoting and enhancing the nascent fashion, tech and creative industries through provision of units suitable for SME occupation and <b>light industrial B1(e)</b> space, particular 'maker space', as well as affordable workspace where appropriate. Ensuring adequate provision of such spaces in Finsbury Park will enable opportunities for the establishment of a mix of dynamic, sustainable local businesses.</p>	Update to reflect change to Use Classes Order	Minor
SDM-MO25	52	Figure 2.7: Finsbury Park Spatial Strategy diagram	<p><i>Replace Figure 2.7 with the updated map below:</i></p>	<p>Updated map to reflect the removal of site allocation FP10.</p> <p>Please see Site Allocation modifications for further details.</p>	Minor

# Local Plan – Strategic and Development Management Policies Modifications



SDM-MO26

53

Policy SP7: Archway, part F

*Amend text as follows:*

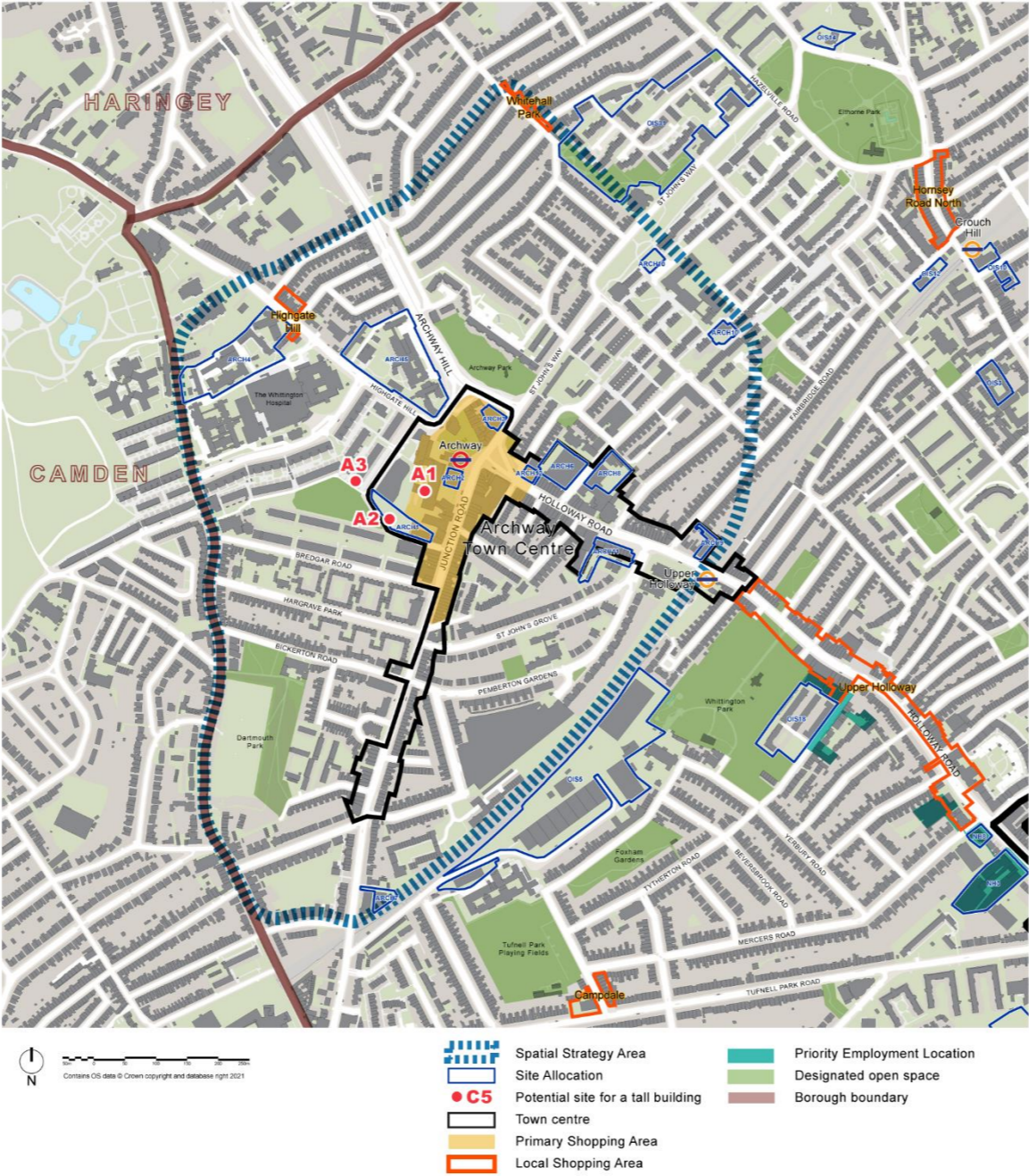
Existing business floorspace will be protected and proposals that result in a net loss of business floorspace in the Town Centre will be resisted. Development proposals for new business floorspace, particularly SMEs and/or **light industrial B1(e)** floorspace which supports the areas cultural offer or other local institutions such as the Whittington Hospital, will be encouraged.

Update to reflect change to Use Class Order

Minor



# Local Plan – Strategic and Development Management Policies Modifications

SDM-MO27	55	Paragraph 2.88	<p><i>Amend text as follows:</i></p> <p>Primary Shopping Area will remain the focus of <b>A4</b> retail use with a range of other uses promoted elsewhere in the Town Centre. Archway is identified as a night-time economy of more than local significance in the London Plan; the area has potential for expansion of night-time economy uses, dependent on mitigation of any adverse impacts, particularly noise and disturbance for residents and businesses.</p>	Update to reflect change to Use Class Order	Minor
SDM-MO28	57	Figure 2.8: Archway Spatial Strategy diagram	<p><i>Replace Figure 2.8 with the updated map below:</i></p>  <p>The map displays the Archway area with various planning zones and site allocations. Key features include:</p> <ul style="list-style-type: none"> <li><b>Spatial Strategy Area:</b> Indicated by a blue dashed line.</li> <li><b>Site Allocation:</b> Shown as blue-outlined polygons.</li> <li><b>Potential site for a tall building (C5):</b> Marked with a red dot.</li> <li><b>Town centre:</b> A central area outlined in black.</li> <li><b>Primary Shopping Area:</b> A yellow-shaded area.</li> <li><b>Local Shopping Area:</b> An orange-outlined area.</li> <li><b>Priority Employment Location:</b> A green-shaded area.</li> <li><b>Designated open space:</b> Green areas.</li> <li><b>Borough boundary:</b> A brown line.</li> </ul> <p>Neighboring areas like Haringey and Camden are also labeled. Specific streets such as Holloway Road, Archway Hill, and Junction Road are visible. A legend at the bottom clarifies the symbols used.</p>	<p>Updated map to reflect the inclusion of Site Allocation OIS31.</p> <p>Please see Site Allocation modifications for further details.</p>	Minor
SDM-MO29	60	Figure 2.9: Highbury Corner and Lower	<p><i>Replace Figure 2.8 with the updated map below:</i></p>	Updated map to reflect amendment to site	Minor

# Local Plan – Strategic and Development Management Policies Modifications

Holloway Spatial Strategy diagram



allocation OIS24 and removal of site allocation OIS9

Please see Site Allocation modifications for further details.

### 3 Thriving Communities

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO30	61	Policy H1: Thriving communities, part I	<i>Amend text as follows:</i>  The Council will maintain a supply of housing land to meet housing targets over the plan period, with a particular focus on demonstrating a five year supply of land. <b>The Council will produce a housing trajectory, which will be published annually as part of the monitoring framework.</b>	Clarity	Minor
SDM-MO31	66	Policy H2: New and existing conventional housing, part G	<i>Amend text as follows:</i>  'To maintain a supply of <del>larger</del> family homes,...	Clarity	Minor
SDM-MO32	69	Paragraph 3.35	<i>Amend text as follows:</i>  ...Further guidance is provided in the <del>Prevented</del> <b>Preventing</b> Wasted Housing Supply SPD...	Correction	Minor
SDM-MO33	82	Paragraph 3.77	<i>Amend text as follows:</i>  London Plan policy <del>D6 D4</del> sets out minimum internal space standards (in GIA) for new residential development, inclusive of space for storage, as well as other specifications for private internal space including bedroom sizes; these standards reflect the Nationally Described Space Standard...	To reflect changes to London Plan policy references consistent with the Publication London Plan.	Minor
SDM-MO34	89	Paragraph 3.107	<i>Amend text as follows:</i>  The London Plan requires provision of 35% affordable student accommodation. Islington support this in principle, but the clear priority is for the provision of student bursaries. All new student accommodation, including any extension/intensification to existing built or permitted schemes, should provide both student bursaries and affordable student accommodation, the latter to be provided in line with London Plan policy <del>H15 H17</del> ...	To reflect changes to London Plan policy references consistent with the Publication London Plan.	Minor
SDM-MO35	91	Policy H7: Meeting the needs of vulnerable older people, part F	<i>Amend text as follows:</i>  F. The Council will resist development which involves the loss of floorspace in specialist older peoples accommodation unless: (i) adequate replacement on-site accommodation will be provided <del>that satisfies Part D or Part E</del> ; or (ii) adequate replacement accommodation is provided elsewhere in the borough <del>that satisfies Part D or Part E; or</del> ; and <b>(iii) replacement accommodation satisfies either Part D or Part E of Policy H7; or</b> (iii) the applicant can robustly demonstrate that there is a surplus over a long-term of this housing type in Islington; and it can be demonstrated that the existing accommodation is unsatisfactory for modern standards and/or not fit for purpose.	Clarity	Main
SDM-MO36	92	Paragraph 3.111	<i>Amend text as follows:</i>  'Islington will consider which Use Class a proposal falls into on <b>a</b> case-by-case basis...'	Correction	Minor
SDM-MO37	97	Paragraph 3.127	<i>Add footnote reference:</i>  Agreed minimum standards <sup>x</sup> for room sizes and the provision of kitchens and bathrooms are used to determine the maximum number of occupiers and households for an HMO licence.	Clarification	Minor

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## Local Plan – Strategic and Development Management Policies Modifications

			<b>* Islington Council Paper: Standards for houses in multiple occupation Housing Act 2004 or any subsequent update.</b>		
SDM-MO38	101	Policy H12, part A	<p><i>Amend text as follows:</i></p> <p>A. To meet the identified <del>maximum</del> need for <del>40</del> Gypsy and Traveller pitches, the Council will seek to provide a site(s) for Gypsy and Traveller accommodation through:</p> <p>(i) use of its own sites identified as part the Council’s ongoing housebuilding programme; and/or</p> <p>(ii) joint working with the GLA and other boroughs to determine scope for accommodating need on a sub-regional basis; and/or</p> <p>(iii) a potential review of Site Allocations where need is not met through Part A(i) and/or (ii).</p>	To reflect changes to the Publication London Plan policy H14 in response to Directions from the Secretary of State which removed the draft London Plan definition of Gypsies and Travellers for the purposes of assessing needs.	Main
SDM-MO39	101	Policy H12: Gypsy and Traveller Accommodation, part B	<p><i>Amend text as follows:</i></p> <p>(iii) provide a good level of residential amenity <b>and high quality housing</b>, in line with relevant policy requirements set out in policy H4;</p>	In response to London Gypsies and Travellers	Minor
SDM-MO40	102	Paragraphs 3.146 to 3.150	<p><i>Amend text as follows:</i></p> <p>3.146 The definition applied to Gypsies and Travellers makes a significant difference in terms of the assessment of accommodation needs. The definition set out in the Government’s Planning Policy for Traveller Sites (PPTS) excludes certain groups of Gypsies and Travellers, for example those who have ceased to travel permanently. However, the <b>draft</b> London Plan definition included <del>ds</del> those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them, by virtue of their cultural preference not to live in bricks and mortar accommodation. The <b>draft</b> London Plan definition also considered <del>eds</del> those who, on grounds of their own or their family’s or dependants’ educational or health needs or old age, have ceased to travel temporarily or permanently. <b>This definition has since been removed from the Publication London Plan.</b> The effect of these different definitions has been considered as part of the Council’s Gypsy and Traveller Accommodation Assessment (2019).</p> <p>3.147 Previously the council has worked with the Greater London Authority on a pan London study, the London Boroughs’ Gypsy and Traveller Accommodation Needs Assessment 2008. The council considers that the assessment of need is best done at the subregional level, which would better reflect the constraints and current level of provision in individual boroughs. The majority of need for Gypsy and Traveller accommodation is focused in Outer London.</p> <p>3.148 The London Plan policy H1<del>46</del> states that boroughs should meet the identified need for Gypsy and Traveller accommodation, based on a figure of need identified in a needs assessment. <b>A need</b> <del>The Council will seek to identify a site(s) to meet the identified need for</del> 10 pitches <b>was</b> identified in the <b>council’s</b> 2019 assessment, which is based on the <b>draft</b> London Plan definition <b>(this definition has since been removed from the Publication London Plan)</b> . <del>Under rather than</del> the more restrictive PPTS definition <b>the identified need is 6 pitches</b>. <del>The need is for 8 pitches by 2025 with a further two pitches required by 2035 (based on newly forming families on existing sites on the assumption that the initial need by 2025 is met and sites are provided).</del></p> <p>3.149 In the first instance, the council will seek to identify a site through its ongoing housebuilding programme. The 2019 assessment sets out factors to consider when identifying sites which are likely</p>	To reflect changes to the Publication London Plan policy H14 in response to Directions from the Secretary of State which removed the draft London Plan definition of Gypsies and Travellers for the purposes of assessing needs.	Main

## Local Plan – Strategic and Development Management Policies Modifications

			<p>to pose particular challenges given the borough’s densely developed context, e.g. sites would not be sought between tower blocks, which potentially rules out a number of council-owned sites.</p> <p>3.150 Depending on the scale of accommodation that can be met through council site(s), there may be further sites needed to meet the full need of 10 pitches, which could be met through a focused review of the Site Allocations document, and/or by working subregionally with other boroughs and the GLA. The policy also sets out assessment criteria for any windfall applications for Gypsy and Traveller accommodation, which would apply to future applications for sites on council owned or privately owned land.</p>																	
SDM-MO41	102	Paragraph 3.150	<p><i>Add to end of paragraph:</i></p> <p><b>The relevant aspects of policy H4 in relation to amenity includes ensuring a good level of privacy and aspects in relation to high quality housing relate to ensuring provision meets accessibility standards in terms of access to amenity blocks for example. Other aspects of policy H4 may also be relevant.</b></p>	In response to London Gypsies and Travellers	Main															
SDM-MO42	104-105	Policy SC1: Social and Community Infrastructure	<p><i>Add new criterion C:</i></p> <p><b>Where a proposed social and community infrastructure use/facility is deemed necessary to mitigate the impacts of existing or proposed development (e.g. a health centre to serve the residents of a large housing scheme), that specific use will be secured at planning stage.</b></p> <p>Amend criterion D (formerly part C): Where new and/or extended social and community infrastructure is provided on-site it must be designed in line with criteria in part GH.</p> <p>Amend criterion E (formerly part D): <b>The Where a change of use falls within planning control the Council will not permit any loss of social and community infrastructure uses unless:</b></p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main															
SDM-MO43	105	Policy SC1: Social and Community Infrastructure, supporting text, new paragraphs after 3.154	<p><i>Add new paragraphs:</i></p> <p><b>3.155 Within the context of supporting the retention of social and community infrastructure it is necessary to note the impact of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 implemented on 1 September 2020. Social and community infrastructure uses which previously fell within the D1 (non-residential institutions) and D2 (assembly and leisure) Use Classes have been reclassified as follows:</b></p> <table border="1"> <thead> <tr> <th>Social and Community Infrastructure Use</th> <th>Use Class prior to 01/09/2020</th> <th>Use Class from 01/09/2020</th> </tr> </thead> <tbody> <tr> <td>Health centres, nurseries, day centres</td> <td>D1 (non-residential institutions)</td> <td>E (commercial, business and service)</td> </tr> <tr> <td>Schools, libraries, art galleries</td> <td>D1 (non-residential institutions)</td> <td>F1 (learning and non-residential institutions)</td> </tr> <tr> <td>Community centres</td> <td>D1 (non-residential institutions)</td> <td>F2 (local community)</td> </tr> <tr> <td>Leisure centres, swimming baths, areas for outdoor sports</td> <td>D2 (assembly and leisure)</td> <td>F2 (local community)</td> </tr> </tbody> </table>	Social and Community Infrastructure Use	Use Class prior to 01/09/2020	Use Class from 01/09/2020	Health centres, nurseries, day centres	D1 (non-residential institutions)	E (commercial, business and service)	Schools, libraries, art galleries	D1 (non-residential institutions)	F1 (learning and non-residential institutions)	Community centres	D1 (non-residential institutions)	F2 (local community)	Leisure centres, swimming baths, areas for outdoor sports	D2 (assembly and leisure)	F2 (local community)	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main
Social and Community Infrastructure Use	Use Class prior to 01/09/2020	Use Class from 01/09/2020																		
Health centres, nurseries, day centres	D1 (non-residential institutions)	E (commercial, business and service)																		
Schools, libraries, art galleries	D1 (non-residential institutions)	F1 (learning and non-residential institutions)																		
Community centres	D1 (non-residential institutions)	F2 (local community)																		
Leisure centres, swimming baths, areas for outdoor sports	D2 (assembly and leisure)	F2 (local community)																		

## Local Plan – Strategic and Development Management Policies Modifications

			<p>The most significant impact of the reclassification is the inclusion of health centres, nurseries and day centres in the new Class 'E' where they now sit alongside retail (former Class 'A') and business (former Class 'B') uses. Changes of use within Class E are not classed as development so do not require planning permission, meaning that the Council no longer has the ability to resist the loss of existing social and community infrastructure facilities that fall within Class E. With regards to proposals for new or extended social and community infrastructure facilities that sit within Class E, the Council will seek to secure the specific proposed use (e.g. a GP surgery or a nursery) through the planning process where it is deemed necessary to mitigate the impacts of development and/or meet the needs of the community.</p> <p>3.156 As set out above, social and community infrastructure uses not falling within Class E will now be classified as either F.1 (learning and non-residential institutions) or F.2 (local community) uses. Another change, although not one that is anticipated to have a significant effect within a densely developed urban environment such as Islington, is the inclusion of 'local shops' (defined as being no more than 280 sq.m in size, largely selling essential goods including food, and located at least 1 km from another similar shop) within the F.2 use class. Applications involving social and community infrastructure uses within the F.1 and F.2 use classes will be fully assessed against the requirements of policy SC1 and other relevant Local Plan policies.</p>		
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## 4 Inclusive Economy

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO44	113	Policy B1: Delivering business floorspace, part E	<p><i>Amend text as follows:</i></p> <p>E Islington’s Locally Significant Industrial Sites are the focus for new industrial uses, namely <b>B4(e)light industrial</b>, B2 <b>general industrial</b> and B8 <b>storage and distribution</b> uses, <b>including Sui Generis uses akin to priority industrial uses</b>. Existing industrial land and floorspace will be safeguarded and the introduction of non-industrial uses will not be permitted. The renewal, modernisation and intensification of industrial uses will be encouraged.</p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E..	Main
SDM-MO45	114	Policy B1 supporting text new paragraph	<p><i>Amend text as follows:</i></p> <p><b>The introduction of Class E poses a number of challenges to business floorspace within the borough. The increased flexibility puts existing floorspace at risk of being converted to other non-business uses eroding the overall supply of business floorspace, with particular challenges for smaller, lower grade and more affordable premises. Furthermore if new business floorspace cannot specifically be secured through new development then this could lead to difficulty in demonstrating identified needs are being met. Whilst the flexibility offered by Class E may be beneficial in some parts of the borough and may help to address short term needs, in locations that are particularly suitable for business floorspace the flexibility and potential lost opportunity to provide business floorspace will be damaging not only in terms of local impacts for employment clusters and job creation, but also strategically for Islington’s economy and the wider contribution this makes to London’s nationally important economic output.</b></p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main
SDM-MO46	113-114	Paragraph 4.6	<p><i>Amend text as follows:</i></p> <p>Business floorspace in this chapter is considered to be activities or uses that fall within <del>the B-use class (i.e.</del> offices, <b>research and development</b>, industry, or warehousing) and some Sui Generis uses which are akin to business uses, such as building merchants and depots. Employment floorspace is a broader term which refers to activities or uses that generate employment, including offices, industry, warehousing, showrooms, hotels, retail, entertainment, educational, health and leisure uses (regardless of whether the end occupier is private, public or charity sector).</p>	Update to reflect changes to Use Classes Order	Minor
SDM-MO47	114	Paragraph 4.9	<p><i>Amend text as follows:</i></p> <p>The success of Islington’s economy can be attributed to a number of factors, including being located in the CAZ, which accommodates 70% of the borough’s jobs, and several unique economic clusters which are of sub-regional or national significance. These clusters include Tech City around Old Street; the Clerkenwell Design Cluster; the Kings Cross-Moorfields Eye Hospital corridor which links the Kings Cross life sciences cluster/Knowledge Quarter’ with Old Street; and</p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main

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			the Vale Royal/Brewery Road industrial cluster. There are also a number of smaller scale clusters of business uses and industrial areas which are located across the borough. <b>Given the concentration of jobs in the CAZ, even a small proportional decrease in office floorspace would have a significant impact on the boroughs economy. Equally business clusters in other locations can be undermined by gradual loses of business floorspace, including to other Class E uses, which will have wider negative impacts on the agglomeration benefits that can be created in these areas with the concentration of business floorspace.</b>		
SDM-MO48	115	Paragraph 4.14	<p><i>Amend text as follows:</i></p> <p>LSISs are the focus for <del>B4(e)</del>, <b>light industrial</b>, B2 <b>general industrial</b> and B8 <b>storage and distribution</b> uses. Existing industrial land will be safeguarded, and its renewal and modernisation will be encouraged. Non-industrial uses will not be allowed in LSISs. <b>It is recognised, however, that some of the existing premises in the LSISs will be able to utilise the flexibility of the new Class E.</b> <del>The</del> Vale Royal/Brewery Road LSIS is the largest concentration of industrial uses in the borough. The area is an established cluster of industrial uses. In addition to the more conventional industrial uses expected in an inner London industrial area, the area is also home to a small cluster of creative industries and specialist event companies/music orientated businesses. The unique function of this LSIS must be protected and nurtured to allow for an intensification of industrial uses – see policy SP3 for further detail. In other LSISs, industrial land will be protected and the industrial function of the areas will be safeguarded, with renewal and modernisation of this industrial function encouraged.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Minor
SDM-MO49	115-116	<p>Policy B2: New Business Floorspace, part A, C and E.</p> <p>New clause D to be added with other clauses references to be updated accordingly.</p>	<p><i>Amend text as follows:</i></p> <p>A. New business floorspace will be directed to the locations identified in (i) to (iii) below (and shown on Figure 4.1) to support the specific role and function of each of the locations. <b>The Council will use conditions on future proposals to ensure that specific uses such as new office, research and development and light industrial floorspace are secured in these locations.</b> Proposals must maximise the provision of business floorspace in line with the priorities for each location. Proposals which are not considered to maximise business floorspace will not be permitted. Proposals involving existing business floorspace must prioritise the intensification, renewal and modernisation of this business floorspace throughout the borough and particularly in the locations set out below.</p> <p>(i) <b>CAZ and Bunhill and Clerkenwell AAP area:</b> office uses are the clear priority in this area, in order to support London's strategic business role. The primary economic function of the CAZ and AAP area depends on maintaining and enhancing office uses. A range of workspace typologies are supported, including Grade A offices, serviced offices, co-working spaces, hybrid workspace and other types of flexible workspace and lower specification office space suitable SMEs and business services. Residential uses are not a key priority in this location.</p> <p>(ii) <b>CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road:</b> New business floorspace is a priority in these Spatial Strategy areas, particularly on White Lion Street, Pentonville Road and upper floor locations across Angel Town Centre. A variety of business floorspace typologies is encouraged along Pentonville Road and around Kings Cross/York Way, including business space which meets the needs of SMEs.</p>	<p>To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.</p> <p>Modification to Part D adds cross reference to other relevant policies to clarify approach.</p>	Main



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			<p>(iii) <b>Priority Employment Locations (PELs):</b> Growth and intensification of business uses to provide for the SME sector, as well as meeting local/specialist needs, is the key priority within these areas. Increasing provision of space that is appropriate to meet the diverse needs of the SME economy is supported. Residential use will not be supported in these areas.</p> <p>B. The introduction of uses that could undermine the specific economic function of the locations identified in Part A will be resisted.</p> <p>C. In LSISs shown on Figure 4.1, the overriding priority land uses are industrial uses (<del>B1(e)</del><b>light industrial</b>, B2 <b>general industrial</b>, B8 <b>storage and distribution</b> and Sui Generis uses which are akin to industrial uses). The retention and intensification of industrial uses and existing clusters of industrial activity in LSISs will be required as part of any proposal within a LSIS. <b>The light industrial element of Class E continues to be sought in the LSIS and will be secured through condition.</b> The provision of hybrid space is supported. The development of office use may be permissible as part of a hybrid workspace scheme, but it must only constitute a small proportion of the overall gross floorspace proposed. The introduction of non-industrial uses would undermine the primary industrial economic function and compromise the future growth of LSISs and will therefore not be permitted unless they are clearly ancillary to a proposal. Residential use is not acceptable within LSISs.</p> <p><b>D. All development proposals within LSISs must prevent or mitigate impacts on air quality, in line with policy S7 and promote sustainable transport in line with policies T2 and T5. Proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts.</b></p> <p><del>D E</del> Proposals for <del>B1(a)</del><b>office, research and development</b> and <del>B1(e)</del><b>light industrial</b> floorspace that meets local and/or wider demand <del>should</del><b>must</b> be located on upper floors in the Primary Shopping Area of designated Town Centres <b>consistent with policy R2</b>, but are considered suitable on any floor elsewhere in designated Town Centres and in LSAs <b>subject to the relevant criteria in policies R3 and R4 respectively.</b> <del>as long as the business use provides an active frontage</del></p>		
SDM-MO50	116	Policy B2: supporting text	<p><i>Add new paragraphs after paragraph 4.17 as follows:</i></p> <p><b>The south of the borough has an important role in supporting Central London’s economy including knowledge economy due to its strategic position within the CAZ. Other areas outside the CAZ such as Priority Employment Locations and Town Centres are important employment hubs that support economic growth in the borough and supply affordable office space suitable for SME occupiers. A supply of offices outside the CAZ is also important and serves different markets. Amongst other things these locations support the establishment of knowledge networks between the CAZ and other areas, including other</b></p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main

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			<p>neighbouring boroughs. These locations suffered significant loses in previous years due to the introduction of Permitted Development Rights. Considering the marked losses of office to residential in past years and the constrained supply, it is important that office floorspace is protected and maximised to ensure that there is a balanced supply to meet demand in key business floorspace locations across the borough.</p> <p>Whilst recognising the benefits and flexibility of class E in different parts of the borough, the Council will use conditions to ensure that in new proposals the office and research and development floorspace is secured for those specific activities in the CAZ, Bunhill and Clerkenwell AAP area and the CAZ fringe Spatial Strategy areas of Angel and Upper Street and King’s Cross and Pentonville Road and PELs. The restriction of other elements of class E in this context is justified and proportionate based on the harmful impacts that changes to business floorspace could have on the wider economy.</p>		
SDM-MO51	120	Paragraph 4.23	<p><i>Amend text as follows:</i></p> <p>Industrial floorspace is vitally important as an economic driver in its own right but also to support other economic functions, including servicing both the wider borough and Central London economies. Within LSISs in particular, the principal objective is to retain and intensify light industrial B1(e), B2 general industry and B8 storage and distribution uses. The introduction of non-industrial uses which could compromise the economic function and future growth of LSISs (including offices and residential uses) will not be permitted. Sui Generis industrial uses may be acceptable but care must be taken to ensure that any non-industrial uses which form part of the overarching Sui Generis use are not of a scale that could adversely impact the LSIS. Similarly, non-industrial uses may be suitable ancillary uses, but only where their operation is clearly ancillary, particularly in terms of scale and function.</p>	Update to reflect changes to Use Class Order	Minor
SDM-MO52	120	Policy B2: supporting text	<p><i>Add new paragraphs after paragraph 4.23 as follows:</i></p> <p><b>The Council recognises the importance that LSISs have as an economic driver in the borough and Central London economies. Existing B2 general industrial and B8 storage and distribution will continue to be protected from change of use to non-industrial. New light industrial floorspace within LSISs will be secured and protected through the use of conditions in order to protect the primary economic function of the LSISs and avoid further loses of industrial floorspace to other Class E uses. The borough has lost a significant amount of industrial land over recent years. The proportionate use of conditions to secure light industrial uses in the boroughs 6 LSISs is essential to protect the primary industrial function of the last remaining concentrations of industrial land in the borough and their role in supporting Islington’s and London’s economy.</b></p> <p><b>Improving air quality is a key aim of the Local Plan, for this reason growth must be managed sensitively. Whilst Islington safeguards, protects and encourages the intensification of industrial uses, these can adapt to the challenges of a 21<sup>st</sup> century Islington. Policy S7 sets out detailed requirements which development proposals must meet to ensure that adverse impacts on air quality are prevented or mitigated, and that reasonable opportunities to prevent negative impacts on air quality are investigated and implemented. While there are a number of industrial uses that would not cause particular concerns regarding air quality, certain industrial uses could (without specific mitigation) lead to adverse impacts on air quality, due to the specific use or, more likely in the LSIS context, due to associated increases in vehicle movements. The Local Plan transport</b></p>	<p>To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.</p> <p>To cross reference other relevant policies and clarify approach.</p>	Main

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			<p>policies promote sustainable modes of transport and limit car parking; these policies will be important considerations when assessing development proposals, in conjunction with policy S7, T2, T5 and other relevant Local Plan policies. For avoidance of doubt, the policy aim to intensify industrial uses in the LSIS would not outweigh air quality considerations, meaning that any proposed intensification of use which creates unacceptable impacts on air quality will be refused.</p>		
SDM-MO53	120	Paragraph 4.23	<p><i>Amend sentence as follows:</i> Industrial floorspace is vitally important as an economic driver in its own right but also to support other economic functions, including servicing both the wider borough and Central London economies. Within LSISs in particular, the principal objective is to retain and intensify B1(c) light industrial, B2 general industry and B8 storage and distribution uses. The introduction of non-industrial uses which could compromise the economic function and future growth of LSISs (including offices, <b>retail or other main town centre uses</b> and residential uses) will not be permitted. Sui Generis industrial uses may be acceptable but care must be taken to ensure that any non-industrial uses which form part of the overarching Sui Generis use are not of a scale that could adversely impact the LSIS. Similarly, nonindustrial uses may be suitable ancillary uses, but only where their operation is clearly ancillary, particularly in terms of scale and function.</p>	Clarification	Main
SDM-MO54	120	Paragraph 4.24	<p><i>Amend text as follows:</i></p> <p>Where new <del>B-uses are</del> <b>business floorspace is</b> provided in the borough, conditions may be attached to the permission to remove any applicable permitted development rights and/or restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). <b>The Council will also use conditions to ensure that new office, research and development and light industrial floorspace is secured and protected as such longer term.</b> For example, this may include restricting business floorspace to <b>B1(a)offices</b> or <b>B1(e)light industrial</b> uses only, within <b>Class E</b> <del>the wider B1-useclass which ordinarily would not be classed as development</del>. The condition could be worded as follows:</p> <p><i>Operation of Section 55(2)(f) of the Town and Country Planning Act 1990 is precluded with regard to permitted <b>B1(a)office/B1(e)light industrial</b> use [DELETE AS APPLICABLE]. The premises shall only be used for <b>B1(a)office/B1(e)light industrial</b> use [DELETE AS APPLICABLE] and for no other purpose (including any other purpose within Class <b>B1E</b> of the Schedule to the Town and Country Planning (Use Classes) Order 1987 <b>and subsequent Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020</b>, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.</i></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main
SDM-MO55	122	Policy B3: Existing business floorspace	<p><i>Amend text as follows:</i></p> <p>A The Council will protect existing business floorspace throughout the borough.</p> <p>B Proposals resulting in the net loss of business floorspace within the CAZ, Bunhill and Clerkenwell AAP area, PELs, LSISs, Town Centres, LSAs, and non-designated locations, either</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Main

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Page 72			<p>through change of use or redevelopment, will be refused unless there are exceptional circumstances which demonstrate:</p> <ul style="list-style-type: none"> <li>(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. <b>This must include marketing for the current use as well as other class E uses;</b> and</li> <li>(ii) the loss of business floorspace – either individually or cumulatively – would not compromise the operation of the wider area, and that the proposed non-business use is compatible with existing uses (including consideration of amenity impacts on uses in the vicinity).</li> </ul> <p><b>C For proposals where the business floorspace is conditioned to be within a particular Class E use, the property must be marketed for that particular use for at least 6 months to demonstrate that there is no longer demand for that use before being able to utilise full class E flexibility, as set out in Appendix 1. For loss of class E to other non-commercial uses, part B applies.</b></p> <p><b>D</b> In addition to Part B which relates to all business floorspace, where existing business uses are industrial in nature – i.e. <del>B1(e)</del> <b>light industrial uses (subject to provisions of Class E)</b>, B2 <b>general industrial</b> or B8 <b>storage and distribution</b> uses, or Sui Generis uses which are akin to industrial uses – there must be at least no net loss of industrial uses as part of development proposals. Marketing requirements for proposals involving the net loss of industrial uses must market the floorspace for continued industrial use; where a proposal is outside an LSIS, marketing must be primarily for industrial use but could include marketing for other business uses (<b>offices and research and development</b>) as a potential option.</p>		
SDM-MO56	123	Paragraph 4.36	<p>Amend text as follows:</p> <p>Industrial uses have seen wholesale losses in recent years. There continues to be significant pressure to redevelop Islington’s remaining industrial land for other uses, due to its often perceived lower value. However, as noted in policy B2, a good supply of industrial land is integral to ensuring inclusive economic development in Islington and Central London. Islington’s Employment Land Study forecasts further losses of industrial land, some 90,000sqm up to 2036. Given the importance of industrial land, the Local Plan will strongly resist the loss of all industrial uses. <del>The London Plan, policy identifies Islington as a borough which must retain and intensify industrial floorspace capacity and follow a general principle of no net loss across</del> <b>The Council will ensure that a sufficient supply of industrial land is maintained to meet future demand in the borough, and that the retention, enhancement and provision of additional industrial capacity is adequately managed and monitored, consistent with the London Plan.</b></p>	To reflect updates to Policy E4 in line with the Publication London Plan December 2020 version.	Main
SDM-MO57	124	Policy B4: Affordable Workspace	<p>Amend text as follows:</p> <p>A Within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road), PELs and Town Centres, major development proposals involving 1,000sqm or more gross <del>B1(a)</del> <b>office</b> and/or <del>B1(b)</del> <b>research and development</b> and/or <del>general B1-use</del> and/or a Sui Generis use akin to <del>B1(a)</del> <b>office</b>/<del>B1(b)</del> <b>research and development</b> floorspace must incorporate at least 10% affordable workspace (as</p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Minor

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			<p>a proportion of proposed <del>B1(a) office</del> and/or <del>research and development B1(b) and/or general B4</del> and/or a Sui Generis use akin to <del>office/research and development B1(a)/B1(b)</del> floorspace GIA) to be leased to the Council at a peppercorn rate for a period of at least 20 years. The Council will subsequently lease the space to a Council-approved operator.</p> <p>B A requirement for affordable workspace will also apply to any major development proposals involving 1,000sqm or more gross <del>B1(a) office</del> and/or <del>research and development B1(b) and/or general B4</del> and/or a Sui Generis use akin to <del>office/research and development B1(a)/B1(b)</del> floorspace within a LSIS.</p> <p>C For proposals involving 10,000sqm or more gross <del>B1(a) office</del> and/or <del>research and development B1(b) and/or general B4</del> and/or a Sui Generis use akin to <del>office/research and development B1(a)/B1(b)</del> floorspace; or significant office extensions/intensification proposals in high value areas, 10% affordable workspace (as a proportion of proposed <del>B1(a) office</del> and/or <del>research and development B1(b) and/or general B4</del> and/or a Sui Generis use akin to <del>office/research and development B1(a)/B1(b)</del> floorspace GIA) for a peppercorn period longer than 20 years will be sought, including space in perpetuity.</p> <p>D Where 1,000sqm or more gross <del>B1(a) office</del> and/or <del>research and development B1(b) and/or general B4</del> and/or a Sui Generis use akin to <del>office/research and development B1(a)/B1(b)</del> floorspace is proposed outside areas identified in parts A and B of this policy, the maximum amount of affordable workspace must be provided, based on site-specific viability information.</p>		
<p>Page 73</p>	<p>SDM-MO58</p>	<p>125</p> <p>Paragraph 4.44</p>	<p><i>Amend text as follows:</i></p> <p>Affordable workspace is business floorspace/workspace which is leased to the Council at a peppercorn rate for a period of at least 20 years, and managed by a Council approved operator (which could be the Council itself <b>or a Council-approved operator selected through a commissioning process in return for social value</b>). Rental values for end occupiers will ultimately depend on the quality of space and its location, and will be considered on a case-by-case basis through the Council's Affordable Workspace Commissioning Process; however, rents (including service charges) must be significantly below the prevailing market rate for the specific sector and/or location, otherwise the workspace would not be affordable. The Council's Inclusive Economy team will lead on the <del>Affordable Workspace Commissioning Process</del> <b>selection of a Council-approved operator</b> once affordable workspace is secured. More information is provided in the Council's Affordable Workspace Strategy.</p>	<p>Clarification</p>	<p>Minor</p>
<p>SDM-MO59</p>	<p>125</p>	<p>Paragraph 4.45</p>	<p><i>Amend text as follows:</i></p> <p>For the avoidance of doubt, floorspace which does not meet these requirements will not be considered to be affordable workspace for the purposes of policy B4. This includes stand-alone small business units, although such units may be required in addition to affordable workspace, under policy B2. Proposals for business floorspace (including various different typologies such as individual desk spaces and co-working space) at a discounted market rent let directly to an end occupier will not be considered to be affordable workspace (regardless of the level of discount) if the space is not <del>let through the Council's Affordable Workspace Commissioning Process</del> <b>managed by a Council-approved operator, or the Council itself</b> (incorporating requirements</p>	<p>Clarification</p>	<p>Minor</p>

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			for letting the head lease at peppercorn rent, with the space being let and managed by a Council approved operator).		
SDM-MO60	125	Paragraph 4.46	<p><i>Amend text as follows:</i></p> <p>Major development proposals for 1,000sqm or more (gross floorspace) of <b>B1(a)office</b> and/or <b>research and development B1(b) and/or general B1</b> and/or a Sui Generis use akin to <b>office/research and development B1(a)/B1(b)</b> floorspace within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas of Angel and Upper Street and King's Cross and Pentonville Road, PELs and Town Centres, must provide at least 10% of affordable workspace, as a proportion of proposed <b>B1(a) office</b> and/or <b>research and development B1(b) and/or general B1</b> and/or a Sui Generis use akin to <b>office/research and development B1(a)/B1(b)</b> floorspace GIA. <b>For PELs and Town Centre Locations outside of the CAZ where wholly commercial schemes are proposed, site specific viability evidence in respect to affordable workspace provision will be considered on a case by case basis.</b></p>	Clarification added in relation to viability evidence, and changes to reflect amendments to the Use Classes Order and the introduction of Class E.	Main
SDM-MO61	126	Paragraph 4.47	<p><i>Amend text as follows:</i></p> <p>For proposals involving redevelopment, refurbishment (or refurbishment and extension), the requirement would apply to all redeveloped, refurbished and/or extended space, regardless of the fact that there is existing floorspace. For proposals solely involving extension of floorspace with no change to existing floorspace, the requirement can be considered to apply to the new floorspace only. In the event that plans to refurbish existing floorspace were arbitrarily excluded and brought forward in a separate proposal (if it required planning permission), this would be subject to affordable workspace requirement at that time. <b>Where proposals involve a small uplift of office floorspace relative to existing office use floorspace, site specific viability evidence will be considered on a case by case basis.</b></p>	Clarification added in relation to viability evidence	Main
SDM-MO62	126	Paragraph 4.48	<p><i>Amend text as follows:</i></p> <p>Where new business floorspace is proposed outside the locations specified in Parts A and B of the policy<sup>1</sup>, and where 1,000sqm or more gross <b>B1(a)office</b> and/or <b>research and development B1(b) and/or general B1</b> and/or a Sui Generis use akin to <b>B1(a)office/B1(b)research and development</b> floorspace is proposed, affordable workspace will be required. The quantum of affordable workspace to be provided must be the maximum amount that is viable, based on site-specific viability information.</p>	Changes to reflect amendments to the Use Classes Order	Minor
SDM-MO63	126	Paragraph 4.49	<p><i>Amend text as follows:</i></p> <p>A requirement for affordable workspace will also apply to any major development proposals involving 1,000sqm or more gross <b>B1(a)office</b> and/or <b>research and development B1(b) and/or general B1</b> and/or a Sui Generis use akin to <b>office/research and development B1(a)/B1(b)</b> floorspace within the LSISs. Policies SP3 (with regard to the Vale Royal/Brewery Road LSIS specifically) and B2 are clear that <b>industrial uses</b> within <b>B1(c)light industrial</b>, B2 <b>general</b></p>	Changes to reflect amendments to the Use Classes Order	Minor

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			<p><b>industrial</b> and B8 <b>storage and distribution</b> uses <del>classes</del> are the priority uses within the LSISs, and that other business <b>uses floorspace</b>, namely <b>B1(a) office, B1(b) and research and development</b> and <del>general B1 floorspace capable of being used for B1(a) or B1(b)</del>, will not be permitted except as part of a hybrid workspace scheme where such uses only constitute a small proportion of the overall gross floorspace proposed. Notwithstanding this, in circumstances where <del>B1(a) office, B1(b) and research and development and/or general B1 uses are</del> <b>is</b> proposed, affordable workspace would be required from any permitted floorspace. There is no general requirement for seeking affordable workspace from industrial/hybrid uses within the LSISs as seeking affordable workspace from non-<b>office/research and development B1(a)/B1(b)/general B1</b> uses in this area is more likely to constrain viability of such uses and therefore may preclude them coming forward, contrary to policy aims for the area; however, <b>B1(a) office</b> and <b>research and development B1(b)</b> floorspace has no such viability concerns, and hence any proposals which would allow for the development of <b>B1(a) office</b> or <b>research and development B1(b)</b> must provide affordable workspace. For avoidance of doubt, this requirement must not undermine the clear policy position to resist non-industrial uses in the LSISs.</p>		
SDM-MO64	126	New paragraph	<p><i>Amend text as follows after paragraph 4.48:</i></p> <p><b>On mixed use proposals which deliver on-site affordable housing, in exceptional circumstances, where the provision of affordable workspace will undermine the ability to the scheme to secure affordable housing compliant with the Policy H3, the provision of affordable housing will take priority.</b></p>	Clarification added in relation to viability evidence	Main
SDM-MO65	126	Footnote 25	<p><i>Amend as follows:</i></p> <p><del>Such proposals would need to justify the suitability of the location in line with Policy B2 Part E</del></p>	Clarification	Minor
SDM-MO66	126	Footnote 26	<p><i>Amend as follows:</i></p> <p>Sui Generis floorspace akin to <b>office/research and development B1(a)/B1(b)</b> is any floorspace where the predominant use is <b>B1(a) office</b> and/or <b>B1(b) research and development</b> but the overarching lawful use is Sui Generis by virtue of elements of other uses which would not constitute an ancillary use.</p>	Changes to reflect amendments to the Use Classes Order	Minor
SDM-MO67	127	Affordable workspace office contributions formula	<p><i>Amend as follows:</i></p> <p><b>Step 1:</b> calculate projected <del>B1(a) office</del> rental values from subject property or comparables (on a per square metre per annum basis).  <b>Step 2:</b> Identify 10% of floorspace in square metres (NIA)  <b>Step 3:</b> 10% of floorspace (from step 2) x rental value per square metre (from step 1) = rent per annum  <b>Step 4:</b> identify <del>B1(a) office</del> yields from subject property or comparables (All Risks Yield)  <b>Step 5:</b> calculate multiplier as follows:  <math display="block">\frac{(1+i)^n - 1}{i(1+i)^n}</math> <i>n = number of years at peppercorn rent (20 years)</i>  <i>i = All Risks Yield (calculated as Yield divided by 100)</i>  <b>Step 6:</b> rent per annum x multiplier = level of Affordable Workspace Contribution required</p>	Changes to reflect amendments to the Use Classes Order	Minor
SDM-MO68	127	Footnote 27	<p><i>Amend as follows:</i></p> <p>This formula may be updated in future <b>in line with market trends and</b> through a SPD</p>	Clarification	Minor
SDM-MO69	128	Paragraph 4.54	<p><i>Amend as follows:</i></p>	Clarification	Minor

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			<p>4.1 The design of affordable workspace will vary, depending on the end occupier or sector; however, all affordable workspace units must be built to at least Category A Fit Out. There is no standard definition for Category A Fit Out, but for the purposes of this policy, it must include, as a minimum:</p> <ul style="list-style-type: none"> <li>• raised floors and suspended ceilings;</li> <li>• internal surface finishes;</li> <li>• installation of mechanical and electrical services;</li> <li>• toilets <b>and kitchenette</b>;</li> <li>• blinds; and</li> <li>• basic fire detection systems.</li> </ul>		
SDM-MO70	129	Policy B5 part C	<p><i>Amend text as follows:</i></p> <p>C) Financial contributions to help support initiatives which tackle worklessness will be sought as set out in the Planning Obligations (Section 106) SPD <b>and its future updates and/or other relevant supplementary documents.</b></p>	Clarification to add reference to Planning Obligations (Section 106) SPD and potential future updates which financial contributions are subject to.	Minor
SDM-MO71	130	Policy R1: Retail, leisure and services, culture and visitor accommodation	<p><i>Amend text as follows:</i></p> <p><b>Retail, Leisure and Services</b></p> <p>A. Town Centres are a focal point for commercial, cultural and civic activity in the borough. There are four Town Centres in Islington: Angel; Nags Head; Finsbury Park; and Archway. Each Town Centre has its own character and serves different functions, which must be maintained and enhanced. Each Town Centre is covered by a specific Spatial Strategy, set out in chapter 2. The Town Centre boundaries are defined on the Policies Map and shown in Figures 4.2 to 4.5 below.</p> <p>B. The Council will seek to ensure that all Town Centres develop in a way that supports their continued vitality and viability to meet the needs of local residents and provide a diverse retail and leisure experience for residents, workers and visitors alike. <b>In order to support Town Centres, the Council is seeking a proportionate tiered approach to development involving Class E proposals where alongside recognising the flexibility provided Class E, impacts are appropriately considered using assessments in relation to the scale of a proposal and the location of a proposal.</b></p> <p>C. Primary Shopping Areas are where retail (<del>particularly A1 uses</del>) uses are concentrated in Islington's Town Centres. The Primary Shopping Area boundaries in each Town Centre are defined on the Policies Map and shown in Figures 4.2 to 4.5 below. <b>Where possible</b> retail uses will be <del>subject to stronger protection</del> <b>maintained</b> in Primary Shopping Areas. Outside the Primary Shopping Area, a range of main Town Centre uses are considered suitable, in order to promote and encourage diverse shopping and leisure destinations.</p>	<p>To clarify the Council's approach following the 2020 amendments to the Use Classes Order.</p> <p>Additional clarifications added.</p>	Main



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Page 77			<p>D. LSAs provide more local services, particularly essential convenience retail which caters for daily shopping needs. Some LSAs also have a more diverse mix of commercial uses, particularly leisure uses, which can help to sustain the vibrancy of these areas. LSAs are identified on the Policies Map.</p> <p>E. There are a number of other retail and leisure uses that provide a valuable service to local communities but are not within specifically designated areas. These dispersed uses, particularly within <del>retail the A1</del> and <del>A3</del> <b>café/restaurant use classes, will must</b> be protected <b>where possible</b>.</p> <p>F. Residential uses have significant potential to cause adverse impacts on the vitality and viability of designated retail areas. As such, they must be located outside the Primary Shopping Area (where proposed in a Town Centre) and situated on upper floors (where proposed elsewhere in Town Centres or in LSAs). Residential uses must also fully prevent/mitigate risk of future impacts through their design, consistent with relevant Local Plan policies including the agent-of-change principle.</p> <p>G. Small shops contribute to the unique character of Islington and support local businesses. The Council will protect <b>the ancillary space of ground floor units and existing small retail units shops where possible. The Council will and</b> promote new small shop provision as part of new developments <b>at ground floor</b>.</p> <p>H. Specialist Shopping Areas, such as Fonthill Road and Camden Passage, <del>have a</del> <b>add to the</b> unique <b>selling proposition function</b> and character <b>within Angel and Finsbury Park Primary Shopping Areas</b>, and contribute to the vitality and viability of the borough. Retail uses in this area will be strongly protected.</p> <p>I. Retail, service and leisure uses will be resisted where, by virtue of their location and/or concentration, they would have negative impacts on the character, function and amenity of an area or would negatively impact on the health and wellbeing of the borough's residents. <b>The impact of a concentration of similar Class E uses may be considered where planning permission for development is sought.</b></p>		
SDM-MO72	132	Policy R1 supporting text	<p><i>Amend text as follows:</i></p> <p>4.68. Each of Islington's Town Centres includes a Primary Shopping Area designation. The Primary Shopping Area (<b>PSA</b>) is located in the core of each Town Centre and <b>is the Council is seeking the PSA to remain</b> the focal point for <del>A1 uses</del> <b>retail. Units within the Town Centre</b>  <del>Outside of the Primary Shopping Area conversely have there is</del> <b>greater flexibility both for Class E uses and to change to</b> other suitable main Town Centre uses <del>which will to</del> help increase the diversity and vibrancy of uses.</p> <p><i>Add new paragraphs as follows:</i></p> <p><b>Class E combines a large range of uses that include retail and services, cafes/restaurants, professional/financial services, as well as business (offices, research and development, light industrial), health and nursery, and indoor recreation uses. This introduces additional flexibility for the commercial market which, whilst beneficial in some situations, could also impact on Islington's established retail hierarchy and access to goods and services. In response to a wide range of uses within Class E being able to change use without permission, it is necessary for the council to consider the impact of development for Class</b></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main

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Page 78			<p><b>E in certain locations, in order to manage the wider function of the use of land, meet identified needs and achieve sustainable development.</b></p> <p><b>The government’s intention is that Class E responds to the changing fortunes of retail centres with a wide range of activities, allowing flexibility to adapt to changing market needs. The Council is taking a tiered approach to class E which recognises the fundamental flexibility which has been introduced and considers the impacts of that flexibility on the wider expectation that the planning system will continue to help to meet the needs of residents, visitors and workers in the borough. The effects of Class E will vary depending on the scale of the proposal and its location and the tiered approach aims to encourage development to maintain the existing retail hierarchy as far as possible in order to help meet retail needs in the most sustainable locations, providing the necessary spaces for convenience and comparison goods and services whilst ensuring adequate floorspace to allow for growth in the retail sector. It is important to continue to seek to meet these needs whilst acknowledging and responding to the government’s intention of increased commercial flexibility.</b></p> <p><b>Impact assessments are an important tool to assess the harm that might arise from the range of uses within Class E and other main town centre uses. Different locations in the borough have the ability to absorb different levels of impact. Further details about impact assessments, including thresholds, where relevant, are set out in more detail in policies R2 to R5. Individual and cumulative impacts of development should be considered as part of an impact assessment. A range of quantitative impacts such as hours of operation, cycle parking, ancillary space, noise, odour; and more qualitative impacts such as vibrancy, character, function, social value will be required in impact assessments. Impact assessments will differ depending on location, scale and range of uses. They will be also be used as a tool to help identify appropriate mitigation measures. Further detail on impact assessments will be set out in guidance.</b></p>		
SDM-MO73	133	Paragraph 4.73	<p><i>Amend text as follows:</i></p> <p>Retail to residential prior approval applications, currently permitted under Part 3, Class M of the General Permitted Development Order (“the GPDO”) will be assessed against relevant Local Plan policies related to prior approval categories; such policies are material to the prior approval determination. The most relevant prior approval category related to land use is condition M.2(1)(D), which requires an assessment of whether it is undesirable for the building to change to residential use because of the impact of the change of use:</p> <ul style="list-style-type: none"> <li>(i) on adequate provision of <del>Use Class A1/A2</del> <b>retail and professional/financial services</b>, but only where there is a reasonable prospect of the building being used to provide such services; or</li> <li>(ii) where the building is located in a key shopping area, on the sustainability of that shopping area.</li> </ul>	Update to reflect changes to the Use Class Order.	Minor
SDM-MO74	133	Paragraph 4.74	<p><i>Amend text as follows:</i></p> <p>Applicable policies will be dependent on the location of the building subject to the application, for example policies R2 and R3 will apply to applications in the Primary Shopping Areas <del>of</del> <b>and</b> Town Centres, while policy R4 will apply to applications in LSAs. In the absence of a definition of the term ‘key shopping area’ set out in the GPDO, a key shopping area (for the purposes of any prior approval assessment) will be considered to be any Town Centre or LSA designated in the Local Plan.</p>	Clarification	Minor

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Page 79	SDM-MO75	135	Policy R2: Primary Shopping Areas	<p><i>Amend text as follows:</i></p> <p><b>A. In order to meet retail needs and support a retail function</b> within Primary Shopping Areas (PSA), the Council is seeking a <del>the</del> percentage of <del>retail</del>A1 uses <del>must be maintained</del> at a minimum of 60% in Angel and Nag's Head Major Town Centres; 55% in Finsbury Park District Town Centre; and 50% in Archway District Town Centre.</p> <p><b>B. New development at ground floor in the PSA should contribute to the retail function as set out in Part A and will be appropriately conditioned to maintain this.</b></p> <p><b>C. Proposals for Class E which do contribute to the retail function at the ground floor within the PSA must:</b></p> <p><del>(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued A1 use, or other appropriate main Town Centre uses;</del></p> <p><b>(i) Provide an impact assessment,</b> prevent/mitigate any individual or cumulative impact on <b>the objective to maintain</b> the vitality, viability, character, vibrancy <b>of the and</b> <del>predominantly A1</del> retail function of the Primary Shopping Area;</p> <p><b>(ii)</b> provide an active <b>main town centre use</b> frontage at ground floor level, particularly where fronting main transport/pedestrian route(s) and</p> <p><b>(iii)</b> ensure there is no harmful break in the continuity of <del>retail units</del> <b>the active frontage.</b></p> <p><b>D. Where retail floorspace is conditioned for that use, and is seeking a change of use to another Class E use or full class E flexibility, the proposal must demonstrate continuous marketing evidence for a period of 6 months, to demonstrate that there is no reasonable prospect of the unit being used for continued retail use.</b></p> <p><b>E. Proposals for change of use from Class E use to other main town centre uses will be required to demonstrate that the premises have been vacant for at least 12 months; and that the premises have been marketed for a continuous period of at least 12 months. Continuous marketing evidence to cover this period must be provided to demonstrate that there is no reasonable prospect of the unit being used in its current use as well as other main town centre E uses as set out in the Appendix 1, to demonstrate that no main town centre E use is viable.</b></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main
	SDM-MO76	135 - 136	Policy R2 supporting text, paragraphs 4.86 – 4.90	<p><i>Amend text as follows:</i></p> <p>4.86 <b>The Council seeks to</b> <del>To ensure support</del> the vitality and viability <del>is maintained, the Primary Shopping Areas</del> of Islington's Town Centres, <b>meet retail needs and maintain a retail function will be protected and enhanced.</b> Primary Shopping Areas contain the greatest concentration of <del>shops-retail (A1-retail-use);</del> are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres, <del>and</del> ensuring their continued vibrancy, vitality and viability. Where proposals within Town Centres fall outside the Primary Shopping Area, Policy R3 will apply.</p> <p>4.87 To <del>ensure support a critical mass of</del> retailing uses <del>is maintained</del> within Primary Shopping Areas, <del>the A1 retail function must remain the principal use; this will be achieved by imposing a</del></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main

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~~specific percentage requirement for A1 uses within Primary Shopping Areas. Proposals which would result in the overall percentage falling below this minimum level must provide marketing and vacancy evidence and meet other criteria to demonstrate that potential adverse impacts are prevented. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.~~ **proposals which require planning consent will be expected to demonstrate their impact through an assessment. An Impact assessment is especially necessary given the wide range of uses within the E use class and therefore the wide range of impacts. An impact assessment will be required for any development seeking flexible E use, to explore the different impacts of the individual E uses and the cumulative impacts these could have on the retail function of the PSA and, depending on the scale of change, on the wider town centre. In regard to other main town centre use development the Council may request an impact assessment depending on whether the scale and use is considered to have potential for significant adverse impacts.**

4.88 To determine the existing Primary Shopping Areas **retail make-up A1** percentage figure, the number of ~~Use Class A1~~ **'retail'** units with a ground floor presence within the Primary Shopping Area should be divided by the total number of units with a ground floor presence within the Primary Shopping Area. A unit with a ground floor presence would include those with additional space below and/or above ground floor level. Other methods to calculate the percentage, for example considering only specific frontages, will not be acceptable for the purposes **of meeting monitoring** policy R2. **The Camden Passage and Fonthill Road Specialist Shopping Areas provide a unique retail proposition that contributes to the character of Angel and Finsbury Park Town Centres. These are included in the PSA but where development is proposed in these areas, Policy R7 is applicable.**

**4.89 Appendix 1 sets out the information to be provided in relation to marketing and vacancy of floorspace. Where specifically an E use proposed to change to a non-E main town centre use(s), the premises must be marketed for 12 months and vacant for at least 12 months. This helps to maintain and promote the retail core of town centres whilst recognising the flexibility that Class E brings. A period of 12 months is considered to be appropriate to reflect the importance of publicly accessible E uses that contribute most significantly to town centres vibrancy, vitality and viability, whilst not making the change of use to other main town centre uses that can also contribute positively to town centres unduly onerous.**

~~4.89~~ **4.90** While the loss of space below and above ground floor level may not trigger policy R2 where a ground floor use is unaffected, policy R3 Part **F C** may apply. ~~Where the change of use of ancillary space below and/or above ground floor level would necessitate significant changes to the frontage to facilitate separate access, this must be factored into the frontage percentage calculations, e.g. it must be classed as the introduction of a separate use into the frontage, which would affect the percentage calculations.~~

~~4.90~~ **4.91** To ensure the Primary Shopping Areas sustain their vitality and function as **important** ~~the~~ retail hubs of Town Centres **and the borough**, it is important to avoid harmful breaks in **retail active** frontages. What constitutes as a 'harmful break' will be assessed on a case-by-case basis taking into account site specific circumstances, but generally refers to the introduction of a use that ~~does not complement the Primary Shopping Area and~~ detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-**main town centre commercial** uses in the centre of a frontage, corner units or larger units. Heritage

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			considerations, shopfront design and the relationship to neighbouring units will also be considered.		
SDM-MO77	136-137	Policy R3: Islington's Town Centres	<p><i>Amend text as follows:</i></p> <p>A. The Council will seek to maintain and enhance the retail, service and leisure function of Islington's four Town Centres, which are designated on the Policies Map and shown on Figures 4.2 to 4.5.</p> <p>B. Proposals for <del>A1-A5, D2 and/or Sui Generis</del> main Town Centre use floorspace should be located within a designated Town Centre. Proposals for these uses outside a designated Town Centre will only be permitted where they meet relevant criteria under Part C, D or E.</p> <p>C <del>F</del>. Any development proposed within a designated Town Centre must:</p> <ul style="list-style-type: none"> <li>(i) be of an appropriate scale related to the size and role of the centre;</li> <li>(ii) ensure there are no adverse impacts on vibrancy, vitality and viability of the centre, including as a result of concentrations of <del>non-A1</del> <b>Class E uses and</b> non-retail uses.</li> <li>(iii) provide a frontage which engages positively with local character and the street scene. Where historic shopfronts and features are present, these must be retained.</li> <li>(iv) provide a high quality design including meeting policies related to accessibility and sustainability;</li> <li>(v) provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated;</li> <li>(vi) not involve the loss of ancillary floorspace (e.g. storage, back-office functions) which could compromise the future operation of the unit and make the unit less desirable for future occupiers.</li> <li><b>(vii) In addition to those criteria above, where development is over 350sqm gross floorspace an impact assessment will be required.</b></li> </ul> <p><b><u>Central Activities Zone (CAZ)</u></b></p> <p><b>D. The CAZ is the primary office location and offices will be supported and secured in line with Policies BC1 (AAP) and B1. Proposals for other elements of class E including retail and other main Town Centre use floorspace in the CAZ may be acceptable where:</b></p> <p><del>C. Proposals for A1-A5, D2 and/or Sui Generis main Town Centre use floorspace in the CAZ may be acceptable where:</del></p> <ul style="list-style-type: none"> <li>(i) the scale of the development would not have an adverse individual or cumulative impact on the character, function, vitality and viability of Islington's Town Centres or LSAs. An impact assessment may be required to fully assess potential impact;</li> <li>(ii) the proposal can be accommodated without adverse impact on the amenity of residents and businesses; and</li> <li>(iii) the proposal does not <b>negatively impact the primary business function of the CAZ involve the loss of existing business floorspace in line with Policy B3</b>; complements the overarching business floorspace focus within the CAZ; and does not detract from the policy requirement to maximise the amount of business floorspace as part of new development.</li> </ul> <p><b><u>Local Shopping Areas</u></b></p> <p><b>E <del>D</del>. Proposals for development of</b> up to 200sqm of <del>A1-A5, D2 and/or Sui Generis</del> main Town Centre uses in LSAs are not required to meet the sequential test. Proposals in excess of 200sqm must meet the sequential test and actively investigate and consider preferable locations in line</p>	To clarify the Council's approach following the amendments to the Use Classes Order.	Main

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			<p>with the Council’s retail hierarchy. An impact assessment may also be required for proposals in excess of 200sqm, to assess the impact of larger proposals on the existing character and function of the LSA and relevant Town Centres.</p> <p><b>Edge of centre/Out of centre</b>  <b>F E.</b> Any proposal for <del>A1-A5, D2 and/or Sui-Generis</del> main Town Centre uses <b>floorspace</b> in an edge-of-centre location outside LSAs or in an out-of-centre location must:</p> <ul style="list-style-type: none"> <li>(i) meet the sequential test and actively investigate and consider sequentially preferable locations in line with the Council’s retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and</li> <li>(ii) provide a detailed impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or LSAs.</li> </ul> <p><del>Moved up to part C – F. Any development proposed within a designated Town Centre must:</del></p> <ul style="list-style-type: none"> <li><del>(i) be of an appropriate scale related to the size and role of the centre;</del></li> <li><del>(ii) ensure there are no adverse impacts on vibrancy, vitality and viability of the centre, including as a result of concentrations of Class E uses and non-A1 uses.</del></li> <li><del>(iii) provide a frontage which engages positively with local character and the street scene. Where historic shopfronts and features are present, these must be retained.</del></li> <li><del>(iv) provide a high quality design including meeting policies related to accessibility and sustainability;</del></li> <li><del>(v) provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated;</del></li> <li><del>(vi) not involve the loss of ancillary floorspace (e.g. storage, back-office functions) which could compromise the future operation of the retail the unit and make the unit less desirable for future occupiers</del></li> </ul> <p><b>Residential</b></p> <p>G. Residential uses are not suitable in Town Centres at Ground Floor level or below. Any applications for residential uses in such locations will be strongly resisted. Applications involving the change of use from existing <b>Class E A1-A5, D2</b> and/or main Town Centre uses (on any floors) to residential use must:</p> <ul style="list-style-type: none"> <li>(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use <b>or any other E main-Town Centre</b> use which could reasonably be assumed to occupy the premises;</li> <li>(ii) follow the ‘agent-of-change’ principle consistent with policy DH5.</li> <li>(iii) not involve the loss of ancillary floorspace (e.g. storage, back-office functions) which could compromise the future operation of <b>a the</b> unit and make the unit less desirable for future occupiers;</li> <li>(iv) ensure that access to the proposed residential use does not affect the operation of any continued <b>main town centre A1-A5, D2 and/or Sui-Generis main-Town-Centre</b> use floorspace or impact on the streetscene and the provision of an active frontage, especially where the loss of floorspace is proposed to facilitate access; and</li> <li>(v) provide high quality dwellings with a high standard of residential amenity, consistent with other relevant policies, including those relating to housing standards, design, accessibility and sustainability.</li> </ul>		
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			H. Any applications for new residential uses in Town Centre locations not involving change of use of existing <del>A1-A5, D2 and/or Sui Generis</del> main Town Centre uses must be located on upper floors. Proposals must address criteria set out in Part G(ii) to (v).		
SDM-MO78	143-144	Policy R3 supporting text paragraphs 4.92-4.99	<p><i>Amend text as follows:</i></p> <p>4.92 Islington's Town Centres are the primary focus for retailing in the borough. The core of <b>retail</b> in Town Centres is focused in Primary Shopping Areas (see policy R2), with locations outside of this suitable for a range of, <del>A1-A5, D2 and/or Sui Generis</del> main Town Centre uses.</p> <p>4.93 Ensuring that retail and other important services and facilities (such as solicitors, post offices, groceries and newsagents) remain readily accessible is essential to the vitality and viability of Town Centres. Focusing <del>these shops</del><b>retail</b> and services within Town Centres will contribute to the inclusivity and sustainability of local communities and the local economy and reduce the number and length of trips undertaken.</p> <p>4.94 To promote the economic and cultural function of Town Centres, in line with the National Planning Policy Framework, the Council will apply a sequential approach to assessing applications for retail, services, entertainment, assembly and leisure uses outside of the Town Centres. For the purposes of this policy, the local impact assessment threshold is 0sqm, meaning that any proposal in an edge-of-centre or out-of-centre location may be required to submit an impact assessment. The level of detail provided in the impact assessment must be proportionate to the scale of the proposed development.</p> <p>4.95 Offices <del>in the B1 use class</del> are also considered a Town Centre use however such applications will be considered in relation to other relevant Local Plan policies and their impact on the predominant retail and leisure function of Town Centres.</p> <p>4.96 London's CAZ has a unique role in the retail hierarchy. The CAZ function is primarily linked to business floorspace, but retail uses are important supporting uses. The CAZ contains clusters of retail premises, notably at Angel (partly covered by the CAZ), which is a designated Town Centre. There are four LSAs within the CAZ, covered by policy R4 and the Bunhill and Clerkenwell AAP. Given the nature of the CAZ, retail uses are also dispersed in numerous other locations. Proposals for new <del>A1-A5, D2 and/or, Sui Generis,</del> main Town Centre use floorspace within the CAZ may be appropriate where it would not undermine the overarching business function of the CAZ and would not detrimentally affect the vitality and viability of Town Centres and/or local amenity. An impact assessment may be required where the proposed scale of retail could have adverse impacts on nearby Town Centres, LSAs or other undesignated clusters of retail, service and leisure uses.</p> <p>4.97 Residential uses on ground floors or below are not appropriate in Town Centres, primarily due to the harmful break in <b>active frontages</b> <del>shopfront continuity</del> which affects the viability, vitality and vibrancy of the centre, and therefore is detrimental to the retail and commercial function of Town Centres. Ground floor and basement levels can often also provide ancillary space for storage or backroom functions and therefore must be preserved for the effective operation of retail and <b>main town centre use</b> <del>commercial</del> units. Residential development on the ground floor or below also raises issues of amenity for the future residential occupiers, as Town Centre uses create heavy footfall and can create disturbance. The quality of <del>retail</del><b>retail</b> conversions to residential is generally poor and therefore would not provide high quality housing as required by policy H4.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor

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			<p>4.98 For proposals to change the use of existing ground floor units (or below) <b>to residential use</b>, continuous marketing evidence will be required demonstrating lack of demand for main Town Centre uses. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.</p> <p>4.99 Residential uses may be suitable on upper floors in Town Centres, outside of Primary Shopping Areas, where they adhere to specified criteria set out in the policy. With regard to facilitating access to upper floor residential units, this must not affect the continued operation of any <del>E, A1-A5, D2 and/or</del> Sui Generis <b>or F.2</b> main Town Centre use floorspace, or impact the street scene or the provision of an active frontage. The loss of such floorspace to facilitate access would trigger Part G of policy R3, unless it was of such a small scale that it was considered de minimis. Other policies may also apply, for example policy DH7.</p>		
SDM-MO79	143	Footnote 29	<p><i>Amend as follows:</i>  <del>B4</del> <b>Office</b> uses are also suitable Town Centre uses; however, proposals for <del>B4</del> <b>Office</b> uses in Town Centres will be assessed against policy B2</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO80	143	Footnote 30	<p>Amend as follows: The sequential approach does not apply to <b>F.1/F.2 D4</b> uses, <del>for example, health clinics, museums and day centres</del>. Applications for new <del>D4</del> <b>F.1/F.2</b> uses will be assessed against policy SC1. <b>In certain circumstances some E uses that provide a clinic, health centre, nursery, day centre function will not be required to adhere to the sequential test but may be conditioned to operate in that use.</b></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO81	144-145	Policy R4: Local Shopping Areas	<p><i>Amend text as follows:</i></p> <p>A. All proposals must maintain and enhance the retail and service function of the Local Shopping Areas (shown in Figure 4.6).</p> <p>B. Proposals involving the change of use from <del>E-A4</del> – including ground floor, basement and first floor operational or ancillary space - to non-<del>E-A4 commercial</del> main town centre use must demonstrate that:</p> <p>(i) the premises have been vacant for a continuous period of at least six months and continuous marketing evidence to cover this period has been provided which demonstrates that there is no reasonable prospect of the unit being used in its current <del>E-A4</del> use;</p> <p>(ii) there would not be a significant adverse effect on amenity, particularly the surrounding residential amenity; and</p> <p>(iii) the proposal does not cause any individual or cumulative adverse impact on the vitality, viability, character, vibrancy and function of the area.</p> <p><b>C. New development in the E use class over 200sqm gross floorspace will be required to provide an impact assessment and may need to meet the sequential test in line with Policy R3. Development within the E use class under 200sqm conditioned to retail use will not have to provide an impact assessment.</b></p> <p><b>D. The Council may consider there is a deficiency in retail premises created by new development or change of use if there is no such provision providing essential daily goods within 300m of the site, and conditions may be sought to secure retail use.</b></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main



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			<p><b>G E.</b> Residential uses in Local Shopping Areas at Ground Floor level or below will be strongly resisted. Applications for the change of use of <del>A1-A5, D2</del> <b>Class E</b> and/or- main Town Centre uses floorspace to residential use and/or a use other than those specified in Part B must:</p> <ul style="list-style-type: none"> <li>(i) demonstrate that the premises have been vacant for a continuous period of at least two years and continuous marketing evidence to cover this period has been provided, which demonstrates that there is no reasonable prospect of the unit being used in its current use and any other use which could reasonably be assumed to occupy the premises;</li> <li>(ii) prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and function of the area;</li> <li>(iii) comply with the ‘agent-of-change’ principle consistent with Policy DH5;</li> <li>(iv) not create a harmful break in the <del>active commercial</del> frontage of the Local Shopping Area;</li> <li>(v) not involve the loss of ancillary floorspace (e.g. storage, back-office functions) which could compromise the loss of ancillary space that is integral to the future operation of the retail unit and make the unit less desirable for future occupiers in the future</li> <li>(vi) ensure that access to the proposed residential use does not affect the operation of any continued, <del>A1-A5, D2 and/or Sui Generis</del> main Town Centre use floorspace or impact on the streetscene and the provision of an active frontage, especially where the loss of floorspace is proposed to facilitate access; and</li> <li>(vii) provide high quality dwellings with a high standard of residential amenity, consistent with other policies relating to housing standards, design, accessibility and sustainability.</li> </ul> <p><b>D F.</b> Any applications for new residential uses in a Local Shopping Area not involving change of use of existing <del>A1-A5, D2 and/or Sui Generis</del> main Town Centre uses must be located on upper floors. Proposals must address criteria set out in Part C (ii), (iii), (v), (vi) and (vii) of Policy R4.</p>		
<p>Page 85 M-MO82</p>	<p>148</p>	<p>Policy R4: Local Shopping Areas, supporting text</p>	<p><i>Amend text as follows:</i></p> <p>4.102 The impact of proposals will therefore affect LSAs differently, with the loss of <b>retail and service</b> uses in smaller LSAs being felt more acutely. The impact on the amenity of local users of a LSA will depend on its size, the current mix of uses, and its proximity to other centres (whether that be LSAs or Town Centres).</p> <p>4.103 LSAs are not immune from wider changes to the retail environment, and therefore need to be resilient to any future changes, such as increases in online shopping. For LSAs to be resilient they need to be able to change use class more flexibly in response to changing demands and trends in local shopping. <b>Recognising this need for flexibility the Council is taking a tiered approach to class E which recognises the fundamental flexibility which has been introduced and considers the impacts of that flexibility on the wider expectation that the planning system will continue to help to meet needs of residents, visitors and workers in the borough. The effects of Class E will vary depending on the scale of the proposal and its location and the tiered approach aims to encourage development to maintain the existing retail hierarchy as far as possible in order to help meet retail needs in the most sustainable locations. In the context of LSA the six-month period of vacancy and marketing evidence for a change of use from E to non-E main town centre use or conditioned retail A4 to other E non-A1-commercial uses and the 200sqm threshold for provision of an impact assessment</b> reflects this increased flexibility.</p> <p>4.104 Non-<del>retail A1-commercial</del> <b>main town centre</b> uses refer to those uses that provide an active frontage and enhance the function of Town Centres through employment or the provision of leisure and retail services. Non-<del>retail A1</del> <b>main town centre uses</b> <del>commercial</del> uses may include</p>	<p>To clarify the Council’s approach following the 2020 amendments to the Use Classes Order.</p>	<p>Main</p>

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Page 86			<p><b>professional/financial services, cafes/restaurants, offices, research and development, light industrial, indoor recreation, outdoor recreation, assembly and community, pubs, hot food takeaways and some further sui generis uses A2-A5, B1(a), B1(c), D2 and some Sui-Generis uses.</b> However, non-retail A4 main town centre commercial uses can vary in their impact, therefore proposals of this nature (including what constitutes a suitable non-retail A4 main town centre commercial use) will be assessed on a case-by-case basis.</p> <p><b>4.105 An impact assessment is necessary given the wide range of uses within the E use class and therefore the wide range of impacts, an impact assessment will be required for any development seeking flexible E use over 200sqm to explore the different impacts of the individual E uses and the cumulative impacts these could have on the LSA and on neighbouring LSA/town centres viability and amenity. In regard to other commercial development the Council may request an impact assessment depending on whether the scale and use is considered to have potential significant adverse impacts.</b></p> <p><b>4.106 For proposals that are marketed within Class E, Appendix 1 sets out the requirements. Applicants must engage with Appendix 1 closely and submit marketing evidence in line with this. Where an E use seeks to change to a non- E main town centre use, the premises must be vacant and marketed for 6 months. This ensures that suitable E uses that have the ability to provide key goods and services, and leisure uses like cafes/restaurants are demonstrated not to be in demand before a change of use away from Class E takes place.</b></p> <p>4.107 <del>4.105</del> In order to protect the function of LSAs, proposals to change the use of ground floor units (including space below ground floor) <del>from A1-A5, D2 and/or Sui-Generis</del> main Town Centre use floorspace to residential use will be required to provide marketing and vacancy evidence for a period of two years, to demonstrate that there is no continued demand for the existing use and any other use which could reasonably be assumed to occupy the premises.</p> <p><b>4.108 <del>4.106</del></b> Proposals of this nature must also not cause a harmful break in the continuity of <del>commercial/active/retail</del> frontages. What constitutes as a ‘harmful break’ will be assessed on a case-by-case basis taking into account site specific circumstances, but generally refers to the introduction of a use that does not complement the LSA and detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-main town centre commercial uses in the centre of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.</p> <p><b>4.109 <del>4.107</del></b> Residential uses may be suitable on upper floors in LSAs where they adhere to specified criteria set out in the policy. With regard to facilitating access to upper floor residential units, this must not affect the continued operation of any <del>A1-A5, D2 and/or Sui-Generis</del> main Town Centre use floorspace <del>or</del>, impact the streetscene or the provision of an active frontage. The loss of such floorspace to facilitate access would trigger Part <del>E G</del> of policy R4, unless it was of such a small scale that it was considered de minimis. Other policies may also apply, for example policy DH7.</p>		
	SDM-MO83	149	Policy R5: Dispersed retail and leisure uses	<p><i>Amend text as follows:</i></p> <p>A. The Council will support and protect <b>retail A4</b> uses located outside designated Town Centres and LSAs. Proposals involving the loss of dispersed <del>shops-retail and cafes/restaurants</del> –</p>	To clarify the Council’s approach following the 2020 amendments to the Use Classes Order.

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Page 87			<p>including ground floor, basement and first floor operational or ancillary space <b>to non-E main town centre use</b> - must:</p> <p>(i) demonstrate that the premises have been vacant for a continuous period of at least one year. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use <b>or any other suitable E use</b>; and</p> <p>(ii) provide evidence that there will be accessible provision of essential daily goods (typically convenience retail) within a short walking distance (within 300m).</p> <p><del>B. The Council will support and protect dispersed A3 uses located outside designated Town Centres and LSAs. Proposals involving the loss of dispersed A3 units – including ground floor, basement and first floor operational or ancillary space – must:</del></p> <p><del>(i) demonstrate that the premises have been vacant for a continuous period of at least six months. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use; and</del></p> <p><del>(ii) demonstrate that the loss of the A3 unit will not have an adverse impact on the local community, including through the loss of social value.</del></p> <p><b>B. Where a new retail development comes forward in some circumstances where there is a particular local need, the council will seek to condition the unit in retail use to provide essential daily goods.</b></p> <p>C. Proposals for the change of use of dispersed <del>A1 or A3</del> <b>retail or café/restaurant</b> units to residential use will only be considered acceptable where Part A <del>and B</del> of this policy <del>is</del> <b>are</b> satisfied, where high quality dwellings with a high standard of residential amenity will be provided consistent with other policies and standards relating to housing and design, and where the Change of Use would not detrimentally affect the street scene and/or the wider character of an area.</p>		
SDM-MO84	149-150	Policy R5 Supporting text	<p><i>Amend text as follows:</i></p> <p>4.108 Local shops located outside designated Town Centres and LSAs can provide a valuable service to the local community by providing for essential day-to-day needs. Their accessibility is particularly important for those with mobility difficulties.</p> <p>4.109 There has been a loss of a number of local shops, particularly to residential use, in recent years. Continuous marketing evidence will be required for proposals for the Change of Use of existing retail units, demonstrating lack of demand for retail or an appropriate commercial use that provides an essential service to residents. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.</p> <p>4.110 Protection of <del>retail</del><b>A1</b> units can assist with work to mitigate the prevalence of food deserts in the borough, in line with the overarching plan objective on healthy environments. Food deserts are where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems. Accessible provision of essential goods has multiple benefits including a balanced diet, active travel, reduced transport congestion, and increased social contact.</p> <p>4.111 Dispersed <del>café/restaurant</del><b>A3</b> leisure units can contribute positively towards the vibrancy and character of places outside of Town Centres and LSAs, especially in residential areas. These</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor

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			<p>units often provide an inclusive meeting place within a community, contributing to community cohesion and can significantly increase the wellbeing and social interaction of those with mobility issues such as the elderly. Facilitating social contact through <b>café/restaurantA3</b> premises benefit mental health and promotes civic activity by providing spaces that can be used as informal community hubs. The Council will seek to protect such uses and any change of use must provide evidence that loss of the <b>café/restaurantA3</b> unit will not have an adverse impact on the local community. Appendix 1 sets out the information to be provided in relation to marketing of vacant floorspace.</p> <p>4.112 Proposals for the Change of Use of dispersed <b>retail or café/restaurantA1/A3</b> to residential use must demonstrate and ensure a high standard of design and residential amenity for occupants (consistent with policy H4) and must not lead to unacceptable adverse impacts on the street scene and the character of an area.</p>		
SDM-MO85	150	Policy R6: Maintaining and enhancing Islington's unique retail character	<p><i>Amend text as follows:</i></p> <p>A. The Council views the retention of small shops as a baseline and places great weight on the need to retain any <b>retail units shops</b> which currently or potentially could be utilised by small retailers. In order to encourage new provision of small <b>retail shop</b> units, the Council will seek to secure small <b>retail shop</b> units (generally considered to be units of around 80sqm GIA or less) suitable for occupation by small retailers by:</p> <p>(i) requiring proposals for new retail development to incorporate small <b>retail shop</b> premises, proportionate to the scale of the proposal;</p> <p>(ii) requiring proposals for the redevelopment of small <b>retail shop</b> units to incorporate adequate re-provision of small units to compensate for any loss, particularly for essential services;</p> <p>(iii) requiring proposals for major housing developments to incorporate small <b>retail shop</b> units where there is no accessible provision of essential daily goods available within a short walking distance (within 300m); and</p> <p>(iv) where appropriate, attaching conditions to permissions for small <b>retail shop</b> units, requiring planning permission to be sought for the future amalgamation of units into larger premises; specifying a certain level of convenience goods in order to protect and promote essential services; and/or making planning consent personal to a specific individual/organisation.</p> <p>B. In order to maintain Islington's retail character, particularly the prevalence of small <b>retail shop</b> units, the Council will resist the amalgamation of individual <b>E use shop</b> units incorporating <b>A Use Classes</b>. Amalgamation of retail units may be suitable where development proposals demonstrate that the intensification of use would not:</p> <p>(i) detrimentally affect the street scene and/or character of the local area; and/or cause unacceptable adverse impacts on the local environment and/or amenity, including impacts from altered/intensified delivery and servicing arrangements.</p> <p>(ii) cause unacceptable adverse impacts on the local environment and/or amenity, including impacts from altered/intensified delivery and servicing arrangements.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO86		Policy R6 supporting text	<p><i>Amend text as follows:</i></p> <p>4.113 Islington's many small shops help lend the borough its special character and contribute to the identity of its neighbourhoods. Small shops provide an important role in servicing the day-to-day needs of local residents, workers and visitors, and can provide greater consumer choice and local employment. Certain types of small and independent shops perform an essential service and must be easily accessible to all residents. These essential services can include butchers,</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main

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Page 89			<p>bakers, greengrocers, grocers, fishmongers, chemists, post offices, newsagents, cobblers, hardware stores, dry cleaners and laundrettes. The loss of <b>retail shop</b> units suitable for such shops, particularly units which contribute to local character, individuality, convenience and the wider commercial success of an area, will be resisted. Applicants for significant retail developments will be encouraged to seek out independent retailers for small units wherever possible</p> <p>4.114 For the purposes of policy R6, a small <b>retail shop</b> is generally considered to be a unit of around 80sqm GIA or less, usually within the <b>E(A) use A1-use-class</b>. Retention of units suitable for occupation by small retailers must be the starting point when drafting development proposals. Any proposals which have not explored the possibility of retaining these units will be resisted.</p> <p>4.115 Proposals for new retail development in the borough must incorporate small <b>E use shop</b> premises suitable for occupation by small retailers. Proposals for major residential developments will also be <b>encouraged required</b> to provide small <b>retail units shops</b> where no suitable retail provision is accessible within a short walking distance (300m or less). Proposals involving the loss of existing small <b>E use units shops</b> must re-provide small <b>E use shop</b> units. Where new small <b>E use shop</b> units are provided, the Council may put in place measures to control their occupation, and guard against future loss through use of relevant planning conditions.</p> <p>4.116 The amalgamation of individual <b>retail shop</b> units can result in material impacts, primarily relating to physical changes and intensification of use. Amalgamation of <b>retail shop</b> units will be resisted where they materially and detrimentally affect the character of Islington's shopping areas, including the impact <del>of amended active frontages shopfronts</del>. Amalgamated <b>retail shop</b> units may also result in different patterns of delivery and servicing; small supermarkets, for example, depend on very fast sales rates, which (where adequate storage is not available) requires 'just in time' deliveries. This can result in more traffic movements by delivery vehicles, which in turn can impact on residential amenity and environmental quality, and cause adverse impacts on the local highway. Where unacceptable adverse impacts arise, the amalgamation of individual <b>retail shop</b> units will be resisted. Policy T5 will be used to assess proposed delivery and servicing arrangements.</p>		
SDM-MO87	151-152	Policy R7: Markets and Specialist Shopping Areas	<p><i>Amend text as follows:</i></p> <p>A. The Council will seek to maintain, and support the enhancement of, existing markets within the borough.</p> <p>B. New markets are encouraged in Town Centres and appropriate locations in the CAZ, where they support and enhance the function of a specific locality and do not adversely impact any predominant 'bricks-and-mortar' based uses.</p> <p>C. The Council will continue to protect and promote the role of Specialist Shopping Areas at Camden Passage and Fonthill Road, <b>as far as possible within the revised Use Class Order</b>. Proposals <b>which should not</b> result in the percentage of <b>A1- retail</b> uses in the Specialist Shopping Areas falling below 75%. <b>must:</b></p> <p><del>(i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued A1 use or other retail or leisure uses which would complement the specialist shopping function;</del></p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main

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			<p><del>(ii) ensure that the proposal would not result in a break in continuity of retail frontage of more than one non-A1 unit in any linear stretch of three units.</del></p> <p><del>(iii) prevent/mitigate D. Any individual or cumulative impacts on the vitality, viability, character, vibrancy and predominantly A1 retail function of the Specialist Shopping Area should be prevented and/or mitigated.</del></p> <p><del>; and (iv) provide an active frontage at ground floor level fronting main transport/pedestrian route(s).</del></p> <p><del>D. Regardless of the resulting percentage of A1 uses, proposals that result in the partial loss of A1 floorspace (including ancillary floorspace) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the A1 unit and/or collectively undermine the function of the Specialist Shopping Area.</del></p>		
SDM-MO88	152	Paragraph 4.118	<p><i>Amend text as follows:</i></p> <p>The Council wishes to see markets continue and thrive, and will encourage a co-ordinated approach to development and management of markets in matters such as deployment of signage, pavement furniture and other market infrastructure. New markets must make a positive contribution to character and support the existing function of the proposed location whilst complementing existing <b>retail shops</b> and services. If markets are poorly designed and managed, they can cause harm to surrounding areas in terms of congestion of local roads and pavements, rubbish and refuse, storage and noise.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO89	152	Paragraph 4.119	<p><i>Amend text as follows:</i></p> <p>Specialist Shopping Areas provide a significant benefit to their local areas, with the ability to draw shoppers from outside the borough due to the more bespoke nature of the goods on offer, as well as adding significant value to the character and vitality of their respective areas. Specialist Shopping Areas in Islington – the antique/curio shops at Camden Passage in Angel and the clothing shops at Fonthill Road in Finsbury Park – have a high level of units in <b>A1 retail</b> use and provide a major contribution toward a healthy retail offer in these centres. The retention of at least 75% <b>A1 retail</b> use in these areas will maintain the specialist character and function of these areas.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO90	152-153	Paragraph 4.120	<p><i>Amend text as follows:</i></p> <p>Fonthill Road has a rich history of fashion manufacturing and wholesale commerce. The upper floors of buildings on Fonthill Road were used as workshops and are now generally used either for storage or have been converted to other uses. The Council will seek to retain these upper floor ancillary spaces (e.g. storage space, back office) in all Specialist Shopping Areas to support the effective operation of the retail units or for stand-alone uses – including SME units for creative enterprises – which complement the area and do not adversely impact the ongoing operation of the area. Proposals that result in the partial loss of <b>A1 retail</b> floorspace (including ancillary floorspace) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the <b>A1 retail</b> unit and/or collectively undermine the function of the Specialist Shopping Area.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO91	153	Paragraph 4.121	<p><i>Amend text as follows:</i></p>	To clarify the Council's approach following the	Minor

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			To determine the percentage of <b>retail A4</b> uses in Specialist Shopping Areas, the total number of <b>retail A4</b> units within the Specialist Shopping Area should be divided by the total number of units within the Specialist Shopping Area. The Fonthill Road Specialist Shopping Area incorporates some units on Wells Terrace as well as those on Fonthill Road. The Camden Passage Specialist Shopping Area includes units on Camden Passage and Pierrepont Row.	2020 amendments to the Use Classes Order.	
SDM-MO92	153-154	Policy R8: Location and concentration of uses	<p><i>Amend text as follows:</i></p> <p>A. Proposals will be resisted where they result in an unacceptable concentration of uses, such as night-time economy uses, hot food takeaways, betting shops and other gambling facilities, payday loan shops, estate agents. <b>The wide range of Class E uses also allows for overconcentration of certain uses such as but not limited to café/restaurants that have potential to cumulatively cause heightened adverse amenity impacts.</b> Concentration of uses will be assessed based on the number of units within a 500m radius of the proposed development. Proposals must be accompanied by sufficient information to allow for assessment of concentration and potential impacts, including information on how these uses will be managed and operated.</p> <p>B. In addition to the general assessment of overconcentration in Part A:</p> <p>(i) proposals for hot food takeaways (<b>Sui Generis Use Class-A5</b>) will be resisted within 200m of primary and secondary schools.</p> <p>(ii) proposals for hot food takeaways (<b>Sui Generis Use Class-A5</b>) will be resisted where:</p> <p>a. they would result in 4% or more of total units being in <b>hot food takeaway A5</b>-use, in LSAs of 26 units or more; or</p> <p>b. they would result in two or more <b>hot food takeaway A5</b> units, in LSAs with 25 units or less.</p> <p>(iii) proposals for betting shops and adult gaming centres will be resisted where:</p> <p>a. they would result in 4% or more of total units being in betting shop/adult gaming centre use, in LSAs of 26 units or more; or</p> <p>b. they would result in two or more betting shop/adult gaming centre units, in LSAs with 25 units or less.</p> <p>(iv) proposals for betting shops or adult gaming centres in Town Centres will not be permitted where there is an existing betting shop or adult gaming centre within 200m walking distance; or where the resulting amount of betting shops and adult gaming centres would exceed 1.5% of the total units in the Town Centre.</p> <p>C. Where proposals for uses serving food and drink are permitted – particularly <b>café/restaurant A3</b>-and <b>hot food takeaway-A5</b>-uses, and <b>retail A4</b>-uses such as coffee shops and sandwich bars – a condition will be attached to require the operator to achieve, and operate in compliance with, the <b>Healthier Catering Commitment</b> standard.</p> <p>D. Where proposals for betting shops, adult gaming centre, payday loan shops, high interest 'rent-to-own' retail stores, pawnbrokers and other similar uses are permitted, conditions may be attached (where relevant) to:</p> <p>(i) require the display of information about local credit unions, debt advice services and/or gambling addiction charities;</p> <p>(ii) require the operator to sign up to, and operate in compliance with, any scheme(s) which promotes community safety and/or other good practice; and</p> <p>(iii) require the display of information about any applicable interest rates, fees and charges.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Main

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SDM-MO93	154	Paragraph 4.124	<p><i>Amend text as follows:</i></p> <p>The policy has restrictions (percentage and/or quantum of units) for hot food takeaways (<del>Use Class Sui Generis A5</del>) and betting shops and adult gaming centres (Sui Generis). These restrictions are necessary due to the adverse impacts on health and wellbeing and vitality and viability of retail centres that these uses can cause. These restrictions are part of a wider comprehensive approach to tackle the causes of ill health, in co-operation with other Council departments including Public Health. The restrictions, either the percentage or the quantum, may be updated in future through an SPD.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO94	155	Paragraph 4.126	<p><i>Amend text as follows:</i></p> <p>All applications for <b>Sui Generis A5</b> Hot Food Takeaway's or Betting Shops must provide a Management and Operating Strategy which includes all the standard information needed when the operator applies for a premises licence. Management and Operating Strategies must also consider any other potential impacts on vitality, viability, character, amenity, function and health and wellbeing.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO95	155	Paragraph 4.127	<p><i>Amend text as follows:</i></p> <p><b>Hot food takeaway A5</b> uses are often associated with unhealthy food, but they are not the only type of premises to serve unhealthy food; <b>retail</b> and <b>cafe/restaurant A3</b> uses such as newsagents, coffee shops and cafes also often sell/serve unhealthy food. Applications for relevant <b>retail A4</b>, <b>café/restaurant A3</b> and <b>hot food takeaway A5</b> uses will therefore be conditioned to achieve, and operate in compliance with, the <b>Healthier Catering Commitment</b> standard. This will help provide easier access to healthier food across the borough.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO96			<p><i>Amend text as follows:</i></p> <p>Islington has a relatively high number of betting shops, compared with other boroughs in London and across the country. Betting shops can have a variety of adverse impacts on communities including worsening mental health (particularly with incidences of problem gambling) and exacerbating incidences of anti-social behaviour and crime. There is evidence of betting shops clustering in deprived areas, and this will be a key consideration as part of any assessment of overconcentration. Tools and evidence such as the gambling-related harm risk index <del>work</del> produced by Geofutures may be utilised to inform this assessment.</p>	Correction	Minor
SDM-MO97	155-156	Policy R9: Meanwhile and temporary uses, part A	<p><i>Amend text as follows:</i></p> <p>A. Applications for meanwhile/temporary use of individual vacant <b>E, F.2 or Sui Generis A1-A5, D2 or Sui Generis</b> uses in Town Centre locations and in the CAZ will be appropriate where:</p> <p>(i) the temporary use sought is <b>a within-retail, professional/financial service, café/restaurant, office, entertainment – such as cinema, bingo, music halls, indoor recreation, or outdoor recreation A</b> use <del>class, B1 or D2 use</del> or is, in the Council's view, a suitable community and/or cultural use;</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO98	156	Paragraph 4.131	<p><i>Amend text as follows:</i></p>	To clarify the Council's approach following the	Minor



## Local Plan – Strategic and Development Management Policies Modifications

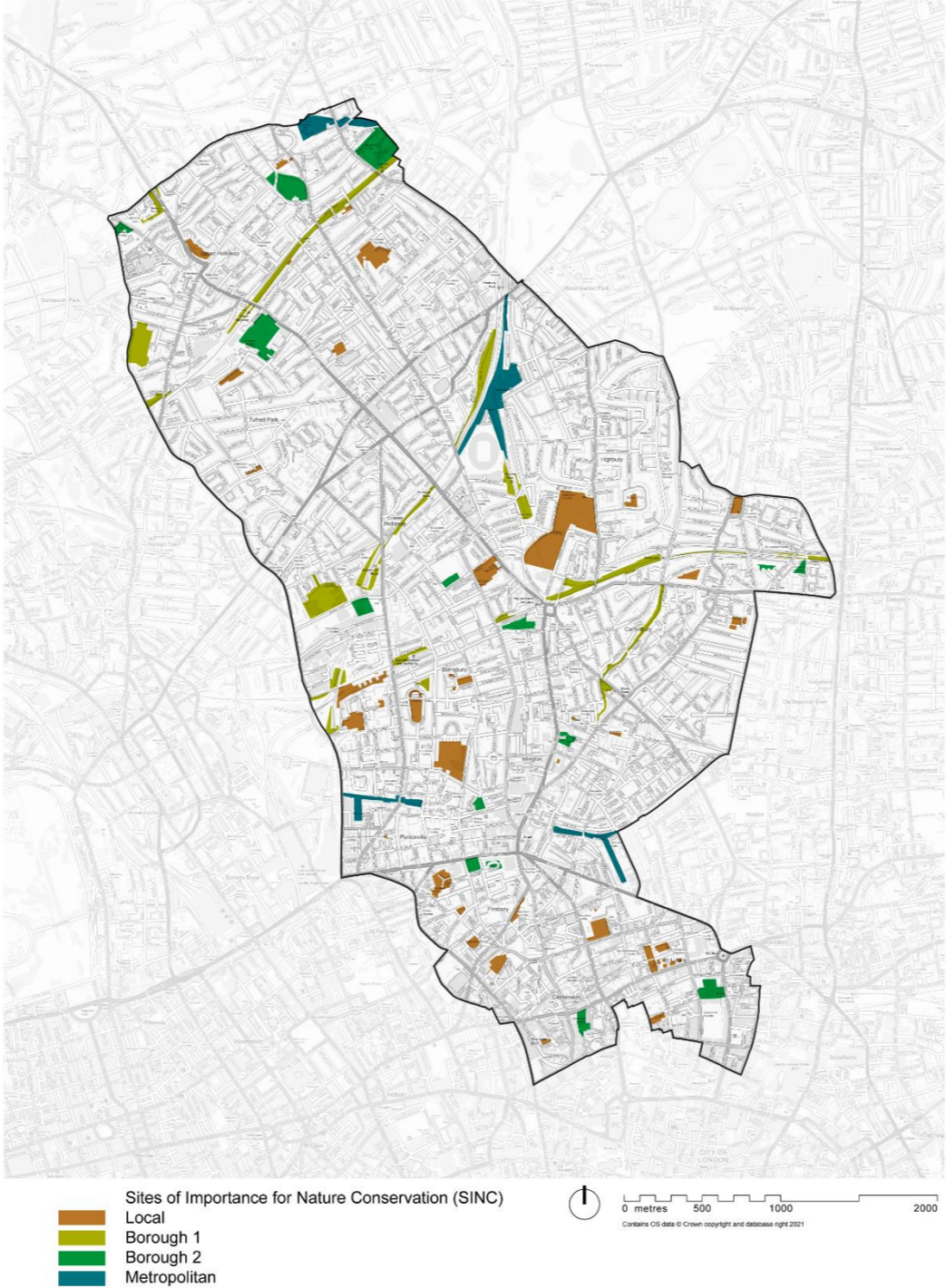
			Vacant premises can detrimentally affect the vibrancy, vitality and viability of places. The efficient use of land is crucial to sustain a vibrant and engaging built environment and vacant premises can provide opportunities for businesses to establish themselves. This is especially applicable to start-ups and businesses within the creative industries. <b>Despite the flexibility introduced by Class E which combines a large range of activities into one use class there are still circumstances where meanwhile use may be beneficial.</b>	2020 amendments to the Use Classes Order.	
SDM-MO99	156	Paragraph 4.132	<i>Amend text as follows:</i>  The Council will encourage meanwhile/temporary use of <b>retail, professional/financial service, café/restaurant, office, entertainment such as cinema, bingo, music halls, indoor recreation, or, outdoor recreation and pubs</b> <del>A-use, D2 and Sui Generis</del> -main Town Centre use units/building/sites in the CAZ and Town Centres, where potential adverse impacts are prevented/mitigated. Temporary use must not preclude permanent occupation of units/buildings/sites, and the Council expect marketing exercises for permanent occupation for an appropriate use to continue throughout the temporary occupation (pending consistency with relevant policies).	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO100	157	Paragraph 4.137	<i>Amend text as follows:</i>  To encourage meanwhile/temporary use of vacant <b>retail, professional/financial service, café/restaurant, office, entertainment – such as cinema, bingo, music halls, indoor recreation, or, outdoor recreation, pub or hot food takeaway</b> <del>A-use, D2 and Sui Generis</del> -A use, D2 use and Sui Generis units, the Council will explore the potential to implement a meanwhile/temporary Use Local Development Order (LDO) which permits temporary uses in specific locations, where certain conditions are met.	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO101	158	Policy R10: Culture and Night Time Economy, part C	<i>Amend text as follows:</i>  C. The loss and/or change of use of cultural facilities in the borough will be strongly resisted. Any proposals for the loss and/or change of use of such facilities must:  (i) demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued cultural use or other suitable cultural or <b>main town centre commercial</b> -uses consistent with the character and function of the area. Such evidence must meet the marketing and vacancy requirements set out in Appendix 1;	Clarification	Minor
SDM-MO102	160	Paragraph 4.147	<i>Amend text as follows:</i>  Music venues in particular – including pubs which have a frequent live music offer-- highlight the potential dual economic and social role of a cultural use. They are frequented by people from all walks of life, which fosters inclusivity; and can contribute significantly to the local economy both in their own right and as a destination which encourages supporting activities. Across London, music venues are in decline due largely to development pressures and an increase in residential uses located in close proximity to existing venues. Falling within the definition of a cultural use and also part of the night-time economy, music venues usually <b>F.2 D2</b> or Sui Generis use will be afforded strong protection in future. The Council supports development of new music venues where appropriate.	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor

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SDM-MO103	160	Paragraph 4.148	<p><i>Amend text as follows:</i></p> <p>The daytime use (including meanwhile/temporary use) of cultural venues that operate solely or predominantly at night can greatly enhance the cultural offer and economy of Town Centres and the CAZ. This can increase employment and add to the vibrancy of an area. <b>Retail, professional/financial services, cafes/restaurants, pubs, and offices</b> <del>A-class uses and office,</del> <b>research and development, light industrial</b><del>B4</del> uses are considered particularly suitable uses in this context.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO104	160	Paragraph 4.150	<p><i>Amend text as follows:</i></p> <p>The Council's strategic employment policy notes the importance of the 24-hour economy, which ensures that a variety of economic activities – both activities which drive and support economic growth – can take place across the borough to help achieve the Council's economic ambitions. The specific night-time economy plays an important role in realising these ambitions. There is crossover between night-time economy uses and cultural uses but the latter holds a wider definition. For the purposes of this policy, night-time economy uses generally fall within the <b>café/restaurant</b><del>A3</del>, <b>pub</b> <del>A4</del>, <b>hot food takeaway</b> <del>A5</del>, <b>entertainment and recreation</b><del>D2</del> and <b>further</b> sui generis uses <del>classes</del>, although this is not considered exhaustive and could include other uses – for example some <b>F.1</b><del>D4</del> uses such as art galleries.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO105	162	Paragraph 4.156	<p><i>Amend text as follows:</i></p> <p>Islington has retained a substantial number of Public Houses, which are valued by local residents and visitors to the borough, but there is increasing pressure to convert pubs to other uses. The Council will resist proposals that result in the removal <b>or change of use</b> of a Public House <del>or a Change of Use away from the A4 Use Class</del>, particularly where this would result in loss of heritage and/or social/community value, and/or would constitute the loss of a pub which contributes to the night-time economy.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO106	162	Paragraph 4.158	<p><i>Amend text as follows:</i></p> <p>Public houses can contribute positively to the vitality of Town Centres, LSAs and communities in Islington. They can also contribute to the night-time economy and serve the leisure demands of residents and visitors alike. The contribution to the night-time economy will be thoroughly assessed for applications seeking a change of use from <b>a pub</b> <del>an A4</del> use.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor
SDM-MO107	163	Paragraph 4.164	<p><i>Amend text as follows:</i></p> <p>Any change of use from <b>A4 a pub</b> must maintain an active frontage which engages positively with the street scene. Public Houses often provide an active frontage which engages with a wide demographic in the daytime and night-time, therefore a loss of an active frontage may be detrimental to the character of an area.</p>	To clarify the Council's approach following the 2020 amendments to the Use Classes Order.	Minor

## 5 Green Infrastructure

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO108	173	Policy G2: Green Infrastructure	<p><i>Amend text as follows:</i></p> <p>A. Development is not permitted on any public open space and significant private open spaces. <b>The exception to this is where development associated with the use of the canal is proposed, including changes to existing canal facilities. Relevant criteria are set out in policy SP2: King’s Cross and Pentonville Road and Bunhill and Clerkenwell AAP Policy BC4: City Road. Such development may be acceptable where it meets the relevant criteria in these policies and does not unacceptably impact the quality and function of the open space.</b></p>	In response to the representation from the Canal and River Trust.	Main
SDM-MO109	175-176	Policy G4, part G	<p><i>Amend text as follows:</i></p> <p>...The Council will normally refuse permission or consent for the removal of protected trees, i.e. trees subject to a Tree <b>Preservation</b> <del>Protection</del> Order (TPO) and trees within a conservation area; and for proposals that would have a detrimental impact on the health of protected trees.</p>	To correct an error	Minor
SDM-MO110	177	Figure 5.2: Sites of Importance to Nature Conservation (SINC) designation	<i>Map to be updated to reflect amended boundary to the SINC at 351 Caledonian Road.</i>	Revision to correct an error and to improve accuracy of mapping. See Policies Map Changes for full explanation.	Main

			 <p>Sites of Importance for Nature Conservation (SINC)</p> <ul style="list-style-type: none"> <li>Local</li> <li>Borough 1</li> <li>Borough 2</li> <li>Metropolitan</li> </ul> <p>0 metres 500 1000 2000</p> <p><small>Contains OS data © Crown copyright and database right 2021</small></p>		
SDM-MO111	187	Policy G5: Green Infrastructure, supporting text, paragraphs 5.51 and 5.52	<p><i>Amend text as follows:</i></p> <p>5.51 Development proposals must prioritise biodiversity-based extensive green roofs in favour of intensive and semi-intensive green roofs, unless it can be demonstrated that an intensive or semi-intensive green roof <b>will enhance the biodiversity, sustainable drainage and cooling functions of the green roof. Accessible intensive or semi-intensive green roofs with areas of amenity space will not be allowed unless it can be demonstrated this</b> is necessary to meet other policy requirements, including those relating to the provision of private open space. Clear</p>	To clarify that intensive and semi-intensive green roofs are not always accessible as amenity space, and may be acceptable if they prioritise biodiversity, sustainable	Main

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			<p>and convincing evidence must be provided to demonstrate that provision of alternative on-site amenity space is not possible in order to justify why an extensive roof cannot be installed.</p> <p>5.52 'Intensive' and 'semi-intensive' green roofs <b>require higher levels of design and maintenance and can</b> provide different degrees of accessible amenity space, such as rooftop gardens and food growing areas <del>and require higher levels of design and maintenance</del>. These types of roofs must be installed on a stronger structure in order to support the additional weight requirements of deeper soils or substrate and features such as paths. As a result, they can <b>also often</b> support a greater diversity of planting and richer ecology including shrubs and tree planting, in addition to wildflowers found on extensive green roofs. Intensive green roofs can provide very effective sustainable drainage as they can support the weight requirements of blue roof storage, which can also be used to irrigate the planting and trees.</p>	<p>drainage and cooling functions.</p>	
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## 6 Sustainable Design

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO112	188	Paragraph 6.6	<p><i>Amend text as follows:</i></p> <p>...Furthermore, prioritising energy efficient design ensures that the associated carbon reductions are guaranteed...</p>	Correction	Minor
SDM-MO113	188 – 189	Policy S1: Delivering Sustainable Design, supporting text, Paragraphs 6.9, 6.10, 6.11	<p><i>Amend text as follows:</i></p> <p>6.9 Islington’s existing heat networks have developed around gas engine combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of National Grid electricity decarbonisation, and there is increasing evidence of adverse air quality impacts related to their use. <del>Despite this, Islington’s gas CHP powered heat networks are still considered to be an effective and low-carbon means of supplying heat when compared to other heat sources, particularly as heat networks offer opportunities to transition to zero carbon heat sources faster than individual building approaches.</del> In order to minimise negative impacts on air quality, CHP technologies used to develop heat networks will only be acceptable where they do not emit significant levels of Nitrogen Oxides (NOx).</p> <p>6.10 The expansion of Islington’s heat networks is a priority for the Council, <b>particularly because heat networks offer opportunities to transition to zero carbon heat sources faster than individual building approaches.</b> <del>Proven low-carbon and</del> Low-emission CHP technology using natural gas <b>will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network</b><del>will continue to be used, where appropriate, to develop new networks</del> in Islington, with planned future transition to cost-effective secondary sources, including low-grade waste heat. The Council is committed to transition to the use of secondary sources to power heat networks in the long term; however practical limitations relating to the use of these sources (such as government direction, available technology and funding requirements) mean that <del>low-carbon</del> natural gas CHP <b>is the most appropriate heat source to develop the borough’s heat networks in the interim.</b> The transition to heat networks powered by secondary sources will ultimately be driven by central government and the evolution of carbon reduction targets through updates to the Building Regulations.</p> <p>6.11 The energy mapping undertaken by Buro Happold suggests that there are a number of sources of low grade heat in the Borough, including London Underground ventilation, data centres and substations. Identifying and capturing such sources of low carbon heat will be key to moving beyond natural gas CHP in the future when heating systems will be required to specify a lower annual carbon content of heat, <del>and natural gas CHP will no longer be a low carbon option.</del></p>	<p>To clarify that gas CHP is no longer considered to be ‘low carbon’ due to the decarbonisation of the electricity grid and updated energy assessment methodology (SAP10).</p> <p>To clarify that the use of low-emission CHP systems will only be acceptable to support the expansion of area-wide heat networks as part of the planned transition to the use of secondary sources to power heat networks.</p>	Main
SDM-MO114	202-203	Policy S5: Energy Infrastructure, part A	<p><i>Amend text as follows:</i></p>	Update. DUKES only provides information on past energy/carbon data.	Main

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			<p>A. All major developments are required to have a communal low-temperature heating system. Heating systems must have a maximum annual carbon content of heat of less than 280 gCO<sub>2</sub>/kWh, calculated using the carbon emissions factor for grid electricity from the most recently available <del>Digest of UK Energy Statistics (DUKES)</del> <b>BEIS energy projections (UEPs) for the first 25 years of operation of the building.</b> The heat source for the communal heating system must be selected in accordance with the following heating hierarchy:</p> <ol style="list-style-type: none"> <li>1. connect to local existing or planned heat networks (subject to parts F and G below)</li> <li>2. use zero-emission or local secondary heat sources (in conjunction with heat pump, if required).</li> <li>3. use low-emission CHP (only where there is a case for CHP to enable the delivery of an area-wide heat network).</li> <li>4. use ultra-low NO<sub>x</sub> gas boilers.</li> </ol>	The BEIS dataset provides a better reflection of a development's future carbon emissions because it includes reliable energy projections.	
SDM-MO115	203	Policy S5: Energy Infrastructure, Part C	<p><i>Add new Part C (references to other parts to be updated accordingly):</i></p> <p><b>C. Larger minor new-build developments should have a communal heating system where feasible and select the heat source for the system in accordance with the heating hierarchy in Part A of this policy.</b></p>	To clarify the policy approach to larger minor new-build developments following amendments to Part D (formally Part C).	Main
SDM-MO116	203	Policy S5: Energy Infrastructure, Part D	<p><i>Amend Part D (formerly part C):</i></p> <p><del>C.D. Minor new-build residential developments with an individual heating system are required to prioritise low carbon heating systems. use ultra-low NO<sub>x</sub> gas boilers as the system heat source. The use of individual air source heat pumps (ASHPs) as the heat source for minor new-build residential developments is not acceptable unless the development is located in an area which is not connected to the gas network; or where the development will achieve minimal heat demands through Passivhaus standards or similar. The use of individual ASHPs may be appropriate for some minor new-build non-residential developments. Larger minor new-build developments should have a communal heating system where feasible and should be designed to connect to a current or planned heat network where Part F of this policy is applicable. Where network connection is not possible, a communal gas boiler or ASHP system may be appropriate.</del></p>	<p>To clarify the policy approach to minor new-build developments with an individual heating system. This modification clarifies that low carbon heating systems, including ASHPs, are prioritised over gas boilers.</p> <p>The government has proposed to phase out the use of gas boilers to heat new homes by 2025 as part of the Future Homes Standard. The carbon content of electricity has reduced in recent years due to the decarbonisation of the grid and the growing use of renewable energy. As a result, heating systems using electricity will result in substantially lower carbon emissions compared to gas powered heating systems.</p>	Main

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SDM-MO117	203	Policy S5 Part E	<p><i>Amend Part E (formerly part D):</i></p> <p><del>D</del>.E. As part of the SDCS, all major developments must demonstrate that they have assessed the feasibility of heat network connection (including a <b>Shared Heat NetworkSHN</b>) or other appropriate heat sources, in accordance with the heating hierarchy, in order to ensure low and zero carbon heating options are prioritised. Larger minor developments that are able to connect to a heat network under Part <b>GF</b> must assess the feasibility of connection as part of the SDCS.</p>	To clarify what SHN stands for and to take account of lettering change due to addition of new Part C.	Minor
SDM-MO118	204	Policy S5 Part J	<p><i>Amend Part J (formerly part I):</i></p> <p><del>I</del>.J. Where connection to an existing or future heat network is deemed possible under parts <b>GF</b> and <b>HG</b> above, major developments are required to provide a preferred energy strategy and an alternative energy strategy (as part of the SDCS). The preferred energy strategy should be enacted based on connection to a heat network. In cases where it is not reasonably possible to connect to a heat network the alternative energy strategy should be enacted and the heat source will be selected in accordance with the heating hierarchy. Minor developments that are able to connect to a heat network are required to provide details of the connection as part of the SDCS.</p>	To take account of lettering change due to addition of new Part C.	Minor
SDM-MO119	204-205	Policy S5 supporting text, paragraphs 6.60 to 6.70	<p><i>Amend text as follows and add new paragraphs 6.67, 6.69 and 6.70:</i></p> <p>6.60. The selection of heat sources for major developments <b>and larger minor developments</b> in line with the heating hierarchy will ensure that developments prioritise low and zero carbon heating options in order to contribute to the decarbonisation of heat, and therefore, the reduction of carbon emissions. The use of low and zero carbon heating options, particularly heat networks and secondary heat sources will also help to reduce fuel poverty and increase energy resilience. Examples of secondary heat sources include recovering waste heat from London Underground ventilation shafts, recovering energy from the cooling requirements of datacentres, and using canal water for heating. Waterways such as canals can be an important local energy resource that can be used for both heating and cooling.</p> <p>6.61. The use of existing or planned heat networks must be prioritised. Developments must connect to a heat network if they are located within the specified distance of an existing or future network in accordance with Parts <b>GF</b> and <b>HG</b>. Larger minor new-build developments are defined as developments involving five units or more, or 500sqm of floorspace or more. Such developments must have a communal heating system where feasible.</p> <p>6.62. Where connection to a heat network is not possible (due to distance or feasibility), all developments must consider alternative low and zero carbon heat options in accordance with policy S5.</p> <p>6.63. <del>The use of ASHPs may be suitable where it can be demonstrated that other heat network connections or other appropriate heating systems are not suitable. The appropriateness of using individual and communal Air Source Heat Pump (ASHP) systems will be considered by the council on a case-by-case basis and will depend on the heat loads associated with the development as</del> ASHPs perform better where heat can be delivered using lower flow/return temperatures, <del>and as a result are less suitable in residential buildings which tend to have high heat demands or high hot water demands. There are also operational, control and fuel poverty issues linked to the use of individual air source heat pump systems, which mean that their use is often not suitable in residential developments. Where the use of an</del></p>	<p>To clarify the council's approach to the use of communal Air Source Heat pumps. A high specification of fabric energy efficiency will ensure the system operates efficiently.</p> <p>To clarify the requirements for minor new-build developments with an individual heating system following the amendments to Part D (formerly part C).</p> <p>To clarify the requirements for the use of individual ASHPs. The decarbonisation of the electricity grid, alongside improvements in ASHP technology, means that when combined with high standards of fabric energy efficient design, ASHPs will generally be the most energy efficient heat source for individual heating systems while also being cost effective.</p>	Main



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			<p><del>ASHP system is considered to be appropriate for use in a residential development, the council will prefer a communal system to an individual system. The use of individual or communal ASHPs may be acceptable in major and minor non-residential developments, depending on the heat loads involved.</del></p> <p>6.64. Where the use of ASHPs is considered appropriate, a high specification of <b>fabric</b> energy efficiency will be expected to ensure the system operates efficiently and to reduce peak electricity demand. Where feasible, it must be demonstrated that an ASHP system provides one external point of connection enabling heat and hot water supply from a future heat network system. <del>The appropriateness of individual and communal ASHPs will be considered by the council on a case-by-case basis.</del> The use of ASHPs will continue to be reviewed as Building Regulation carbon factors are updated, and as domestic fossil fuel heating systems are gradually phased out. Islington's Environmental Design SPD contains further information on the use of ASHPs.</p> <p>6.65. Development proposals incorporating variable refrigerant flow (VRF) heat pump systems will be treated in the same way as any other ASHP-based systems, and must also ensure they comply with the overheating and cooling requirements in Policy S6. VRF systems use a refrigerant as the cooling and heating medium and are generally specified to provide both cooling and heating.</p> <p>6.66. Proposals for the use of low-emission CHP systems to support area-wide heat networks will continue to be considered on a case by case basis and will only be acceptable where there is a strategic case for low-emission CHP systems to support the delivery of area-wide heat networks <b>as part of the transition to the use of secondary sources to power heat networks in the long term.</b> Low-emission CHP in this policy refers to those technologies which inherently emit very low levels of NOx.</p> <p><b>6.67. The use of ultra-low NOx gas boilers as the heat source for the communal heating system of major and larger minor developments will be considered by the council on a case-by-case basis and will only be acceptable where it can be demonstrated that heat network connection and zero-emission or local secondary heat sources are not feasible. Gas will only be considered as the heat source for communally heated developments as part of a hybrid system involving heat pumps. This may be particularly relevant in refurbishments where less can be achieved with the building fabric, and higher heating flow temperatures are therefore needed. The use of direct electric heating as the heat source for a communal heating system will only be acceptable in very exceptional circumstances and is unlikely to be suitable as part of a modern building design.</b></p> <p>6.68. (formerly 6.67) A key consideration when selecting heat sources that use natural gas is their impact on air quality due to the resulting NOx emissions, with Nitrogen Dioxide (NO<sub>2</sub>) in particular having a major impact on air pollution. This policy adopts an integrated approach to energy supply to ensure that the selection of heat sources will result in low or zero emissions of both carbon dioxide and NOx. In order to avoid further deterioration of existing poor air quality, all development proposals using CHP in Islington must provide evidence to demonstrate that emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler. CHP and ultra-low NOx gas boiler communal or heat network systems must be designed to ensure that they have no significant impact on local air quality.</p>	<p>To clarify that the use of low-emission CHP systems to support the expansion of area-wide heat networks will only be acceptable as part of the planned transition to the use of secondary sources to power heat networks.</p> <p>To clarify when the use of direct electric heating and ultra-low NOx gas boilers may be considered for different types of development.</p>	
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## Local Plan – Strategic and Development Management Policies Modifications

			<p><b>6.69. The most appropriate low carbon heating systems for use in minor new-build developments with an individual heating system will be Air Source Heat Pumps (ASHPs). A high standard of fabric energy efficiency is particularly important where the use of an individual ASHP is proposed. The use of individual ASHPs as the heat source for minor new-build residential developments will only be acceptable where the development will achieve minimal heat demands. Passivhaus standards or similar are strongly encouraged. The council must be satisfied that operational, control and fuel poverty issues have been minimised. The use of smart energy systems and tariffs should be used to help reduce energy bills.</b></p> <p><b>6.70. The use of direct electric heating as the heat source for the individual heating system of a minor development will only be acceptable in exceptional circumstances where it can be demonstrated that an ASHP is not feasible. Due to the high running costs associated with direct electric heating, such systems will only be acceptable where the building has been designed to have a very high standard of fabric energy efficiency (Passivhaus standards or similar) and heat demand has been reduced to a very low level. The use of ultra-low NOx gas boilers as the heat source for the individual heating system of a minor development will only be acceptable in exceptional circumstances where it can be demonstrated that an ASHP or direct electric heating is not feasible.</b></p>		
SDM-MO120	206	Paragraph 6.75 (formerly 6.72)	<p><i>Amend text as follows:</i></p> <p>In order to minimise fuel poverty linked to energy prices, the consequences of energy supply decisions at the planning stage must be assessed not only in terms of carbon efficiency, but also in terms of the likely energy supply prices. This is particularly important in the context of promoting low carbon heating systems because some systems, such as direct electric heating, can be low carbon while also leading to high energy bills. Part FE of this policy seeks to resolve this by requiring all residential developments to estimate the anticipated heat unit supply price (£/kWh), annual standing charge and estimated annual maintenance costs of their proposed heating system; and requiring major applications to provide estimates of the life cycle costs of the proposed heating system using CIBSE quoted plant lifetimes.</p>	Update to take account of changes to policy references following modifications.	Minor
SDM-MO121	206-207	Paragraphs 6.78 and 6.79 (formerly 6.75)	<p><i>Amend former 6.75 to divide into two paragraphs and amend the text as follows:</i></p> <p>6.78 The Council will assess whether a development can reasonably connect to an existing heat network or can be designed to connect to a planned heat network based on a feasibility assessment, which must be submitted (as part of the SDCS) at the earliest possible stage of the planning process, ideally at pre-application stage. The feasibility assessment will assess the technical feasibility of a development’s heat demand being supplied in part or wholly through connection to a heat network, and the financial reasonableness of the proposed connection charges.</p> <p><b>6.79 The feasibility assessment will be carried out using a whole life-cycle assessment methodology, including maintenance requirements, to be outlined by the council. A whole life-cycle assessment methodology will enable the council to make a fair comparison between heat networks and other heat source options. Further guidance on what will be expected as part of a whole-cycle assessment methodology will be provided in a revision of the Environmental Design SPD and/or Net Zero Carbon SPD. The Council, or relevant Energy Service Company, will provide relevant information to inform the feasibility</b></p>	The new text clarifies that major developments should assess the feasibility of heat network connection using a whole life-cycle assessment methodology which captures a building’s operational emissions from energy consumption as well as its embodied emissions. This will enable the council to make a fair comparison between carbon emissions associated with heat	Main

## Local Plan – Strategic and Development Management Policies Modifications

			<p>assessment, including an assessment of the approximate cost of connection. Feasibility assessments must consider a range of factors, including:</p> <ul style="list-style-type: none"> <li>the size and use class of the development, and the associated heat load and energy demands;</li> <li>the capability of the network to supply part or all of the heat demand;</li> <li>the location of the development and the distance to network pipes;</li> <li>physical barriers e.g. roads and railways;</li> <li>other developments in the vicinity that may also be required to connect to the network; and</li> <li>an assessment of the financial implications of connection, using a Whole Life Costing methodology.</li> </ul>	network connection and other heat source options.	
SDM-MO122	207	Paragraph 6.80 (formerly 6.76)	<p><i>Amend text as follows:</i></p> <p>Where connection of a development to an existing or future planned heat network is required in accordance with Parts <b>GF</b> and <b>HG</b> of this policy, and is deemed to be feasible, developers are required to commit to connection prior to occupation via a Section 106 agreement for major developments, and a Unilateral Undertaking for minor developments. The legal agreement will include provision for a reasonable financial contribution to the Council to enable connection and the submission of an updated energy strategy prior to implementation. Major developments located within 500 metres of a planned future heat network are required to be designed to be able to connect to that network in the future, in accordance with Part <b>HG</b> of this policy.</p>	To take account of lettering change due to addition of new Part C.	Minor
SDM-MO123	208	Policy S5 supporting text	<p><i>Insert new paragraph after 6.84 (formerly 6.80):</i></p> <p><b>The council will produce a Zero Carbon SPD to assist with the implementation of the council’s planning policies as part of the council’s wider net zero commitment. Policies S1-S5 cover an area where changes in technology, national policy, best practice and guidance is evolving quickly. These changes will be kept under review with further guidance produced, where required, to set out how these policies should be applied.</b></p>	Update to provide link to future guidance.	Main
SDM-MO124	222	Paragraph 6.118	<p><i>Amend text as follows:</i></p> <p>This means that in the majority of cases <b>Part (a) of the Exception Test</b> <del>will not be required as it can be demonstrated that met when</del> any potential flood risk will be outweighed by other sustainability factors; <del>and the fact.</del> <b>A site specific flood risk assessment can help determine whether part (b) of the Exceptions Test can be met. Part (b) of the Exceptions Test will be met when it can be demonstrated</b> that the development will be safe during its lifetime, considering climate change, <b>without increasing flood risk elsewhere and where possible reduce flood risk overall. This can be achieved</b> through the use of mitigation and adaptation measures.</p>	Clarification to ensure the requirements of the Exception Test are clear. In response to representations from the Environment Agency.	Minor
	224	Policy S9, Part C	Development proposals for impermeable paving will be resisted, including on small surfaces such as front gardens and driveways, unless they can demonstrate that the level of run-off will not exacerbate flood risk in the area, <del>either</del> <b>both</b> direct and cumulative risk.	Error. Clarification that direct and cumulative risk should be considered.	Minor

## Local Plan – Strategic and Development Management Policies Modifications

SDM-MO125	225	Policy S9, Part G	<p><i>Amend text as follows:</i></p> <p>Major developments involving works to an existing building <del>are encouraged to</del> <b>should</b> reduce run-off rates for the site as a whole, rather than focusing solely on new buildings.</p>	Clarification to ensure major developments utilise opportunities to reduce run-off rates.	Main
SDM-MO126	226	Policy S9, Part O	<p><i>Amend text as follows:</i></p> <p>The development of land affected by contamination must not create unacceptable risks to human health and the wider environment, including local water resources. Assessment and <del>adequate treatment</del> <b>remediation</b> of any contaminated land must be carried out before any development commences on site.</p>	In response to representations from the Environment Agency	Minor
SDM-MO127	229	Paragraph 6.147	<p><i>Amend text as follows:</i></p> <p><del>Full</del> <b>Preliminary</b> details of the proposed decontamination will be required as part of any planning application before it is considered.</p>	In response to representations from the Environment Agency	Minor
SDM-MO128	231	Policy S10, part G	<p><i>Amend text as follows:</i></p> <p>All developments are required <del>to take all possible measures</del> to minimise the impact of construction on the environment and comply with Islington's Code of Practice for Construction Sites.</p>	For clarity. In response to representations from the Environment Agency	Minor

## 7 Public Realm and Transport

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO129	233 - 235	Policy T1 supporting text	<p><i>Add the following paragraph after 7.1:</i></p> <p><b>The Islington Transport Strategy was adopted on 26 November 2020. It sets the Council's vision for a fairer, healthier, safer, greener transport environment in the borough by 2041. Its overarching themes are the delivery of People Friendly Streets, Vision Zero and a borough wide programme of Low Traffic Neighbourhoods. The Low traffic neighbourhoods are a long term initiative that restrict through traffic to create more space for pedestrians and cyclists on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area.</b></p>	To reflect the recently adopted Islington Transport Strategy and respond to representations from Islington Living Streets	Main
SDM-MO130	235	Policy T2 supporting text	<p><i>Amend text as follows:</i></p> <p>7.11 The Local Plan promotes sustainable transport choices in order to mitigate the impact of developments on the environment, improve air quality, reduce health impacts, respond to congestion affecting roads and public transport, and promote healthier lifestyles. Walking is a priority mode of transport; development proposals must be designed from the outset to facilitate walking to and from the development, in line with the Council's Inclusive Landscape Design and Streetbook SPDs, <b>as well as the <a href="#">Mayor's Transport Strategy</a> and <a href="#">TfL's Healthy Streets Indicators</a>.</b></p> <p>7.15 The Council supports cycling infrastructure improvements that adhere to guiding principles and achieve the good design outcomes set out in the <b><a href="#">London Cycling Design Standards</a>.</b></p>	Transport for London Statement of Common Ground	Minor
SDM-MO131	238	Paragraph 7.17	<p><i>Amend as follows:</i></p> <p>The lack of secure and accessible cycle parking is commonly recognised as one of the main barriers to cycling. Cycle parking – including accessible cycle parking spaces for mobility bicycles and tricycles, for cyclists with disabilities, as well cycles for parents with children - must be provided as part of development proposals, including, but not limited to, uses within the <b>E(a) and F2(a) A4 (shops), E(c) A2 (financial and professional services), E(b) A3 (restaurants and cafés), E(c) B4 (offices), D1 (non-residential institutions), D2 F2(b) and E(d) (assembly and leisure) and Sui Generis Use Classes</b>. Cycle parking provision (including accessible parking and visitor parking) must be provided in line with Appendix 4.</p>	In response to the Use Class Order and reflecting TfL SOCG	Minor
SDM-MO132	245	Policy T5, part A	<p><i>Amend text as follows:</i></p> <p>A. Delivery and Servicing Plans will be required for developments that may impact on the operation of the public highway, private roads, the public realm and/or the amenity of residents and businesses, by virtue of likely vehicle movements. These plans must demonstrate how <b>safe, clean and efficient deliveries and servicing has been facilitated and</b> any potential impacts will be mitigated and Delivery and Servicing Plans will be required to assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system.</p>	Clarification to be consistent with the London Plan	Main

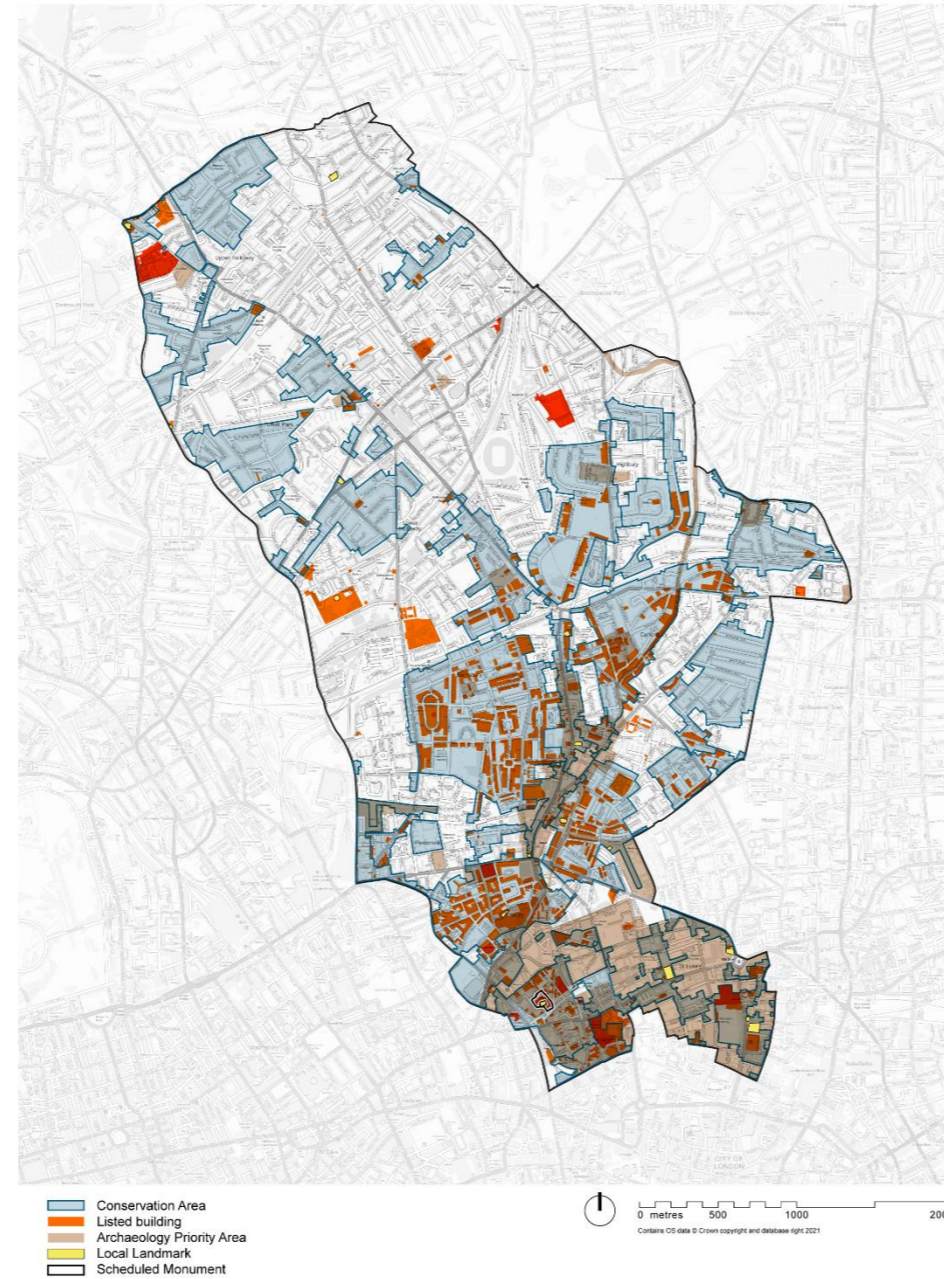
## Local Plan – Strategic and Development Management Policies Modifications

SDM-MO133	245	Policy T5, new part C  Other clauses references to be updated	<i>Add new part C as follows:</i>  <b>Proposals for uses which generate deliveries to end customers as part of their operation (for example, retail and restaurants) must prioritise non-motorised sustainable modes of transport. Such proposals are required to robustly demonstrate that all options for non-motorised sustainable modes, such as cargo cycles have been fully explored and have been maximised before exploring motorised modes. Following this, ‘clean’ vehicles (such as electric vehicles) should be used unless there are exceptional reasons why this is not possible.</b>	Clarification and update for consistency with Islington’s Transport Strategy.	Main
SDM-MO134	245	Policy T5	<i>Add new part, after part D as follows:</i>  <b>Proposals within LSISs and other development incorporating vehicle usage as an integral part of industrial operations should facilitate sustainable freight movement, including demonstrating opportunities to maximise use of more sustainable, non-motorised modes of transport, including for deliveries and servicing.</b>	Clarification for consistency with the London Plan and Islington’s Transport Strategy	Main
SDM-MO135	247	New paragraph	<i>Add new supporting paragraph after paragraph 7.52 as follows:</i>  <b>Through the Council’s Transport Strategy, the council is committed to reducing the number of vehicle trips in the borough. Promoting sustainable freight movement within the borough will be a key part of this. The council has a committed to developing a freight consolidation strategy to reduce the impact of deliveries and where these are made, wherever possible, this is done through non-motorised means. Development should investigate how sustainable and non-motorised modes can be maximised through their design as well as how motorised vehicle trips can be reduced (this includes developments that generate deliveries, for example restaurants and supermarkets or any other form of activity which involves delivering to costumers). Measures can include parking, end of trip facilities, last mile delivery considerations as well as freight consolidation to optimise vehicular movements. Details should be set out in a Transport Assessment/Transport Statement as appropriate. Further guidance may be provided on this.</b>	Clarification and update to link to the Transport Strategy.	Main

## 8 Design and Heritage

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO136	255	Policy DH2 Heritage Assets Part B Conservation Areas	<p><i>Amend text as follows:</i></p> <p>Development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve <b>and</b> <b>or</b> enhance the significance of the area, and must be of a high quality contextual design. Proposals that harm the significance of a conservation area must provide clear and convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted.</p>	<p>To ensure DH2 is consistent with the duty in the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>In response to the representation from Lion Portfolio.</p> <p>To ensure consistency with Policy DH1.</p>	Minor
SDM-MO137	253	Figure 8.1	<p><i>Figure 8.1 to be updated with replacement map which does not depict St John's Gate as a scheduled monument. St John's Gate has been de-scheduled (as a historic monument). It remains a grade I listed building.</i></p>	<p>In response to representation from Historic England</p>	Minor

Local Plan – Strategic and Development Management Policies Modifications



SDM-MO138	257	Paragraph 8.34	<p><i>Amend text as follows:</i></p> <p><del>There are two scheduled monuments in the borough — St. John’s Gate and the Nunnery of St. Mary de Fonte. These are identified on the Policies Map.</del></p> <p><b>There is one scheduled monument in the borough – the Benedictine nunnery of St Mary, Clerkenwell, which is identified on the Policies Map.</b></p>	<p>In response to representation from Historic England</p> <p>St John’s Gate has been de-scheduled (as a historic monument). It remains a grade I listed building.</p>	Main
SDM-MO139	257	Paragraph 8.32	<p><i>Add footnote:</i></p> <p>“The following Archaeological Priority Areas<sup>x</sup> are identified on the Policies Map”</p>	<p>In response to HE Regulation 19 comments</p>	Minor



## Local Plan – Strategic and Development Management Policies Modifications

			<p><b>* Further information on Archaeology Priority Areas is available at: <a href="https://historicengland.org.uk/content/docs/planning/apa-islington/">https://historicengland.org.uk/content/docs/planning/apa-islington/</a></b></p>		
SDM-MO140	258	Paragraph 8.35	<p><i>Amend text as follows:</i></p> <p>All planning applications likely to affect important archaeological remains are required to include an Archaeological Assessment and may require trial excavations to establish the significance and vulnerability of surviving remains. <b>Historic England recommend pre-application consultation with the Greater London Archaeological Advisory Service (Historic England) for all development sites over 0.5 hectares and for smaller development sites in Archaeological Priority Areas.</b></p> <p>Footnote: <b>Refer to GLAAS consultation guidelines at <a href="https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/">https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/</a></b></p>	In response to representation from Historic England	Minor
SDM-MO141	266	Policy DH3 Tall Buildings Part F	<p><i>Amend text as follows:</i></p> <p><del>All proposals for tall buildings must mitigate the individual and cumulative visual, functional and environmental impacts on the surrounding and wider context, and fully satisfy all the following criteria.</del></p> <p><b>Tall buildings must be high quality in accordance with policy PLAN1. Designs for tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. The following criteria must be fully satisfied:...</b></p>	Clarification	Main

## 9 Strategic Infrastructure

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO142	285	Paragraph 9.4	<i>Add additional text as follows:</i>  <b>Developer contributions may be secured retrospectively where it has been necessary to forward fund infrastructure projects.</b>	In response to representations from the Department for Education.	Main
SDM-MO143	285	Paragraph 9.6	<i>Add additional text as follows:</i>  <b>Should future demand for school places exceed supply, infrastructure costs will be sought through CIL.</b>	In response to representations from the Department for Education.	Minor
SDM-MO144	286	Paragraph 9.11	<i>Add additional text as follows:</i>  <b>In line with the plan the safeguarded Hornsey Street Re-use and Recycling Centre is identified on the Policies Map.</b>	Clarification	Main
SDM-MO145	287	Policy ST3: Telecommunications, communications and utilities equipment, Part C	<i>Amend text as follows:</i>  Applications for mobile phone network development must demonstrate that they have followed and are in accordance with the Code of Best Practice on Mobile Network Development in England or subsequent similar guidance, <b>and the latest TfL Streets toolkit guidance.</b>	In response to TfL City Planning Regulation 19 response	Minor
SDM-MO146	287	Paragraph 9.12	<i>Amend text as follows:</i>  In general, it is not acceptable to locate satellite dishes and other telecommunications and utilities equipment on the front of buildings and other locations where they are visible from the public realm. On-street location of telecommunications boxes and other utilities equipment should be avoided. Where this is not possible, equipment must be designed and located to prevent street clutter and conflict with pedestrian movement and street furniture. conflict with pedestrian <b>and cycle</b> movement, and street furniture.	In response to Cycle Islington response	Minor

# 10 Monitoring

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification																																			
SDM-MO147	284	Monitoring	<p><i>Add additional text after paragraph 10.7 as follows:</i></p> <p><b>Whilst the AMR will report on a broad range of indicators that will be updated over time and reflect on new and changing sources of data, some of the key indicators that cover a range of policies within the plan and that will be used to help with monitoring are set out below. Further information on monitoring is also set out in the Site Allocations document and Bunhill and Clerkenwell Area Action Plan.</b></p> <table border="1"> <thead> <tr> <th>Reference</th> <th>Key Indicator</th> <th>Target/milestone (if applicable)</th> <th>Relevant policy</th> </tr> </thead> <tbody> <tr> <td>SDM1</td> <td>Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)</td> <td></td> <td>SP1-SP8</td> </tr> <tr> <td>SDM2</td> <td>Housing completions and net change</td> <td>Progress in meeting the 10 year housing target set out in the London Plan (775 per year and 7750 overall)</td> <td>H2: New and existing conventional housing</td> </tr> <tr> <td>SDM3</td> <td>Mix of dwelling sizes in completed developments</td> <td>Development to be in line with housing mix priorities set out in table 3.2</td> <td></td> </tr> <tr> <td>SDM4</td> <td>1. Gross and net affordable housing completions for major developments</td> <td>1. 50% of total net additional homes to be genuinely affordable over the plan period.</td> <td rowspan="2">H3: Genuinely affordable housing</td> </tr> <tr> <td>SDM5</td> <td>2. Affordable housing contributions secured for minor schemes (permitted)</td> <td>2. Contributions secured in the monitoring year.</td> </tr> <tr> <td>SDM6</td> <td>Non-self-contained units completed by type: (i) within sites identified for student accommodation development; and (ii) outside sites identified for student accommodation</td> <td>No new purpose built student accommodation on sites outside those allocated or sites with existing purpose built student accommodation</td> <td>H6: Purpose-built Student Accommodation</td> </tr> <tr> <td>SDM7</td> <td>Progress in meeting identified needs for Gypsy and Traveller Accommodation</td> <td>Written update to provide annually on progress against policy objectives.</td> <td>H12: Gypsy &amp; Traveller Accommodation</td> </tr> <tr> <td>SDM8</td> <td>Business floorspace completed (and net change) in major developments within  (i) CAZ and Bunhill and Clerkenwell AAP  (ii) CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King’s Cross and Pentonville Road</td> <td></td> <td>B1: Delivering business floorspace</td> </tr> </tbody> </table>	Reference	Key Indicator	Target/milestone (if applicable)	Relevant policy	SDM1	Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)		SP1-SP8	SDM2	Housing completions and net change	Progress in meeting the 10 year housing target set out in the London Plan (775 per year and 7750 overall)	H2: New and existing conventional housing	SDM3	Mix of dwelling sizes in completed developments	Development to be in line with housing mix priorities set out in table 3.2		SDM4	1. Gross and net affordable housing completions for major developments	1. 50% of total net additional homes to be genuinely affordable over the plan period.	H3: Genuinely affordable housing	SDM5	2. Affordable housing contributions secured for minor schemes (permitted)	2. Contributions secured in the monitoring year.	SDM6	Non-self-contained units completed by type: (i) within sites identified for student accommodation development; and (ii) outside sites identified for student accommodation	No new purpose built student accommodation on sites outside those allocated or sites with existing purpose built student accommodation	H6: Purpose-built Student Accommodation	SDM7	Progress in meeting identified needs for Gypsy and Traveller Accommodation	Written update to provide annually on progress against policy objectives.	H12: Gypsy & Traveller Accommodation	SDM8	Business floorspace completed (and net change) in major developments within  (i) CAZ and Bunhill and Clerkenwell AAP  (ii) CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King’s Cross and Pentonville Road		B1: Delivering business floorspace	To provide further clarification about how the plan will be monitored.	Main
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## Local Plan – Strategic and Development Management Policies Modifications

			(iii) Priority Employment Locations (PELs)		
			SDM9 Town centre uses completed within Town Centres, and within the Bunhill and Clerkenwell AAP area		Policy R1: Retail, leisure and services, culture and visitor accommodation
			SDM10 Proportion of units within each Town Centre that are vacant	Trend in vacant units over time	Policy R3: Islington's Town Centres
			SDM11 Proportion of units within each Local Shopping Area that:  (i) are in class E use;  (ii) are vacant;  (iii) have changed to C3 use within the monitoring year.	(i) Percentage change from previous year  (ii) No target  (iii) Zero	Policy R4: Local Shopping Areas
			SDM12 Public houses gained and lost (completions)		Policy R11: Public Houses
			SDM13 Visitor accommodation change (completions) in schemes and bed spaces in identified locations and outside of identified locations		Policy R12: Visitor accommodation
			SDM14 Proportion of completed new hotel rooms that are wheelchair accessible		
			SDM15 Designated public open space gains and losses (sqm) (completions)	No loss	G2: Protecting open space
			SDM16 On-site carbon reduction achieved for major development	To achieve minimum target for on-site reduction on average.	S4: Minimising greenhouse gas emissions
			SDM17 Offsetting contributions from completed new developments	Overall amount of offset contributions in a monitoring year.	
			SDM18 Major developments (completions) that have:  1. Connected to a heat network.  2. Where there is a Commitment to connect to a future network		S5: Energy infrastructure
			SDM19 Annual mean air pollution levels for nitrogen dioxide and PM10	Reduction	S7: Improving Air Quality
			SDM20 Circular Economy Statements for referable applications (permissions)	Performance against metrics and targets set out in GLA circular economy statement guidance.	S10: Circular Economy and Adaptive Design
			SDM21  Change in mode share	Increase in mode share of sustainable transport modes over time.	T1: Enhancing the public realm and sustainable transport
			SDM22 S106 contributions for accessible parking bays		T3: Car-free development

## Local Plan – Strategic and Development Management Policies Modifications

			<b>SDM23</b>	<b>Additions and removals from the Historic England Buildings at Risk Register</b>	<b>No target</b>	<b>DH2: Heritage assets</b>		
			<b>SDM24</b>	<b>Tall buildings completed in identified locations and outside of identified locations</b>	<b>All new tall buildings to developed in locations identified in DH3</b>	<b>DH3: Building heights</b>		
			<b>SDM25</b>	<b>Review the Infrastructure Delivery Plan on a regular basis</b>		<b>ST1: Infrastructure Planning and Smarter City Approach</b>		

# 11 Appendices

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SDM-MO148	285	Appendix 1: Marketing and Vacancy Criteria	<p><i>Amend text as follows:</i></p> <p><b><u>Additional considerations in relation to Class E</u></b></p> <p><b>For proposals that are marketed within class E it will be important that the existing use plus all uses within class E are specified in order to robustly demonstrate there is no demand for the floorspace. A log should be provided evidencing the range of uses advertised, prices advertised and all offers received, this should be accompanied by a signed declaration. Where specific Class E uses are not marketed or are excluded from marketing due to site specific or local circumstances this should be robustly justified. Where a property is vacant and is being marketed, if a new occupier is found the council encourages properties to be brought back into commercial use as soon as possible to avoid unnecessary vacancy.</b></p> <p><b>Where a specific use or uses is conditioned, for example within Class E, six months of marketing for the specific use will be required to demonstrate that there is no longer demand for the use(s) it was secured for. In this instance there is no requirement for the premises to be vacant.</b></p> <p><b>Marketing and vacancy criteria will be kept under review and may need to be changed over time – this will be done through guidance.</b></p>	Clarification in response to changes to Use Class Order	Main
SDM-MO149	287	Appendix 2: Noise and vibration	<p><i>Amend text as follows:</i></p> <p>22. Any development which includes residential floorspace adjacent to non-residential uses must submit an assessment of the internal sound transfer, including for any development which may increase noise impacts in existing multi-use buildings. Some examples of where an assessment would be required are:</p> <ul style="list-style-type: none"> <li>• a new development incorporating an <b>A4 bar (Sui Generis)</b> on the ground floor and residential flats above;</li> <li>• conversion of an existing ground floor <b>premises A1 shop</b> to an <b>A3</b> restaurant where there is an existing residential flat above; or</li> <li>• conversion of an office sharing a party wall with a light industrial use into a residential dwelling</li> <li>• <b>conversion of an existing ground floor shop to a gym or nursery where there is an existing residential flat above</b></li> </ul> <p>23. In some cases, an airborne sound insulation standard will be specified rather than requiring compliance with a noise rating criterion.</p>	Updated to reflect Use Classes Order changes.	Main

## Local Plan – Strategic and Development Management Policies Modifications

			<p>24. Party walls, floors and ceilings between the non-residential premises and residential floorspace should be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:</p> <ul style="list-style-type: none"> <li>• For <b>A4 premises drinking establishments, D1\D2-Sui Generis/F.2-</b> premises such as places of worship, concert halls, community space for hire or B2\B8 industrial premises, standards will be judged on a case by case basis depending on the exact nature of the use. Greater than 60dB DnT,w + Ctr is likely to be necessary</li> <li>• For cafes and restaurants <b>A3</b> or <b>A5-Take away</b> premises or large <b>A1-cafes,</b> shops and supermarkets: At least 55dB DnT,w + Ctr</li> </ul> <p><b>25. Where non-residential uses are placed above residential floorspace or high impact generating uses such as gyms are placed on the ground floor and residential above there are likely to be impact noise issues. An impact sound insulation limit will be specified. These will be determined on a case by case basis and in such cases specialist advice and assessment will be necessary.</b></p>																														
SDM-MO150	293	Appendix 3 – Table A3.1	<p><i>Amend table as follows:</i></p> <p><b>Table A3.1: Thresholds for Transport Assessments and Full Travel Plans</b></p> <table border="1"> <thead> <tr> <th>Use</th> <th>Threshold</th> </tr> </thead> <tbody> <tr> <td><b>A4E(a)</b> Retail</td> <td>Equal or more than 1,000sqm</td> </tr> <tr> <td><b>A2E(c)i</b> Financial Services</td> <td>Equal or more than 1,000sqm</td> </tr> <tr> <td><b>A3/A4/A5E(b)/Sui Generis hot food takeaway</b></td> <td>Equal or more than 750sqm</td> </tr> <tr> <td><b>B4B2/B8/E(c) / E(g)</b></td> <td>Equal or more than 2,500sqm</td> </tr> <tr> <td>C1 Hotels</td> <td>Equal or more than 50 beds</td> </tr> <tr> <td>C3 Residential</td> <td>Equal or more than 50 residents</td> </tr> <tr> <td><b>D4E(e)</b> Hospitals/medical centres*</td> <td>Equal or more than 50 staff</td> </tr> <tr> <td><b>D4F1(a)</b> Schools</td> <td>All developments to have a school travel plan</td> </tr> <tr> <td><b>D4F1(a)</b> Higher and further education</td> <td>Equal or more than 2,500sqm</td> </tr> <tr> <td><b>D4F1(c) and F1(e)</b> Museum/gallery</td> <td>Equal or more than 100,000 visitors annually</td> </tr> <tr> <td><b>D4F1(f)</b> Places of worship</td> <td>Equal or more than 200 members/regular attendees</td> </tr> <tr> <td><b>D2E(d), F(c-d) and Sui Generis</b> Assembly and Leisure</td> <td>Equal or more than 1,000sqm</td> </tr> <tr> <td><b>General Class E (unspecified activity)</b></td> <td><b>Equal or more than 750sqm</b></td> </tr> </tbody> </table> <p><i>*It is mandatory for NHS trusts to have travel plans, required by separate Department of Health and Social Care guidance.</i></p>	Use	Threshold	<b>A4E(a)</b> Retail	Equal or more than 1,000sqm	<b>A2E(c)i</b> Financial Services	Equal or more than 1,000sqm	<b>A3/A4/A5E(b)/Sui Generis hot food takeaway</b>	Equal or more than 750sqm	<b>B4B2/B8/E(c) / E(g)</b>	Equal or more than 2,500sqm	C1 Hotels	Equal or more than 50 beds	C3 Residential	Equal or more than 50 residents	<b>D4E(e)</b> Hospitals/medical centres*	Equal or more than 50 staff	<b>D4F1(a)</b> Schools	All developments to have a school travel plan	<b>D4F1(a)</b> Higher and further education	Equal or more than 2,500sqm	<b>D4F1(c) and F1(e)</b> Museum/gallery	Equal or more than 100,000 visitors annually	<b>D4F1(f)</b> Places of worship	Equal or more than 200 members/regular attendees	<b>D2E(d), F(c-d) and Sui Generis</b> Assembly and Leisure	Equal or more than 1,000sqm	<b>General Class E (unspecified activity)</b>	<b>Equal or more than 750sqm</b>	In response to the Use Class Order and reflecting TfL SOCG	Main
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SDM-MO151	293	Appendix 3	<p><i>Insert the following paragraph after paragraph 3:</i></p> <p><b>4. Unspecified Class E activities need a transport assessment for premises larger than 750sqm. This new threshold is designed to ensure that the flexibility of Class E does not result in unintended negative transport impacts. When Class E activities are specified, specific thresholds apply.</b></p>	In response to changes to the Use Class Order	Main																												

## Local Plan – Strategic and Development Management Policies Modifications

SDM-MO152	294	Appendix 3, footnote 62	Update URL to: <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants">https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants</a>	In response to TfL City Planning Regulation 19 response	Minor																	
SDM-MO153	295	Appendix 3, footnote 63	Update URL to: <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants">https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants</a>	In response to TfL City Planning Regulation 19 response	Minor																	
SDM-MO154	296	Appendix 4	<p><i>Insert the following paragraphs after paragraph 2:</i></p> <p><b>3. The table below describes minimum cycle parking standards. The nature and amount of cycle parking required varies by use. For instance within Class E, the needs for long or short stay cycle parking, as well as the amount will vary depending on whether a development caters for an office or a retail use. An office would be expected to provide more long stay parking, while a store should provide more short stay cycle parking.</b></p> <p><b>4. These differing standards within Class E or Class F mean that cycle parking needs to be delivered in a way which can easily be adapted to respond to the different activities within the same land use category. The Council therefore expects provision of cycle parking to be mainly located at ground floor, in a way that provides flexibility between short and long stay, and support the flexibility of activities sought by Class E.</b></p> <p><b>5. Where unspecified Class E activities are proposed developers should provide cycle parking in line with the requirement below and in a way which facilitates switching from long stay to short stay cycle parking based on changing activity needs. Flexibility is essential to ensure different uses can be adequately provided for and to adapt to different uses over time.</b></p>	In response to the Use Classes Order and reflecting TfL SOCG	Main																	
SDM-MO155	296	Appendix 4, Table A4.1,	<p><i>Amend table as follows:</i></p> <p><b>Table A4.1: Minimum cycle parking standards (excluding circulation space)</b></p> <table border="1" data-bbox="949 1352 2136 1858"> <thead> <tr> <th data-bbox="949 1352 1074 1507">Use class</th> <th data-bbox="1074 1352 1288 1507">Use</th> <th data-bbox="1288 1352 1519 1507">Spaces per member of staff or resident (GIA) of which 20% accessible</th> <th data-bbox="1519 1352 1786 1507">Spaces per visitors or customers (GIA) of which 20% accessible</th> <th data-bbox="1786 1352 1941 1507">Spatial equivalent – standard cycle</th> <th data-bbox="1941 1352 2136 1507">Spatial equivalent – accessible cycle</th> </tr> </thead> <tbody> <tr> <td data-bbox="949 1507 1074 1692" rowspan="2">A+E(a) / E(b)</td> <td data-bbox="1074 1507 1288 1692">Retail - food</td> <td data-bbox="1288 1507 1519 1692">from a threshold of 100sqm: 1 per 175sqm</td> <td data-bbox="1519 1507 1786 1692"><b>First 750sqm</b>, from a threshold of 100sqm: 1 space per 20sqm. Beyond 750sqm, 1 space per 150sqm</td> <td data-bbox="1786 1507 1941 1692">1sqm</td> <td data-bbox="1941 1507 2136 1692">2sqm</td> </tr> <tr> <td data-bbox="1074 1692 1288 1858">Retail – non food</td> <td data-bbox="1288 1692 1519 1858">from a threshold of 100sqm: 1 per 250sqm. Beyond 1000sqm, 1 space per 1000sqm</td> <td data-bbox="1519 1692 1786 1858"><b>First 1000sqm</b>, from a threshold of 100sqm: 1 space per 60sqm. Beyond 1000sqm, 1 space per 500sqm</td> <td data-bbox="1786 1692 1941 1858">1sqm</td> <td data-bbox="1941 1692 2136 1858">2sqm</td> </tr> </tbody> </table>	Use class	Use	Spaces per member of staff or resident (GIA) of which 20% accessible	Spaces per visitors or customers (GIA) of which 20% accessible	Spatial equivalent – standard cycle	Spatial equivalent – accessible cycle	A+E(a) / E(b)	Retail - food	from a threshold of 100sqm: 1 per 175sqm	<b>First 750sqm</b> , from a threshold of 100sqm: 1 space per 20sqm. Beyond 750sqm, 1 space per 150sqm	1sqm	2sqm	Retail – non food	from a threshold of 100sqm: 1 per 250sqm. Beyond 1000sqm, 1 space per 1000sqm	<b>First 1000sqm</b> , from a threshold of 100sqm: 1 space per 60sqm. Beyond 1000sqm, 1 space per 500sqm	1sqm	2sqm	In response to Groveworld Regulation 19 response, TfL SOCG and Use Classes Order changes.	Main
Use class	Use	Spaces per member of staff or resident (GIA) of which 20% accessible	Spaces per visitors or customers (GIA) of which 20% accessible	Spatial equivalent – standard cycle	Spatial equivalent – accessible cycle																	
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			<b>A2E(c)</b>	Financial and professional services	from a threshold of 100sqm: 1 per 175sqm	from a threshold of 100sqm: 1 space per 20sqm	1sqm	2sqm		
			<b>A3E(b)</b>	Restaurants and cafés	1 per 175sqm	from a threshold of 100sqm: 1 space per 20sqm	1sqm	2sqm		
			<b>A4Sui Generis</b>	Drinking establishments	1 per 175sqm	from a threshold of 100sqm: 1 space per 20sqm	1sqm	2sqm		
			<b>A5Sui Generis</b>	Hot food takeaways	1 per 175sqm	from a threshold of 100sqm: 1 space per 20sqm	1sqm	2sqm		
			<b>B1(a)E(c) / E(g)</b>	Offices	1 per 75sqm	First 5000sqm: 1 space per 500sqm. Thereafter: 1 space per 5000sqm	1sqm	2sqm		
			<b>E(c) / E(g)</b>	Other	1 per 250sqm	1 space per 1000sqm	1sqm	2sqm		
			B2	General industry	1 per 500sqm	1 space per 1000sqm	1sqm	2sqm		
			B8	Storage and distribution	1 per 500sqm	1 space per 1000sqm	1sqm	2sqm		
			<b>C1</b>	<b>Hotels</b>	<b>1 per 20 bedrooms</b>	<b>1 space per 50 bedrooms</b>	<b>1sqm</b>	<b>2sqm</b>		
			<b>C1</b>	<del>Hotels (Sui Generis)</del>	<del>1 per 20 bedrooms</del>	<del>1 space per 50 bedrooms</del>	<del>1sqm</del>	<del>2sqm</del>		
			<b>C1C2</b>	<b>Hospitals</b>	<b>1 space per 5 FTE staff</b>	<b>1 space per 30 FTE staff</b>	<b>1sqm</b>	<b>2sqm</b>		
			<b>C1C2</b>	<b>Care homes / secure accommodation</b>	<b>1 space per 5 FTE staff</b>	<b>1 space per 20 bedrooms</b>	<b>1sqm</b>	<b>2sqm</b>		
			<b>C3-C4</b>	Housing	1 per studio <b>or 1 person dwelling, 1.5 per 2 persons 1 bedroom dwelling</b> , 2 spaces per all other dwellings	5 space per 40 dwellings, thereafter: 1 space per 40 dwellings	1sqm	2sqm		
				<b>Specialist older people housing</b>	<b>1 per 10 bedrooms</b>	<b>1 space per 40 bedrooms</b>	<b>1sqm</b>	<b>2sqm</b>		

## Local Plan – Strategic and Development Management Policies Modifications

			<table border="1"> <tr> <td><del>C4</del></td> <td><b>Student accommodation</b></td> <td><b>0.75 spaces per bedroom</b></td> <td><b>1 space per 40 bedrooms</b></td> <td><b>1sqm</b></td> <td><b>2sqm</b></td> </tr> <tr> <td rowspan="7"><del>D4E(e-f) / F1</del></td> <td>Nurseries</td> <td>1 space per 8 staff and 1 per 8 pupils</td> <td>X</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td>Schools</td> <td>1 per 8 staff plus 1 per 8 students</td> <td>1 space per 100 students</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td>Higher education</td> <td>1 per 4 staff plus 1 per 20 peak time students</td> <td>1 space per 7 students</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td>Libraries <b>or churches</b> (for staff and visitors)</td> <td>1 per 8 staff</td> <td>1 space per 100sqm</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td>Health facilities/clinics (for staff and visitors)</td> <td>1 per 5 staff</td> <td>1 space per 3 staff</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td>Community centres (for staff and visitors)</td> <td>1 per 3 staff</td> <td>1 space per 100sqm</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td rowspan="2"><del>D2E(d) / F(c-d)</del></td> <td>Theatres and cinemas</td> <td>1 per 8 staff</td> <td>1 space per 30 seats</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td>Leisure and sports</td> <td>1 per 8 staff</td> <td>1 space per 100sqm</td> <td>1sqm</td> <td>2sqm</td> </tr> <tr> <td><b>General Class E</b></td> <td><b>Unspecified activity</b></td> <td colspan="2"><b>Provision to be delivered at ground floor to ensure flexibility.</b></td> <td><b>1sqm</b></td> <td><b>2sqm</b></td> </tr> <tr> <td></td> <td></td> <td colspan="2"><b>First 1,000sqm: 1 space per 20sqm</b></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td colspan="2"><b>Beyond first 1,000: 1 space per 65sqm</b></td> <td></td> <td></td> </tr> <tr> <td><b>Sui Generis</b></td> <td colspan="5"><b>As per most relevant other standard.</b></td> </tr> <tr> <td><b>Stations</b></td> <td colspan="5"><b>To be considered on a case by case basis in liaison with TfL.</b></td> </tr> </table>	<del>C4</del>	<b>Student accommodation</b>	<b>0.75 spaces per bedroom</b>	<b>1 space per 40 bedrooms</b>	<b>1sqm</b>	<b>2sqm</b>	<del>D4E(e-f) / F1</del>	Nurseries	1 space per 8 staff and 1 per 8 pupils	X	1sqm	2sqm	Schools	1 per 8 staff plus 1 per 8 students	1 space per 100 students	1sqm	2sqm	Higher education	1 per 4 staff plus 1 per 20 peak time students	1 space per 7 students	1sqm	2sqm	Libraries <b>or churches</b> (for staff and visitors)	1 per 8 staff	1 space per 100sqm	1sqm	2sqm	Health facilities/clinics (for staff and visitors)	1 per 5 staff	1 space per 3 staff	1sqm	2sqm	Community centres (for staff and visitors)	1 per 3 staff	1 space per 100sqm	1sqm	2sqm	<del>D2E(d) / F(c-d)</del>	Theatres and cinemas	1 per 8 staff	1 space per 30 seats	1sqm	2sqm	Leisure and sports	1 per 8 staff	1 space per 100sqm	1sqm	2sqm	<b>General Class E</b>	<b>Unspecified activity</b>	<b>Provision to be delivered at ground floor to ensure flexibility.</b>		<b>1sqm</b>	<b>2sqm</b>			<b>First 1,000sqm: 1 space per 20sqm</b>						<b>Beyond first 1,000: 1 space per 65sqm</b>				<b>Sui Generis</b>	<b>As per most relevant other standard.</b>					<b>Stations</b>	<b>To be considered on a case by case basis in liaison with TfL.</b>						
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SDM-MO156	296	Appendix 4, Table A4.1, column two	<i>Amend text within table heading as follows:</i>			In response to TfL City Planning Regulation 19 response	Minor																																																																												
SDM-MO157	296	Appendix 4, Table A4.1, column three	<i>Amend text within table heading as follows:</i>			In response to TfL City Planning Regulation 19 response	Minor																																																																												
SDM-MO158	N/A	Appendix 5: Social Value self-assessment	<i>Add following social value benefit as new ref 15 in table:</i>			In response to FFI	Main																																																																												

## Local Plan – Strategic and Development Management Policies Modifications

			<b>Promote low carbon behaviour in the operation and use of the building to reduce carbon emissions.</b>		
SDM-MO159	333	Appendix 9: Glossary and abbreviations; Term: Affordable Workspace	<i>Amend text as follows:</i>  Business floorspace/workspace which is leased to the Council at a peppercorn rate for a specified period and managed by a Council approved operator, <b>including the Council itself</b> . Affordable workspace should be let to end occupiers at rents significantly below the prevailing market rent for the specific sector and/or location. Actual rental values will be considered on a case-by-case basis through the Council's Affordable Workspace Commissioning Process.	Clarification	Minor
SDM-MO160	335	Appendix 9: Glossary and abbreviations  Term: Business floorspace/buildings/development/uses	<i>Amend text as follows:</i>  Amend text as follows: <b>Office, research and development and light industrial aActivities as well as industrial uses B2 general industrial and B8 storage and distribution, and Sui Generis industrial uses.</b> <del>or uses that fall within the B-use class.</del> Sui <del>generis</del> Generis uses which are akin to business floorspace, such as depots or builders merchants, can be classed as business floorspace for the purposes of the Local Plan.	Update following changes to the Use Classes Order	Main
SDM-MO161	338	Appendix 9: Glossary and Abbreviations; Term: Commercial floorspace/buildings/development/uses	<i>Amend text as follows:</i>  Activities or uses which involve business activities and/or the sale of good or services. For the purposes of the Local Plan, this is <b>a</b> broad term which encompasses business and retail uses.	Correction	Minor
SDM-MO162	348	Appendix 9: Glossary and Abbreviations; Term: Hybrid space	<i>Amend text as follows:</i>  The main feature of hybrid space is that it straddles different <del>B-use</del> <b>business floorspace classes uses.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Minor
SDM-MO163	348	Appendix 9: Glossary and Abbreviations; Term: Industrial floorspace/buildings/development/uses/land	<i>Amend text as follows:</i>  Activities or uses that fall within light industrial <del>(B1c)</del> , general industry (B2) and storage and distribution (B8) uses, <b>Sui Generis industrial uses</b> , and some <del>sui</del> <b>Sui generis Generis</b> akin to industrial uses such as depots and builder's merchants.	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987.	Main
SDM-MO164	351	Appendix 9: Glossary and Abbreviations; Term: Locally Significant Industrial Sites	<i>Amend text as follows:</i>  Designated areas where light industrial <del>(B1c)</del> , general industry (B2) and storage and distribution (B8) are the priority land uses.	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987.	Minor
SDM-MO165	354	Appendix 9: Glossary and Abbreviations; Term: Office-led development	<i>Amend text as follows:</i>  Development where the majority of floorspace/uses is office. <del>within use class B1(a)</del>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987.	Minor

## Local Plan – Strategic and Development Management Policies Modifications

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SDM-MO166	356	Appendix 9: Glossary and Abbreviations; Term: Primary Shopping Area	<p><i>Amend text as follows:</i></p> <p>Spatial designations that contain the greatest concentration of <del>A1 shops</del> <b>retail</b> within a Town Centre; are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres, ensuring their continued vibrancy, vitality and viability</p>	Update following changes to the Use Classes Order	Minor
SDM-MO167	360	Appendix 9: Glossary and Abbreviations; Term: Social and community infrastructure	<p><i>Amend text as follows:</i></p> <p>Infrastructure that is available to, and serves the needs of, local communities and others, which is often funded in some way by a grant or investment from a government department, public body and/or the voluntary sector. Social and community facilities comprises a wide variety of facilities/buildings including those which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres; education and training facilities including early years providers, nurseries, schools, colleges and universities; children and young peoples' play facilities; health facilities; youth centres; libraries; community meeting facilities; community halls; places of worship; sport, leisure and recreation facilities; and policing facilities. Social and community infrastructure generally falls within Use Classes <b>E, F.1 or F.2</b>, <del>C2, D1 or D2</del>, and possibly some Sui Generis uses. This list is not intended to be exhaustive and other facilities can be included as social and community infrastructure.</p>	To reflect the removal of the D1 and D2 use classes from the Town and Country Planning (Use Classes) Order 1987.	Minor
SDM-MO168	357	Appendix 9: Glossary and Abbreviations; Term: Retail floorspace/buildings/development/uses	<p><i>Amend text as follows:</i></p> <p><del>Activities or uses that fall within the A1 use class.</del> <b>Uses for the display or retail sale of goods, other than hot food, principally to visiting members of the public - as defined in Class E(A). This includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes.</b></p>	To reflect the removal of the 'A' use class from the Town and Country Planning (Use Classes) Order 1987.	Main
SDM-MO169	360	Appendix 9: Glossary and Abbreviations; Term: Source Protection Zones	<p><i>Amend text as follows:</i></p> <p>Areas of influence around groundwater sources used for public drinking which provide additional protection to safeguard drinking water quality, through constraining the <b>close</b> proximity of an activity that may impact upon a drinking water abstraction.</p>	Error	Minor
SDM-MO170	N/A	Appendix 9: Glossary and Abbreviations; Term: Leisure uses	<p><i>Add following definition:</i></p> <p><b>Activities or uses including food and drink uses as defined within Class E(b), some indoor recreational activities falling within E(d) and some Sui Generis uses including drinking establishments including pubs and wine bars, hot food take aways, live music venues, cinemas, concert halls, nightclubs and theatres.</b></p>	Update following changes to the Use Classes Order	Main
SDM-MO171	N/A	Appendix 9: Glossary and Abbreviations; Term: Conventional housing	<p><i>Add following definition:</i></p> <p><b>Conventional housing: self-contained homes from new build, conversions or changes of use</b></p>	In response to Line Planning	Minor
SDM-MO172	N/A	Appendix 9: Glossary and Abbreviations; Term: Non-self contained housing	<p><i>Add following definition:</i></p> <p><b>Non-self-contained housing: housing such as bedrooms in hostels or halls of residence</b></p>	In response to Line Planning	Minor
SDM-MO173	352	Appendix 9: Glossary and Abbreviations; Term: Low Traffic Neighbourhoods	<p><i>Add following definition:</i></p> <p><b>Low Traffic Neighbourhoods: Low Traffic Neighbourhoods restrict through traffic to create more space for pedestrians and cyclists on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area. However, Low Traffic Neighbourhoods maintain access for local residents, their visitors, the emergency services, and local shops and businesses. A</b></p>	Added following the Council's adoption of the Transport Strategy on 26 November 2020.	Main

## Local Plan – Strategic and Development Management Policies Modifications

			<b>reduction in through traffic will improve air quality and allow more space for local people to travel safely around their local streets on foot and by bicycle</b>		
SDM-MO174	N/A	Appendix 9: Glossary and Abbreviations; Term: Local resident (mentioned in Policy B5 part A)	<i>Add following definition of local resident:</i>  <b>A local resident means a person who lives within the administrative area of Islington Council.</b>	Clarification	Minor
SDM-MO175	N/A	Appendix 9: Glossary and Abbreviations; Term: Shop	<i>Add following definition:</i>  <b>Shop: refers to the function of uses that operate as shops. However, in relation to planning applications that involve the loss or development of a 'shop' the encompassing definition of 'retail' will be used in determining applications.</b>	Clarification	Main
SDM-MO176	N/A	Appendix 9: Glossary and Abbreviations; Term: Non-motorised forms of transport	<i>Add following definition:</i>  <b>This refers to active travel and human powered transportation, including walking and cycling, and variants such as small-wheeled transport (cycle rickshaws, cargo cycles, skateboards, push scooters and hand carts, and hybrid electric cycles) and wheelchair travel. The Council also considers mobility scooters form part of that category.</b>	Clarification	Main

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# Site Allocations

## Modifications for consultation

1	Introduction .....	2
2.	New Site Allocations.....	3
3.	Site Allocations to be removed.....	15
4.	Modifications to Site Allocations.....	18



# 1 Introduction

- 1.1 This document contains all the changes (known as modifications) to the Islington Site Allocations document proposed since the document was submitted to the Planning Inspectorate for Examination in February 2020.
- 1.2 Modifications are identified as being 'Main' or 'Minor'. The Minor Modifications do not materially affect the substance of the plan, its overall soundness or the submitted sustainability appraisal. The minor modifications relate to points of clarification, factual updates and typographical or grammatical errors. The reasons for making each of the changes are clearly set out.
- 1.3 The Modifications are split into three chapters. The first chapter sets out new sites that are proposed to be allocated, the second chapter sets out sites that are proposed to be deleted from the document, the final chapter sets out Main and Minor modifications that are proposed to the rest of the Site Allocations document.
- 1.4 This document is accompanied by schedules setting out relevant changes on the Strategic and Development Management Policies document and Bunhill and Clerkenwell Area Action Plan. An update to the Sustainability Appraisal/IIA and relevant changes to the Policies Map have also been published.

## **Format of changes**

The following format has been used to set out what the changes are and distinguish between existing and new text

**Blue** – new text proposed


~~Red~~ – text proposed for removal


Changes to diagrams, tables etc described in *italic text*

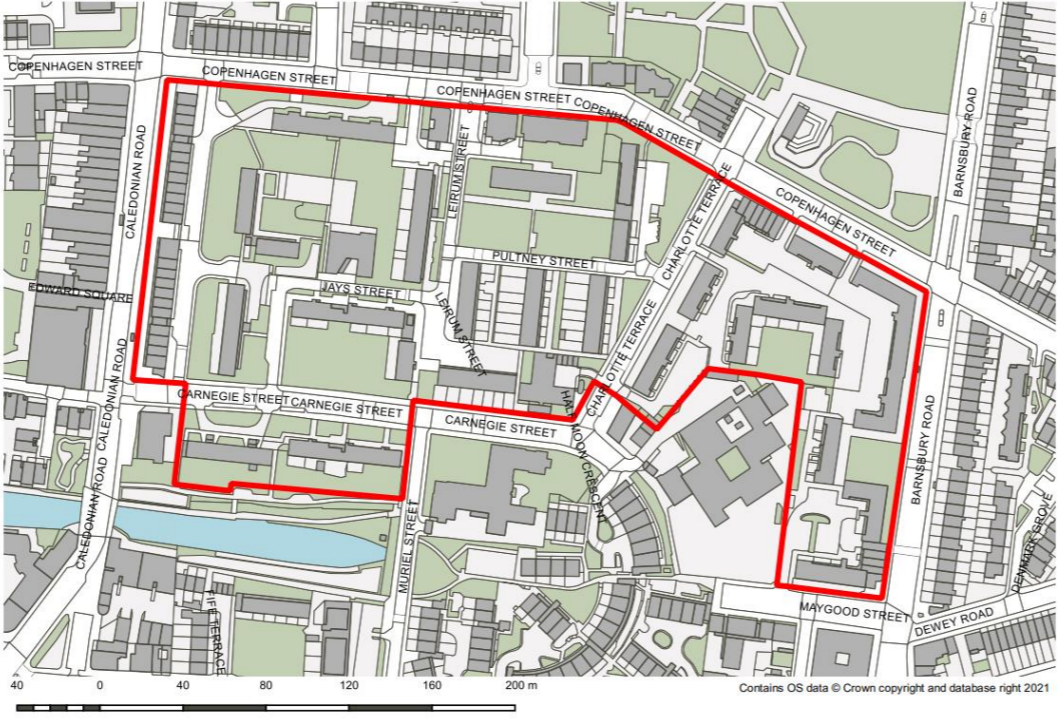
# 2 New Site Allocations

2.1 This sections sets out new Site Allocations that are proposed to be allocated to the plan. These sites are proposed to be included to further add to the boroughs housing supply over the plan period to help meet identified housing needs.

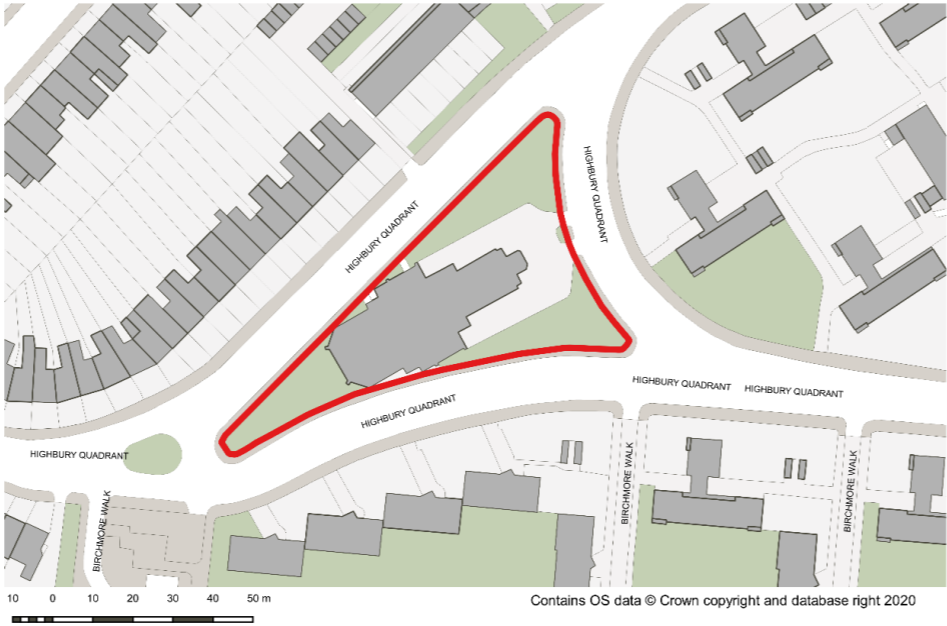
Page 126


Reference	Page	Site reference, site name and section	Proposed allocation	Main or minor modification												
SA-M01	29	KC8, Bemerton Estate South, Section 2	<p><b>KC8: Bemerton Estate South</b></p>  <table border="1"> <tr> <td>Address</td> <td><b>Bemerton Estate South</b></td> </tr> <tr> <td>Ownership</td> <td><b>London Borough of Islington</b></td> </tr> <tr> <td>Approximate size of site:</td> <td><b>14,623sqm</b></td> </tr> <tr> <td>Current/previous use</td> <td><b>Housing estate</b></td> </tr> <tr> <td>How the site was identified and relevant planning history</td> <td><b>Pre-application discussions.</b></td> </tr> <tr> <td>Allocation and justification</td> <td><b>Infill residential development including the provision of additional genuinely affordable housing. Re-provision of community space and provision of new retail/commercial spaces along Caledonian Road. Improved landscaping, lighting, seating, play spaces and security measures across the estate.</b></td> </tr> </table>	Address	<b>Bemerton Estate South</b>	Ownership	<b>London Borough of Islington</b>	Approximate size of site:	<b>14,623sqm</b>	Current/previous use	<b>Housing estate</b>	How the site was identified and relevant planning history	<b>Pre-application discussions.</b>	Allocation and justification	<b>Infill residential development including the provision of additional genuinely affordable housing. Re-provision of community space and provision of new retail/commercial spaces along Caledonian Road. Improved landscaping, lighting, seating, play spaces and security measures across the estate.</b>	Main
Address	<b>Bemerton Estate South</b>															
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How the site was identified and relevant planning history	<b>Pre-application discussions.</b>															
Allocation and justification	<b>Infill residential development including the provision of additional genuinely affordable housing. Re-provision of community space and provision of new retail/commercial spaces along Caledonian Road. Improved landscaping, lighting, seating, play spaces and security measures across the estate.</b>															

			<p>Site designations and constraints</p> <ul style="list-style-type: none"> <li>• <b>Adjacent to Barnsbury Conservation Area.</b></li> <li>• <b>Opposite a row of Grade II listed buildings (214-268 Caledonian Road).</b></li> </ul>		
			<p>Development considerations</p> <ul style="list-style-type: none"> <li>• <b>Any development should ensure high quality design and meet identified local housing needs.</b></li> <li>• <b>Development should maximise opportunities to improve urban greening and enhance green infrastructure. There are a number of trees on the estate which should be carefully considered as part of a comprehensive landscaping plan for the estate.</b></li> <li>• <b>Development should increase permeability with the creation of safe, direct, active and overlooked routes through the estate.</b></li> </ul>		
			<p>Estimated timescale</p> <p><b>2021/22-2025/26</b></p>		
SA-MO2	181	OIS27: York Way Estate, Section 9	<p><b>OIS27 York Way Estate</b></p> 		Main
			<p>Address</p> <p><b>York Way Estate, N7 9QA</b></p>		
			<p>Ownership</p> <p><b>City of London Corporation</b></p>		
			<p>Approximate size of site:</p> <p><b>19,109sqm</b></p>		
			<p>Current/previous use</p> <p><b>Residential estate with large areas of underused car parking (surface level and basement), perimeter hardstanding, amenity space and estate community centre.</b></p>		

			<p>How the site was identified and relevant planning history</p> <p>Allocation and justification</p> <p>Site designations and constraints</p> <p>Development considerations</p> <p>Estimated timescale</p>	<p><b>Pre-application discussions with the site owner</b></p> <p><b>Additional genuinely affordable housing can be accommodated on new blocks within the estate, improved play space provision, improvements to communal facilities and enhanced landscaping.</b></p> <ul style="list-style-type: none"> <li>• No site-specific designations in current plan</li> <li>• Adjacent to Caledonian Park which is a Borough Grade 1 SINCE and listed heritage asset (the railings, walls, gate piers and gates to the Park, running along Market Road and Shearling Way are Grade II listed and the Clock Tower within the park is Grade II* listed).</li> <li>• Adjacent to Grade II listed building, 24 North Road.</li> </ul> <ul style="list-style-type: none"> <li>• Any development should look to integrate with the character of the surrounding townscape as well as the existing estate and ensure high quality contextual design.</li> <li>• Any development should improve the quality of landscaping and permeability and enhance usability to create inclusive spaces.</li> </ul> <p><b>2021/22-2025/26</b></p>	
SA-MO3	182	OIS28: Barnsbury Estate, Section 9	<p><b>OIS28: Barnsbury Estate</b></p>  <p>Address <b>Barnsbury Estate</b></p> <p>Ownership <b>Newlon Housing Trust</b></p> <p>Approximate size of site: <b>55,764sqm</b></p>		Main

			Current/previous use	<b>Housing estate</b>		
			How the site was identified and relevant planning history	<b>Pre-application discussions</b>		
			Allocation and justification	<b>Refurbishment of Old Barnsbury estate and redevelopment of New Barnsbury estate for residential use, including the provision of additional new homes and genuinely affordable housing. Improvements to existing estate open spaces including the creation of a park on Pultney Street, and the provision of a new park on Carnegie Street with a community centre, play and exercise equipment and ball court. Improvements to landscaping, planting, lighting and security measures, play spaces, seating and bin and cycle storage across the estate.</b>		
			Site designations and constraints	<ul style="list-style-type: none"> <li>• <b>Adjacent to the Barnsbury and Regent's Canal West Conservation Areas.</b></li> <li>• <b>Adjacent to the Regent's Canal (West) Site of Importance for Nature Conservation (Metropolitan grade) and Regent's Canal Open Space.</b></li> <li>• <b>Adjacent to Thornhill Bridge Community Garden open space.</b></li> <li>• <b>Within Local Views 4 (view from Archway Road) and 5 (view from Archway Bridge).</b></li> <li>• <b>In close proximity to a terrace of Grade II listed buildings (16-62 Barnsbury Road).</b></li> <li>• <b>Regents Canal runs through Islington Tunnel underneath the Estate with the West Portal of the tunnel opening on Muriel Street. The Portal and Tunnel are Grade II listed.</b></li> <li>• <b>The site is partially within a local flood risk zone (LFRZ).</b></li> </ul>		
			Development considerations	<ul style="list-style-type: none"> <li>• <b>Any development should ensure high quality design and meet identified local housing needs with an emphasis on improving space standards within dwellings and reducing overcrowding.</b></li> <li>• <b>Development should increase permeability with the creation of safe, accessible, direct, active and overlooked routes through the estate from north to south (Copenhagen Street to Carnegie Street) and east to west (for example Pultney Street to Caledonian Road). The delivery of usable, inclusive spaces is a priority.</b></li> <li>• <b>Active frontages should be provided, particularly along Caledonian Road with the currently blocked access to the estate restored.</b></li> <li>• <b>Replacement commercial uses should be provided to maintain and enhance the retail and service</b></li> </ul>		

			<p>function of the Caledonian Road Local Shopping Area, alongside public realm improvements to Caledonian Road.</p> <ul style="list-style-type: none"> <li>• Opportunities to improve urban greening and enhance green infrastructure should be maximised as part of an integrated approach to landscape design. Development must be sensitive to the adjacent SINC.</li> <li>• Estate-wide improvements for pedestrians and cyclists should be provided, including improved connections along the Regent's Canal to deliver a safer pedestrian and cycling environment. The cycle hire station on Charlotte Terrace should be retained.</li> </ul>														
			<p>Estimated timescale <b>2021/22-2025/26; 2026/27-2030/31</b></p>														
SA-MO4	184	OIS29: Highbury Quadrant Congregational Church, Section 9	<p><b>OIS29: Highbury Quadrant Congregational Church</b></p> 		Main												
			<table border="1"> <tr> <td>Address</td> <td><b>Highbury Quadrant Congregational Church, Highbury Quadrant, N5 2TE</b></td> </tr> <tr> <td>Ownership</td> <td><b>The Congregational Federation Limited</b></td> </tr> <tr> <td>Approximate size of site:</td> <td><b>2,764sqm</b></td> </tr> <tr> <td>Current/previous use</td> <td><b>Place of worship and community space</b></td> </tr> <tr> <td>How the site was identified and relevant planning history</td> <td><b>Pre-application discussions and planning application P2020/2507/FUL</b></td> </tr> <tr> <td>Allocation and justification</td> <td><b>Re-provision of the Church and community space alongside residential development, including affordable housing. Landscaping and public realm improvements should be provided. Improvements to pedestrian</b></td> </tr> </table>	Address	<b>Highbury Quadrant Congregational Church, Highbury Quadrant, N5 2TE</b>	Ownership	<b>The Congregational Federation Limited</b>	Approximate size of site:	<b>2,764sqm</b>	Current/previous use	<b>Place of worship and community space</b>	How the site was identified and relevant planning history	<b>Pre-application discussions and planning application P2020/2507/FUL</b>	Allocation and justification	<b>Re-provision of the Church and community space alongside residential development, including affordable housing. Landscaping and public realm improvements should be provided. Improvements to pedestrian</b>		
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			<p>access to the site are also important given its 'island' location.</p> <p>Site designations and constraints</p> <ul style="list-style-type: none"> <li>The site contains a number of trees subject to Tree Preservation Orders (TPOs) which should be considered as part of any development proposals and landscaping plans for the site.</li> <li>In close proximity to Highbury Quadrant Island Open Space.</li> </ul> <p>Development considerations</p> <ul style="list-style-type: none"> <li>Development of the site represents an opportunity to bring an underused community facility back into beneficial use. Any net loss of social infrastructure must be justified in line with policy SC1.</li> <li>The site occupies a prominent location and warrants a well-designed building that optimises the development potential of the site alongside public realm improvements that will contribute to a high quality street environment.</li> <li>High quality residential accommodation must be provided, including genuinely affordable housing to meet identified local housing need.</li> </ul> <p>Estimated timescale <b>2021/22-2025/26</b></p>		
SA-MO5	185	OIS30: Cluse Court, Section 9	<p><b>OIS30: Cluse Court</b></p>  <p>Address <b>Cluse Court, St. Peter's Street, N1 8PD</b></p> <p>Ownership <b>London Borough of Islington</b></p> <p>Approximate size of site: <b>12,031sqm</b></p> <p>Current/previous use <b>Housing estate</b></p> <p>How the site was identified and <b>Pre-application discussions</b></p>		Main

			relevant planning history			
			Allocation and justification	<b>Additional residential development, including the provision of genuinely affordable housing. Improvements to play space, amenity space and landscaping across the estate.</b>		
			Site designations and constraints	<ul style="list-style-type: none"> <li>• <b>Adjacent to the Duncan Terrace/Colebrooke Row Conservation Area.</b></li> <li>• <b>In close proximity to the Waterside Play and Youth Project Adventure Playground.</b></li> <li>• <b>Opposite a terrace of Grade II listed buildings at 64-82 St. Peter's Street.</b></li> <li>• <b>In close proximity to the Regent's Canal open space.</b></li> </ul>		
			Development considerations	<ul style="list-style-type: none"> <li>• <b>Any development should ensure high quality design and meet identified local housing needs.</b></li> <li>• <b>Development should maximise opportunities to improve urban greening and enhance green infrastructure. There are a number of trees on the site which should be carefully considered as part of a comprehensive landscaping plan for the estate.</b></li> <li>• <b>Development should increase permeability with the creation of safe, direct, active and overlooked routes through the estate.</b></li> <li>• <b>Services provided by the Waterside Play and Youth Project should remain available throughout any development.</b></li> <li>• <b>The site falls within the Crossrail 2 safeguarding limits (March 2015). Liaison with Crossrail 2 should take place at an early stage as part of any development proposals for this site.</b></li> </ul>		
			Estimated timescale	<b>2021/22-2025/26</b>		





SA-MO6 187 OIS31: Hillside Estate, Section 9

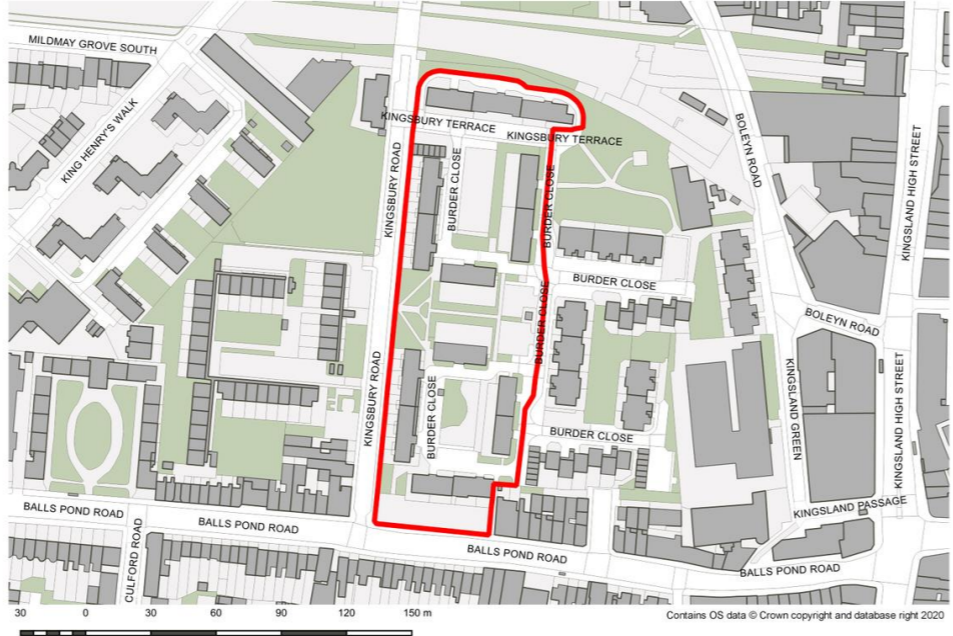


Address	<b>Hillside Estate, N19</b>
Ownership	<b>London Borough of Islington</b>
Approximate size of site:	<b>36,508sqm</b>
Current/previous use	<b>Housing estate</b>
How the site was identified and relevant planning history	<b>Pre-application discussions</b>
Allocation and justification	<b>Subject to justifying any loss of social infrastructure, additional residential development including the provision of genuinely affordable housing. Improvements to play space, amenity space and landscaping across the estate.</b>
Site designations and constraints	<ul style="list-style-type: none"> <li>• <b>Adjacent to the Whitehall Park Conservation Area.</b></li> <li>• <b>Hillside Park and Pilgrims Way Garden open spaces fall within the estate boundary.</b></li> <li>• <b>Adjacent to a locally listed building (131 St. John's Way).</b></li> <li>• <b>The Hazelville Road frontage of the site is opposite Elthorne Park and Sunnyside Gardens which is a SINC (Borough Grade 2).</b></li> </ul>
Development considerations	<ul style="list-style-type: none"> <li>• <b>Any development should ensure high quality design and meet identified local housing needs.</b></li> <li>• <b>Development should maximise opportunities to improve urban greening and enhance green infrastructure. There are a number of trees on the site which should be carefully considered as part of a</b></li> </ul>

Main

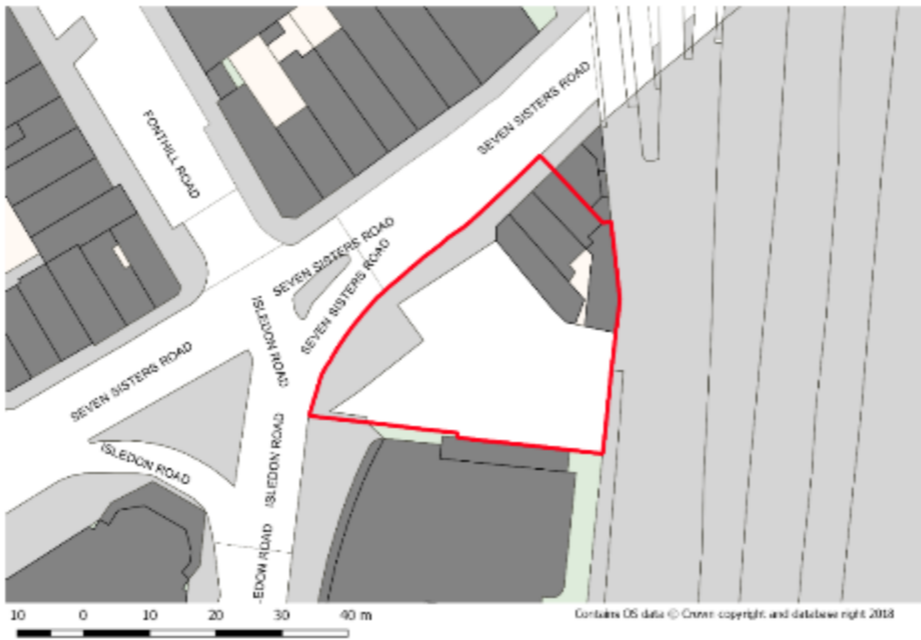
			<p>comprehensive landscaping plan for the estate. In addition any potential impacts on the designated open spaces falling within the site boundary should be carefully considered and mitigated.</p> <ul style="list-style-type: none"> <li>Development should increase permeability with the creation of safe, direct, active and overlooked routes through the estate. Opportunities to provide more active frontages to Pilgrims Way and St. John's Way should be explored.</li> </ul>																	
			<p>Estimated timescale <b>2021/22-2025/26</b></p>																	
SA-MO7	188	OIS32: New Orleans Estate, Section 9	<p><b>OIS32: New Orleans Estate</b></p> 																	
			<table border="1"> <tr> <td>Address</td> <td><b>New Orleans Estate, Hornsey Rise, N19</b></td> </tr> <tr> <td>Ownership</td> <td><b>London Borough of Islington</b></td> </tr> <tr> <td>Approximate size of site:</td> <td><b>24,058sqm</b></td> </tr> <tr> <td>Current/previous use</td> <td><b>Housing estate</b></td> </tr> <tr> <td>How the site was identified and relevant planning history</td> <td><b>Pre-application discussions</b></td> </tr> <tr> <td>Allocation and justification</td> <td><b>Additional residential development including the provision of genuinely affordable housing. Relocation and re-provision of the existing multi-use games area and community building. Improvements to play space, amenity space and landscaping across the estate.</b></td> </tr> <tr> <td>Site designations and constraints</td> <td> <ul style="list-style-type: none"> <li><b>In close proximity to the Whitehall Park Conservation Area.</b></li> <li><b>Opposite locally listed building 87 Sunnyside Road.</b></li> </ul> </td> </tr> <tr> <td>Development considerations</td> <td> <ul style="list-style-type: none"> <li><b>Any development should ensure high quality design and meet identified local housing needs.</b></li> </ul> </td> </tr> </table>	Address	<b>New Orleans Estate, Hornsey Rise, N19</b>	Ownership	<b>London Borough of Islington</b>	Approximate size of site:	<b>24,058sqm</b>	Current/previous use	<b>Housing estate</b>	How the site was identified and relevant planning history	<b>Pre-application discussions</b>	Allocation and justification	<b>Additional residential development including the provision of genuinely affordable housing. Relocation and re-provision of the existing multi-use games area and community building. Improvements to play space, amenity space and landscaping across the estate.</b>	Site designations and constraints	<ul style="list-style-type: none"> <li><b>In close proximity to the Whitehall Park Conservation Area.</b></li> <li><b>Opposite locally listed building 87 Sunnyside Road.</b></li> </ul>	Development considerations	<ul style="list-style-type: none"> <li><b>Any development should ensure high quality design and meet identified local housing needs.</b></li> </ul>	
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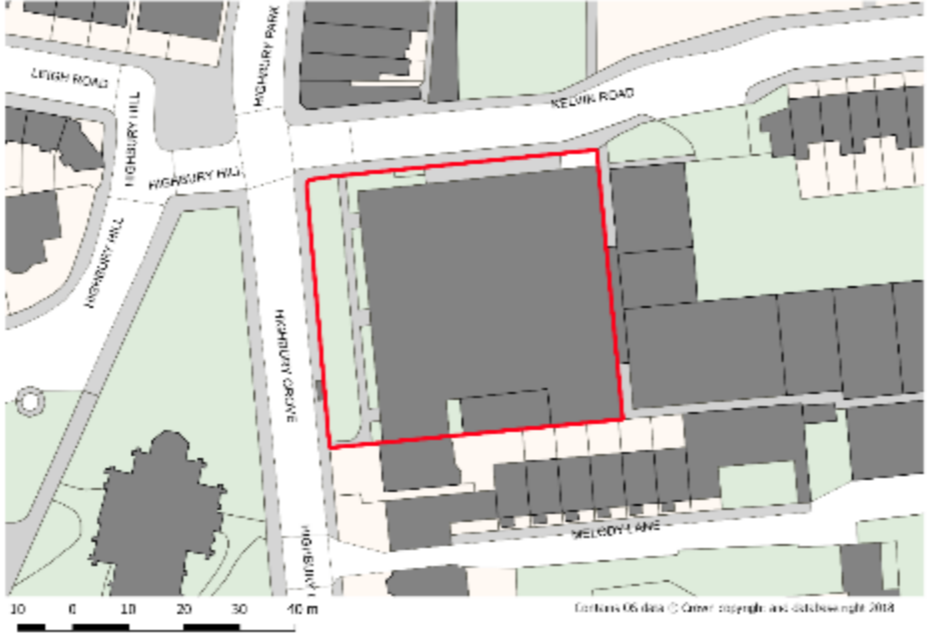
			<ul style="list-style-type: none"> <li>Any development should maximise opportunities to improve urban greening and enhance green infrastructure. There are a number of trees on the estate which should be carefully considered as part of a comprehensive landscaping plan for the estate.</li> <li>Development should increase permeability with the creation of safe, direct, active and overlooked routes through the estate.</li> <li>Development proposals should introduce a built edge and provide an active frontage onto Hornsey Rise.</li> </ul>													
			Estimated timescale <b>2021/22-2025/26</b>													
SA-MO8	189	OIS33: Drakeley Court and Aubert Court	<p><b>OIS33: Drakeley Court and Aubert Court</b></p> 	Main												
			<table border="1"> <tr> <td>Address</td> <td><b>Drakeley Court Estate and Aubert Court Estate</b></td> </tr> <tr> <td>Ownership</td> <td><b>London Borough of Islington</b></td> </tr> <tr> <td>Approximate size of site:</td> <td><b>18,542sqm</b></td> </tr> <tr> <td>Current/previous use</td> <td><b>Housing estate</b></td> </tr> <tr> <td>How the site was identified and relevant planning history</td> <td><b>Pre-application discussions</b></td> </tr> <tr> <td>Allocation and justification</td> <td><b>Additional residential development including the provision of genuinely affordable housing. Improving access to a new community facility in the heart of the estate that will improve visibility. Improved landscaping, including the creation of a new green square. Improved lighting, seating, play space and security measures across the estate.</b></td> </tr> </table>	Address	<b>Drakeley Court Estate and Aubert Court Estate</b>	Ownership	<b>London Borough of Islington</b>	Approximate size of site:	<b>18,542sqm</b>	Current/previous use	<b>Housing estate</b>	How the site was identified and relevant planning history	<b>Pre-application discussions</b>	Allocation and justification	<b>Additional residential development including the provision of genuinely affordable housing. Improving access to a new community facility in the heart of the estate that will improve visibility. Improved landscaping, including the creation of a new green square. Improved lighting, seating, play space and security measures across the estate.</b>	
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Ownership	<b>London Borough of Islington</b>															
Approximate size of site:	<b>18,542sqm</b>															
Current/previous use	<b>Housing estate</b>															
How the site was identified and relevant planning history	<b>Pre-application discussions</b>															
Allocation and justification	<b>Additional residential development including the provision of genuinely affordable housing. Improving access to a new community facility in the heart of the estate that will improve visibility. Improved landscaping, including the creation of a new green square. Improved lighting, seating, play space and security measures across the estate.</b>															

			<p>Site designations and constraints</p> <ul style="list-style-type: none"> <li>• <b>Adjacent to the Highbury Fields Conservation Area</b></li> <li>• <b>Adjacent to the Grade II listed Highbury Stadium site</b></li> </ul> <p>Development considerations</p> <ul style="list-style-type: none"> <li>• <b>Any development should ensure high quality design, meet identified local housing needs and respect the integrity of the existing estates where appropriate.</b></li> <li>• <b>Any development should maximise opportunities to improve urban greening and enhance green infrastructure. There are a large number of trees on the site which should be carefully considered as part of a comprehensive landscaping plan.</b></li> <li>• <b>Development should increase permeability and usability with the creation of safe, direct, active and overlooked routes through the estates. There is an opportunity to open up access from the estates to Avenell Road.</b></li> </ul> <p>Estimated timescale <b>2021/22-2025/26</b></p>		
SA-MO9	190	OIS34: Kerridge Court	<p><b>OIS34: Kerridge Court</b></p>  <p>Address <b>Kerridge Court, Balls Pond Road and Kingsbury Road, N1</b></p> <p>Ownership <b>London Borough of Islington</b></p> <p>Approximate size of site: <b>13,496sqm</b></p> <p>Current/previous use <b>Housing estate</b></p> <p>How the site was identified and relevant planning history <b>Pre-application discussions</b></p> <p>Allocation and justification <b>Additional residential development including the provision of genuinely affordable housing. Re-provision of the existing multi-use games area within a new,</b></p>		Main

				centrally located public space. Improvements to play space, amenity space and landscaping across the estate.		
			Site designations and constraints	<ul style="list-style-type: none"> <li>• The site is in close proximity to the Kingsbury Road Conservation Area, incorporating the Grade II listed Jewish Burial Ground, a designated open space which is also a SINC (borough grade 2).</li> <li>• Adjacent to the North London Line East SINC (borough grade 1).</li> </ul>		
			Development considerations	<ul style="list-style-type: none"> <li>• Any development should ensure high quality design and meet identified local housing needs.</li> <li>• Development should maximise opportunities to improve urban greening and enhance green infrastructure. There are a number of trees on the estate which should be carefully considered as part of a comprehensive landscaping plan for the estate.</li> <li>• Development should increase permeability with the creation of safe, direct, active and overlooked routes through the estate. Development offers an opportunity to improve east to west pedestrian routes through the estate (King Henry's Walk to Kingsland Road) and provide more legible access into the estate, particularly from Balls Pond Road.</li> <li>• Active frontages should be provided, particularly along Kingsbury Road and Balls Pond Road.</li> </ul>		
			Estimated timescale	2021/22-2025/26		

### 3 Site Allocations proposed to be removed

Reference	Page	Site reference, site name and section	Proposed allocation	Main or minor modification														
SA-MO10	115	FP10: Former George Robey Public House, 240 Seven Sisters Road	<p>Delete allocation FP10:</p> <p><del>FP10: Former George Robey Public House, 240 Seven Sisters Road</del></p>  <table border="1"> <tr> <td>Address</td> <td><del>Former George Robey Public House, 240 Seven Sisters Road, N4 2HX</del></td> </tr> <tr> <td>Ownership</td> <td><del>S.H. Developments (SS) Limited</del></td> </tr> <tr> <td>Approximate size of site</td> <td><del>1,311sqm</del></td> </tr> <tr> <td>Current/previous use</td> <td><del>Former public house (A4), site now vacant</del></td> </tr> <tr> <td>How the site was identified and relevant planning history</td> <td><del>Planning application P2017/3429/FUL</del></td> </tr> <tr> <td>Allocation and justification</td> <td><del>Hotel, with some business floorspace including affordable workspace.</del></td> </tr> <tr> <td>Site designations and constraints</td> <td><del> <ul style="list-style-type: none"> <li>• Finsbury Park Town Centre</li> <li>• Primary Shopping Area</li> <li>• Opposite Grade II* listed Rainbow Theatre, 232-238 Seven Sisters Road</li> </ul> </del></td> </tr> </table>	Address	<del>Former George Robey Public House, 240 Seven Sisters Road, N4 2HX</del>	Ownership	<del>S.H. Developments (SS) Limited</del>	Approximate size of site	<del>1,311sqm</del>	Current/previous use	<del>Former public house (A4), site now vacant</del>	How the site was identified and relevant planning history	<del>Planning application P2017/3429/FUL</del>	Allocation and justification	<del>Hotel, with some business floorspace including affordable workspace.</del>	Site designations and constraints	<del> <ul style="list-style-type: none"> <li>• Finsbury Park Town Centre</li> <li>• Primary Shopping Area</li> <li>• Opposite Grade II* listed Rainbow Theatre, 232-238 Seven Sisters Road</li> </ul> </del>	<p>Islington's 2019/20 Development Starts and Completions survey indicated that development of this site has been completed, with a hotel opening on the site in early 2020. As such it is considered the allocation is no longer required.</p>
Address	<del>Former George Robey Public House, 240 Seven Sisters Road, N4 2HX</del>																	
Ownership	<del>S.H. Developments (SS) Limited</del>																	
Approximate size of site	<del>1,311sqm</del>																	
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			<p><b>Development considerations</b></p> <ul style="list-style-type: none"> <li>Development should mitigate adverse impacts relating primarily to noise from the adjacent railway line.</li> <li>Improvements to the public realm should be sought to create an attractive and safe pedestrian environment fronting Seven Sisters Road.</li> <li>Design of the building should seek to increase levels of natural light in the basement to allow for a wider range of potential future uses.</li> <li>Upgrades to the wastewater network may be required as a result of development on this site (including as a result of cumulative impacts). Developers should engage with Thames Water at the earliest opportunity to determine whether wastewater capacity exists.</li> <li>Upgrades to the existing water network infrastructure may be required as a result of demand anticipated from development on this site (including as a result of cumulative impacts). Developers should engage with Thames Water at the earliest opportunity to determine the specific impact on infrastructure.</li> </ul>		
			<p><b>Estimated timescale</b> 2021/22-2025/26</p>		
SA-MO11	162	OIS9: Ladbroke House, 62-66 Highbury Grove	<p>Delete allocation OIS9:</p>  <p><b>OIS9: Ladbroke House, 62-66 Highbury Grove</b></p>		<p>Islington's 2019/20 Development Starts and Completions survey indicated that development of this site for educational purposes has been completed, with a new college operating from the building since September 2019. As such it is considered the allocation is no longer required.</p>
			<p><b>Address</b> Ladbroke House, 62-66 Highbury Grove, N5 2AD</p>		
			<p><b>Ownership</b> Education Funding Agency</p>		
			<p><b>Approximate size of site</b> 2,564sqm</p>		

			Current/previous use	Education (D1)		
			How the site was identified and relevant planning history	Planning permission P2017/3006/FUL		
			Allocation and justification	Retention of education use.		
			Site designations and constraints	<ul style="list-style-type: none"> <li>• <del>Highbury Fields Conservation Area</del></li> <li>• <del>Grade II listed Christ Church and Vicarage nearby</del></li> <li>• <del>Locally listed building adjacent at 60 Highbury Grove</del></li> <li>• <del>In close proximity to Highbury Grove Clock Tower Open Space and Highbury Fields Metropolitan Open Land and SINC.</del></li> </ul>		
			Development considerations	• <del>No site specific considerations, relevant policies apply.</del>		
			Estimated timescale	2021/22-2025/26		

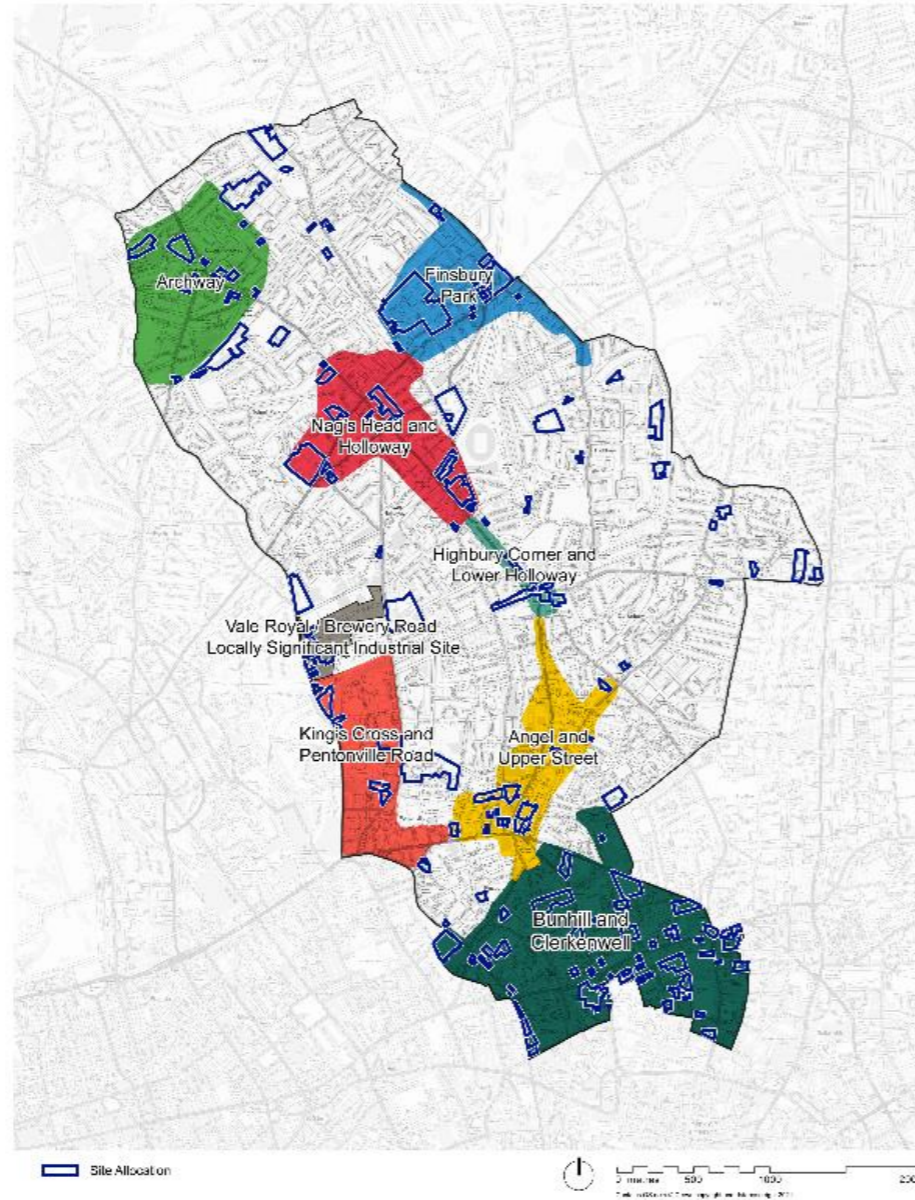


# 4 Modifications to Site Allocations

This section sets out proposed main and minor changes to Site Allocations

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
SA-MO12	1	Section 1, paragraph 1.2	<i>Amend text as follows:</i>  The Local Plan, including this document, covers the period 2021 <del>0</del> /22 <del>4</del> to 2035/36 (“the plan period”).	Updated detail	Minor
SA-MO13	1	Section 1, paragraph 1.4	<i>Amend second sentence as follows:</i>  As well as setting out the most appropriate uses for sites, site allocations also <b>detail</b> site-specific constraints and development considerations where relevant.	Error	Minor
SA-MO14	3	Section 1, paragraph 1.13	<i>Amend second sentence as follows:</i>  Whilst individual site allocations provide information on the designations relevant to a site - such as its <b>existing uses</b> , location within a conservation area or listed building status - applicants should refer to the appropriate chapter of the Local Plan for guidance on how such <del>a designation</del> <b>information</b> should be taken into account when developing planning applications, and how it will inform the planning decision making process.	To provide additional clarification in response to discussions with Sport England, as outlined in the Statement of Common Ground.	Minor
SA-MO15	4	Section 1, Figure 1.2: Islington Spatial Strategy areas and site allocations	<i>Replace Figure 1.2 with an updated plan showing the location of new site allocations KC8 and OIS27-OIS34 and removing completed allocations FP10 and OIS9.</i>	Updated detail	Minor

Page 1 of 1



SA-MO16 5

Section 1, Policy SA1

*Amend text as follows:*

A. The Local Plan will deliver its objectives and priorities by ensuring that sites allocated for specific uses **within the Site Allocations DPD and Bunhill and Clerkenwell AAP** actually deliver particular types of development in line with the allocations. Proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted.

B. **For the avoidance of doubt, where sites are allocated for a specific use which falls within a broader use class (i.e. office or retail uses which sit within use class E), the specific allocated use will be secured at planning stage. This is to ensure that development contributes towards meeting Islington's identified development needs.** Where ~~the~~ site allocations are expressed more broadly in

To clarify the Council's approach to determining development proposals for allocated sites in light of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and the potential impact of the new class E on Islington's ability to meet its evidenced priority development needs.

Main

			terms of use class, there <b>is more</b> <del>may be some</del> flexibility regarding <b>at</b> the range of acceptable uses, subject to compliance with all relevant Local Plan policies.																										
SA-MO17	5	Section 1, new paragraph 1.17	<p><i>Amend text as follows:</i></p> <p><b>The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the Regulations) came into effect on 1 September 2020. The most significant impact of the Regulations in relation to site allocations is the creation of a new use class ‘E’ comprising the former ‘A’ (shops, professional and financial services, restaurants and cafes, drinking establishments and hot foot takeaways) and ‘B1’ (business) uses, alongside parts of the former D1 (clinics, health centres, creches and day nurseries, day centres) and D2 (gyms and indoor recreation facilities) use classes.</b></p>	Explanatory text following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and the absorption of some former D1 uses into the new class E.	Main																								
SA-MO18	5	Section 1, new paragraph 1.18	<p><i>Amend text as follows:</i></p> <p><b>Changes of use within Class E are not classed as development and do not require planning permission. Whilst this introduces a level of flexibility that could have benefits in allowing landowners to respond to changing circumstances, it may also have consequences for the Council’s ability to meet its evidenced development need, particularly for office floorspace, as well as for the availability of services valued by residents such as shops, health clinics and day centres.</b></p>	Explanatory text following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and the absorption of some former D1 uses into the new class E.	Main																								
SA-MO19	5-6	Section 1, paragraph 1.19 (formerly paragraph 1.17)	<p><i>Amend text as follows:</i></p> <p>In order for the Local Plan to deliver its objectives and priorities, and given the shortage of available land in the borough <b>and the potential impacts of use class E</b>, it is necessary to ensure that sites allocated for specific uses actually deliver particular types of development in line with the allocations. Therefore, on the majority of sites the allocations explicitly identify which uses are required, e.g. offices, residential. These uses have been established through consideration of priority development needs and the context of each site; proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted. <b>In line with this, to ensure that priority uses are delivered, where an allocated use (e.g. offices or retail) falls within a broader use class the Council will require the specific allocated use to be secured at planning stage.</b></p>	To clarify the Council’s approach to determining development proposals for allocated sites in light of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Main																								
SA-MO20	6-11	Section 1, Table 1.1: List of strategic and non-strategic policies and allocations	<p><i>Amend table as follows:</i></p> <p><b>Table 1.1: List of strategic and non-strategic policies and allocations<sup>1</sup></b></p> <table border="1"> <thead> <tr> <th colspan="2">Site allocations</th> </tr> <tr> <th>Strategic policies</th> <th>Non-strategic policies</th> </tr> </thead> <tbody> <tr> <td>Policy SA1: Delivering development priorities</td> <td>None</td> </tr> <tr> <th>Strategic allocations</th> <th>Non-strategic allocations</th> </tr> <tr> <td>VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, 196-200 York Way, N7 9AX</td> <td>KC1: King’s Cross Triangle Site, bounded by York Way, East Coast Main Line &amp; Channel Tunnel Rail Link, N1</td> </tr> <tr> <td>VR2: 230-238 York Way, N7 9AG</td> <td>KC2: 176-178 York Way, N1 0AZ; 57-65 Randell’s Road, N1</td> </tr> <tr> <td>VR3: Tileyard Studios, Tileyard Road, N7 9AH</td> <td>KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1</td> </tr> <tr> <td>VR4: 20 Tileyard Road, N7 9AH</td> <td>KC4: Former York Road Station, 172-174 York Way</td> </tr> <tr> <td>VR5: 4 Brandon Road, N7 9AA</td> <td>KC5: Belle Isle Frontage, land on the east side of York Way</td> </tr> <tr> <td>VR7: 43-53 Brewery Road, N7 9QH</td> <td></td> </tr> <tr> <td>VR8: 55-61 Brewery Road, N7 9QH</td> <td></td> </tr> <tr> <td>VR9: Rebond House, 98-124 Brewery Road, N7 9BG</td> <td></td> </tr> </tbody> </table>	Site allocations		Strategic policies	Non-strategic policies	Policy SA1: Delivering development priorities	None	Strategic allocations	Non-strategic allocations	VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, 196-200 York Way, N7 9AX	KC1: King’s Cross Triangle Site, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1	VR2: 230-238 York Way, N7 9AG	KC2: 176-178 York Way, N1 0AZ; 57-65 Randell’s Road, N1	VR3: Tileyard Studios, Tileyard Road, N7 9AH	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1	VR4: 20 Tileyard Road, N7 9AH	KC4: Former York Road Station, 172-174 York Way	VR5: 4 Brandon Road, N7 9AA	KC5: Belle Isle Frontage, land on the east side of York Way	VR7: 43-53 Brewery Road, N7 9QH		VR8: 55-61 Brewery Road, N7 9QH		VR9: Rebond House, 98-124 Brewery Road, N7 9BG		Table updated to remove deleted allocations (FP10 and OIS9) and include new draft allocations (KC8 and OIS27 to OIS34).	Minor
Site allocations																													
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<sup>1</sup> There are further strategic and non-strategic sites identified in the Bunhill and Clerkenwell AAP.

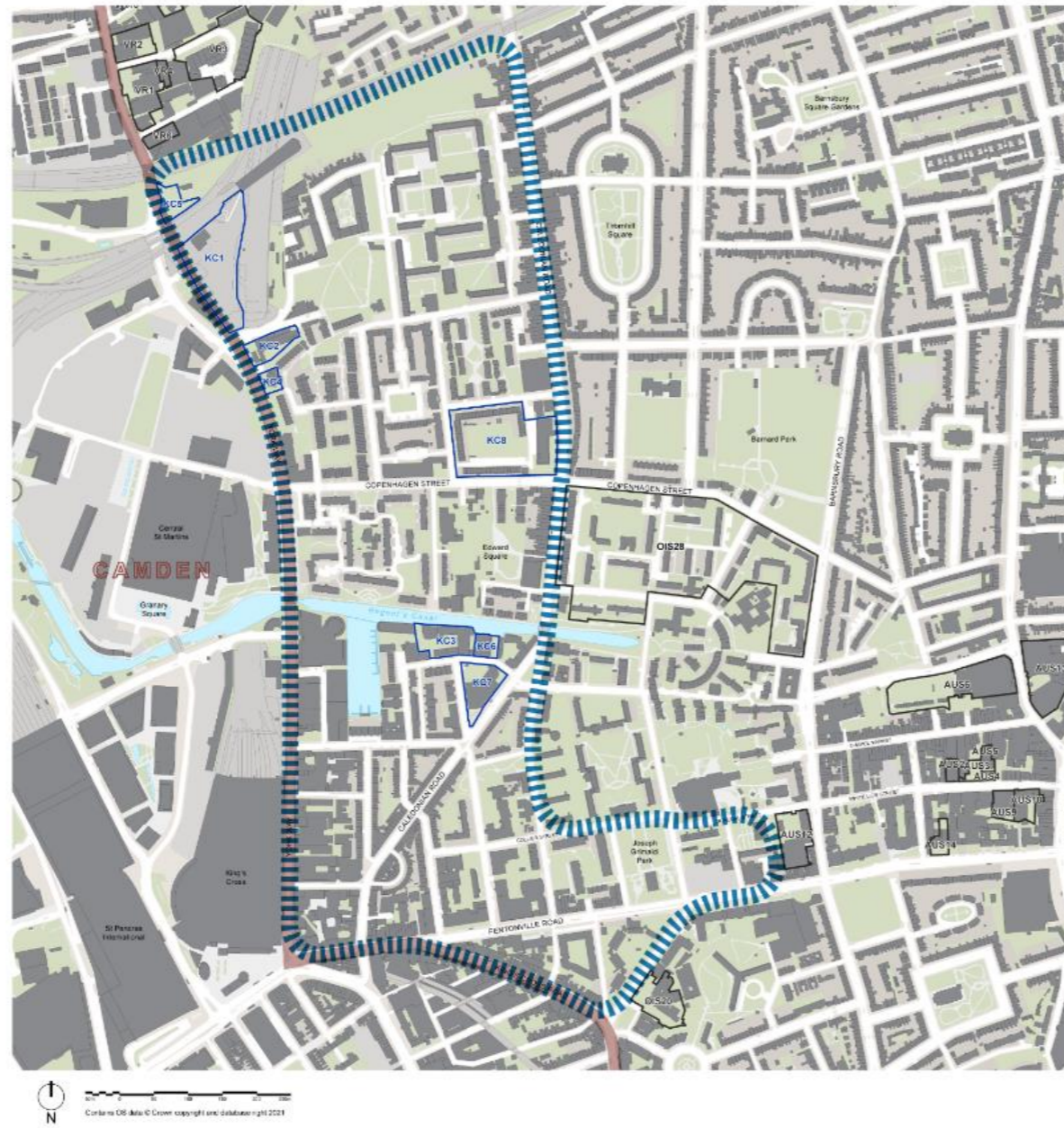
<p>VR10: 34 Brandon Road, London N7 9AA  AUS6: Sainsbury's, 31-41 Liverpool Road, N1 ORW  NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG  NH7: Holloway Prison, Parkhurst Road, N7 0NU  ARCH4: Whittington Hospital Ancillary Buildings, N19  ARCH5: Archway Campus, Highgate Hill, N19  OIS24: Pentonville Prison, Caledonian Road, N7 8TT</p>	<p>KC6: 8 All Saints Street, N1 9RJ  KC7: All Saints Triangle, Caledonian Rd, Kings Cross, London N1 9RR  <b>KC8: Bemerton Estate South</b>  VR6: The Fitzpatrick Building, 188 York Way, N7 9AD  AUS1: Royal Bank of Scotland, 40-42 Islington High Street, N1 8EQ  AUS2: Pride Court, 80-82 White Lion Street, N1 9PF  AUS3: Electricity substation, 84-89 White Lion Street, N1 9PF  AUS4: Land at 90-92 White Lion Street, N1 9PF  AUS5: 94 White Lion Street (BSG House), N1 9PF  AUS7: 1-7 Torrens Street, EC1V 1NQ  AUS8: 161-169 Essex Road, N1 2SN  AUS9: 10-14 White Lion Street, N1 9PD  AUS10: 1-9 White Lion Street, N1 9PD  AUS11: Proposed Collins Theatre, 13-17 Islington Green, N1 2XN  AUS12: Public Carriage Office, 15 Penton Street, N1 9PU  AUS13: N1 Centre, Parkfield Street, N1  AUS14: 46-52 Pentonville Road, N1 9HF  AUS15: Windsor Street Car Park, N1 8QF  AUS16: Angel Square, EC1V 1NY  NH2: 368-376 Holloway Road (Argos and adjoining shops), N7 6PN  NH3: 443-453 Holloway Road, N7 6LJ  NH4: Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP  NH5: 392A and 394 Camden Road, N7  NH6: 11-13 Benwell Road, N7 7BL  NH8: 457-463 Holloway Road, N7 6LJ  NH9: Islington Arts Factory, Parkhurst Road, N7 0SF  NH10: 45 Hornsey Road (including land and railway arches 1-21 to rear), N7 7DD and 252 Holloway Road, N7 6NE  NH11: Mamma Roma, 377 Holloway Road, N7 0RN  NH12: 379-391 Camden Road and 341-345 Holloway Road  NH13: 166-220 Holloway Road, N7  NH14: 236-250 Holloway Road, N7 6PP and 29 Hornsey Road, N7 7DD  FP1: City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street, N4  FP2: Morris Place/Wells Terrace (including Clifton House), N4 2AL</p>			
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			<p>FP3: Finsbury Park Station and Island, Seven Sisters Road, N4 2DH</p> <p>FP4: 129-131 &amp; 133 Fonthill Road &amp; 13 Goodwin Street, N4</p> <p>FP5: 1 Prah Road, N4 2RA</p> <p>FP6: Cyma Service Station, 201A Seven Sisters Road, N4 3NG</p> <p>FP7: Holloway Police Station, 284 Hornsey Road, N7 7QY</p> <p>FP8: 113-119 Fonthill Road, N4 3HH</p> <p>FP9: 221-233 Seven Sisters Road, N4 2DA</p> <p><del>FP10: Former George Robey Public House, 240 Seven Sisters Road, N4 2HX</del></p> <p>FP11: 139-149 Fonthill Road, N4 3HF</p> <p>FP12: 179-199 Hornsey Road, N7 9RA</p> <p>FP13: Tesco, 103-115 Stroud Green Road, N4 3PX</p> <p>FP14: Andover Estate bounded by Durham Road, Moray Road, Andover Road, Hornsey Road, Newington Barrow Way and Seven Sisters Road, London N7</p> <p>FP15: 216-220 Seven Sisters Road, N4 3NX</p> <p>ARCH1: Vorley Road/Archway Bus Station, N19</p> <p>ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ</p> <p>ARCH3: Archway Central Methodist Hall, Archway Close, N19 3TD</p> <p>ARCH6: Job Centre, 1 Elthorne Road, N19 4AL</p> <p>ARCH7: 207A Junction Road, N19 5QA</p> <p>ARCH8: Brookstone House, 4-6 Elthorne Road, N19 4AJ</p> <p>ARCH9: 724 Holloway Road, N19 3JD</p> <p>ARCH10: Elthorne Estate, Archway, N19 4AG</p> <p>ARCH11: Dwell House, 619-639 Holloway Road, N19 5SS</p> <p>ARCH12: 798-804 Holloway Road, N19 3JH</p> <p>HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner, N5 1RA</p> <p>HC2: Spring House, 6-38 Holloway Road, N7 8JL</p> <p>HC3: Highbury and Islington Station, Holloway Road, N5 1RA</p> <p>HC4: Dixon Clark Court, Canonbury Road, N1 2UR</p> <p>HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London, N5 1RN</p> <p>HC6: Land adjacent to 40-44 Holloway Road, N7 8JL</p> <p>OIS1: Leroy House, 436 Essex Road, N1 3QP</p> <p>OIS2: The Ivories, 6-8 Northampton Street, N1 2HY</p>		
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			<p>OIS3: Belgravia Workshops, 157-163 Marlborough Road, N19 4NF          OIS4: 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green          OIS5: Bush Industrial Estate, Station Road, N19 5UN          OIS6: Site of Harvist Under Fives, 100 Hornsey Road, N7 7NG          OIS7: Highbury Delivery Office, 2 Hamilton Lane, N5 1SW          OIS8: Legard Works, 17a Legard Road, N5 1DE  <del>OIS9: Ladbroke House, 62-66 Highbury Grove</del>          OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road, N19 4EH          OIS11: Park View Estate, Collins Road, N5          OIS12: 202-210 Fairbridge Road, N19 3HT          OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road, N5 1XB          OIS14: 17-23 Beaumont Rise, N19 3AA          OIS15: Athenaeum Court, 94 Highbury New Park, N5 2DN          OIS16: Harvist Estate Car Park, N7 7NJ          OIS17: Hathersage and Besant Courts, Newington Green, N1 4RF          OIS18: Wedmore Estate Car Park, N19 4NU          OIS19: 25-27 Horsell Road, N5 1XL          OIS20: Vernon Square, Penton Rise, WC1X 9EW          OIS21: Former railway sidings adjacent to and potentially including Caledonian Road Station          OIS22: 114 Balls Pond Road and 1 King Henry's Walk, N1 4NL          OIS23: 1 Lowther Road, N7 8US          OIS25: Charles Simmons House, 3 Margery Street, WC1X 0HP          OIS26: Amwell Street Water Pumping Station, EC1R  <b>OIS27: York Way Estate</b>  <b>OIS28: Barnsbury Estate</b>  <b>OIS29: Highbury Quadrant Congregational Church</b>  <b>OIS30: Cluse Court Estate</b>  <b>OIS31: Hillside Estate</b>  <b>OIS32: New Orleans Estate</b>  <b>OIS33: Drakeley Court Estate and Aubert Court Estate</b>  <b>OIS34: Kerridge Court Estate</b></p>												
SA-MO21	13	Section 1, Table 1.2: Site capacity assumptions	<p><u>Amend Table 1.2 as follows:</u></p> <p><b>Table 1.2: Site capacity assumptions</b></p> <table border="1"> <thead> <tr> <th></th> <th>Years 1-5</th> <th>Years 6-10</th> <th>Years 11-15</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Years 1-5	Years 6-10	Years 11-15	Total						Table 1.2 amended to reflect changes made to capacity assumptions following the grant of planning permission for certain sites, as well as the addition of	Main
	Years 1-5	Years 6-10	Years 11-15	Total											

				Homes (no.)	Offices (sqm)	Homes (no.)	Offices (sqm)	Homes (no.)	Offices (sqm)	Homes (no.)	Offices (sqm)	new site allocations and amendments to existing site allocations outlined in this schedule of modifications.	
			King's Cross and Pentonville Road	<del>200</del> 120	<del>900</del> 1,300	70	18,700	0	900	<del>270</del> 190	<del>20,500</del> 900		
			Vale Royal/Brewery Road LSIS	0	<del>4,900</del> 8,700	0	0	0	0	0	<del>4,900</del> 8,700		
			Angel and Upper Street	<del>1</del> 30	<del>9,000</del> 7,600	0	13,200	30	<del>5,400</del> 3,900	<del>4</del> 60	<del>27,6</del> 24,700		
			Nag's Head and Holloway	<del>95</del> 760	<del>15,500</del> 14,650	<del>34</del> 630	<del>8,800</del> 4,660	<del>8</del> 140	<del>6,6</del> 2,700	<del>1,530</del> 70	<del>30,900</del> 21,990		
			Finsbury Park	<del>13</del> 200	<del>5</del> 3,700	90	16,500	0	0	<del>290</del> 20	<del>22</del> 20,200		
			Archway	<del>44</del> 150	6,700	<del>7</del> 360	1,600	0	0	510	8,300		
			Highbury Corner and Lower Holloway	50	2,800	0	0	0	1,400	50	4,200		
			Other important sites	<del>260</del> 500	<del>10,3</del> 9,600	<del>260</del> 830	4,500	<del>370</del> 550	2,300	<del>890</del> 1,880	<del>17,1</del> 16,400		
			<b>Total</b>	<del>1,960</del> 1,900	<del>56,200</del> 54,580	<del>1,810</del> 1,970	<del>63,3</del> 59,070	<del>480</del> 720	<del>16,6</del> 11,200	<del>3,270</del> 4,580	<del>136,00</del> 124,780		
SA-MO22	14	Section 1, paragraph 1.32 (formerly paragraph 1.30)	Amend text of second sentence as follows:  Over the 15 year period from 2021/22 to 2035/36, Islington's total housing requirement will be 11,625 residential units <del>per annum</del> ; this means that 1,163 residential units will need to be identified on sites of one hectare or less, to accord with the NPPF.									Error	Minor
SA-MO23	15	Section 2, paragraph 2.2	Amend text of second sentence as follows:  These sites can contribute towards the Local Plan's priority development needs and provide opportunities to deliver key spatial objectives set out in policy SP2.									Error	Minor
SA-MO24	15	Section 2, Table 2.1: King's Cross and Pentonville Road Spatial Strategy area site allocations	Add new row to table as follows:  <b>Table 2.1: King's Cross and Pentonville Road Spatial Strategy area site allocations</b>									To include new King's Cross and Pentonville Road Spatial Strategy area Site Allocation (reference KC8: Bemerton Estate South)	Minor
			<b>Site reference</b>	<b>Site name</b>									
			KC1	King's Cross Triangle Site, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1									
			KC2	176-178 York Way, N1 OAZ; 57-65 Randell's Road, N1									
			KC3	Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1									
			KC4	Former York Road Station, 172-174 York Way, N1									
			KC5	Belle Isle Frontage, land on the east side of York Way									
			KC6	8 All Saints Street, N1 9RJ									
			KC7	All Saints Triangle, Caledonian Road, N1 9RR									
			<b>KC8</b>	<b>Bemerton Estate South</b>									
SA-MO25	16	Section 2, Figure 2.1: Location of King's	Replace Figure 2.1 to include new site allocation KC8 (Bemerton Estate South).									Updated details	Minor

Cross and Pentonville Road Spatial Strategy area site allocations



SA-MO26	16-17	Section 2, Site KC1: King's Cross Triangle Site, Allocation and justification	<p><i>Amend text of second paragraph as follows:</i></p> <p>Should the site be subject to further amendments or new applications, uses should include residential (in particular maximising genuinely affordable housing), business, retail (<del>within the A1, A2, A3 and A4 use classes</del>), leisure and community facilities, amenity and open space.</p>	To reflect the removal of the 'A' use classes from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Minor
SA-MO27	Various	Sections 2-9, Sites: KC2; KC3; KC4; KC5; KC6; KC7; VR1; VR3; VR4; VR5; VR6; VR7; VR8; VR9; VR10;	<p><i>Each of these site allocations has the same typo in the Development Considerations, amend text as follows:</i></p> <p>Upgrades to the wastewater network may be required as a result <b>of</b> development on this site</p>	Error	Minor



		AUS2; AUS3; AUS4; AUS5; AUS6; AUS7; AUS8; AUS9; AUS10; AUS13; AUS14; AUS15; AUS16; NH1; NH2; NH3; NH4; NH5; NH6; NH7; NH8; NH9; NH10; NH11; NH12; FP1; FP2; FP4; FP5; FP6; FP7; FP8; FP9; FP10; FP11; FP12; FP13; FP14; FP15; ARCH2; ARCH3; ARCH4; ARCH6; ARCH7; ARCH8; ARCH9; ARCH10; ARCH11; ARCH12; HC1; HC2; HC3; HC4; HC5; HC6; OIS1; OIS2; OIS3; OIS4; OIS6; OIS7; OIS10; OIS11; OIS12; OIS13; OIS14; OIS15; OIS16; OIS17; OIS18; OIS21; OIS22; OIS24; OIS26, Development Considerations			
SA-MO28	20-21	Section 2, KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, Ownership	<i>Amend text as follows:</i>  <del>BNP Paribas Securities Services Trust Company (Jersey) Limited</del> <b>Regent's Wharf Unit Trust</b>	Updated details	Minor
SA-MO29	20-21	Section 2, KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  Planning <del>application</del> <b>permission P2019/3481/FULP2016/4805/FUL (refused)</b>	Updated details	Minor
SA-MO30	20-21	Section 2, KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, Allocation and justification	<i>Amend second sentence as follows:</i>  Small scale commercial uses at ground floor level.	Error	Minor
SA-MO31	20-21	Section 2, KC3: Regents Wharf, 10,	<i>Amend text of third bullet point as follows:</i>	Error	Minor

		12, 14, 16 and 18 All Saints Street, Development Considerations	Early engagement with the Canal and River Trust is advised in order to avoid adverse impacts on the canal and its infrastructure, and to maximise positive impacts as a result of the site's <del>its</del> close proximity to the canal.		
SA-MO32	23-24	Section 2, KC5: Belle Isle Frontage, land on the east side of York Way, Allocation and justification	<i>Amend second sentence as follows:</i>  The front portion of the site should <del>ould</del> be business/office-led linking to the office cluster at King's Cross.	Error	Minor
SA-MO33	25-26	Section 2, KC6; 8 All Saints Street, Allocation and justification	<i>Amend second sentence as follows:</i>  Small scale commercial uses at ground floor level.	Error	Minor
SA-MO34	30-31	Section 3, VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Toad, 196-220 York Way, N7 9AX, How the site was identified and planning history	<i>Amend text as follows:</i> Pre-application discussions, <del>and</del> planning permission <b>P2019/3300/FUL P2015/1204/FUL and planning application P2019/3410/FUL (approved subject to conditions/S106 agreement)</b>	Updated details	Minor
SA-MO35	30-31	Section 3, VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Toad, 196-220 York Way, N7 9AX, Allocation and justification	<i>Amend text as follows:</i>  <del>Retention and intensification for industrial uses (B1(c), B2 and B8) to contribute toward the delivery of the strategic priorities for the Spatial Strategy area. The site has planning permission for a mix of B1(c), B8, flexible B1/B1(a) and A3 floorspace.</del>  <b>Should the site be subject to further amendments or new planning applications, any proposal should seek to retain and intensify industrial uses to contribute toward the delivery of the strategic priorities for the Spatial Strategy area in line with policies B2-B4 and SP3. Office floorspace will only be acceptable as part of a hybrid workspace scheme.</b>	To reflect recent planning decisions affecting the site.	Main
SA-MO36	32	Section 3, VR2: 230-238 York Way, Allocation and justification	<i>Amend text as follows:</i>  Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>and in line with policies B2-B4 and SP3.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO37	32	Section 3, VR2: 230-238 York Way, Development Considerations	<i>Amend first bullet point: Delete additional full stop.</i>	Error	Minor
SA-MO38	33	Section 3, VR3: Tileyard Studios,	<i>Amend text as follows:</i>	To reflect the removal of the 'B1' use class from the Town and	Minor

		Tileyard Road, N7 9AH, Allocation and justification	Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3</b> .	Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	
SA-MO39	34	Section 3, VR4: 20 Tileyard Road, Allocation and justification	<i>Amend text as follows:</i>  Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3</b> .	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO40	35	Section 3, VR5: 4 Brandon Road, Allocation and justification	<i>Amend text as follows:</i>  Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3</b> .	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO41	36-37	Section 3, VR6: The Fitzpatrick Building, 188 York Way, Allocation and justification	<i>Amend second sentence as follows:</i>  Should the site be subject to further amendments or new planning applications, any proposal should seek to retain and intensify industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3</b> .	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO42	38	Section 3, VR7: 43-43 Brewery Road, How the site was identified and	<i>Amend text as follows:</i>  Planning application <b>P2020/1891/FUL</b> <del>P2018/0136/FUL</del>	Updated details	Minor

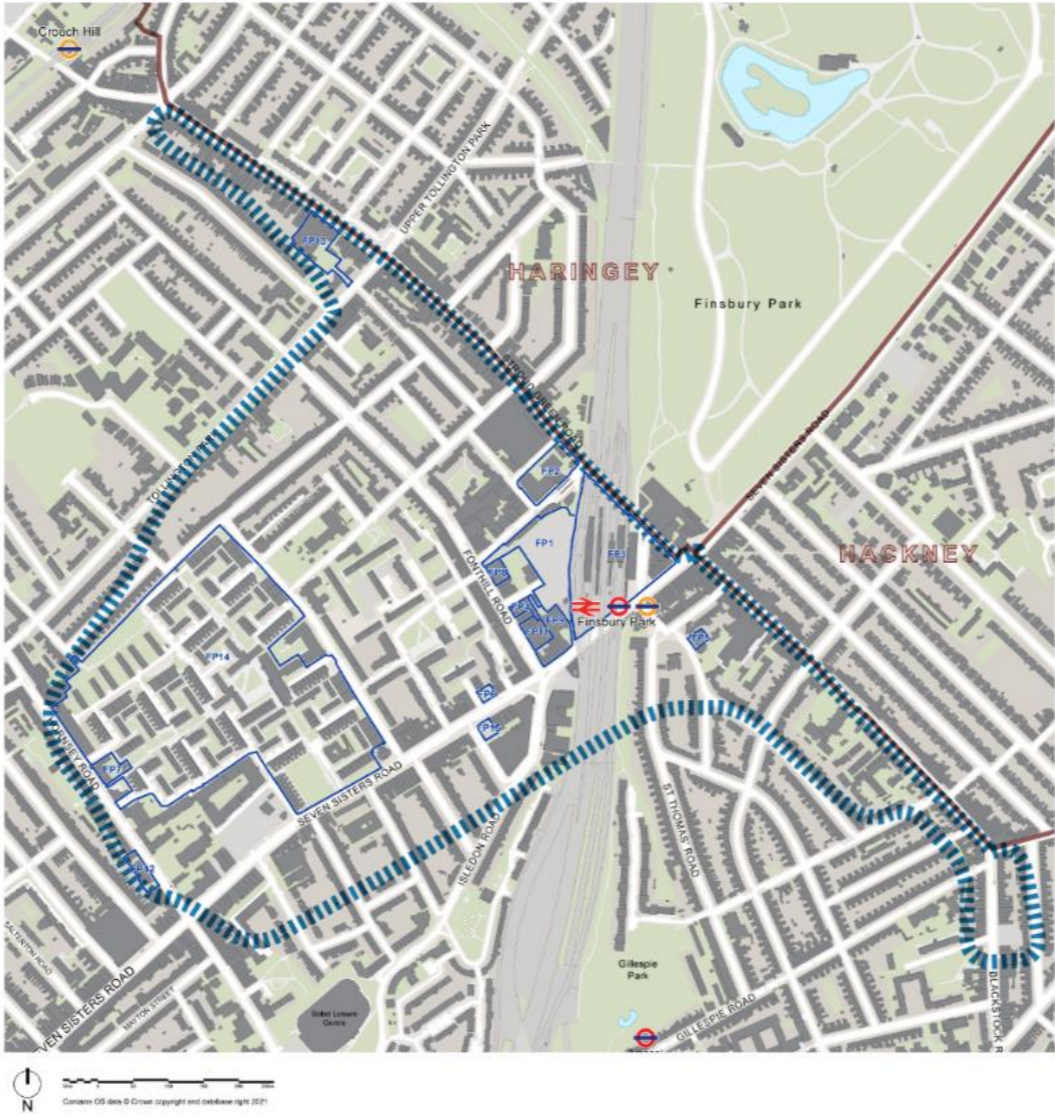
		relevant planning history			
SA-MO43	38	Section 3, VR7: 43-43 Brewery Road, Allocation and justification	<i>Amend text as follows:</i>  Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO44	39	Section 3, VR8: 55-61 Brewery Road, N7 9QH, Allocation and justification	<i>Amend second sentence as follows:</i>  Should the site be subject to further amendments or new planning applications, any proposal should seek to retain and intensify industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO45	40	Section 3, VR9: Rebond House, 98-124 Brewery Road, Allocation and justification	<i>Amend text as follows:</i>  Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor
SA-MO46	41	Section 3, VR10: 34 Brandon Road, Allocation and justification	<i>Amend text as follows:</i>  Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del> to contribute toward the delivery of the strategic priorities for the Spatial Strategy area <b>in line with policies B2-B4 and SP3.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The provision of industrial uses, including light industrial uses now falling within class E will continue to be prioritised at the site.	Minor

SA-MO47	46-47	Section 4, AUS2: Pride Court, 80-82 White Lion Street, How the site was identified and relevant planning history	<i>Amend text as follows:</i> Amended allocation (formerly part of AUS4) <b>and planning permission P2018/3351/FUL</b>	Updated details	Minor
SA-MO48	46-47	Section 4, AUS2: Pride Court, 80-82 White Lion Street, Allocation and justification	<i>Amend text as follows:</i> <b>The site has planning permission for the change of use of the ground floor to a restaurant, reconfiguration of the existing office floorspace and relocation of the two on-site residential units.</b> <b>Should the site be subject to further amendments or new applications, intensification of business floorspace should be prioritised.</b>	Updated in response to the recent grant of planning permission for the site.	Main
SA-MO49	54-55	Section 4, AUS6: Sainsbury's, 31-41 Liverpool Road, Development Considerations	<i>Delete empty fifth bullet point</i>	Error	Minor
SA-MO50	56-57	Section 4, AUS7: 1-7 Torrens Street, Site designations and constraints	<i>Amend text of third bullet point as follows:</i> In <del>a</del> close proximity to the Duncan Terrace/Colebrooke Row, Angel and New River Conservation Areas	Error	Minor
SA-MO51	58-59	Section 4, AUS8: 161-169 Essex Road, Allocation and justification	<i>Amend text as follows:</i> A mix of retail, culture and leisure uses are considered suitable on this site. There is an opportunity to develop the car park <del>in</del> <b>at</b> the rear of the site <b>for residential use</b> ; <del>any development on this part of the site should prioritise business floorspace, particularly offices.</del>	In response to representation R19.0185.	Main
SA-MO52	59-60	Section 4, AUS9: 10-14 White Lion Street, How the site was identified and relevant planning history	<i>Amend text as follows:</i> Planning <del>application</del> permission P2017/0297/FUL <del>(granted subject to completion of legal agreement, January 2018)</del>	Updated details	Minor
SA-MO53	64	Section 4, AUS12: Public Carriage Office, 15 Penton Street, Allocation and justification	<i>Amend text as follows:</i> Mixed-use development for re-provision and intensification of business floorspace with an element of residential uses	Error	Minor
SA-MO54	65-66	Section 4, AUS13: N1 Centre, Parkfield Street, How the site was identified and relevant planning history	<i>Amend text as follows:</i> Planning <del>application</del> permission P2017/2964/FUL	Updated details	Minor
SA-MO55	67-68	Section 4, AUS14: 46-52 Pentonville Road, How the site was identified and	<i>Amend text as follows:</i> Planning <del>application</del> permission P2017/3100/FUL	Updated details	Minor

		relevant planning history			
SA-MO56	67-68	Section 4, AUS14: 46-52 Pentonville Road, Allocation and justification	<i>Amend text of second sentence as follows:</i>  Should the site be subject to further amendments or new applications <del>should prioritise</del> business floorspace <b>should be prioritised</b> .	Error	Minor
SA-MO57	74-75	Section 5, NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, Allocation and justification	<i>Amend text as follows:</i>  The site has potential for a significant <del>retail-led</del> mixed-use development, with <b>a large quantum of residential use, retention of and improvements to existing retail floorspace provision of improved retail provision (in terms of quantum and quality) as well as and</b> a significant amount of new office floorspace; <del>residential accommodation may be acceptable on the upper floors, subject to amenity issues being addressed</del> . Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and enhancement of the covered market will be supported.	It is considered that seeking a greater amount of residential accommodation would be appropriate at the site, whilst retaining and improving retail floorspace.	Main
SA-MO58	74-75	Section 5, NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, Estimated timescale	<i>Amend as follows:</i>  2026/27 <del>1/22</del> -2030/31 <del>25/26</del> ; <b>2031/32-2035/36</b>	Updated details	Minor
SA-MO59	78	Section 5, NH3: 443-453 Holloway Road, How the site was identified and relevant planning history	<i>Amend as follows:</i>  2013 Site Allocation (NH4) and planning permission <del>P2013/3213/FUL (now lapsed)</del> . <b>New planning P2019/2839/FUL (granted on appeal)</b> . <del>application P2018/1812/FUL (yet to be determined)</del>	Updated details	Minor
SA-MO60	78	Section 5, NH3: 443-453 Holloway Road, Allocation and justification	<i>Amend second sentence as follows:</i>  Existing arts/cultural uses <del>should</del> be retained.	Error	Minor
SA-MO61	79	Section 5, NH4: Territorial Army Centre, 65-69 Parkhurst Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  2013 Site Allocation (NH5) and <del>refused planning applications</del> <b>planning permission P2020/0648/FUL</b>	Updated details	Minor
SA-MO62	80-81	Section 5, NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  2013 Site Allocation (NH9). <del>Extant p</del> <b>P</b> lanning permission for 392A Camden Road and 1 Hillmarton Road ( <del>permission</del> references P121287 and P121288)	Updated details	Minor
SA-MO63	83-84	Section 5, NH7: Holloway Prison,	<i>Amend text as follows:</i>  <del>Ministry of Justice</del> <b>Peabody Group</b>	Updated details	Minor

		Parkhurst Road, Ownership																			
SA-MO64	83-84	Section 5, NH7: Holloway Prison, Parkhurst Road, How the site was identified and relevant planning history	Amend text as follows: GLA SHLAA Call for Sites 2017, <del>and</del> discussions with the Ministry of Justice <b>and pre-application discussions</b>	Updated details	Minor																
SA-MO65	85	Section 5, NH8: 457-463 Holloway Road, Site designations and constraints	Amend text of third bullet point as follows: <ul style="list-style-type: none"> <li>Priority Employment Location</li> </ul>	Error	Minor																
SA-MO66	85	Section 5, NH8: 457-463 Holloway Road, Development Considerations	Amend first sentence of first bullet point as follows: <ul style="list-style-type: none"> <li>The building is currently in a state of disrepair, with various inappropriate and unsympathetic additions/actions which affect and detract from the building's contribution to the conservation area.</li> </ul>	Error	Minor																
SA-MO67	88-89	Section 5, NH10: 45 Hornsey Road and 252 Holloway Road, Ownership	Amend text as follows: Ashburton Trading Limited; <b>Network Rail</b>	Update	Minor																
SA-MO68	88-89	Section 5, NH10: 45 Hornsey Road and 252 Holloway Road, Development Considerations	Amend text of fifth bullet point as follows: The <b>close</b> proximity of the site to the busy Holloway Road and railway tracks mean that the design of conventional residential and/or student accommodation should address and mitigate noise and air quality issues.	Error	Minor																
SA-MO69	91-92	Section 5, NH12: 379-391 Camden Road and 341-345 Holloway Road, Approximate size of site	Amend as follows: <del>1,562,697</del> sqm	Updated details	Minor																
SA-MO70	95	Section 6, Table 6.1 Finsbury Park Spatial Strategy area site allocations	Amend table 6.1 as follows:  <p style="text-align: center;"><b>Table 6.1: Finsbury Park Spatial Strategy area site allocations</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Site reference</th> <th>Site name</th> </tr> </thead> <tbody> <tr> <td>FP1</td> <td>City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street, N4</td> </tr> <tr> <td>FP2</td> <td>Morris Place/Wells Terrace (including Clifton House), N4 2AL</td> </tr> <tr> <td>FP3</td> <td>Finsbury Park Station and Island, Seven Sisters Road, N4 2DH</td> </tr> <tr> <td>FP4</td> <td>129-131 &amp; 133 Fonthill Road &amp; 13 Goodwin Street, N4</td> </tr> <tr> <td>FP5</td> <td>1 Prah Road, N4 2RA</td> </tr> <tr> <td>FP6</td> <td>Cyma Service Station, 201A Seven Sisters Road, N4 3NG</td> </tr> <tr> <td>FP7</td> <td>Holloway Police Station, 284 Hornsey Road, N7 7QY</td> </tr> </tbody> </table>	Site reference	Site name	FP1	City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street, N4	FP2	Morris Place/Wells Terrace (including Clifton House), N4 2AL	FP3	Finsbury Park Station and Island, Seven Sisters Road, N4 2DH	FP4	129-131 & 133 Fonthill Road & 13 Goodwin Street, N4	FP5	1 Prah Road, N4 2RA	FP6	Cyma Service Station, 201A Seven Sisters Road, N4 3NG	FP7	Holloway Police Station, 284 Hornsey Road, N7 7QY	Table updated to remove developed site FP10 (Former George Robey Public House).	Minor
Site reference	Site name																				
FP1	City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street, N4																				
FP2	Morris Place/Wells Terrace (including Clifton House), N4 2AL																				
FP3	Finsbury Park Station and Island, Seven Sisters Road, N4 2DH																				
FP4	129-131 & 133 Fonthill Road & 13 Goodwin Street, N4																				
FP5	1 Prah Road, N4 2RA																				
FP6	Cyma Service Station, 201A Seven Sisters Road, N4 3NG																				
FP7	Holloway Police Station, 284 Hornsey Road, N7 7QY																				

			FP8	113-119 Fonthill Road, N4 3HH		
			FP9	221-233 Seven Sisters Road, N4 2DA		
			<del>FP10</del>	<del>Former George Robey Public House, 240 Seven Sisters Road, N4 2HX</del>		
			FP11	139-149 Fonthill Road, N4 3HF		
			FP12	179-199 Hornsey Road, N7 9RA		
			FP13	Tesco, 105-119 Stroud Green Road, N4 3PX		
			FP14	Andover Estate bounded by Durham Road, Moray Road, Andover Road, Hornsey Road, Newington Barrow Way and Seven Sisters Road, London N7		
			FP15	216-220 Seven Sisters Road, N4 3NX		

SA-MO71	96	Section 6, Figure 6.1: Location of Finsbury Park Spatial Strategy area site allocations	<p>Replace Figure 6.1 to remove completed site allocation FP10 (Former George Robey Public House).</p> 			Updated details	Minor
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SA-MO72	101-102	Section 6, FP3: Finsbury Park Station and Island, Seven	<p>Amend as follows:  <span style="color: red;">4,783</span><span style="color: blue;">18,732</span>sqm</p>			Error	Minor
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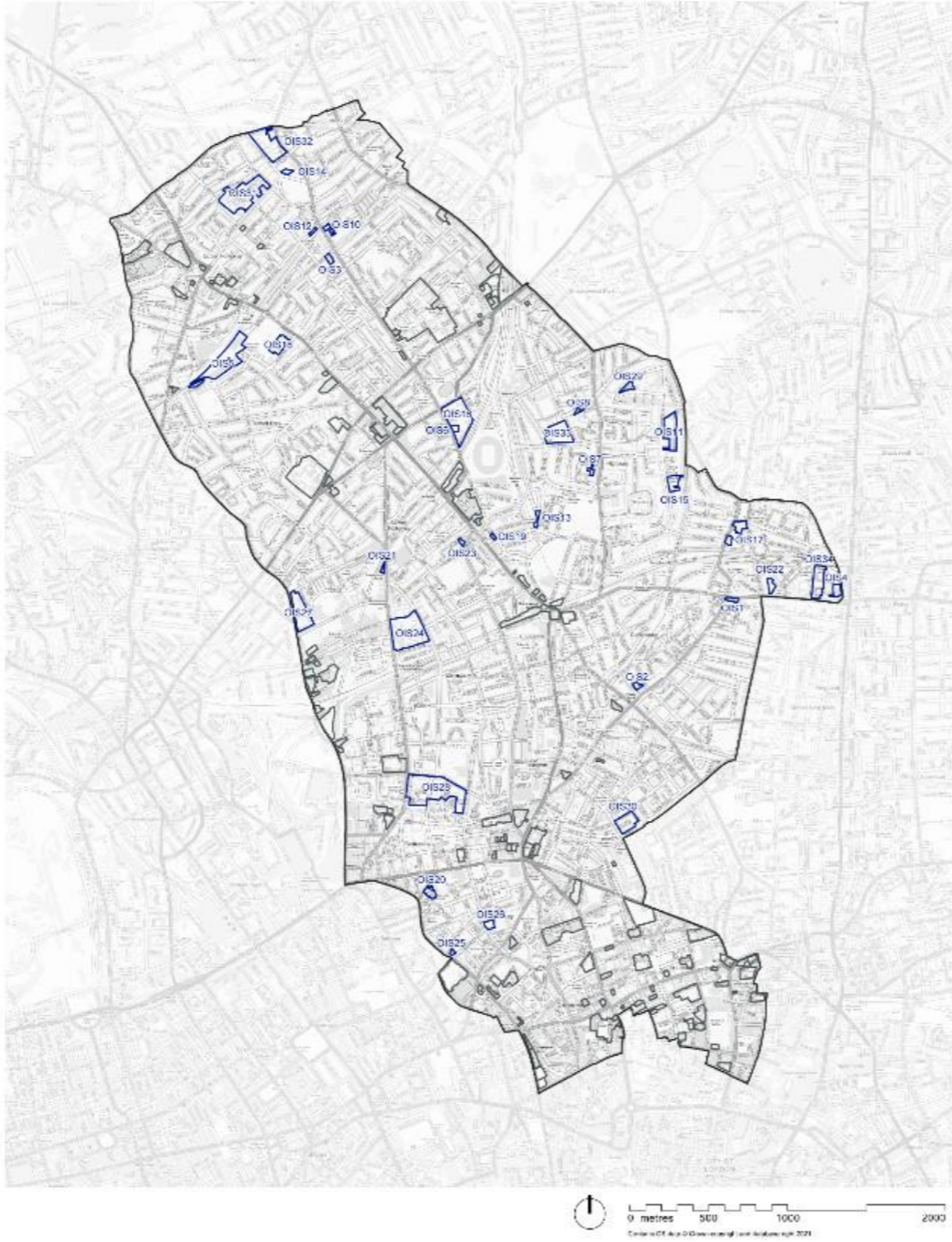


		Sisters Road, Approximate size of site			
SA-MO73	103-104	Section 6, FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street, How the site was identified and relevant planning history	<i>Amend as follows:</i>  2013 Site Allocation (FP2) <b>and planning application P2020/2722/FUL</b>	Updated details	Minor
SA-MO74	105	Section 6, FP5: 1 Prah Road, Allocation and justification	<i>Amend as follows:</i>  <del>Business floorspace, particularly workspace suitable for SMEs.</del> <b>Residential development and public realm improvements.</b>	In response to representation R19.0174. Whilst residential use of this site is deemed to be appropriate, it should be noted that the landowner's representations regarding a large HMO/build-to-rent type scheme remains contrary to policy.	Main
SA-MO75	108	Section 6, FP8: 113-119 Fonthill Road, Site designations and constraints	<i>Amend third bullet point as follows:</i>  • <b>Close P</b> proximity to locally listed building at 4-5 Goodwin Street	Error	Minor
SA-MO76	113	Section 6, FP11: 139-149 Fonthill Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  Planning <b>permission P2019/2563/FUL</b> <del>application P2017/0333/FUL (refused; dismissed on appeal)</del>	Updated details	Minor
SA-MO77	114	Section 6, FP12: 179-199 Hornsey Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  <b>Planning permission P2018/1452/FUL</b> <del>application P2017/2175/FUL</del>	Updated details	Minor
SA-MO78	121-122	Section 7, ARCH1: Vorley Road/Archway Bus Station, Allocation and justification	<i>Amend text as follows:</i>  Residential led development with <b>social and community infrastructure uses.</b> <del>an</del> <b>There may also be potential for an</b> element of business floorspace including affordable workspace and space suitable for SMEs .	The site has been identified as having potential to support social infrastructure uses.	Main
SA-MO79	124-125	Section 7, ARCH3: Archway Central Methodist Hall, Archway Close, Ownership	<i>Amend as follows:</i>  Trustees for Methodist Church; Flowervale Properties <b>UK</b> Limited; London Underground Limited	Updated details	Minor
SA-MO80	124-125	Section 7, ARCH3: Archway Central Methodist Hall, Archway Close, Current/previous use	<i>Amend text as follows:</i>  Vacant community space <del>(D1/D2)</del>	In response to changes to the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Minor

SA-MO81	124-125	Section 7, ARCH3: Archway Central Methodist Hall, Archway Close, N19 3TD, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  Amended allocation (formerly part of 2013 Site Allocation ARCH1), <b>planning application P2018/4068/FUL (refused on appeal) and pre-application discussions</b>	Updated details	Minor
SA-MO82	126	Section 7, ARCH4: Whittington Hospital Ancillary Buildings, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  2013 Site Allocation (ARCH2) <b>and planning permission P2020/0687/FUL</b>	Updated details	Minor
SA-MO83	126	Section 7, ARCH4: Whittington Hospital Ancillary Buildings, Estimated timescale	<i>Amend as follows:</i>  <del>2031/32-2035/36</del> <b>2026/27-2030/31</b>	Error – updated to match information in the housing trajectory	Minor
SA-MO84	131	Section 7, ARCH5: Archway Campus, Highgate Hill, Current/ previous use	<i>Amend text as follows:</i>  <del>Education, clinical and health services research (D1)</del> <b>Site currently vacant, formerly used by University College London/Whittington Health NHS Trust</b>	Updated details	Minor
SA-MO85	127	Section 7, ARCH5: Archway Campus, Highgate Hill, Allocation and justification	<i>Amend text as follows:</i>  Residential-led <del>mixed-use</del> development, <b>with some commercial and with</b> community and social infrastructure uses <b>on the ground floor.</b>  <b>Given the very limited supply of development land in Islington policies strongly prioritise the most urgent need, which is conventional housing. An element of student housing may be acceptable as part of the development mix, provided that the quantum of student accommodation is not held to weigh against both the provision of priority conventional housing on the site, and provided that it ensures that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant.</b>	To increase flexibility to facilitate delivery of this site.	Main
SA-MO86	127	Section 7, ARCH5: Archway Campus, Highgate Hill, Development Considerations	<i>Delete third bullet point:</i>  <del>• Any net loss of existing social infrastructure must be justified in line with policy SC1</del>	Requirement captured by SDMP policy SC1	Minor
SA-MO87	127	Section 7, ARCH5: Archway Campus, Estimated timescale	<i>Amend as follows:</i>  <del>2021/22-2025/26</del> <b>2026/27-2030/31</b>	Timescale updated to reflect information from landowner.	Minor
SA-MO88	128	Section 7, ARCH6: Job Centre, 1 Elthorne Road, Ownership	<i>Amend text as follows:</i>  <del>Department for Environment, Food and Rural Affairs</del> <b>Gladquote Ltd.</b>	Updated details	Minor
SA-MO89	128	Section 7, ARCH6: Job Centre, 1 Elthorne Road,	<i>Amend text as follows:</i>	Error	Minor

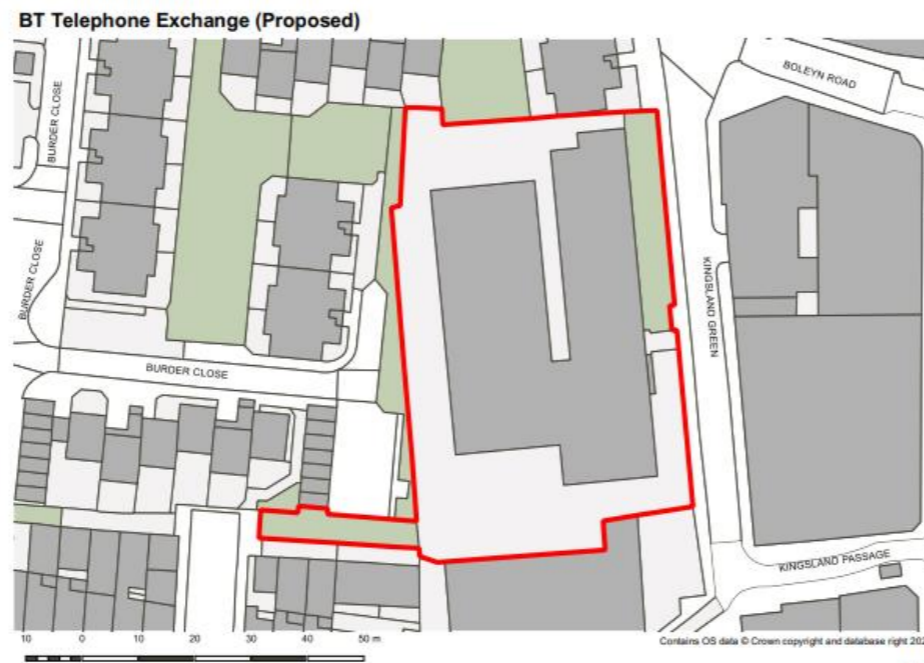
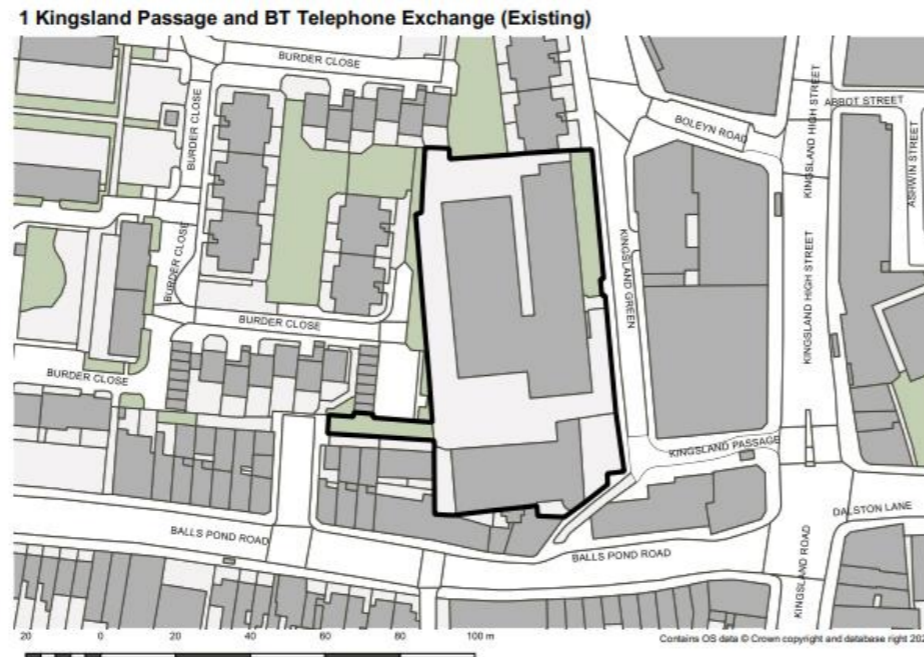
		Allocation and justification	Business led mixed-use development, including provision of SME workspace-, and <del>with</del> an element of residential use.										
SA-MO90	128	Section 7, ARCH6: Job Centre, 1 Elthorne Road, Estimated timescale	<i>Amend as follows:</i> <del>2021/22-2025/26</del> 2026/27-2030/31	Updated to reflect information from landowner	Minor								
SA-MO91	129	Section 7, ARCH7: 207A Junction Road, Development considerations	<i>Amend first bullet point as follows:</i> <ul style="list-style-type: none"> <li>This backland site is constrained by <b>close</b> proximity to existing residential uses and the railway line. Development must have regard to the potential impact on the nearby residential properties, and impacts on future residential occupiers in terms of noise and vibration.</li> </ul>	Error	Minor								
SA-MO91	129	Section 7, ARCH8: Brookstone House, 4-6 Elthorne Road	<i>Amend site reference and site address as follows:</i> <b>Bellside House, 4 Elthorne Road and</b> Brookstone House, <del>4-6</del> Elthorne Road	Updated details	Minor								
SA-MO92	131	Section 7, ARCH9: 724 Holloway Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i> Planning <del>applications: P2016/4533/FUL and P2015/4816/FUL</del> permission P2018/3191/FUL	Updated details	Minor								
SA-MO93	133	Section 7, ARCH12: 798-804 Holloway Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i> Planning permission P2016/4529/FUL <b>and P2017/4826/S73</b>	Updated details	Minor								
SA-MO94	142	Section 8, HC4: Dixon Clark Court, How the site was identified and relevant planning history	<i>Amend text as follows:</i> Planning <del>application</del> <b>permission</b> P2017/2936/FUL ( <del>granted subject to completion of legal agreement, March 2018</del> )	Updated details	Minor								
SA-MO95	143-144	Section 8, HC5: 2 Holloway Road and 4 Highbury Crescent, Allocation and justification	<i>Amend text as follows:</i> Mixed use commercial and residential redevelopment. Retail frontage onto Holloway <b>Road</b> to be retained. Any proposal should include business floorspace.	Error	Minor								
SA-MO96	146-147	Section 9, Table 9.1: Other important site allocations	<i>Amend table 9.1 as follows:</i>  <b>Table 9.1: Other important site allocations</b> <table border="1"> <thead> <tr> <th>Site reference</th> <th>Site name</th> </tr> </thead> <tbody> <tr> <td>OIS1</td> <td>Leroy House, 436 Essex Road, N1 3QP</td> </tr> <tr> <td>OIS2</td> <td>The Ivories, 6-8 Northampton Street, N1 2HY</td> </tr> <tr> <td>OIS3</td> <td>Belgravia Workshops, 157-163 Marlborough Road, N19 4NF</td> </tr> </tbody> </table>	Site reference	Site name	OIS1	Leroy House, 436 Essex Road, N1 3QP	OIS2	The Ivories, 6-8 Northampton Street, N1 2HY	OIS3	Belgravia Workshops, 157-163 Marlborough Road, N19 4NF	Table updated to remove deleted allocation (OIS9: Ladbroke House) and include draft new allocations OIS27 to OIS34.	Minor
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SA-MO97	148	Section 9, Figure 9.1: Location of site allocations outside	Replace Figure 9.1 to include new site allocations OIS27-OIS34 and remove completed allocation OIS9 (Ladbroke House).	Updated details	Minor																																																														

		<p>Spatial Strategy areas</p>			
<p>SA-MO98</p>	<p>149</p>	<p>Section 9, OIS1: Leroy House, 436 Essex Road, How the site was identified and relevant planning history</p>	<p><i>Amend text as follows:</i>  2013 Site Allocation (OIS3); planning <del>application</del> <b>permission</b> P2017/3081/FUL (<del>registered</del>)</p>	<p>Updated details</p>	<p>Minor</p>
<p>SA-MO99</p>	<p>152- 153</p>	<p>Section 9, OIS4: 1 Kingsland Passage</p>	<p><i>Amend site name:</i> OIS4: <del>1 Kingsland Passage and</del> <b>t</b>The BT Telephone Exchange, Kingsland Green</p>	<p>A recent grant of planning permission for 1 Kingsland</p>	<p>Main</p>

and the BT Telephone Exchange, Kingsland Green

Amend site boundary to exclude 1 Kingsland Passage as follows:



Amend address: ~~1 Kingsland Passage and t~~The BT Telephone Exchange, Kingsland Green, Dalston, E8 2BB

Amend ownership: ~~MRC Pension Trust Limited;~~ British Telecommunications PLC

Amend site size: ~~4,734sqm~~3,783sqm

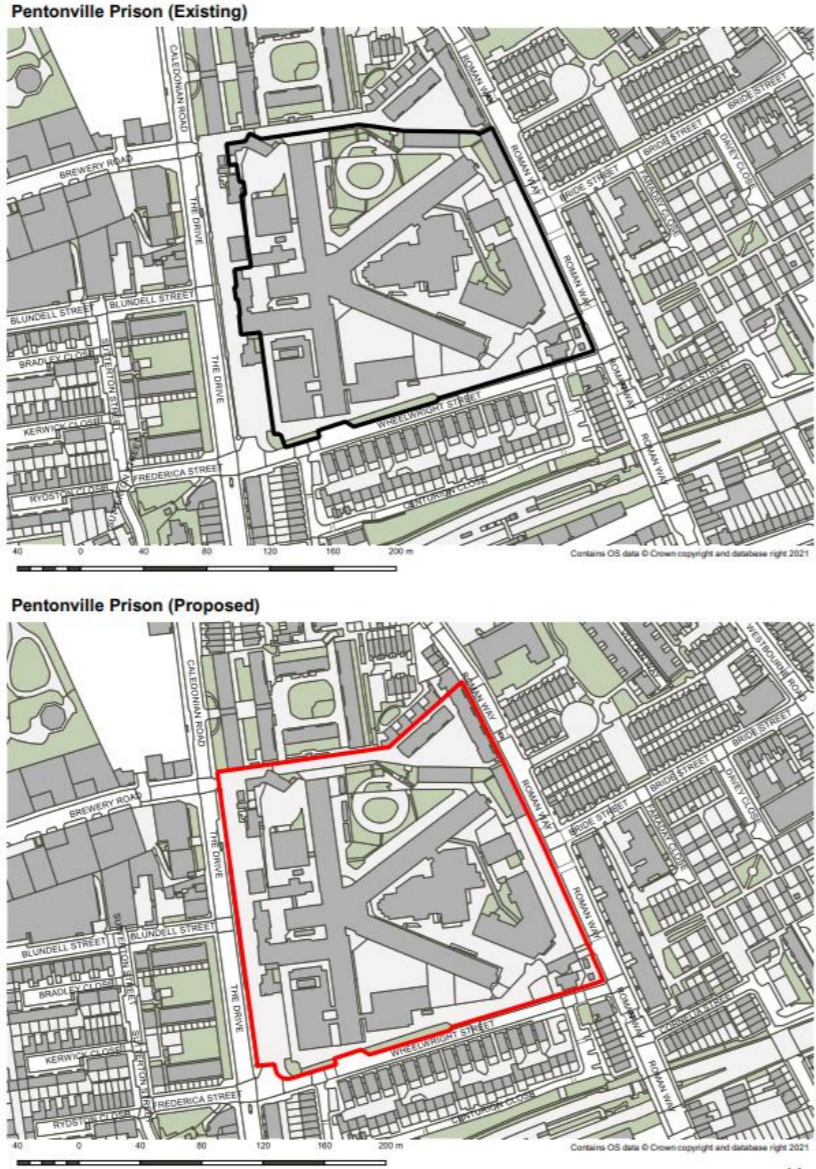
Amend current/previous use: ~~1 Kingsland Passage is currently used as offices (B1).~~ Some of the telephone exchange is still in use but most of the building is vacant.

Passage has made comprehensive development of the site as originally envisaged by the allocation unlikely during the plan period. The telephone exchange building continues to have development potential.

			<p><b>Amend how the site was identified:</b> 2013 Site Allocation (OIS7) <del>and planning permission P2016/4155/FUL</del></p> <p><b>Amend allocation and justification:</b></p> <p>Mixed use commercial and residential development, which maximises the provision of office use at the ground floor and lower levels. Development which improves the quality and quantity of existing business floorspace provision is encouraged.</p> <p><del>1 Kingsland Passage has planning permission for 360sqm of additional B1(a) office floorspace.</del></p> <p><b>Amend second bullet point of development considerations:</b></p> <ul style="list-style-type: none"> <li><del>Comprehensive development of 1 Kingsland Passage and the BT Telephone Exchange is encouraged.</del></li> </ul> <p>Some accommodation for a new telephone exchange will need to be reprovided on-site or nearby. This is likely to be significantly smaller than the current building.</p> <p><b>Amend estimated timescale:</b> <del>2026/27-2030/31</del> <b>2031/32-2035/36</b></p>		
SA-MO100	154-155	Section 9, OIS5: Bush Industrial Estate, Station Road, Allocation and justification	<p><i>Amend text as follows:</i></p> <p>Retention and intensification for industrial uses <del>(B1(c), B2 and B8)</del>. Office floorspace will only be acceptable as part of a hybrid workspace scheme.</p>	In response to changes to the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Minor
SA-MO101	154-155	Section 9, OIS5: Bush Industrial Estate, Station Road, Site designations and constraints	<p>Add two new site designations and constraints:</p> <ul style="list-style-type: none"> <li><b>Upper Holloway Railway Cutting SINC</b></li> <li><b>Adjacent to Yerbury Primary School</b></li> </ul>	Updated context	Minor
SA-MO102	154-155	Section 9, OIS5: Bush Industrial Estate, Station Road, Development considerations	<p>Add a new development consideration as follows:</p> <p><b>The northeastern section of the site is located in close proximity to Yerbury Primary School, Whittington Park (a designated SINC), and existing residential uses. Development proposals for this section of the site will be required to carefully consider and mitigate potential negative impacts.</b></p>	Additional information provided in relation to the sites context and how this should be considered by future proposals.	Main
SA-MO103	155	Section 9, OIS6: Site of Harvist Under Fives, 100 Hornsey Road, How the site was identified and relevant planning history	<p><i>Amend text as follows:</i></p> <p>2013 Site Allocation (OIS11); planning applications <del>P2016/3478/FUL (refused at appeal) and P2018/4131/FUL (registered approved subject to conditions/S106 agreement)</del></p>	Updated details	Minor
SA-MO104	155	Section 9, OIS6: Site of Harvist Under Fives, 100 Hornsey Road, Allocation and justification	<p><i>Amend text as follows:</i></p> <p>Residential redevelopment with <del>provision of nursery</del>, open space and public realm improvements.</p>	Updated in response to advice from the Early Years' Service and the recent grant of planning permission for the site.	Main

SA-MO105	159	Section 9, OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  Planning <b>permission P2017/3242/FUL (granted on appeal)</b> <del>application P2016/1642/FUL (refused)</del>	Updated details	Minor
SA-MO106	1159	Section 9, OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road, Allocation and justification	<i>Amend text as follows:</i>  <del>Business-led redevelopment with re-provision and intensification for business use (particularly B1(c)).</del> <b>Mixed use office and residential development.</b>	Updated in response to the recent grant of planning permission for the site on appeal.	Main
SA-MO107	165	Section 9, OIS16: Harvist Estate Car Park, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  <del>Application</del> <b>Planning permission P2018/2767/FUL (registered)</b>	Updated details	Minor
SA-MO108	166	Section 9, OIS17: Hathersage and Besant Courts, Newington Green, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  <del>London Borough of Islington Housing Service proposals</del> <b>Planning permission P2018/1970/FUL</b>	Updated details	Minor
SA-MO109	167	Section 9, OIS18: Wedmore Estate Car Park, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  Planning <del>application</del> <b>permission</b> P2017/4763/FUL	Updated details	Minor
SA-MO110	168	Section 9, OIS19: 25-27 Horsell Road, How the site was identified and relevant planning history	<i>Amend text as follows:</i>  London Borough of Islington's Call for Sites; planning <del>application</del> <b>permission</b> P2015/1655/FUL	Updated details	Minor
SA-MO111	168	Section 9, OIS19: 25-27 Horsell Road, Allocation and justification	<i>Amend text as follows:</i>  <del>Planning Committee resolved to approve planning application ref: P2015/1655/FUL on 18/07/2016, subject to legal agreement as yet unsigned.</del> <b>The site has planning permission</b> for mixed use development including residential uses and reconfigured office use.  Should the site be subject to further amendments or new applications, intensification of business floorspace should be prioritised.	Updated in response to the recent grant of planning permission for the site	Minor
SA-MO112	169	Section 9, OIS20: Vernon Square,	<i>Amend text as follows:</i>	Updated details	Minor



		Penton Rise, Current/previous use	<del>Vacant, previously used as higher education facilities by SOAS</del> Temporarily occupied by the Courtauld <b>Institute for educational purposes.</b>		
SA-MO113	174	Section 9, OIS24: Pentonville Prison, Caledonian Road	Amend site boundary to include land to the west and to the northeast as follows:  	In response to representations from the MoJ (R19.0144) stating that the prison estate is more extensive than shown on the published plan.  The MoJ stated the site boundary should be extended further west up to the boundary with Caledonian Road.  The boundary is also amended to include the land to the northeast of the site at Wellington Mews because this forms part of the prison estate and is ancillary to the prison.	Main
SA-MO114	174	Section 9, OIS24: Pentonville Prison, Caledonian Road, Approximate size of site	Amend as follows:  <b>33,17841,660</b> sqm	To reflect the extended site boundary.	Minor
SA-MO115	177	Section 10, Monitoring, paragraph 10.3	Amend second sentence as follows:  This completion data will be assessed spatially with reference to relevant Local Plan policies and designations; this could include development located within or in <b>close</b> proximity to a specific designation.	Error	Minor
SA-MO116	177	Section 10, Monitoring, paragraph 10.4	Amend as follows:  <b>Future AMRs will include an indicator monitoring the progress of individual site allocations to help the Council assess the success of policy SA1 (Delivering development priorities). Success will be measured in terms of the number of sites permitted in accordance with the allocated uses. Other</b>	To provide additional information on how the delivery of allocated sites will be monitored.	Main

			<b>information relating to</b> <del>The AMR will include specific monitoring of</del> site allocations <b>may also be kept under review</b> , <del>utilising all relevant quantitative and qualitative information. This could</del> including <b>information on the status of a particular site allocation</b> , for example, whether a planning permission has been <b>granted</b> , implemented, completed or has lapsed; and (where relevant) the reasons why specific sites have not come forward in line with the estimated timescales within the allocation. It could also include data on how the quantum of development which is coming forward through applications compares to the site capacity assumptions identified in the Local Plan.		
SA-MO117	182	Appendix 2: Glossary and Abbreviations; Term: Business floorspace/buildings/development/uses	<i>Amend text as follows:</i>  <b>Office, research and development and light industrial a</b> Activities <b>as well as industrial uses B2 general industrial and B8 storage and distribution, and Sui Generis industrial uses.</b> <del>or uses that fall within the B-use class.</del> Sui <del>generis</del> Generis uses which are akin to business floorspace, such as depots or builders merchants, can be classed as business floorspace for the purposes of the Local Plan.	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Main
SA-MO118	182	Appendix 2: Glossary and Abbreviations; Term: Commercial floorspace/buildings/development/uses	<i>Amend text as follows:</i>  Activities or uses which involve business activities and/or the sale of good or services. For the purposes of the Local Plan, this is <b>a</b> broad term which encompasses business and retail uses.	Error	Minor
SA-MO119	187	Appendix 2: Glossary and Abbreviations; Term: Hybrid space	<i>Amend text as follows:</i>  The main feature of hybrid space is that it straddles different <del>B-use</del> <b>business floorspace-classes uses.</b>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987 following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Minor
SA-MO120	187	Appendix 2: Glossary and Abbreviations; Term: Industrial floorspace/buildings/development/uses/land	<i>Amend text as follows:</i>  Activities or uses that fall within light industrial <del>(B1e)</del> , general industry (B2) and storage and distribution (B8) uses, <b>Sui Generis industrial uses</b> , and some <del>sui</del> <b>Sui generis</b> <del>Generis</del> akin to industrial uses such as depots and builder's merchants.	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987.	Main
SA-MO121	188	Appendix 2: Glossary and Abbreviations; Term: Leisure uses	<i>Add new definition:</i>  <b>Activities or uses including food and drink uses as defined within Class E(b), some indoor recreational activities falling within E(d) and some Sui Generis uses including drinking establishments including pubs and wine bars, hot food take aways, live music venues, cinemas, concert halls, nightclubs and theatres.</b>	To provide clarification following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Main
SA-MO122	189	Appendix 2: Glossary and Abbreviations; Term: Locally Significant Industrial Sites	<i>Amend text as follows:</i>  Designated areas where light industrial <del>(B1e)</del> , general industry (B2) and storage and distribution (B8) are the priority land uses.	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987.	Minor
SA-MO123	190	Appendix 2: Glossary and Abbreviations; Term: Office-led development	<i>Amend text as follows:</i>  Development where the majority of floorspace/uses is office. <del>within use class B1(a)</del>	To reflect the removal of the 'B1' use class from the Town and Country Planning (Use Classes) Order 1987.	Minor

SA-MO124	191	Appendix 2: Glossary and Abbreviations; Term: Retail floorspace/buildings/development/uses	<p><i>Amend text as follows:</i></p> <p><del>Activities or uses that fall within the A1 use class.</del> <b>Uses for the display or retail sale of goods, other than hot food, principally to visiting members of the public - as defined in Class E(A). This includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes.</b></p>	To reflect the removal of the 'A' use class from the Town and Country Planning (Use Classes) Order 1987.	Major
SA-MO125	193	Appendix 2: Glossary and Abbreviations; Term: Social and community infrastructure	<p><i>Amend text as follows:</i></p> <p>Infrastructure that is available to, and serves the needs of, local communities and others, which is often funded in some way by a grant or investment from a government department, public body and/or the voluntary sector. Social and community facilities comprises a wide variety of facilities/buildings including those which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres; education and training facilities including early years providers, nurseries, schools, colleges and universities; children and young peoples' play facilities; health facilities; youth centres; libraries; community meeting facilities; community halls; places of worship; sport, leisure and recreation facilities; and policing facilities. Social and community infrastructure generally falls within Use Classes <b>E, F.1 or F.2, C2, <del>D1 or D2,</del></b> and possibly some Sui Generis uses. This list is not intended to be exhaustive and other facilities can be included as social and community infrastructure.</p>	To reflect the removal of the D1 and D2 use classes from the Town and Country Planning (Use Classes) Order 1987.	Minor
SA-MO126	193	Appendix 2: Glossary and Abbreviations; Term: Source Protection Zones	<p><i>Amend text as follows:</i></p> <p>Areas of influence around groundwater sources used for public drinking which provide additional protection to safeguard drinking water quality, through constraining the <b>close</b> proximity of an activity that may impact upon a drinking water abstraction.</p>	Error	Minor

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# Bunhill and Clerkenwell Area Action Plan Modifications for consultation



1	Introduction.....	2
2	Table of modifications.....	3

# 1 Introduction

- 1.1 This document contains all the changes (known as modifications) to the Finsbury Local Plan proposed since the document was submitted to the Planning Inspectorate for Examination in February 2020.
- 1.2 Modifications are identified as being 'Main' or 'Minor'. The Minor Modifications do not materially affect the substance of the plan, its overall soundness or the submitted sustainability appraisal. The Minor Modifications relate to points of clarification, factual updates and typographical or grammatical errors. The reasons for making each of the changes are clearly set out.
- 1.3 This document is accompanied by schedules setting out relevant changes on the Site Allocations and Bunhill and Clerkenwell Area Action Plan. An update to the Sustainability Appraisal/IIA and relevant changes to the Policies Map have also been published.

## **Format of changes**

The following format has been used to set out what the changes are and distinguish between existing and new text

**Blue** – new text proposed

~~Red~~ – text proposed for removal

Changes to diagrams, tables etc described in *italic text*

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
BC-MO1	11	1.36	<p><i>Amend text as follows:</i></p> <p>There are 11 conservation areas either fully or partially within the AAP area, covering 50% of the area. Each of these conservation areas have detailed <del>management plans</del> <b>design guidelines</b> to guide development.</p>	Clarification. Islington has design guidelines for all conservation areas but no separate appraisals or management plans.	Minor
BC-MO2	18	BC1 d(ii)	<p><i>Amend text as follows:</i></p> <p>(ii) where a particular site is considered more suitable for other types of business floorspace such as <del>B1(c)light industrial or research and development</del> space. In such cases, the relevant percentage/requirement set out in Part B or C would apply to total business floorspace rather than office;</p>	Update to reflect introduction of Class E	Main
BC-MO3	19	BC1, supporting text New paragraph 2.7 and 2.8	<p><i>Amend text as follows:</i></p> <p><b>2.7 On 1 September 2020 the Government introduced new Use Class Order changes, including the creation of the new commercial Class E. Class E now includes office use alongside a broad range of other commercial uses including light industrial, retail, café, indoor leisure activities and health facilities.</b></p> <p><b>2.8 Class E means office floorspace in the area can change to other Class E uses without requiring planning permission. Large scale loss of office floorspace would impact the important employment, office, and knowledge economy function of Bunhill and Clerkenwell, Islington, and the Central Activities Zone. The knowledge economy is a key driver of job creation and prosperity in Islington and supports a network of service and related industries. Development of office floorspace is also essential to support small and medium enterprises, provide affordable workspace, and to provide training opportunities. The Bunhill and Clerkenwell Area Action Plan recognises how supporting uses, including those in Class E such as cafes, restaurants, bars, pubs, shops, and gyms add vitality and viability to the area. Development of these supporting uses is encouraged as part of office led mixed use schemes under policy BC1. Due to the constrained number of new development opportunities in Central London the Council's approach is to allow smaller proportions of these supporting uses alongside larger amounts of office floorspace to protect the employment function of the area. The flexibility class E provides is recognised, however without some proportionate measures, Class E would significantly reduce the Council's ability to proactively plan for Bunhill and Clerkenwell and meet identified employment needs as required by national policy. The Council has no powers to prevent existing office stock from changing to other Class E uses, however new build office floorspace will be secured as office use through the use of planning conditions. The Council will secure this new office floorspace to meet demand for employment floorspace which will support business, economic growth, and create jobs, in line with objective 2 of the Local Plan to deliver an inclusive economy. This policy, in addition to policies B1 and B2 in the Strategic and Development Management Policies is a targeted approach where business floorspace is delivered and retained where it is most needed. Policy BC1 will secure development of new high specification office accommodation in the Bunhill and Clerkenwell AAP area, ensuring supply and allowing business to take advantage of the central London agglomeration benefits..</b></p>	Update to reflect introduction of Class E	Main
BC-MO4	19	2.8, 2.9, 2.10,	<p><i>Amend text as follows:</i></p>	To reflect introduction of Class E	Minor



Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			<p>2.8 Considering this context, the key objective for the Bunhill and Clerkenwell AAP is to protect the predominant business role of the area by affording strong protection to existing business floorspace and prioritising growth in new business floorspace – particularly <b>B1(a)</b> office floorspace – across the area. The AAP provides further detail to heighten the priority for business uses in the area.</p> <p>2.9 Development of <b>B1(a)</b> office uses in the AAP area is also essential to contribute to the unique agglomeration of business and supporting uses of the CAZ, Tech City, and the City Fringe Opportunity Area, contributing to London’s role as a world city and maximising the competitiveness of the economy of the borough.</p> <p>2.10 There may be limited circumstances where the Council will prioritise uses other than <b>B1(a)</b> office in the AAP area, as set out in policy BC1 Part D. This may include locations where other typologies of business space are preferable to meet specific demand, such as <b>B1(c)</b> light industrial, <del>and/or</del> hybrid space, <b>or research and development space.</b></p>		
BC-MO5	21	BC2 Culture, retail and leisure uses	<p><i>Amend text as follows:</i></p> <p><b>Retail and leisure uses:</b>  A. The Council encourages <del>development</del> <b>the locating of new of</b> retail and leisure uses <b>in the AAP area</b> in <del>predominantly commercial areas, including</del> the four Local Shopping Areas.</p> <p><b>Cultural uses:</b>  B. The Clerkenwell/Farringdon Cultural Quarter is the focus for cultural uses <b>in the AAP area. In the AAP area</b> <del>Such cultural</del> uses <b>should only be located</b> <del>may also be suitable in other</del> <b>outside of the Clerkenwell/Farringdon Cultural Quarter if no suitable sites can be identified within this area as demonstrated by a sequential assessment provided by the applicant.</b> <del>predominantly commercial areas, pending assessment of sequentially preferable sites within the cultural quarter.</del></p> <p><b>Retail, leisure, and cultural uses in the AAP area:</b>  C. Areas which are predominantly residential will be considered less appropriate locations for retail, <del>food and drink, cultural,</del> leisure, and <del>entertainment</del> <b>cultural</b> uses.  D. Where suitable in line with Parts A <del>and/or</del> B, proposals involving new retail, <del>food, drink, entertainment and/or leisure, and</del> cultural uses in the AAP area will be permitted where:  (i) they would not individually or cumulatively harm the vitality, viability, character, function or amenity of the area, in particular residential amenity or the primary office function;  (ii) they would not result in a harmful concentration of night time economy uses, particularly premises licensed to sell alcohol; and  (iii) the operation of the use does not impact affect use of the public realm by other users, particularly more vulnerable users.  E. Active frontages must be provided for proposals for <b>retail, leisure, and</b> cultural uses. <del>e, retail and leisure uses.</del></p> <p>2.132.15 <b>Retail, leisure, and C</b>ultural uses <del>e, retail and leisure uses</del> are important for the functioning of the AAP area. They are employment generating and contribute to economic growth, although in the context of the area, they are considered to be supporting uses for the primary office function.</p>	Consistency and clarity , and to reflect introduction of Class E	Main
BC-M06	21	Footnote 10:	<p><i>Amend text as follows:</i></p>	Update to reflect introduction of Class E	Main

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			<p>“See policies R1 and R10 of the Local Plan - Strategic and Development Management Policies DPD for information on identifying what constitutes a cultural use. <b>Retail use is for the retail sale of goods, other than hot food shops as defined in Class E(A). This includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes. Leisure uses refer to food and drink uses as defined within Class E(b) some indoor recreational activities falling within E(d) and some Sui Generis uses including drinking establishments including pubs and wine bars, hot food take aways, live music venues, cinemas, concert halls, nightclubs and theatres. Retail and leisure uses fall within the A1-A5 and D2 Use Classes, and some Sui Generis uses akin to these uses, such as nightclubs and theatres</b>”</p>		
BC-M07	23	2.20	<p>The AAP area borders the City of London’s Culture Mile to the south, which is developing as a major destination for culture and creativity in the Square Mile and stretches from Farringdon to Moorgate. The area will be host to a programme of events and installations and will also benefit from further investment including public realm improvements. Significant changes are anticipated as part of the Culture Mile project, including the <b>proposed</b> relocation of the Museum of London to Smithfield; the potential development of a new Centre for Music on the site of the existing Museum of London, and the <b>possible</b> moving of Smithfield Meat Market from its current location. These changes will likely result in increased pedestrian activity and footfall in the area.</p>	Responding to the City of London representation.	Minor
BC-M08	28	BC3 supporting text	<p><i>Amend text as follows:</i></p> <p>3.11 Given its location, and given the limited number of potential large development sites in the area, the Moorfields site represents a unique opportunity to provide a large quantum of additional <b>B-use office</b> floorspace, which would enable the expansion of this internationally important business location. The Council’s ambition for the Moorfields site is to create a new business quarter, with a diverse range of business premises and a high quality public realm, in line with key principles set out in Site Allocation BC38.</p>	Update to reflect introduction of Class E	Main
BC-M09	33	BC4 and supporting text	<p><i>Amend text as follows:</i></p> <p>G: The Council supports greater public access around the basin with a wider ambition to link into the Regent’s Canal pathways. Proposals for <b>boater facilities and</b> residential moorings, including those which meet an identified housing need for boat dwellers, will <b>only</b> be permitted where:</p> <ul style="list-style-type: none"> <li>(i) supporting uses and facilities are in place from the first use of the mooring;</li> <li>(ii) public access to and along the towpath is not impeded;</li> <li>(iii) they do not hinder navigation along the waterway;</li> <li>(iv) there is no impact on leisure provision; and</li> <li><b>(v) there is no detrimental impact on air quality, nature conservation/ and biodiversity value of and the character and amenity of the waterway corridor, including its function as public open space.</b></li> </ul> <p><b>H: In addition to part G above:</b></p> <ul style="list-style-type: none"> <li><b>(i) Development in the canal corridor should be consistent with the City Road Basic Waterspace Strategy.</b></li> <li><b>(ii) Development of boater facilities will only be acceptable where there is an identified need, which may include being identified in the London Mooring Strategy.</b></li> <li><b>(iii) Development of residential moorings must be located on the south of the canal (off-side) and supporting uses and facilities must be in place before the first use of the mooring.</b></li> </ul>	In response to the representation from the Canal and River Trust	Main

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			<p>Supporting text (new paragraph added):</p> <p><b>13.32 The Council will undertake a waterspace strategy for use of the City Road Basin in partnership with the Canal and River Trust. This will provide a framework for making future decisions about the operation of the City Road Basin waterspace for different uses. Residential Moorings including those which meet an identified housing need for boat dwellers. Boater facilities for the canal corridor includes infrastructure such as mooring points, water and electrical supply, and waste collection and does not include the development of buildings, which in accordance with policy G2 should not be developed on significant private open spaces including the canal corridor.</b></p>		
BC-M10	38	3.37	<p><i>Amend text as follows:</i></p> <p>An improved, high quality public realm should create a series of integrated, linked and high quality public spaces, including neighbouring spaces such as Clerkenwell Green. The provision of adequate facilities for passengers is also important, including a need for publicly accessible toilets. <b>The Council will work with the City of London to manage the likely significant increase in pedestrian movements in the vicinity.</b></p>	Responding to the City of London representation.	Minor
BC-M11	48	3.66	<p><i>Change to update Scheduled Monuments information. St John's Gate was de-scheduled from being a scheduled monument, but remains a Grade I listed building. Changes are set out below and reflected in policies map changes. Amend text as follows:</i></p> <p>3.66 The area includes a number of Conservation Areas, <del>and</del> listed buildings, and a <del>two</del> Scheduled Monuments <b>(the Benedictine nunnery of St Mary, Clerkenwell the Nunnery of St. Mary de Fonte and St. John's Gate,</b> as shown on the Policies Map). Its significant historic value (which is acknowledged to be of London-wide importance) is well recognised, but is undermined in some places by the poor quality of the public realm and dominance of vehicular traffic. Development which comes forward within the Spatial Strategy area should, as a starting point, be based on the principle of conserving heritage assets, i.e. historic buildings, structures or places). Heritage assets can add to the economic viability of development and improve the cultural offer to both local residents and visitors. Policy DH2 of the Strategic and Development Management Policies DPD requires submission of a heritage statement as part of planning applications.</p>	In response to Historic England Regulation 19 comments, and to update the BCAAP to reflect current heritage status of sites.	Main
BC-M12	52	Policy AAP1 and supporting text	<p><i>Amend text as follows:</i></p> <p>A. The Local Plan will deliver its objectives and priorities by ensuring that sites allocated for specific uses <b>within Bunhill and Clerkenwell AAP</b> actually deliver particular types of development in line with the allocations. Proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted.</p> <p>B. <b>Allocated uses which fall within a broader use class (i.e. office or retail uses which sit within use class E) will be secured for the specific allocated use at planning stage. This is to ensure that development contributes towards meeting Islington's identified development needs.</b> Where <del>the</del> site allocations are expressed more broadly in terms of use class, there may be some flexibility regarding a range of acceptable uses, subject to compliance with all relevant Local Plan policies.</p>	Update to reflect introduction of Class E	Main

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification																																																																																	
			<p>4.4 On 1 September 2020 the Government introduced new Use Class Order changes, including the creation of the new commercial Class E. Class E now includes a broad range of commercial uses previously grouped in separate use classes. Class E includes office, light industrial, shops, cafés and restaurants, gyms, health facilities, day centres, creches, and nurseries. Under the new Use Class Order regulations change of uses within Class E do not require planning permission. This could have significant consequences for the Council’s ability to meet its evidenced development need, particularly for office floorspace, as well as for the availability of services valued by residents such as shops, health clinics and day centres.</p> <p>4.4 Islington is a geographically small with a dense built form, high population density, and high land values. The borough has a comparatively small supply of large development sites from which it can meet its identified needs including for homes and jobs. In response to this constrained supply the Council allocates a large number of development sites, including many smaller sites. In order for the Local Plan to deliver its objectives and priorities, and given the shortage of available land in the borough and the potential impacts of use class E, it is necessary to ensure that where sites are allocated for specific uses actually deliver particular types of development in line with the allocations. Therefore, on the majority of sites the allocations explicitly identify which uses are required, e.g. offices and residential. These uses have been established through consideration of priority development needs and the context of each site; proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted. <b>In line with this, to ensure that priority uses are delivered, where an allocated use (e.g. offices or retail) falls within a broader use class the Council will require the specific allocated use to be secured at planning stage.</b></p> <p>4.54.7 <del>In a small number of cases, the</del> <b>Some</b> site allocations are less specific, e.g. they allocate for “commercial uses”, which allows some flexibility regarding acceptable uses, subject to compliance with all relevant Local Plan policies.</p>																																																																																			
BC-M13	57	Table 4.2 Site Capacity Assumptions	<p>Delete existing table:</p> <table border="1"> <thead> <tr> <th></th> <th>Years 1-5</th> <th></th> <th>Years 6-10</th> <th></th> <th>Years 11-15</th> <th></th> <th>Total</th> <th></th> </tr> <tr> <th></th> <th>Homes</th> <th>Offices (sqm)</th> <th>Homes</th> <th>Offices (sqm)</th> <th>Homes</th> <th>Offices (sqm)</th> <th>Homes</th> <th>Offices (sqm)</th> </tr> </thead> <tbody> <tr> <td>B &amp; C: City Fringe Opportunity Area</td> <td>-60</td> <td>-63,100</td> <td>--</td> <td>-61,600</td> <td>--</td> <td>-18,500</td> <td>-60</td> <td>-143,200</td> </tr> <tr> <td>B &amp; C: City Road</td> <td>-340</td> <td>-21,500</td> <td>--</td> <td>-500</td> <td>--</td> <td>--</td> <td>-340</td> <td>-22,000</td> </tr> <tr> <td>B &amp; C: Farringdon</td> <td>--</td> <td>-13,300</td> <td>--</td> <td>--</td> <td>--</td> <td>-1,000</td> <td>--</td> <td>-14,300</td> </tr> <tr> <td>B &amp; C: Mount Pleasant and Exmouth Market</td> <td>-190</td> <td>-7,300</td> <td>--</td> <td>-1,600</td> <td>--</td> <td>--</td> <td>-190</td> <td>-8,900</td> </tr> <tr> <td>B &amp; C: Central Finsbury</td> <td>-250</td> <td>-6,100</td> <td>--</td> <td>-1,500</td> <td>--</td> <td>--</td> <td>-250</td> <td>-7,600</td> </tr> <tr> <td>B &amp; C: Historic Clerkenwell</td> <td>--</td> <td>-4,500</td> <td>--</td> <td>-900</td> <td>--</td> <td>--</td> <td>--</td> <td>-5,400</td> </tr> <tr> <td>Total</td> <td>-840</td> <td>-115,800</td> <td>--</td> <td>-66,100</td> <td>--</td> <td>-19,500</td> <td>-840</td> <td>-201,400</td> </tr> </tbody> </table> <p>Replace with the following table:</p>		Years 1-5		Years 6-10		Years 11-15		Total			Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)	B & C: City Fringe Opportunity Area	-60	-63,100	--	-61,600	--	-18,500	-60	-143,200	B & C: City Road	-340	-21,500	--	-500	--	--	-340	-22,000	B & C: Farringdon	--	-13,300	--	--	--	-1,000	--	-14,300	B & C: Mount Pleasant and Exmouth Market	-190	-7,300	--	-1,600	--	--	-190	-8,900	B & C: Central Finsbury	-250	-6,100	--	-1,500	--	--	-250	-7,600	B & C: Historic Clerkenwell	--	-4,500	--	-900	--	--	--	-5,400	Total	-840	-115,800	--	-66,100	--	-19,500	-840	-201,400	Updated to reflect current development progress.	Main
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				Years 1-5		Years 6-10		Years 11-15		Total			
			Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)	Homes	Offices (sqm)			
			B & C: City Fringe Opportunity Area	60	72,200	-	61,600	-	18,500	60	152,300		
			B & C: City Road	690	21,500	-	500	-	-	690	22,000		
			B & C: Farringdon	-	22,700	-	-	-	1,000	-	23,700		
			B & C: Mount Pleasant and Exmouth Market	190	9,400	-	1,600	-	-	190	11,000		
			B & C: Central Finsbury	310	6,100	-	700	-	-	310	6,800		
			B & C: Historic Clerkenwell	-	4,500	-	900	-	-	-	5,400		
			<b>Total</b>	<b>1,260</b>	<b>136,500</b>	<b>-</b>	<b>65,400</b>	<b>-</b>	<b>19,600</b>	<b>1,260</b>	<b>221,200</b>		
BC-M14	58	Site Allocation BC1, BC2, BC3, BC4, BC5, BC6, BC7, BC9, BC10, BC11, BC13, BC14, BC15, BC16, BC17, BC18, BC21, BC23, BC24, BC25, BC26, BC28, BC29, BC30, BC31, BC34, BC35, BC37, BC38, BC39, BC40, BC41, BC42, BC43, BC47.	<p><i>Each of these site allocations has the same typographical error in the Development Considerations, amend text as follows:</i></p> <p>Upgrades to the wastewater network may be required as a result <b>of</b> development on this site</p>								Error	Minor	
BC-M15	59	Site Allocation BC2	<p><i>How the site was identified and relevant planning history, amend text as follows:</i></p> <p>2013 Site Allocation (BC6) and planning permission P2013/1089/FUL, <b>amended by P2016/2994/S73.</b></p>								Updated details	Minor	
BC-M16	59	Site Allocation BC2	<p><i>Amend allocation and justification as follows:</i></p> <p>The site has hybrid planning permission for the development of four blocks ranging in height from 7 to 42 storeys to provide up to 995 residential units, <del>7,600</del> <b>8,413sqm</b> of B1 floorspace and a mix of other uses. Should the site be subject to further amendments or new applications, the Council will seek to maximise provision of genuinely affordable housing and affordable workspace.</p>								Correction	Minor	
BC-M17	65	Site Allocation BC5	<p><i>Current/previous use, amend text as follows:</i></p> <p>Further education <del>(D1)</del></p>								To reflect introduction of Class E	Minor	
BC-M18	69	Site Allocation BC8	<p><i>How was the site identified and relevant planning history, amend text as follows:</i></p>								Update planning details.	Minor	

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			2013 Site Allocation (BC24) TfL are undertaking a comprehensive highway and public realm improvements to the area to improve the public realm, conditions for walking and cycling, and the station environment. The works involve the closure of the north-western arm of the roundabout, creating a two-way road system, with the roundabout becoming a peninsula. Much of the work is being undertaken under TfL's permitted development rights. Two planning permissions were required: P2015/5222/FUL for new a station entrance to the south-east at Cowper Street (approved 2016) and P2019/0528/FUL for construction of a new station entrance to provide access to St. Agnes Well and Old Street Station (approved 2019).		
BC-M19	77	Site Allocation BC12	Current/previous use, amend text as follows:  University teaching facilities <del>(D1)</del>	To reflect introduction of Class E	Minor
BC-M20	81	Site Allocation BC13, Allocation and Justification	Amend the text as follows:  The site has planning permission for the development of a 61- bedroom hotel, 35 residential units, 1,954sqm office (B1) floorspace, 80sqm retail (A1) floorspace, 1,536sqm restaurant (A3) floorspace and 263sqm leisure (D2) floorspace.  Should the site be subject to further amendments or new applications, the Council will seek <del>redevelopment to provide an office development including affordable workspace and small scale business uses</del> redevelopment to provide a mixed use development which includes a significant amount of office floorspace including affordable workspace and small scale business uses. Additional residential use may be acceptable.	To recognise that residential use may be acceptable as part of a development which provides a significant amount of office floorspace.	Main
BC-M21	82	Site Allocation BC15	How was the site identified and relevant planning history, amend text as follows:  <del>2013 Site Allocation (BC34) and planning application P2017/2961/FUL (granted subject to legal agreement, March 2018)</del> 2013 Site Allocation (BC34) and planning permission P2017/2961/FUL (permission granted and construction started in 2018)	To update planning application implementation status	Minor
BC-M22	85	Site Allocation BC17	How was the site identified and relevant planning history, amend text as follows:  2013 Site Allocation (BC36) and planning permission P120484. <b>Construction started. A S73 application was approved in March 2020 for minor material amendments (P2019/2991/S73).</b>	To update planning application implementation status	Minor
BC-M23	86	Site Allocation BC18	How the site was identified and relevant planning history, amend text as follows:  2013 Site Allocation (BC37) and pPlanning permission P121162	Clarification.	Minor
BC-M24	88	Site Allocation BC19	Current/previous use, amend text as follows:  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M25	90	Site Allocation BC20	Current/previous use, amend text as follows:  Current/previous use: Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M26	91	Site Allocation BC21	Current/previous use, amend text as follows:  Current/previous use: Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M27	91	Site Allocation BC21	How the site was identified and relevant planning history, amend as follows:	Updated details	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			Planning permission P112478 <del>(now lapsed)</del> <b>Planning permission P2016/3353/FUL to provide a 6-storey building accommodating 1,307sqm office 243sqm retail at ground level, granted 2018, under construction.</b>		
BC-M28	93	Site Allocation BC23	<i>Current/previous use, amend text as follows:</i>  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M29	100	Site Allocation BC27	<i>Amend allocation and justification as follows:</i>  Healthcare and community uses <del>(D1)</del>	To reflect introduction of Class E	Minor
BC-M20	102	Site Allocation BC28	<i>Current/previous use, amend text as follows:</i>  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M31	102	Site Allocation BC29	<i>Current/previous use, amend text as follows:</i>  Tribunal hearing centre <del>(D1)</del>	To reflect introduction of Class E	Minor
BC-M32	102	Site Allocation BC29	<i>Allocation and justification, amend text as follows: :</i>  Redevelopment for office use, subject to justifying the loss of social infrastructure in line with relevant Local Plan policies. Mixed-use office/ <del>D1</del> <b>social or community use</b> development may also be acceptable where retention of social infrastructure is required on site.	To reflect introduction of Class E	Minor
BC-M33	105	Site Allocation BC31	<i>Allocation and justification, amend text as follows:</i>  Intensification of business use, particularly industrial uses such as <del>B1(e)</del> <b>light industrial</b> . Proposals must ensure at least no net loss of existing industrial use.	To reflect introduction of Class E	Minor
BC-M34	105	Site Allocation BC31	<i>Amend allocation and justification as follows:</i>  Intensification of business use, particularly industrial uses such as <del>B1(e)</del> light industrial. Proposals must ensure at least no net loss of existing industrial use.	To reflect introduction of Class E	Minor
BC-M35	106	Site Allocation BC32	<i>Current/previous use, amend text as follows:</i>  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M36	107	Site Allocation BC33	<i>Current/previous use, amend text as follows:</i>  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor
BC-M37	108	Site Allocation BC34	<i>How the site was identified and relevant planning history, amend as follows:</i>  Planning <del>application</del> <b>permission</b> P2017/3103/FUL <b>(granted 2018)</b>	Updated details	Minor
BC-M38	108	Site Allocation BC34	<i>Current/previous use, amend text as follows:</i>  Offices <del>(B1)</del> and financial and professional services <del>(A2)</del>	To reflect introduction of Class E	Minor
BC-M39	109	Site Allocation BC35	<i>Current/previous use, amend text as follows:</i>  Offices <del>(B1)</del>	To reflect introduction of Class E	Minor

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
BC-M40	111	Site Allocation BC36	<i>Current/previous use, amend text as follows:</i>  Office and light industrial <del>(B1)</del> . Part of the site is used for the London Metropolitan Archives.	To reflect introduction of Class E	Minor
BC-M41	114	Site Allocation BC38	<i>Amend allocation and justification as follows:</i>  ...This site is, therefore, required to deliver a very substantial quantum of <del>B1</del> office floorspace, a large proportion of which is expected to be Grade A office space. A range of unit types and sizes, including a significant proportion of small units, particularly those suitable for SMEs, must be provided.  Active <b>shops, cafes and restaurants, or drinking establishment A1, A3 and/or A4</b> uses will be sought on the ground floor as part of any future development proposal.  A substantial amount of affordable workspace at peppercorn rent must be delivered as part of the <del>B1</del> office floorspace, as well as a proportion of affordable retail units.	To reflect introduction of Class E	Minor
BC-M42	117	Site Allocation BC39	<i>How the site was identified and relevant planning history, amend as follows:</i>  Planning <del>applications</del> <b>permissions</b> P2017/1103/FUL (refused) and P2018/1578/FUL (granted March 2019)	Updated details	Minor
BC-M43	119	Site Allocation BC41	<i>Current/previous use, amend as follows:</i>  <del>D1</del> education use	To reflect introduction of Class E	Minor
BC-M44	120	Site Allocation BC42	<i>How the site was identified and relevant planning history, amend as follows:</i>  London Borough of Islington's Call for Sites/planning <del>permission application</del> P2017/3389/FUL (granted subject to completion of legal agreement, February 2018)	Error	Minor
BC-M45	122	Site Allocation BC44	<i>Current/previous use, amend text as follows:</i>  <del>(B1)</del> <b>Offices</b>	To reflect introduction of Class E	Minor
BC-M46	124	Site Allocation BC46	<i>Current/previous use, amend text as follows:</i>  University teaching facilities <del>(D1)</del> and ancillary uses	To reflect introduction of Class E	Minor
BC-M47	124	Site Allocation BC46	<i>How the site was identified and relevant planning history, add text as follows:</i>  <b>P2019/1124/FUL extension to library, granted 2019.</b>	Updated planning history.	Minor
BC-M48	127	Site Allocation BC49	<i>Amend allocation and justification as follows:</i>  Intensification for business use, particularly <del>B1(e)</del> <b>light</b> industrial uses.	To reflect introduction of Class E	Minor
BC-M49	128	Site Allocation BC50	<i>Amend allocation and justification as follows:</i>  Higher education and medical and research uses, alongside improvements to increase permeability through the site. Development on the site may include some <del>B1(a)</del> office space and <del>B1(b)</del> research space linked to overarching higher education, medical, and/or research uses. The Council will resist development of additional student accommodation on the site; however, development which rearranges the existing quantum of provision of student accommodation may be acceptable.	To reflect introduction of Class E	Minor
BC-M50	130	Site Allocation BC51	<i>Current/previous use, amend text as follows:</i>  <del>D1</del> <b>Education</b>	To reflect introduction of Class E	Minor



Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification																
BC-M451	130	Site Allocation BC51	<p>Amend allocation and justification as follows:</p> <p>Retention of <b>D4 social and community</b> infrastructure use unless the loss of <b>social and community infrastructure D4</b> use can be robustly justified, in which case office development would be required in this location.</p>	To reflect introduction of Class E	Minor																
BC-M52	131	Site Allocation Monitoring	<p>New section to be added after paragraph 5.2:</p> <p><b>5.3 The list of indicators to be used for monitoring of the Local Plan is set out in Section 10 of the Strategic and Development Management Policies document. This list includes indicators to monitor implementation of the Bunhill and Clerkenwell Area Action Plan, also set out in Table 10.1 below.</b></p> <p><b>Table 10.1 Bunhill and Clerkenwell AAP Monitoring Indicators</b></p> <table border="1"> <thead> <tr> <th>Policy Reference</th> <th>Proposed indicator(s) if applicable</th> <th>Target/milestone/success factor (if applicable)</th> <th>Source of data</th> </tr> </thead> <tbody> <tr> <td>BC1 Prioritising office use</td> <td>Office floorspace as a proportion of total floorspace completed in major developments in the City Fringe Opportunity Area and across rest of Bunhill and Clerkenwell AAP area.</td> <td>90% office in the City Fringe Opportunity Area and 80% elsewhere in the Bunhill and Clerkenwell AAP area.</td> <td>London Planning Datahub, Islington Development Management</td> </tr> <tr> <td>BC2 Culture, retail and leisure uses</td> <td>New major cultural floorspace completed in the cultural quarter.  New major retail and leisure floorspace completed in the Local Shopping Areas.</td> <td>New cultural uses located in the Cultural Quarter unless sites are not available or appropriate.  New retail and leisure uses located in the Local Shopping Areas.</td> <td>London Planning Datahub, Islington Development Management</td> </tr> <tr> <td>BC1 Prioritising office use and</td> <td>Sqm of floorspace completed against site</td> <td>Percentage of floorspace completed from each site capacity assumption</td> <td>London Planning Datahub, Islington</td> </tr> </tbody> </table>	Policy Reference	Proposed indicator(s) if applicable	Target/milestone/success factor (if applicable)	Source of data	BC1 Prioritising office use	Office floorspace as a proportion of total floorspace completed in major developments in the City Fringe Opportunity Area and across rest of Bunhill and Clerkenwell AAP area.	90% office in the City Fringe Opportunity Area and 80% elsewhere in the Bunhill and Clerkenwell AAP area.	London Planning Datahub, Islington Development Management	BC2 Culture, retail and leisure uses	New major cultural floorspace completed in the cultural quarter.  New major retail and leisure floorspace completed in the Local Shopping Areas.	New cultural uses located in the Cultural Quarter unless sites are not available or appropriate.  New retail and leisure uses located in the Local Shopping Areas.	London Planning Datahub, Islington Development Management	BC1 Prioritising office use and	Sqm of floorspace completed against site	Percentage of floorspace completed from each site capacity assumption	London Planning Datahub, Islington	To update monitoring indicators in light of Class E policy modifications	Main
Policy Reference	Proposed indicator(s) if applicable	Target/milestone/success factor (if applicable)	Source of data																		
BC1 Prioritising office use	Office floorspace as a proportion of total floorspace completed in major developments in the City Fringe Opportunity Area and across rest of Bunhill and Clerkenwell AAP area.	90% office in the City Fringe Opportunity Area and 80% elsewhere in the Bunhill and Clerkenwell AAP area.	London Planning Datahub, Islington Development Management																		
BC2 Culture, retail and leisure uses	New major cultural floorspace completed in the cultural quarter.  New major retail and leisure floorspace completed in the Local Shopping Areas.	New cultural uses located in the Cultural Quarter unless sites are not available or appropriate.  New retail and leisure uses located in the Local Shopping Areas.	London Planning Datahub, Islington Development Management																		
BC1 Prioritising office use and	Sqm of floorspace completed against site	Percentage of floorspace completed from each site capacity assumption	London Planning Datahub, Islington																		

Reference	Page	Section/Paragraph/Policy	Proposed change				Reason	Main or minor modification
			Site Allocations	capacity assumptions set out in the Local Plan	Percentage of 400,000sqm B1a floorspace provided during plan period	Development Management		
BC-M53	136	Appendix 1, Scheduled Monuments						
BC-M53	136	Appendix 1, Scheduled Monuments						
BC-M54	141	Glossary and Abbreviations Term: Business floorspace/buildings/development/uses						
BC-M55	144	Glossary and Abbreviations Term: Entertainment uses						
BC-M56	144	Glossary and Abbreviations Term: Function						
BC-M57	147	Glossary and Abbreviations Term: Hybrid space						

Reference	Page	Section/Paragraph/Policy	Proposed change	Reason	Main or minor modification
			predominantly industrial function, which could combine features of light industrial, studio and production space, as well as storage and logistics; however, it can include supporting/complementary elements of office provided they are ancillary. As such, hybrid space is likely to be considered a Sui Generis use. Fundamentally, hybrid space must be conducive to occupation by a range of industrial and light industrial users due to its flexible design.		
BC-M58	148	Glossary and Abbreviations  Term: Industrial floorspace/buildings/development/uses/land	<i>Amend text as follows:</i>  Activities or uses that fall within light industrial ( <del>B1e</del> ), general industry (B2) and storage and distribution (B8) uses, <b>Sui Generis industrial uses</b> , and some <del>Ssui G</del> generis akin to industrial uses such as depots and builder's merchants.	To reflect introduction of Class E	Main
BC-M59	150	Glossary and Abbreviations  Term: Office-led development	<i>Amend text as follows:</i>  Development where the majority of floorspace/uses is offices <del>s within use class B1(a)</del>	To reflect introduction of Class E	Minor
BC-M60	152	Glossary and Abbreviations  Term: Retail floorspace/buildings/development/uses,	<i>Amend text as follows:</i> <del>Activities or uses that fall within the A1 use class.</del> <b>Uses for the display or retail sale of goods, other than hot food, principally to visiting members of the public - as defined in Class E(A). This includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafes.</b>	To reflect introduction of Class E	Main
BC-M61	153	Glossary and Abbreviations  Term: Social and community infrastructure	<i>Amend text as follows:</i> Infrastructure that is available to, and serves the needs of, local communities and others, which is often funded in some way by a grant or investment from a government department, public body and/or the voluntary sector. Social and community facilities comprises a wide variety of facilities/buildings including those which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres; education and training facilities including early years providers, nurseries, schools, colleges and universities; children and young peoples' play facilities; health facilities; youth centres; libraries; community meeting facilities; community halls; places of worship; sport, leisure and recreation facilities; and policing facilities. Social and community infrastructure generally falls within Use Classes <del>G2, D1 or D2</del> , <b>E, F.1 or F.2</b> and possibly some Sui Generis uses. This list is not intended to be exhaustive and other facilities can be included as social and community infrastructure.	To reflect introduction of Class E	Minor

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# IIA examination addendum

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# Introduction

1.1 This is an addendum to the interim Integrated Impact Assessment (IIA) which formed part of the Regulation 19 consultation into the Islington Local Plan - this will be referenced the 'submission IIA' throughout this document. The Local Plan was published for consultation in September 2019, and subsequently submitted to the Secretary of State in February 2020.

1.2 The aim of the report is:

- to present new information to respond to the concerns raised by the Inspectors (**Part 1**).
- to present an appraisal of the changes to the plan that are subject to pre-hearings modifications consultation (**Part 2**). This includes an update to Habitats Regulations Assessment Screening and Equalities Impact Assessment

1.3 These two matters are addressed as two separate parts to this report. The following paragraphs explain the relationship between the submission IIA and Part 1 of the examination IIA addendum – this will be referenced as the 'examination IIA' throughout this document.

Part 1 of the examination IIA responds to issues identified by the Planning Inspectors in respect of identification and assessment of alternatives for policies and site allocations, assessment of cumulative effects and identification of effects overall. The work completed in Part 1 creates new assessments, updates assessments and/or replaces assessments in the submission IIA. The Sustainability Appraisal content set out in section 4 of the submission IIA which provides a summary of the assessments contained in the tables in appendix 5, 6 and 7 is now replaced by the examination IIA.

The following sets out the work that has been carried out and clarifies what has been replaced:

- The consideration of **policy alternatives** has been reviewed and presented as a process with each policy considered in turn in plan order. Explanation of the 'screening' of policies is included for each policy. An introduction and screening table is included in Part 1: Alternatives: Policies. The presentation of the submission IIA assessment has been reviewed and where a reasonable alternative or alternatives has been identified they have been presented as a single assessment alongside the assessment of the submission policy. This section includes assessment of alternatives requested by the Inspectors in their letters (ref INS04 dated 30 April and ref INS05 dated 24 June). A summary for each assessment is included. This section replaces relevant content in section 4 of the submission IIA and all the assessments in appendix 5.

- The consideration of **site alternatives** is a new assessment and is presented alongside the revised presentation of the site assessments. This is set out in Part 1: Site Assessments and Site Alternatives. The revised presentation of the site assessment includes assessment against the full set of appraisal objectives as requested by the Inspectors. Reasonable alternatives are considered alongside site assessments where relevant or explanations of where there are no alternatives. This section replaces relevant content in section 4 and all of the assessments in appendix 7.
- The assessment of the **submission policies** has been reviewed and additional effects identified. Also, further clarification in the assessment text has been added.. This section replaces relevant content in section 4 of the submission IIA and all the assessments in appendix 6.
- The assessment of **cumulative effects** is new assessment that has been presented in a more comprehensive and transparent manner. This section replaces relevant content in section 4 of the submission IIA.
- The references made in Section 4 of the submission IIA which summarises the EqIA and HRA content remains valid.

1.4 **Part 2** of the examination IIA considers and assesses where necessary changes made to the plan for the policies and allocated sites. The changes to the draft Local Plan are defined as modifications to the plan. There main drivers for the modifications made:

- the issues raised by the Inspectors in their initial letters
- the representations made at Regulation 19 stage of consultation
- wider changes in the planning system.

1.5 Further detail on the changes is set out in the background section below.

1.6 All the modifications made to the draft Local Plan have been screened to consider which changes need to be assessed and where alternatives need to be considered. Further assessment have also been provided that consider the policy changes in respect to the EqIA and Habitats Regulations Assessment. These are appended at appendix 1 and 2.



# Non technical summary

- o This is the Non-Technical Summary of the Integrated Impact Assessment (IIA) of Islington's Local Plan.
- o The London Borough of Islington (LBI) is preparing a new Local Plan for the borough to cover the period 2020 to 2035. The Islington Local Plan is made up of four Development Plan Documents:
  - o Local Plan: Strategic and Development Management policies – the principal document in the Local Plan, which sets out strategic policies to identify where and how change will happen in Islington; and detailed policies to manage development.
  - o Site Allocations – this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
  - o Bunhill and Clerkenwell Area Action Plan (AAP) – a plan for the south of the borough where significant change is expected to occur. The plan sets out spatial policies covering different parts of the area with further policies to manage development.
  - o North London Waste Plan (NLWP) - a joint waste plan together with six other boroughs within the North London Waste Authority area (Camden, Haringey, Hackney, Barnet, Enfield and Waltham Forest). The Waste Plan will identify a range of suitable sites for the management of all North London's waste up to 2031 and will include policies and guidelines for determining planning applications for waste developments.
- o The IIA brings together into a single document a number of assessments which are required to assess the social, environmental and economic impact of the planning policies contained in the three Development Plan documents (The NLWP is not part of this assessment). The following statutory requirements are addressed and presented together in one document:
  - o Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA), and
  - o Health Impact Assessment (HIA) and
  - o Equalities Impact Assessment (EqIA)
  - o Habitats Regulation Assessment (HRA)
- o The methodology used for the IIA process for the Islington Local Plan review is based on the Sustainability Appraisal process set out in Government guidance.
- o The Sustainability Appraisal process is a five stage process and this document represents the third stage in the process, which is preparation of the interim Sustainability Appraisal report, the first substantial reporting stage.
- o The Islington Local Plan was submitted to the Secretary of State on 12 February 2020 along with the interim Sustainability Appraisal Report – known in this document as the 'submission IIA'. The Secretary of State appointed two Inspectors to undertake an independent examination of the Local Plan; this is the last stage in the Plan making process. Through their initial questions the Inspectors identified concerns with housing supply and the Sustainability Appraisal assessment. To address the Inspectors concerns there is a need for

additional consultation and an update to the IIA. This report is an addendum to the submission IIA and has been produced as part of the examination process. This report is known as the examination IIA and was published in March 2021.

- o The aim of the examination IIA is:
  - o to present new information to respond to the concerns raised by the Inspectors (Part 1).
  - o to present an appraisal of the changes to the plan that are subject to pre-hearings modifications consultation (Part 2).
- o The first stage in the Sustainability Appraisal process is identifying the key issues in Islington to be addressed within the Plan – this information is presented in the Scoping Report which was published initially in October 2016 for consultation. This stage also proposes the draft framework objectives against which all policies are considered.
- o The framework objectives have been derived from an analysis of the sustainability, health and equalities issues facing the borough. These locally-specific objectives describe the outcomes that the Local Plan should seek to achieve, and will be used to check and refine the policies as the Local Plan develops. Using the framework, the assessment of policies and sites is set out in a series of tables.
- o The second stage in the Sustainability Appraisal process is developing and refining alternatives to policies. The purpose of this stage is to evaluate the likely significant effects of the draft Local Plan policies and to test reasonable alternatives to policies against the objectives set out in the framework. Only realistic alternatives need to be considered and not every plan issue needs an alternative policy solution. Sometimes there may be only one approach to an issue.
- o In the submission IIA fourteen alternatives were assessed for the policies set out in the Islington Local Plan. Some alternatives were considered but then discounted and not assessed; the basis for these discounted alternatives is set out in the report. The examination IIA responds to concerns raised by the Inspectors and the consideration of policy alternatives has been reviewed. Additional reasonable alternatives have been assessed and extra detail about discounted alternatives has been added which has been combined and presented in a single section. In addition the assessment of reasonable alternatives for site allocations has been added.
- o The Local objectives, area spatial strategies, policies and sites have been assessed by section (eg Thriving Communities, Inclusive Economy). The framework identifies the effects considered; either significant or minor effect, negative or positive or neutral. The assessment also includes consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects. Where negative effects are identified, mitigation should be considered to reduce the negative effects. The assessment should also consider ways that policies can be improved. The examination IIA responds to concerns raised by the Inspectors and the consideration of effects. The assessment of policies have been reviewed and additional effects identified. Also, further clarification in the assessment text has been added. The presentation of the assessment of site allocations has been revised to include assessment against all the objectives with further clarification in the assessment text has been added.
- o The examination IIA also contains Part 2 which presents an assessment of the changes to the plan that are subject to pre-hearings modifications consultation. There are three drivers for the modifications:
  - o the issues raised by the Inspectors in their initial letters
  - o the representations made at Regulation 19 stage of consultation
  - o wider changes in the planning system.

- o The Sustainability Appraisal process is iterative and on-going process, which has been in train from the start of the Local Plan review.
- o The Site Allocations have also been subject to a separate bespoke sequential assessment, using the outputs of Islington's Strategic Flood Risk Assessment (SFRA). The examination IIA has assessed the 8 new site allocations.

### Other assessments

- o Health Impact Assessment (HIA) is a systematic approach which ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. Camden and Islington Public Health have undertaken a HIA of the Local Plan. The HIA has eleven topics which were adapted by Camden and Islington Public Health for their consideration of the Local Plan. Where an impact was identified an action to mitigate that effect was considered or enhance a positive effect.
- o An Equalities Impact Assessment (EqIA) is a way of measuring the potential impacts (both positive and negative) that a policy may have on groups with key protected characteristics covered by the Equality Duty and on Human Rights. The examination IIA has considered the modifications for potential impacts.
- o The Habitats Regulations Assessment (HRA) purpose is to assess the impacts of a land-use plan against the conservation objectives of a European Site and determine whether it would adversely affect the integrity of that site. The closest European site to Islington is Epping Forest. European sites are designated to provide legal protection of habitats and species that are of European significance. The examination IIA has screened the modifications.

### Key Findings by Local Plan section

- o **Area Spatial Strategies:** The Area Strategies help focus development in the most appropriate locations by recognising the various areas range of commercial uses including retail, leisure, service, and office uses. Some of the area strategies also recognise the rich variety of community uses and cultural spaces that are available. Policy in the area spatial strategies supports high quality improved public realm with more functional spaces that improves permeability and connectivity. Most of the spatial strategies identify specific heritage assets and local landmarks, highlighting them helps enhance the borough's heritage and culture. Similarly the Bunhill and Clerkenwell Area Action Plan Spatial Strategies policies work in combination with the area wide policies by adding much more detailed site specific policy helping implement the broader AAP strategy, for example by protecting an individual use or space, or by designating a particular opportunity for development such as a new open space or route.
- o **Thriving Communities:** the Sustainability Appraisal considered that the policies in this section will go as far as reasonable possible to meet the housing needs for the borough through delivery of conventional housing and as part of that utmost quantum of affordable housing which is viably possible. Alternative policy approaches for affordable housing were considered and whilst highlighting arguments for flexibility an increased degree of uncertainty in overall delivery was also identified which were judged to rule the alternatives out. The housing delivered will be high quality going further than national minimum standards to better reflect needs in Islington. To ensure maximum delivery certain forms of housing are restricted as far as possible which when considered cumulatively as a group of policies will

have a particularly positive cumulative effect on meeting housing needs. In addition the assessment of alternative policy approaches for certain forms of housing such as student accommodation and large HMO also identifies the lack of flexibility in the building design to meet a range of needs. Meeting needs for certain specific forms of housing; supported housing, older peoples and gypsies and travellers will have no effect. When the policies within the section are considered together, they are considered by the assessment to have a particularly positive cumulative effect on the sustainability objectives for affordable housing, inclusion and equality, health and wellbeing, liveable neighbourhoods and the built environment.

- **Inclusive Economy:** the Sustainability Appraisal considered that the policies in this section will have a significant positive effect on economic growth with a significant quantum of business floorspace identified through site allocations. In addition the combined effect of delivering this growth will achieve positive effects on reducing worklessness by providing more opportunities for getting people back into work as well as supporting new business develop through the provision of affordable workspace. The protection of industrial land, in particular Vale Royal/Brewery Road was considered by the assessment alongside alternative policy approaches. Whilst there are land use benefits from the co-location of office and residential uses with industrial, it is considered that housing and office needs can be met elsewhere in the borough, and the importance of one of the last remaining industrial clusters within close proximity to central London had to be a factor in its continued protection for industrial use. The submission IIA considered that the effect of the retail policies will provide flexibility for town centres to respond to the changing retail environment which will help ensure residents various service and leisure needs continue to be met. However the examination IIA concluded that the wider changes made to the planning system would affect the wider function of town centres by removing the need to seek planning permission for non-retail uses which may exacerbate the structural weaknesses in the retail sector. Whilst results of the assessment of the policy modifications to respond to these wider changes to the planning system are considered positive there is uncertainty over the extent to which it is possible to plan to meet various service and leisure needs because of the wider changes to the Use Classes Order.
- **Green Infrastructure and Sustainable Design:** the Sustainability Appraisal considered that these sections evidences the significant positive effect these group of policies will have on reducing carbon emissions and reducing the effects of climate change through adaptation and mitigation. The sustainable design policies will individually and cumulatively contribute to reducing fuel poverty in the borough. In addition requirements for open space / public realm and biodiversity improvements in the urban environment can help tackle air quality issues and will support a healthier population encouraging people to use more sustainable forms of transport.
- **Public Realm and Transport:** the Sustainability Appraisal considered that overall the policies in this section will help encourage people to use more sustainable modes of transport helping reduce congestion and have a cumulative effect on reducing the impact of air pollution across the borough and beyond. There will be a positive effect on inclusion with the policy aim to improve transport for those with no access to private motor vehicles and practical, safe and convenient access to the public realm. The examination IIA identified the further positive effects from policy changes that seek to promote more sustainable freight movements helping further improve air quality, reduce congestion and other negative consequences relating to traffic.
- **Design and heritage and Plan1:** the Sustainability Appraisal considered that when taken together demonstrates the positive effects that design and a design led approach will have on improving peoples quality of life and reducing the potential amenity impacts of development.

In particular the positive effect from ensuring the use of a site is fully optimised helps make the best use of the scarce land resource in the borough which combined with other policies in the plan helps meet and prioritise the various development needs in the borough in particular housing need and employment. Policy PLAN1 has a number of cross-cutting elements which will help to deliver synergistic and positive effects across the sustainability appraisal objectives.

- **Site Allocations:** the Sustainability Appraisal considered that the sites will have considerable benefits in delivering growth in terms of both housing and business floorspace. They will also have a positive cumulative effect in relation to sustainability assessment objectives as sites will help deliver improvements to the public realm and wider built environment, provide high quality housing and affordable housing, deliver services and infrastructure needed to serve wider needs across the borough, support town centres, benefit the environment through achieving reduced run off rates and a reduction in carbon emissions, make a significant contribution to economic growth both within and outside the borough and make more efficient use of land in the borough.
- **Bunhill and Clerkenwell AAP:** the Sustainability Appraisal considered that the policies and sites in the BCAAP have considerable benefits in delivering growth in terms of both housing but particularly business floorspace. The approach to focus development of business uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport is positive against objective for climate change. The AAP will also have a positive cumulative effect in relation to sustainability assessment objectives and will help deliver improvements to the public realm and wider built environment. The particular significant positive effect of the AAP is on economic growth with a significant quantum of business floorspace identified in site allocations as well as the clear policy requirement.
- The **Health Impact Assessment** concludes that the policies in the draft Local Plan support health improvement and, importantly, underpin the Council's vision in tackling inequalities, including health inequalities, in the borough.
- The **Habitats Regulation Assessment** considered the effect of Islington's Local Plan policies on the European sites and concluded it is not significant. Impacts from policies or sites allocations in the plan on water resources, air quality and from visitors have been considered unlikely to have any significant effects.
- The **Equalities Impact Assessment** concluded that there were no negative impacts on groups with protected characteristics and highlighted the many positive effects that the policies in the Local Plan will have for all groups including those with protected characteristics. The examination IIA has considered the modifications for impacts on groups with protected characteristics and not identified any negative impacts.

## Next steps

The examination IIA is available for comment alongside the Local Plan modifications as part of the pre-hearing consultation. The consultation runs from [insert date] until [insert date]. Following the consultation the representations to the modifications will be sent to the Inspectors appointed by the Government as part of the examination process.



# Background

- 2.1 The Local Plan was approved at the meeting of full Council on 27 June 2019. Prior to the consultation two further changes were made to the draft Strategic and Development Management Policies document. Further changes were made to reflect updated evidence relating to Gypsy and Traveller accommodation need; and the Council declaration of an environment and climate emergency and the associated aim to achieve net zero carbon by 2030 ahead of the formal 2050 target set out in the draft Local Plan.
- 2.2 The Regulation 19 consultation on the draft Local Plan documents ran for a period of 6 weeks between 5 September 2019 to 18 October 2019. In total, 184 email / letter responses were received and a total 1,465 'set responses' were received. The 'Local Plan consultation statement (Regulation 22)' sets out a summary of responses to Islington Local Plan Regulation 19 draft (examination library reference PD7).
- 2.3 A significant response on the IIA was received from Tileyard London (examination library reference: R19.0132). The respondent commissioned an independent review of the IIA, which considers that the IIA process for the draft Local Plan is deficient, particularly in respect of the assessment of 'reasonable alternatives', as well as substantial flaws in the application of the IIA methodology itself. Furthermore, the representation considered the Council failed to prepare or consult on an IIA for the Regulation 18 draft Local Plan 2018, removing the opportunity for the authorities or the public to have early or effective consultation on the impacts of the emerging Plan, or to show how the IIA has influenced the emerging plan as it has evolved. The Council provided response to this review of the IIA as part of the submission documents in 'the London Borough of Islington Legal Compliance Statement' (examination library reference SD30).

## **Inspectors issues raised**

- 2.4 Following the Regulation 19 consultation the Local Plan was submitted to the Secretary of State on 12 February 2020. The Council received preliminary questions from the Planning Inspectors appointed to examine the draft Local Plan on 20 February 2020. This requested additional information on the housing trajectory, a response from the council on initial thoughts on a shortfall in housing supply and the deliverability of a number of sites which form part of the five-year land supply. In relation to the Site Allocations clarity was sought on site capacity, site selection and the balance of uses. Following the Councils response to this preliminary letter a further two letters were received from the Inspectors seeking further clarification on housing supply, the housing trajectory and site deliverability.

- 2.5 The Inspectors letters INS04 dated 30 April and INS05 dated 24 June sought further clarification and justification in relation to a number of matters associated with the Sustainability Appraisal. INS04 sought clarification with the assessment of reasonable alternatives and INS05 followed up on this requesting assessment of specific alternatives. In addition, the Inspectors in letter INS05 sought review of the assessment tables and cumulative assessments in order to ensure that all effects are documented. In addition the Inspectors requested that the Council should review all allocations and consider whether different uses or a mix of different uses could feasibly be delivered on the site and assess these as part of the IIA or assess these as reasonable alternatives.
- 2.7 The Inspectors in their letters INS04 dated 30 April and INS05 dated 24 June also sought further clarification on the issue of housing supply both in respect of the five-year housing land supply and the housing supply over the plan period. Following the Councils initial response on this issue the Inspectors significant concerns remained and they sought additional work from the Council to address both shortfall issues. The Inspectors identified that there would need to be additional consultation on both the IIA and in relation to the housing matters.
- 2.8 The Council in their letter 7 October 2020 set out the progress on addressing the issues raised and the indication of the future timetable. In terms of housing supply the council set out that it will put forward additional allocations alongside increased housing numbers from a small number of existing allocations. In respect of the IIA the council will undertake further work to address the points raised by the Inspectors. The additional sites will be considered as part of the IIA update.
- 2.9 Given the extent of the changes identified the Council has identified that approval for these changes will be needed by the Council before the additional consultation. The significance of the changes relates in no small way to the amendments to the Use Classes Regulations.



# Part 1: Alternatives: Policies

## 1. Introduction

This section sets out the consideration of alternatives for all policies contained in the Islington Local Plan. The approach to alternatives has been updated since the assessment included in the submission IIA and seeks to make clear the process taken in the consideration and assessment of alternatives. Where relevant, cross references are made to the submission IIA.

A three stage process has been followed which considers each of the policies in turn:

- Step 1 – sift out policies where there is clearly no reasonable need to explore reasonable alternatives, on the basis of there being little or no potential to meaningfully and confidently differentiate reasonable alternatives in terms of ‘significant effects’;
- Step 2 – screen-out further policies where there is judged to be no reasonable need to explore reasonable alternatives on balance, after having given a degree of consideration to potential reasonable alternatives and their differential impacts;
- Step 3 – define and appraise reasonable alternatives for the remaining (‘screened-in’) policies.

The outcome of this three step process is summarised in Table 1. Subsequent headings then consider all policies in turn, other than those sifted-out at Step 1. The consideration has been presented alongside assessment tables for relevant policies with a summary then included beneath the table that discusses the alternative.

Where an alternative from the submission IIA has been assessed this has been reviewed and updated where appropriate. New alternatives have been added for some policies and additional explanation where no alternatives were considered reasonable for other policies.

Table 1.1 : Overview of the three step approach to exploring policy alternatives

Policy	Step reached in the process
PLAN1: Site appraisal, design principles and process	Screened-out at step 2
Area spatial strategy (SP policies x8)	Screened-out at step 2*
H1: Thriving communities	Sifted-out at step 1
H2: New and existing conventional housing	RAs defined and appraised
H3: Genuinely affordable housing	RAs defined and appraised
H4: Delivering high quality housing	RAs defined and appraised
H5: Private outdoor space	Sifted-out at step 1
H6: Purpose-built Student Accommodation	RAs defined and appraised
H7: Meeting the needs of vulnerable older people	RAs defined and appraised
H8: Self-build and Custom Housebuilding	Sifted-out at step 1

H9: Supported Housing	Sifted-out at step 1
H10: Houses in Multiple Occupation (HMOs)	RAs defined and appraised
H11: Purpose Built Private Rented Sector development	RAs defined and appraised
H12: Gypsy and Traveller Accommodation	Sifted-out at step 1
SC1: Social and Community Infrastructure	Sifted-out at step 1
SC2: Play space	Screened-out at step 2
SC3: Health Impact Assessment	Screened-out at step 2
SC4: Promoting Social Value	Sifted-out at step 1
B1: Delivering business floorspace	RAs defined and appraised*
B2: New business floorspace	Screened-out at step*
B3: Existing business floorspace	Sifted-out at step 1
B4: Affordable workspace	Screened-out at step 2
B5: Jobs and training opportunities	Screened-out at step 2
R1: Retail, leisure and services, culture and visitor accommodation	Screened-out at step 2
R2: Primary Shopping Areas	RAs defined and appraised
R3: Islington's Town Centres	RAs defined and appraised
R4: Local Shopping Areas	Screened-out at step 2
R5: Dispersed retail and leisure uses	Sifted-out at step 1
R6: Maintaining and enhancing Islington's unique retail character	Screened-out at step 2
R7: Markets and specialist shopping areas P	RAs defined and appraised
R8: Location and Concentration of Uses	RAs defined and appraised
R9: Meanwhile/temporary uses	Screened-out at step 2
R10: Culture and the Night-Time Economy	Screened-out at step 2
R11: Public Houses	Screened-out at step 2
R12: Visitor accommodation	RAs defined and appraised
G1: Green infrastructure	Screened-out at step 2
G2: Protecting open space	Screened-out at step 2
G3: New public open space	Screened-out at step 2
G4: Biodiversity, landscape design and trees	Sifted-out at step 1
G5: Green roofs and vertical	Sifted-out at step 1
S1: Delivering Sustainable Design	Sifted-out at step 1
S2: Sustainable Design and Construction	Sifted-out at step 1
S3: Sustainable Design Standards	Sifted-out at step 1
S4: Minimising greenhouse gas emissions	Sifted-out at step 1

S5: Energy Infrastructure	RAs defined and appraised
S6: Managing heat risk	Sifted-out at step 1
S7: Improving Air Quality	Sifted-out at step 1
S8: Flood Risk Management	Sifted-out at step 1
S9: Integrated Water Management and Sustainable Drainage	Sifted-out at step 1
S10: Circular Economy and Adaptive Design	Sifted-out at step 1
T1: Enhancing the public realm and sustainable transport	Sifted-out at step 1
T2: Sustainable Transport Choices	Sifted-out at step 1
T3: Car-free development	Sifted-out at step 1
T4: Public realm	Sifted-out at step 1
T5: Delivery, servicing and construction	Sifted-out at step 1
DH1: Fostering innovation and conserving / enhancing the historic environment	Sifted-out at step 1
DH2: Heritage assets	Sifted-out at step 1
DH3: Building heights	RAs defined and appraised
DH4: Basement development	Sifted-out at step 1
DH5: Agent-of-change, noise and vibration	Sifted-out at step 1
DH6: Advertisements	Sifted-out at step 1
DH7: Shopfronts	Sifted-out at step 1
DH8: Public art	Sifted-out at step 1
ST1: Infrastructure Planning and Smarter City Approach	Sifted-out at step 1
ST2: Waste	Sifted-out at step 1
ST3: Telecommunications, communications and utilities equipment	Sifted-out at step 1
ST4: Water and wastewater infrastructure	Sifted-out at step 1
BC1: Prioritising office use	RAs defined and appraised
BC2: Culture, retail and leisure uses	Sifted-out at step 1
BC Area Spatial Strategies (x8)	Sifted-out at step 1
AAP1: Delivering development priorities	Sifted-out at step 1
* SP3, B1 and B2	RAs defined and appraised as a set across the three policies

## 2. Consideration of alternative for Policy PLAN 1

Policy PLAN1 aims to deliver on the aspiration to achieve the highest standards of architectural and urban design in London, to be at the forefront of sustainability and to preserve and enhance the borough's historic environment, its heritage assets and their settings and sets out four key design principles; contextual, connected, include and sustainable.

The approach to design principles has evolved and this was previously explained in paragraph 4.100 of the submission IIA. This context is identified in the Vision and Objectives, Policy PLAN1, Spatial Strategies Topic Paper and explains why the PLAN1 approach is necessary in the context of Islington being the second most densely populated borough in the UK and an extremely limited land supply. The evolution of the policy has seen it move away from an original design policy embedded within the Design and Heritage chapter to an overarching policy that requires a holistic approach to all development. The policy and its approach also enables sustainable development in line with the NPPF which sets out at paragraph 8 the three overarching objectives of the planning system; a) an economic objective b) a social objective c) an environmental objective.

PLAN1 also reflects the principles of Good Growth which are integral to the draft London Plan (2019), including, *inter alia*:

- GG1 which puts inclusive growth at the heart of Good Growth and emphasises the need to plan for good quality inclusive spaces and buildings and the importance permeability.
- GG2 which emphasises the importance of making the best use of land, whilst also taking a design-led approach to optimising development capacity, understanding what is valued about places, strengthening the distinct and varied character of London.
- GG3 which seeks to improve health outcomes and reduce health inequalities by addressing the wider determinants of health (PLAN 1 seeks to promote positive health outcomes through the key design principles).
- GG4 which seeks to create good quality homes that meet high standards of design
- GG5 which seeks to ensure economy benefits are shared more equitably
- GG6 which seeks to achieve resilience through development that also contributes to wider sustainability objectives in tackling climate change for example.

PLAN 1 also aligns with the approach advocated in Policy D3 of the draft London Plan which advocates a design-led approach to development. Strong alignment with the NPPF and London Plan objectives together with Islington's mission of making the borough fairer makes alternatives to this policy unreasonable.

Through its integrated design approach, PLAN1 is a design-led response to building strong and inclusive communities. PLAN1 is the overarching design policy for the implementation of the Local Plan and the Local Plan is clear that high quality design is very important. The four key design principles are considered an essential part of delivering the vision and objectives of the Local Plan, these have evolved from the Government's Lifetime Neighbourhood principles. Policy PLAN1 has adopted the Lifetime Neighbourhood principles that are directly

related to planning and development in forming appropriate key design principles for use in a Local Plan and can apply to all chapters of the Local Plan. The four principles: Connected; Contextual, Inclusive and Sustainable are all crucial to delivering development that meets Islington's needs.

Taking account of the need nationally to create high quality buildings and places and the London Plan approach to delivering good growth and good design alongside the specific context of Islington, the council does not consider that there are reasonable alternatives to this policy.

## 2. Area Spatial Strategies

### Consideration of alternatives for Spatial Strategies (policies SP1-SP8)

The area spatial strategies help deliver the Local Plan objectives and are the spatial expression of the Local Plan policies. The spatial strategies in Islington are based on key areas where the level of change expected over the plan period requires specific spatial policies for managing growth.

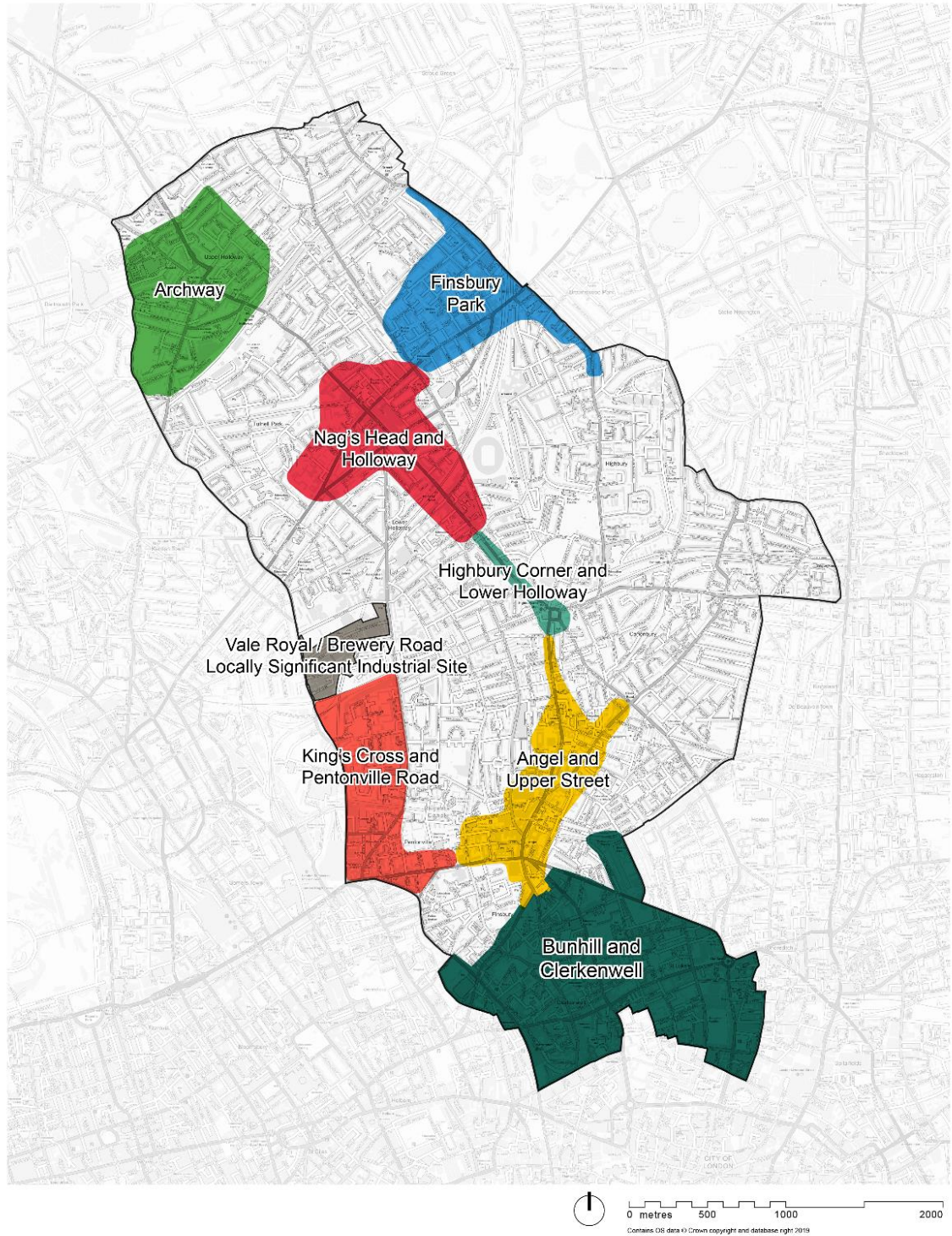
The Local Plan contains a number of spatial strategies for various parts of the borough where growth and change is expected to occur within the plan period. These are shown on figure 4.1 below. Each spatial strategy policy sets out the key priorities and requirements for the respective areas, with a detailed spatial strategy map visualising these. All development proposals within the spatial strategy areas must actively consider how they will address the Local Plan objectives, from the very first stage of the proposal through to any eventual permission.

The area spatial strategies help deliver the Local Plan objectives and are the spatial expression of the Local Plan policies which are assessed in full. All site allocations in the area spatial strategies have been assessed. For completeness and consistency the spatial strategy policies have been considered against the whole assessment framework.

The spatial strategies in Islington are based on key areas where the level of change expected over the plan period requires specific spatial policies for managing growth. The Core Strategy which was adopted in 2011 featured seven key area policies including Bunhill and Clerkenwell, the borough's four town centres and two other key areas of change around key transport hubs and regeneration areas. These seven key areas have been carried forward into the Local Plan with policies which contain a broad vision and strategic approach for each area. As set out in Topic Paper SD20 the issues that existed when the spatial areas were derived continue to exist. The spatial strategy reflects the areas where growth and development needs have been - and continue to be – focused given the constraints and challenges for accommodating growth sustainably that operate within the borough. The amount of development delivered in recent years and further pressure for development means these spatial areas continue to be necessary.

An additional area – the Vale Royal industrial area is included in the Local Plan because of its significance as the largest concentration of industrial land / warehousing / employment land in the borough. Although it should be noted that SP3 is not a newly identified spatial strategy area. It is included in the current Local Plan as part of the King's Cross and Pentonville Road key area.

**Figure 4.1: Map showing Area Spatial Strategies**





The principle of growth and development in these spatial areas is already established through the adopted Core Strategy, and within the context set by the London Plan so it is not considered reasonable to consider alternatives to these locations. The borough outside the spatial areas is largely residential with no significant commercial areas. The largely residential areas are considered less likely to experience significant levels of change given they do not contain town centres or, do not form part of the CAZ and are not proximate to key infrastructure such as public transport hubs and/or located on key commercial routes. Therefore its considered they do not warrant specific growth strategy and it would be unreasonable to consider any of these areas as alternative to the eight spatial strategies identified. Moreover, there are 13 specific sites allocated outside the spatial strategy areas identified under 'Other Important Sites', which have been subject to assessment and consideration for alternative development scenarios therefore site specific opportunities have been considered.

The borough outside of the spatial areas is predominantly residential and whilst there will be development opportunities that do come forward, these will be at a more limited scale and not require specific spatial policies. Moreover other policies in the plan provide a clear basis for guiding development in such locations. Other constraints which affect the potential for growth outside the spatial areas include heritage assets, social infrastructure, transport infrastructure and open spaces. Approximately half of the borough is covered by Conservation Area designations, 41 in total and this is where most of the listed buildings are located. Both Conservation Areas and listed buildings are largely concentrated in the southern half of the borough, south of the Emirates Stadium and to the west of Holloway Road. The Emirates Stadium itself is a constraint as it will inevitably remain in place throughout the plan period. The transport corridors; the East Coast mainline, the overground network, the Regent's canal and the primary road network are constraints through their use, although the road network provides growth opportunities at key junctions. Islington parks and open spaces are protected land use of utmost importance. Given these constraints and the specific borough context, the council does not consider that there are any realistic alternative locations for focusing growth and addressing identified development needs for a range of uses.

An alternative way of viewing this is the variety of existing uses in the spatial strategy areas provides the opportunity for growth. Targeting growth towards the spatial strategy areas therefore responds to the identified need for land supply and changing needs for different uses and the ability for these uses to work together harmoniously. It also reinforces a sustainable pattern of development given the proximity of the Spatial Strategy areas to key transport links present, and their location along historic transport routes. Specific policies are needed within these areas to help guide the competing pressures for land use as well as to ensure that growth and change is accommodated sustainably. These locations reflect the locations in the London Plan where growth is focused and are therefore consistent with the objective of achieving Good Growth. Part of achieving the Mayor's aim of Good Growth is the objective to make the best use of land which means directing growth towards the most accessible and well-connected places to make the most efficient use of the existing public transport network. It is not considered that a plan without specific spatial policies within these locations would be justified, effective or deliverable or lead to sustainable development outcomes.

Presentationally there could have been one overarching spatial strategy policy rather than eight individual strategies with further detailed content included elsewhere in thematic policies in the Local Plan. However this would not have changed the areas identified for growth, which would have remained and may have led to repetition and a lack of clarity from a spatial point of view.

Most of the spatial areas accommodate a range of uses and do not restrict other uses. In terms of alternative uses which should have been assessed by the IIA as reasonable alternatives, the one use which is restricted, to an extent, across the town centre focused spatial areas is residential uses in town centres. This is set out in Policy R3. Other restricted uses such as hotels and Purpose built student accommodation have had a more permissive alternative considered which could potentially be an alternative in some of the spatial strategy areas<sup>1</sup>. With regards conventional residential use the topic paper for Retail, Leisure and Services, Culture and Visitor Accommodation (SD22) sets out why the council considers residential uses to be problematic in terms of how they co-exist with a broad range of commercial uses found in Town Centres as well as the risks posed in terms of their potential negative impacts on commercial uses. Residential uses are not precluded. Policy R3 strongly resists residential uses at ground floor level. Changes of use at upper floor levels, whilst permitted, would have to comply with criteria in relation to residential quality, impact on continued operation of other town centre uses and loss of ancillary floorspace. The significant additional promotion of residential use in the town centre spatial strategy areas has not been included as an alternative as it would conflict with the borough wide approach.

The assessment of alternatives for SP3 is set out below in Section 4: Inclusive Economy.

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<sup>1</sup> Paragraphs 4.206 to 4.211 Integrated Impact Assessment Islington Local Plan Proposed Submission (Regulation 19), September 2019

### 3. Thriving Communities

#### Consideration of alternative for Policy H1

Policy H1 sets out the strategic policy approach to meeting the range of various housing needs in the borough and meeting need for social and community infrastructure. No alternatives were considered for policy H1 and no mitigation or enhancements were identified.

#### Assessment of alternative for Policy H2: New and existing conventional housing (criterion H)

Policy H2 is focused on housing delivery; quantity of units, new build, protection of existing, conversion of and unit size mix. No alternatives were considered for much of policy H2 apart from one aspect where a strategic choice was recognised.

The reasonable alternative considered for policy H2 (criterion H). Criterion H includes a requirement for all residential developments of 20 units and over to enter into a Section 106 legal agreement to ensure that all residential units are not left unoccupied for an extensive period of time, to prevent wasted housing supply. The following alternative is considered.

Table 1.2 Policy H2 alternative description

Alternative Reference	Alternative Description
1.	The submission policy, but with criterion H removed (Alternative to Policy H2).

Table 1.3: Assessment of alternative for Policy H2: New and existing conventional housing (criterion H)

IIA Objective	Policy H2	Alternative to Policy H2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	0	<p>Policies H1 and H2 will have a significant positive effect. H1 promotes high quality new homes which fully integrate within, and relate positively to, the immediate locality. Both policies promote optimal densities having regard, inter alia, to the specific site context, which will allow for location sensitive density levels to be determined. Gated development - which can isolate new development and impact on local character, as well as reducing opportunities for crime reduction through increased passive surveillance – is explicitly identified as unsuitable in policy H1. Policy H1 sets out the expectation that new homes should be adaptable over their lifetime and meet a variety of needs, which contributes to the positive effect.</p> <p>New positive effects have been identified following review of the IIA as part of the examination for Policy H2 which does not change the overall effect. Policy H2 restricts bedsits on the basis that there is no evidence of need so they are not a priority unit size and the approach sets out priorities for larger unit sizes, in particular 2 bedroom units. Larger unit sizes are more likely to create robust and adaptable dwellings and buildings.</p> <p>No effect for alternative to policy H2 which relates to a specific aspect of policy H2.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	0	<p>Policy H2 will have significant positive effect. It requires development proposals involving new housing to optimise the use of the building/site. This includes consideration of competing demands from other land uses. The policy resists smaller studio and bedsit units, and high concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing need and can be more easily adapted to evolving social and economic needs more generally. H2 also prevents housing supply being wasted by ensuring new homes will be occupied; this is a direct measure to ensure that land will actually be used for its permitted purpose, and hence directly leads to the efficient use of land.</p> <p>There is a minor negative effect for the policy H2 alternative, as it would mean there is less certainty that units will be occupied. This would have the effect of units not fulfilling the boroughs housing</p>

IIA Objective	Policy H2	Alternative to Policy H2	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>need. However it is acknowledged that development finance could be withheld by lenders, on the basis of concerns over the risk of lack of sales due to the obligation, but this would only likely occur where the development's business model depended on selling to buyers (domestic and foreign) who do not intend to comply with the obligation. If this were the case, then this would raise fundamental questions over the extent to which the proposed development would meet any of Islington's and London's housing needs in the first place.</p> <p>It is also noted that the Council engaged with the Council for Mortgage Lenders when drafting the adopted SPD. In light of this, the council considers that there would be no real issues faced by prospective purchasers in obtaining mortgage finance to buy a dwelling subject to the Local Plan/SPD obligations, and therefore there is little scope to suggest that development finance would be jeopardised as a direct result of the obligations. Overall given the uncertainty the effect is considered neutral for the alternative for policy H2.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy and alternative to policy H2
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	<p>Policy H2 will have a minor positive effect. The requirement for new housing to be occupied could help to support local services and facilities, for example through increased custom from new occupiers. H2 requires the optimal use of sites/buildings; when considering what constitutes 'optimal' for a specific proposal, consideration should be given to social infrastructure requirements and the impact on existing social infrastructure. This will help to ensure that the appropriate level of SI is available for the local population.</p> <p>No effect for policy and alternative to policy H2 which relates to a specific aspect of policy H2.</p>

IIA Objective	Policy H2	Alternative to Policy H2	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	<p>Policy H2 will have significant positive effect. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that affordable housing provision can meet the broadest range of need possible. H2 also seeks the optimum use of sites/buildings, informed in part by housing density.</p> <p>No effect for alternative to policy H2 which relates to a specific aspect of policy H2..</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	-	<p>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that housing provision can meet the broadest range of need possible and reduce inequality providing more opportunity and potentially addressing overcrowding issues.</p> <p>There is a minor negative effect for the alternative policy H2. Without guarantees on occupancy, units could remain vacant which does not promote social cohesion.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. H2 requires the optimal use of sites/buildings and consideration of social infrastructure (SI) requirements and impact on existing SI. This will help to support existing facilities and ensure that the appropriate level of SI is available for the local population.</p> <p>No effect for alternative to policy H2 which relates to a specific aspect of policy H2.</p>

IIA Objective	Policy H2	Alternative to Policy H2	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	<p>New effects for Policy H2 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy H2 considers the interaction with other policy priorities in particular new business floorspace helping ensure sufficient space is provided in the right locations where appropriate.</p> <p>No effect for alternative to policy H2 which relates to a specific aspect of policy H2.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for policy H2 and alternative to policy H2
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H2 and alternative to policy H2
11. Create, protect and enhance suitable wildlife habitats wherever possible and	0	0	No effect for policy H2 and alternative to policy H2

IIA Objective	Policy H2	Alternative to Policy H2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
protect species and diversity.			
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H2 and alternative to policy H2
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy H2 and alternative to policy H2
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H2 and alternative to policy H2



IIA Objective	Policy H2	Alternative to Policy H2	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)

**Summary**

Much of the assessment of policy H2 focuses on the other aspects of policy H2. The positive effects in relation to criterion H include meeting housing needs and ensuring land is used efficiently and supporting local services. The assessment highlights some of the problems that arise from leaving properties empty. The appraisal does not highlight any benefits to the alternative approach of removing criterion H, although it does highlight some uncertainty around the matter of development finance and the assessment acknowledges that development finance could be withheld by lenders, on the basis of concerns over the risk of lack of sales due to the obligation. In practice any such effect is thought likely to be marginal and the effect is judged neutral.

### Consideration of Alternatives for Policy H3 – Affordable Housing and Viability

Policy H3 focuses on securing affordable housing from all development and suitable tenure mixes to meet local housing need.

The submission IIA identified and considered by assessment two reasonable alternatives to Policy H3; 1) the approach to determining the proportion of affordable housing delivered at development sites; and 2) the site size threshold below which sites are exempt from delivering affordable housing. In addition the Inspectors have sought further assessments in relation to use of the Mayor’s ‘threshold’ approach and use of the NPPF approach to small sites ie where no affordable housing requirement is sought from small sites. The following alternatives are considered:

Table 1.4: Policy H3 Alternative Description

Alternative Reference	Alternative Description
1.	Using the Mayor’s ‘threshold’ approach to securing on-site affordable housing
2.	An assessment of a viability tested route for every site, ie no threshold percentage target
3.	Imposing a higher trigger of 3 to 9 net additional units for affordable housing small sites contributions
4.	An approach where there is no affordable housing requirement for small sites

To aide the review, the assessment of additional alternatives has been combined with the existing assessment of the alternatives in the assessment table below for policy H3, alongside the assessment for policy H3. It should be noted that there are a number of different permutations of all four of these alternatives which could be combined in a number of ways. For example applying the small sites approach where no affordable housing requirement for small sites is required could be combined with either alternative 1 or 3. Also there is a possibility that the Mayor’s threshold approach could be combined with alternative 3; no percentage target, a viability tested route. However, for the sake of assessment these have been disaggregated to present distinct policy choices to be considered in isolation.

Table 1.5 Assessment of Alternatives for Policy H3 – Affordable Housing and Viability

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.
2. Ensure efficient use of land, buildings and infrastructure	+	-	-	+	--	<p>Policy H3 will have minor positive effect. It provides a strong requirement for the delivery of affordable housing, which ensures that this key priority is appropriately factored in to any judgement on balancing competing development needs. Delivery of affordable housing is one of the key development needs of the area.</p> <p>There is a minor negative effect for the policy H3 alternative 1. While the alternative would allow for site specific evidence to be provided in more circumstances, which introduces more flexibility, it would likely result in the delivery of less affordable housing and therefore contribute less to meeting the boroughs identified development needs. Given the Viability evidence which demonstrates that more than 35% affordable housing can be achieved, this approach whilst positive when considered against the baseline, in comparison to the preferred approach has a minor negative effect.</p> <p>Alternative 2, whilst similar to alternative 1 introduces more flexibility to provide site specific viability evidence for every development proposal, an approach akin to the achieving 'the maximum</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>reasonable amount' set out in the current adopted policy. Developers providing individual site viability evidence for every individual scheme should achieve the same outcome as the preferred approach based on the results of a viability assessment. Seeking the maximum amount possible based on individual site viability should achieve similar results to the preferred approach which is reliant on the evidence that sites can viably deliver 45% or more affordable housing. Also alternative 2 provides the most flexibility for developers to demonstrate individual site circumstances where there might be possible issues with viability. However this very flexibility is considered to create greater uncertainty in the longer term as providing developers the opportunity to put forward a viability case for every scheme will likely lead to delays, which would reduce the rate of delivery of housing and potentially the quantum of affordable housing with protracted negotiations for each site. In the longer term this negative effect is likely to become more significant and could affect the wider delivery of housing by creating greater uncertainty affecting the land market by distorting the price developers pay for land where they consider there is the opportunity to challenge policy on viability grounds. When developers overpay for land then they are unable to provide adequate viability evidence which can lead to lengthy procedural challenges and ultimately the sale of the site.</p> <p>There is a minor negative effect for the policy H3 alternative 3. The alternative may incentivise 1 or 2 unit schemes due to the non-imposition of affordable housing contributions, which could lead to under-optimisation of land. It would also lessen the ability to meet development needs as there would be less contributions towards affordable housing. This negative effect would increase for alternative 4 with the potential for the threshold for affordable housing to be avoided through over-sized units for example which is</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						inefficient use of land as it reduces both the overall quantum of housing and reduces contributions towards affordable housing.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	No effect for alternatives to policies H3 or policy H3.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	0	0	0	<p>Policies H1 and H3 will have a minor positive effect. The core aim of policy H1 is the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. It also seeks new housing development that is fully integrated within, and relates positively to, the immediate locality; this would include consideration of access to services. H1 in particular will support the provision of necessary social infrastructure to support residents, workers and visitors helping meet needs and improve access to essential services in the right locations.</p> <p>Policy H3 requires delivery of affordable housing, but will deliver similar effects as it provides an important component of mixed and balanced communities.</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						No effect for alternatives to policies H3.
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	--	-	-	--	<p>Policy H3 will have significant positive effect. It will increase the delivery of affordable housing through implementation of robust policy and the refusal of applications which do not provide the appropriate level of AH; and through collection of financial contributions which will go toward measures to further increase AH supply. The policy requires that the majority of AH secured is social rent, which reflects housing need established by evidence.</p> <p>There is a significant negative effect for policy H3 alternative 1, as it would likely result in less affordable housing being delivered when considered over the plan period and therefore contribute less to meeting the boroughs identified need for affordable housing. Given the Viability evidence which demonstrates that more than 35% affordable housing can be achieved through this approach whilst positive when considered against the baseline, in comparison to the preferred approach has a minor negative effect.</p> <p>There is a minor negative effect for policy H3 alternative 3. The alternative would result in less contributions towards affordable housing and may dis-incentivise higher density development (as 1 or 2 unit schemes may be preferred due to the non-imposition of contributions).</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>Alternative 4 for policy H3 would have a significant negative effect on access to affordable housing - the London Borough of Islington has received small sites affordable housing contributions amounting to £12.4 million since 2014. Reducing the contributions for affordable housing from small sites contributions to zero would result in a loss in contributions and have a direct effect on the delivery of council housing to meet significant identified affordable housing needs. Meeting the affordable need in Islington is likely to be impossible. The level of need is greater than the entire housing target for the plan period, therefore even if Islington meets its housing targets entirely through the provision of social rented accommodation, this would not meet affordable need. Islington has the eighth highest quartile house price in the country yet close to a third of Islington households have incomes of less than £20,000 per year, a higher proportion than the London average. This is why a key objective for the Local Plan is the delivery of affordable housing. Whilst there may be a positive effect on stimulating housing delivery overall from small developers by allowing minor development to be exempt from affordable housing contributions this will not make the housing provided any more affordable in the Islington context and therefore not contribute to helping meet the need for affordable housing in the borough.</p> <p>In addition, the effect of permitted development rights for upwards extensions is likely to reduce the quantum of contributions from small scale development by taking away the ability to require affordable housing contributions from this development. This further increases the need for development which can provide affordable housing contributions to deliver this.</p> <p>Alternative 2, whilst similar to alternative 1, introduces more flexibility to provide site specific viability evidence for every</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>development proposal, an approach akin to the achieving 'the maximum reasonable amount' set out in the current adopted policy. The effect is considered to have a minor negative effect in the short and medium term. Developers providing individual site viability evidence for every individual scheme should achieve the same outcome as the preferred approach based on the results of a viability assessment. Seeking the maximum amount possible based on individual site viability should achieve similar results to the preferred approach which is reliant on the evidence that sites can viably deliver 45% or more affordable housing. Also alternative 2 provides the most flexibility for developers to demonstrate individual site circumstances where there might be possible issues with viability. However this very flexibility is considered to create greater uncertainty in the longer term as providing developers the opportunity to put forward a viability case for every scheme will likely lead to delays, which could reduce the rate of delivery of housing and potentially the quantum of affordable housing with protracted negotiations for each site. In the longer term this negative effect is considered to become more significant and could affect the wider delivery of housing by creating greater uncertainty affecting the land market by distorting the price developers pay for land where they consider there is the opportunity to challenge policy on viability grounds. When developers overpay for land then they are unable to provide adequate viability evidence which can lead to lengthy procedural challenges and ultimately the sale of the site as has been evidenced in a number of cases in the borough previously.</p>



IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
6. Promote social inclusion, equality, diversity and community cohesion	+	-	-	-	--	<p>Policy H3 will have minor positive effects. Increased delivery of AH could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. AH is also an important component in delivering mixed and balanced communities which will improve social cohesion and integration.</p> <p>Minor negative effects for alternatives 1 and 3 and a significant negative effect for alternative 4 for policy H3. For the reasons outlined in response to objective 5 the alternatives would deliver less affordable housing, which would do less to reduce poverty and result in less community cohesion. Alternative 4 is judged to have a more significant effect with considerable impacts on reducing contributions from small sites. Small sites are set to contribute significant amounts of housing to the boroughs housing target and therefore will contribute significant contributions to affordable housing. The London Borough of Islington has received small sites affordable housing contributions amounting to £12.4 million since 2014.</p> <p>Alternative 2 is considered to have a minor negative effect. For the reasons outlined in response to objective 5 the alternatives would deliver less affordable housing, which would do less to reduce poverty and social exclusion.</p>
7. Improve the health and wellbeing of the population and	+	-	-	-	-	<p>Policy H3 will have minor positive effect. By providing greater amounts of affordable accommodation, greater amounts of people are less likely to experience financial hardship, which can be a key contributor to poor mental and physical health. By reducing the proportion of income spent on accommodation, this frees up a</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
reduce health inequalities						<p>greater proportion of income for other living costs such as utilities bills, which could reduce fuel poverty.</p> <p>Minor negative effects have been identified for alternatives 1, 3 and 4 as explained under objective 5 they would deliver less affordable housing, which means there would be less reduction in poverty which could affect health and wellbeing with links between housing costs and mental health issues for example.</p> <p>Alternative 2 is considered to have a minor negative effect on the objective. Under objective 5 the alternative would deliver less affordable housing, which means there would be less reduction in poverty which could affect health and wellbeing with links between housing costs and mental health issues for example. Housing is one of the key determinants of health and wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	-	<p>New effects for Policy H3 have been identified which changes the effect from neutral to minor positive following review of the IIA as part of the examination process. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital.</p> <p>There are likely to be neutral effects from alternatives 1, 2 and 3 for policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital. All the policy alternatives reduce the potential quantum of affordable</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>housing delivered to varying extents as set out in more detail in response to objectives 2 and 5 above. Alternative 4 would reduce the contributions for affordable housing from small sites contributions to zero so would have a negative effect.</p>
<p>9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</p>	+	0	0	0	-	<p>A new effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel.</p> <p>There are likely to be neutral effects from alternatives 1, 2 and 3 for policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital increasing the need to travel. All the policy alternatives reduce the potential quantum of affordable housing delivered to varying extents as set out in more detail in response to objectives 2 and 5 above. Alternative 4 would reduce the contributions for affordable housing from small sites contributions to zero so would have a negative effect.</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	0	0	0	<p>New effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process.. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel and contribution to climate change.</p> <p>There are likely to be neutral effects from alternatives 1, 2 and 3 for policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						people out of the borough and potentially out of the capital and can increase the need to travel and consequently increase emissions. All the policy alternatives reduce the potential quantum of affordable housing delivered to varying extents as set out in more detail in response to objectives 2 and 5 above. Alternative 4 would reduce the contributions for affordable housing from small sites contributions to zero so would have a negative effect.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.

## Summary

The appraisal highlights that there are arguments for allowing flexibility in some limited circumstances. However, greater flexibility brings a range of issues which would undermine the delivery of affordable housing. The assessment draws on the experience in Islington which is that negotiating affordable housing provision on a site-by-site basis, informed by site-specific viability evidence, leads to lengthy and costly delays to delivery. On balance, the appraisal reaches the conclusion that the submission policy will deliver the most affordable homes borough-wide in the long term, drawing on the evidence set out in the Local Plan Viability Study (2018);

The appraisal highlights the quite wide ranging draw-backs to exempting either all small sites or some small sites, including because it can lead to development sites being under-utilised, e.g. delivery of a small number of overly large new homes (so as to be exempt from making a contribution to affordable housing) rather than a larger number of appropriately sized new homes. The significant reduction in financial contributions of not requiring any contributions from small sites was identified as having a significant negative effect on the delivery of affordable housing overall. Whilst it is recognised that the policy could lead to viability challenges for some small sites, there is flexibility in policy to take account of site specific viability evidence in exceptional circumstances. The submission policy is supported by the Local Plan Small Sites Viability Study tested the viability for different types of small site and concluded that the majority of development typologies will be able to absorb the required level of financial contributions set out in the submission policy.

## Assessment of alternative for Policy H4: Delivering high quality housing

Policy H4 sets out how high quality housing will be delivered in the borough including requirements covering space standards, accessibility, aspect, ceiling heights, noise and vibration, natural light and tenure blind principles. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe, where noise impacts and vibration is mitigated, and natural ventilation is promoted. The alternative to Policy H4 is as follows.

Table 1.6 Policy H4: Alternative Description

Alternative Reference	Alternative Description
1.	Policy H4 would apply the 2015 National Technical Housing Standard without additional local design standards

National Standards are judged to not specify sufficient detail with regards to:

- transport/drop off/storage to individual dwelling entrance will be limited to 75m
- opening weight of common entrances and accessible ironmongery and entryphones
- minimum width communal circulation corridors
- sufficiently large enough common/ shared entrances for people to manoeuvre with shopping and/or baby buggies, and in wheelchairs, with ease
- maximum number of dwellings accessed from a single core
- flush internal thresholds
- step free access to balconies and terraces
- suitable and flexible bathrooms
- wheelchair accessible refuse storage

Further to this National Technical Housing Standard specifies a lower ceiling height of 2.3 metres. Local design standards include a ceiling height of 2.6 metres. Lower ceiling heights of 2.3m would adversely affect levels of daylight and sunlight, over-heating and ventilation, flexibility and use of a room and the sense of space and general comfort of a dwelling. In the Islington context, with its existing high densities, and where higher density new development is supported, higher ceilings are particularly important to off-set any impacts of higher density development. Therefore having a lower ceiling height could have an impact on peoples wellbeing. In addition, lower ceiling heights would increase the likelihood of over-heating through reduced ventilation and therefore not encourage resilience of the housing stock to address changing conditions due to climate change.

Regarding optimising the use of previously developed land the National Technical Housing Standard does not preclude the provision of two storey wheelchair housing with an internal lift, which, based on Islington experience, is inconvenient, expensive and unsustainable and rejected by the vast majority of those on the housing waiting list. Similarly, where units are located above ground level and no second (back-up) lift is provided, they have proven to be less desirable, due to concerns about mechanical breakdown of single lifts and the impacts this could cause on access and movement of wheelchair users. These issues mean that wheelchair units may not end up housing disabled people, which means that needs for wheelchair housing would go unfulfilled. In addition lifts also require additional energy and therefore contributes to an increase in carbon emissions and fuel poverty

Regarding robust and adaptable buildings the National Technical Housing Standard would be applied to new build proposals only and does not consider redevelopment of existing buildings, which would mean a number of applications would not be subject to specific design standards. In addition the quality of housing would be lower would not adequately meet the needs of Islington’s population.

Table 1.7: Assessment of Alternatives for Policy H4: Delivering high quality housing

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
1. Promote a high quality, inclusive, safe and sustainable built environment	++	-	<p>Policy H4 will have a significant positive effect. Delivery of the policy requirements will create inclusive, robust and adaptable buildings that can respond to changes over their life, for example, ensuring minimum space standards and wheelchair accessible/adaptable standards will enable a unit to be occupied by families with young children, and older people. The standards set out in H4 are people-focused to ensure that the needs of individuals and families are at the heart of new housing in the borough.</p> <p>There is a minor negative effect for the policy H4 alternative as implementation of the National Technical Housing Standard would not create the same level of robust and adaptable buildings that can respond to change over their lifetime. The National Technical Housing Standard would be applied to new build proposals only and does not consider redevelopment of existing buildings, which would mean a number of applications not be subject to specific design standards.</p>



IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
2. Ensure efficient use of land, buildings and infrastructure	++	+	<p>Policy H4 will have significant positive effect. It ensures that where housing is developed, it is high quality which helps make the most out of land available. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. These standards link with other plan policies including sustainable design requirements to ensure that development contributes to a broad range of plan priorities and hence meets a broad range of identified needs. It is noted that H4 includes minimum space standards which have an impact on how efficiently land is used and mitigates the impact of potentially low quality small units/person. Space standards would also apply to the alternative.</p> <p>The National Technical Housing Standard does not preclude the provision of two storey wheelchair housing with an internal lift, which, based on Islington experience, is inconvenient, expensive and unsustainable and rejected by the vast majority of those on the housing waiting list. Similarly, where units are located above ground level and no second (back-up) lift is provided, they have proven to be less desirable, due to concerns about mechanical breakdown of single lifts and the impacts this could cause on access and movement of wheelchair users. These issues mean that wheelchair units may not end up housing disabled people, which means that needs for wheelchair housing would go unfulfilled.</p> <p>However not applying the local standards in relation to accessibility, ceiling heights and restricting two storey wheelchair housing, would result in a minor positive effect through making even more out of the land available albeit to the detriment of some aspects of quality. For example if more units could access off one core, ceiling heights could be lower and corridors / entrances narrower then it may result in a small increase in overall unit delivery from a scheme. Cumulatively across the borough this could be considered a minor positive effect for the policy H4 alternative, regarding optimising the use of previously developed land.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy H4 and alternative to policy H4.

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	No effect for policy H4 and alternative to policy H4.
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	<p>Policy H4 will have significant positive effect. It will ensure that all housing is of a high quality through requirement to meet specific design standards, including minimum space standards. Taken together and with other policy requirements of the Local Plan, the standards in H4 will deliver homes that are adaptable to meet the diverse and changing needs of Islington's population. The policy requires adherence to tenure blind principles to ensure that affordable and market housing is integrated.</p> <p>There is a neutral effect for the policy H4 alternative as implementation of the National Technical Housing Standard would provide a quality of housing that may not adequately meet the diverse needs of Islington's population, as it does not specify sufficient detail with regards to:</p> <ul style="list-style-type: none"> <li>• transport/drop off/storage to individual dwelling entrance will be limited to 75m</li> <li>• opening weight of common entrances and accessible ironmongery and entryphones</li> <li>• minimum width communal circulation corridors</li> <li>• sufficiently large enough common/ shared entrances for people to manoeuvre with shopping and/or baby buggies, and in wheelchairs, with ease</li> <li>• maximum number of dwellings accessed from a single core</li> <li>• flush internal thresholds</li> <li>• step free access to balconies and terraces</li> <li>• suitable and flexible bathrooms</li> <li>• wheelchair accessible refuse storage</li> </ul> <p>Lower ceiling heights of 2.3m would adversely affect levels of daylight and sunlight, over-heating and ventilation, flexibility and use of a room and the sense of space and general comfort of a dwelling. In</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>the Islington context where higher density development is supported, higher ceilings are particularly important to off-set any impacts of higher density development.</p> <p>However not applying the local standards in relation to accessibility, ceiling heights and restricting two storey wheelchair housing, would result in a minor positive effect through making even more out of the land available albeit to the detriment of the aspects of quality noted. For example if more units could access off one core, ceiling heights could be lower and corridors / entrances narrower then it may result in a small increase in overall unit delivery from a scheme. Cumulatively across the borough this could be considered a minor positive effect for the policy H4 alternative, regarding optimising the use of previously developed land.</p> <p>On balance the positive effect of increasing supply and meeting more housing need is not considered to outweigh the potential negative effects on overall quality of housing that the alternative to Policy H4 would have and the overall the effect is considered to be neutral.</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	0	<p>Policy H4 will have a significant positive effect. The requirement for new development to be 'tenure blind' will promote social cohesion and integration. This requirement, and others included in H4 such as requiring certain proportions of wheelchair accessible and adaptable properties, could lead to greater equity between population groups and those with protected characteristics.</p> <p>No effect for alternative to policy H4.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	-	<p>Policy H4 will have significant positive effect. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe. Delivery of high quality homes in line with H4 is therefore likely to improve health and wellbeing. H4 has specific requirements relating to noise and vibration to ensure that potential impacts are identified and mitigated. The policy also includes detailed measures to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage); this could assist with reducing fuel poverty. The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights create a sense of space and improve quality of accommodation and also help keep rooms cooler in summer, which help improve peoples' health and wellbeing.</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>There is a minor negative effect for the policy H4 alternative due to the lower ceiling heights and the impact on the standard and quality of accommodation. Lower ceiling heights would adversely affect the general comfort of a dwelling. In the Islington context where higher density development is supported, higher ceilings are particularly important to off-set any impacts of higher density development which can otherwise have a negative effect on wellbeing.</p>
<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	0	0	<p>No effect for policy H4 and alternative to policy H4.</p>
<p>9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</p>	0	0	<p>No effect for policy H4 and alternative to policy H4.</p>
<p>10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</p>	0	0	<p>No effect for policy H4 and alternative to policy H4.</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H4 and alternative to policy H4.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>There are minor positive effects for policies H1 and H4. Both policies promote high quality housing which is comfortable, improves the quality of life of residents and contributes to improvements in health. What constitutes 'comfortable' is ever changing given the increasing impacts of climate change, but the policies promote the mitigation and adaptation of climate change impacts through design without reliance on technological and/or retrofitted solutions. For example, Policy H4 includes detailed housing standards including measures to reduce impacts of noise and vibration and to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage). The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights help keep rooms cooler in summer reducing need for mechanical ventilation and maximising light reduces period when electrical light is used.</p> <p>There is a minor negative effect for the policy H4 alternative. The National Technical Housing Standard does not preclude two storey wheelchair housing with an internal lift. As well as being inconvenient and expensive (which often leads to wheelchair dwellings with a lift being rejected by the vast majority of those on the housing waiting list), lifts also require additional energy and therefore contributes to an increase in carbon emissions and fuel poverty.</p> <p>In addition, lower ceiling heights would increase the likelihood of over-heating through reduced ventilation and therefore not encourage resilience of the housing stock to address changing conditions due to climate change.</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	++	-	<p>Policy H4 will have significant positive effect. The policy requires new homes to consider how recycling and waste arising from occupation of the development will be stored, collected and managed, which could contribute to increased levels of recycling. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. This will contribute to the delivery of a circular economy.</p> <p>There is a minor negative effect for the policy H4 alternative, regarding ensuring a design is appropriate for the lifetime of the development. Implementation of the National Technical Housing Standard would be applied to new build proposals only and not the development of existing buildings so misses the opportunity to create an overall stock of homes that is adaptable and capable of flexing to diverse and changing needs. The lesser standards than those proposed in the policy approach would also mean that more resource intensive future adaptations may be necessary, rather than considering meeting a range of occupier needs from the outset.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H4 and alternative to policy H4.

## Summary

Whilst there could be benefits to increasing the supply of housing from the alternative, it is not possible to conclude that these would be significant enough and that both more homes and more affordable homes would be delivered. On balance the positive effect of ensuring the quality of housing is considered to outweigh the alternative to Policy H4. Whilst it is noted that the Local Plan Viability Study (2018) did not explicitly examine the viability implications of requiring locally established design standards, it does apply construction costs that mirror construction standards contained in the London Plan therefore the study broadly considers standards similar to the local standards - ceiling heights for example are similar in the adopted London Plan which strongly encourages ceiling heights of at least 2.5 metres.



### Consideration of alternative for Policy H5: Private outdoor space

Policy H5 sets out how private outdoor amenity space should be provided in the borough which is an important issue given the deficiency of open space in the borough. No alternatives were considered for policy H5 and no mitigation or enhancements were identified.

### Assessment of alternative for Policy H6: Purpose-built student accommodation

Policy H6 restricts new development to an allocated site and redevelopment and/or intensification of existing purpose-built student accommodation and ensures a high standard of amenity for future occupiers. The policy alternative to Policy H6 would apply the London Plan policy H15: Purpose-built student accommodation which seeks to ensure that local and strategic need for purpose-built student accommodation is addressed and encourages student housing as part of mixed-use regeneration and redevelopment schemes in locations well-connected to local services by walking, cycling and public transport.

Table 1.8 Policy H6: Alternative Description

Alternative Reference	Alternative Description
1.	A more positive/permissive approach, in accordance with London Plan Policy H15

Table 1.9 Assessment of Alternatives for Policy H6: Purpose-built student accommodation

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>New effects have been identified which improve the effects for H6 and H10 following review of the IIA as part of the examination process. The policies will have minor positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to a safer environment.</p> <p>New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IIA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</p>



IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			Overall considering the above minor negative effects for H6 and H10 around flexible and adaptable buildings together with the minor positive effects for site management plans is considered to have an overall neutral effect for these policies.
2. Ensure efficient use of land, buildings and infrastructure	-	-	<p>There is a minor negative effect for the policies H6, H7, H10 and H11. The <b>land uses</b> would not be sufficiently flexible and adaptable <b>in most cases</b> to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Policy H11 would reduce the ability of development to meet wider development needs through likelihood of delivering less affordable housing. Providing these forms of accommodation would therefore not optimise the use of land.</p> <p>There is a minor negative effect for policy H6 alternative. The alternative would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that purpose built student accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing this form of accommodation would therefore not optimise the use of land.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy H6 and alternative to policy H6.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policy will have minor positive effects through the requirement for a site management plan which will in part manage potential for noise related anti-social behaviour which can help contribute to a safer environment. In addition the policy makes clear that change of use on a temporary basis to visitor accommodation is not acceptable.

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			The alternative to Policy H6 would have same effect as policy H6 which would be more positive if the alternative delivers more student accommodation.
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	--	<p>There is a minor negative effect for the land uses H6, H10 and H11. They would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. Whilst Policy H6 expects provision of affordable student accommodation, its recognised that this is not meeting affordable housing need so can't be considered to help meet an identified need in the borough. In addition it is unclear whether affordable student accommodation would be likely to meet accommodation needs of Islington students. Therefore effect is considered negative. Policy H7 strongly resists market extra care accommodation and is supportive of social rent extra care so is considered neutral.</p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future and do not represent a diversity of housing sizes.</p> <p>There is a significant negative effect for the alternative effect for policy H6 alternative as it would not increase the supply of affordable housing, rather it would provide affordable student accommodation and be a forgone opportunity for conventional housing delivery.</p> <p>In addition purpose-built student accommodation in particular tends to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which contributes to reducing inequality.

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			Because of new positive effects identified for Policy H6 it is considered that the minor negative effect for the alternative will become a neutral effect. A minor effect is created by purpose-built student accommodation potentially creating communities which are more itinerant because they are not designed for long term occupation therefore undermining social cohesion. When considered together with the new effects as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which contributes to reducing inequality it is considered the overall effect is neutral.
7. Improve the health and wellbeing of the population and reduce health inequalities	-	-	Policy H6 and H10 are both minor negative as they do not provide the same quality of residential accommodation as conventional housing with no private outdoor space for example undermining the concept of the home as a place of retreat. In addition trends in student accommodation are seeing studios preferred over communal flats reducing the opportunity for social interaction between students. There is the same minor effect for the alternative.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	<p>New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which can also contribute towards training support for local people helping to increase their employment opportunities.</p> <p>The alternative to Policy H6 would have same effect as policy H6 which would be more positive if the alternative delivers more student accommodation.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for policy H6 and alternative to policy H6.

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H6 and alternative to policy H6.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H6 and alternative to policy H6.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H6 and alternative to policy H6.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	--	<p>There is a minor negative effect for policies H6 and H10. Due to their design, student accommodation and large-scale HMOs may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs.</p> <p>There is a significant negative effect for the alternative to policy H6 as due to their design, purpose-built student accommodation may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs. There is a significant negative effect for the alternative policy H6 compared to H6 given the potential increase in quantity of purpose-built student accommodation the alternative would support.</p>
14. Maximise protection and enhancement of	0	0	No effect for policy H6 and alternative to policy H6.

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
natural resources including water, land and air			

### Summary

The appraisal highlights two main reasons for restricting student accommodation in a densely populated borough such as Islington; land will typically be better used for housing, and student accommodation is typically not suited to retrofitting for housing. The assessment of the alternative recognises the benefits of supporting student accommodation, which includes increased bursary contributions which contributes to reducing inequality by helping students leaving council care and students facing hardship however on balance this does not outweigh the submission policy.

## Assessment of alternative to Policy H7: Meeting the Needs of Vulnerable Older People

Policy H7 sets out policy to meet the need for accommodation for older people and provides related design quality. The additional assessment requested by the Inspectors will assess as an alternative a more permissive policy framework for market extra care housing for older people and the use of the London Plan benchmark instead of local figures for housing for older people.

Table 1.10: Policy H7 Alternative Description

Alternative Reference	Alternative Description
1.	A more positive/permissive approach involving use of the London Plan benchmark, which for Islington would mean delivering 60 units per annum, instead of requiring local evidence of need for housing for older people.

By 'more permissive' the alternative is considered to remove the resistance to market extra care housing and also remove the policy test to demonstrate evidence of local unmet need for specialist older peoples accommodation. Use of the London Plan benchmark would provide the context for such an approach, providing a figure for specialist accommodation for each borough based upon a London-wide set of assumptions.

The other alternative not considered would be the collaborative approach suggested in the London Plan Policy H13 that suggests boroughs work with providers to identify sites suitable for older persons housing as part of the Local Plan process. Providers of specialist housing for older people have not responded at any point through the various stages of consultation. In addition, the Council's Strategy and Commissioning Team are committed to supporting Older People to live healthy, purposeful, independent, connected, and fulfilling lives in a variety of ways which includes developing additional in-borough ECH provision although at this stage the allocation of sites is not a reasonable prospect.

Table 1.11 Assessment of Alternatives to Policy H7: Meeting the Needs of Vulnerable Older People

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	-	<p>There are no effects for policies H6, H7 and H9 to H12.</p> <p>Whilst some of the policies require a high quality design response in terms of internal design for the occupants the objective seeks consideration of the response of a proposal to the policy in the wider context.</p> <p>No effect for the alternative to Policy H7</p>
2. Ensure efficient use of land, buildings and infrastructure	-	-	<p>There is a minor negative effect for the policies H6, H7, H10 and H11. The land uses would not be sufficiently flexible and adaptable in most cases to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can.</p> <p>Overall there is a minor negative effect for the policy alternative to policy H7.</p> <p>A more permissive approach would lead to more market older peoples housing which would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that market older peoples housing can provide the same level of flexibility and adaptability as conventional housing in meeting older persons housing need over the short, medium and long term as conventional housing development can. Meeting the broadest spectrum of need is the most efficient use of land in the short term but also in the longer term. If needs change in the longer term the flexibility of conventional housing means that it can provide the opportunity to meet other needs as well as general housing needs.</p> <p>The assessment of the policy H7 identified a similar minor negative effect, although it can be considered to be of less significance than the more permissive alternative.</p> <p>New effects have been identified which have a minor positive for H7 following review of the IIA as part of the examination process. There is a positive effect from policy H7 as it focuses development of older peoples accommodation in the right locations appropriate to the needs of the occupiers. The policy alternative will have the</p>

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>same positive effect. The assessment does not consider that this negative effect outweighs the negative effect for both policy H7 and the alternative to policy H7.</p>
<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	0	0	<p>No effect for the alternative to Policy H7 or policy H7.</p>
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	+	+	<p>New effects have been identified which changes the effects from neutral to minor positive for H7 and H9 following review of the IIA as part of the examination process. The policies will have minor positive effects as they expect sites for older persons accommodation / supported housing to be easily accessible to shops, services and community facilities which helps provide access to and support to existing services.</p> <p>The alternative for policy H7 would have the same minor positive effect as policy H7.</p>
<p>5. Ensure that all residents have access to good quality, well-located, affordable housing</p>	0	-	<p>Policy H7 strongly resists market extra care accommodation and is supportive of social rent extra care so is considered neutral.</p> <p>The more permissive approach alternative to policy H7 would lead to more market older peoples housing which would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that market older peoples housing can provide the same level of flexibility and adaptability as conventional housing in meeting older persons housing need over the short, medium and long term as conventional housing development can. In addition alternative models such as market extra care can make it more difficult to deliver social rented housing that is effectively integrated within a development.</p>



IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>Use of the London Plan benchmark would help promote provision of specialist housing, with 60 units a year sought in Islington and when combined with a permissive approach may lead to more proposals for specialist housing provision coming forward. This would contribute to meeting wider London needs in addition to any local older peoples specialist housing needs, which would be a positive effect, although this would detract from meeting the full range of housing needs in the borough given the less flexible nature of the accommodation as noted above. This support for market extra care accommodation would contrast with the evidence set out locally in the SHMA and other evidence which supports a greater need for social rent extra care in the borough.</p> <p>On balance the positive effect of the alternative of meeting more than Islington needs could be considered to neutralise the negative effect of the lack of flexibility and adaptability of specialist accommodation for older people but it is not considered to outweigh the negative effects. There are difficulties in delivering social rented housing from this source of supply and it is considered likely that integrating affordable extra care alongside market care would be more difficult. It is also noted that meeting more housing need for older people would detract from meeting wider housing needs. Policy H7 which strongly resists market extra care, therefore provides more conventional housing and avoids difficulties around social rented provision. Policy H7 is also supportive of social rent extra care is considered neutral because it does not maximise the quantum of housing provided compared to conventional housing.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	<p>Policy H7 could be conceived to reduce the opportunity to provide market extra care homes but is considered to have no discernible effect on inclusion given the support that older people have for remaining in their own homes and living independently. This is considered in light of the Councils intention to support older people to remain in their own homes and live independently, with the assumption made that the Council will further develop ways and means of enabling this. Therefore it is considered to have a neutral effect.</p> <p>The alternative to Policy H7 and use of the London Plan benchmark would help promote provision of specialist housing and combined with a permissive approach may lead to more proposals for specialist housing provision coming forward which go beyond meeting local needs. This would improve social exclusion for those able to access market extra care. Therefore this aspect is considered to have a minor positive effect, although the effect of doing this would be to the detriment of delivering general purpose housing which meets wider needs would exclude more from housing and social exclusion which cancels out this positive effect.</p>

IIA Objective	Policy H7	Alternative 1 Policy H7	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	<p>Policy H7 has a minor positive effect. The policy would enable people to stay in their own home which can have positive benefits in terms of mental and physical health.</p> <p>The alternative to Policy H7 and use of the London Plan benchmark would help promote provision of specialist housing and combined with a permissive approach may lead to more proposals for specialist housing provision coming forward which go beyond meeting local needs. This is likely to have a minor positive effect on the health inequalities for older people who need the facilities provided by specialist older peoples accommodation. It is noted that not all the facilities provided by market extra care are necessary for improving peoples health and wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	No effect for Policy H7 or the alternative to Policy H7.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	There is a minor positive effect for both policy H7 and the alternative to policy H7 which ensure that proposals have easy access to public transport, shops, services and community facilities.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for Policy H7 or the alternative to Policy H7.

IIA Objective	Policy H7	Alternative 1 Policy H7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for Policy H7 or the alternative to Policy H7.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for Policy H7 or the alternative to Policy H7.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	-	There is a minor negative effect for the alternatives to policy H7. Due to their design, older persons accommodation may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs. This is linked to the assessment set out under objective 2 in relation to the insufficient flexibility and adaptability of more market older persons housing to accommodate evolving social and economic needs. There is a similar minor negative effect for Policy H7, although to a lesser significance as the approach would likely lead to less older persons accommodation.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for Policy H7 or the alternative to Policy H7.

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)

## Summary

The appraisal is quite finely balanced. The assessment considers that there is no evidence to suggest that market older peoples housing can provide the same level of flexibility and adaptability as conventional housing in meeting older persons housing need over the short, medium and long term as conventional housing development can. In addition alternative models such as market extra care can make it more difficult to deliver social rented housing that is effectively integrated within a development. However the more permissive approach would contribute to meeting wider London needs in addition to local older peoples specialist housing needs, which would be a positive effect, although this would detract from meeting the full range of housing needs in the borough given the less flexible nature of the accommodation as noted above. This support for market extra care accommodation would contrast with the evidence set out locally in the SHMA and other evidence which supports a greater need for social rent extra care in the borough. On balance the positive effect of the alternative of meeting more than Islington needs could be considered to neutralise the negative effect of the lack of flexibility and adaptability of specialist accommodation for older people but it is not considered to outweigh the negative effects. There are difficulties in delivering social rented housing from this source of supply and it is considered likely that integrating affordable extra care alongside market care would be more difficult. It is also noted that meeting more housing need for older people would detract from meeting wider housing needs. Policy H7 which strongly resists market extra care, therefore provides more conventional housing and avoids difficulties around social rented provision.

### **Consideration of alternatives for Policy H8: Self-build and Custom Housebuilding**

Policy H8 sets out the need for and requirements that proposals including Self-build and Custom build unit(s) must meet. No alternatives were considered for policy H8 and no mitigation or enhancements were identified.

### **Consideration of alternatives for Policy H9: Supported Housing**

Policy H9 defines the wide range of supported housing types including permanent, long term and shorter term accommodation which meets temporary need. The policy states when the Council will support and resist supported housing. No alternatives were considered for policy H9 and no mitigation or enhancements were identified.

## Assessment of Policy alternatives to: Policy H10: Houses in Multiple Occupation (large HMO)

Policy H10 focuses on when HMOs will be protected and supported as well as requirements for their size and quality and generally resists large-scale HMO. The Policy alternative to Policy H10 would apply the London Plan Policy H16 Large-scale purpose-built shared living which is more permissive and does not seek to refuse large HMO.

Table 1.12: Alternative Description for H10

Alternative Reference	Alternative Description
1.	A more permissive approach, in accordance with London Plan Policy H16

Policy H16 seeks proposals to locate in area well-connected to local services and employment by walking, cycling and public transport. For the purposes of the assessment other aspects of Policy H10 are considered to apply in terms of accessible bedspaces and application of affordable housing policies.

Table 1.13: Assessment of Policy alternatives to: Policy H10: Houses in Multiple Occupation (large HMO)

IJA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>New effects have been identified which create the effects from neutral to minor positive for H6 and H10 following review of the IJA as part of the examination process. The policies will have minor positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to a safer environment.</p> <p>New effects have been identified which changes the effects from neutral to minor negative for H6, and H10 following review of the IJA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</p>

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			Overall considering the above minor negative effects for H6 and H10 around flexible and adaptable buildings together with the minor positive effects for site management plans is considered to have an overall neutral effect for these policies.
2. Ensure efficient use of land, buildings and infrastructure	-	-	There is a minor negative effect for both the alternative to policy H10 and policy H10. The alternative would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that large HMO accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing these forms of accommodation would therefore not optimise the use of land. The more permissive alternative policy approach to large-scale HMO would increase the significance of this effect.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy H10 or alternative for policy H10.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policy and the alternative to policy H10 will have minor positive effects through the requirement for a site management plan which will in part manage potential for noise related anti-social behaviour which can help contribute to a safer environment. In addition the policy makes clear that change of use on a temporary basis to visitor accommodation is not acceptable.
5. Ensure that all residents have access to good quality, well-	-	--	There is a negative effect for both policy H10 and the alternative to policy H10 as both would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, alternative models can make it more difficult to deliver social rented

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
located, affordable housing			housing that is effectively integrated within a development. The more permissive alternative policy approach to large-scale HMO would increase the significance of this effect. In addition large-scale HMOs in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.
6. Promote social inclusion, equality, diversity and community cohesion	0	-	There is a minor negative effect which is created by this housing model potentially creating communities which are more itinerant because they are not designed for long term occupation therefore undermining social cohesion.
7. Improve the health and wellbeing of the population and reduce health inequalities	-	-	Policy H6 and H10 are both minor negative as they do not provide the same quality of residential accommodation as conventional housing with no private outdoor space for example undermining the concept of the home as a place of retreat. There is a minor negative effect for Policy H10 large-scale HMOs and the more permissive alternative policy approach to large-scale HMO which would increase the significance of this effect.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	No effect for policy H10 or alternative for policy H10.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road,	0	0	No effect for policy H10 or alternative for policy H10.



IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
public transport, cycling and walking			
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H10 or alternative for policy H10.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H10 or alternative for policy H10.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H10 or alternative for policy H10.
13. Promote resource efficiency by decoupling waste generation from economic growth and	-	--	There is a significant negative effect for the alternative to policy H10. Due to their design, large-scale HMOs may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs. The more permissive alternative policy approach to large-scale HMO would increase the significance of this effect.

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
enabling a circular economy that optimises resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H10 or alternative for policy H10.

### Summary

The assessment recognises that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs; however, on balance there is considered to be a need to resist large-scale HMOs in the Islington context. This context highlights a key reason for guarding against a proliferation of large HMOs which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.

## Assessment of Policy alternative for Policy H11: Purpose Built Private Rented Sector development

Policy H11 resists purpose built Private Rented Sector (PRS) development and sets out requirements if it is to be built. The alternative to Policy H11 would take a more supportive approach to purpose built Private Rented Sector (PRS) more in line with the London Plan policy H11 Build to rent.

Table 1.14 Alternative description for Policy H11

Alternative Reference	Alternative Description
1.	A more permissive approach, in line with the London Plan policy H11 Build to rent

Table 1.15 Assessments of Alternatives for Policy H11: Purpose Built Private Rented Sector development

IJA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	-	-	New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IJA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
2. Ensure efficient use of land, buildings and infrastructure	-	-	There is a minor negative effect for policy H11 and policy alternative to H11. Both policy approaches to land uses would not be sufficiently flexible and adaptable in most cases to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that PRS can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing these forms of accommodation would therefore not optimise the use of land. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
3. Conserve and enhance the significance of heritage assets and	0	0	No effect for policy H11 and policy alternative to H11.

IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
their settings, and the wider historic and cultural environment.			
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	No effect for policy H11 and policy alternative to H11.
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	--	There is a minor negative effect for policy H11 and significant negative effect for policy alternative to H11. Purpose built Private Rented Sector would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for policy H11 and policy alternative to H11.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	New effects have been identified which changes the effects from neutral to minor positive for Policy H11 following review of the IIA as part of the examination process. The policy expects high quality housing in line with H4 which has various aspects to which is overall likely to improve health and wellbeing. The same effect will be created for the alternative to Policy H11.
8. Foster sustainable	0	0	No effect for policy H11 and policy alternative to H11.

IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
economic growth and increase employment opportunities across a range of sectors and business sizes			
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for policy H11 and policy alternative to H11.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H11 and policy alternative to H11.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H11 and policy alternative to H11.

IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H11 and policy alternative to H11.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy H11 and policy alternative to H11.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H11 and policy alternative to H11.

## Summary

The assessments identifies the main reason for resisting PRS schemes in the Islington is the housing is not as flexible or adaptable as conventional housing in meeting housing need over the short, medium and long term. The assessment explains that PRS schemes can make it

more difficult to deliver social rented housing that is effectively integrated within a development. The assessments recognises that some of the arguments for PRS schemes, as set out at paragraph 4.11.1 of the London Plan, do apply to some extent in the Islington context. For example PRS schemes can: offer longer-term tenancies and more certainty over long-term availability; ensure a commitment to, and investment in, place-making through single ownership; and provide better management standards and better quality homes. However, not all of the London Plan's reasons for supporting PRS schemes apply in the Islington context, and on balance it is considered appropriate to restrict PRS schemes through the Local Plan.

### **Consideration of alternatives for Policy H12: Gypsy and Traveller Accommodation**

Policy H12 identifies how the need for Gypsy and Traveller accommodation will be met and the requirements for sites. No reasonable alternatives were identified for policy H12 and no mitigation or enhancements were identified.

### **Consideration of alternatives for Policy SC1: Social and Community Infrastructure**

Policy SC1 focuses on protecting, supporting, assessing and meeting needs for social and community infrastructure. No reasonable alternatives were identified for policy SC1 and no mitigation or enhancements were identified.

### **Consideration of alternatives for Policy SC2: Play space**

Policy SC2 seeks to protect existing play space and ensure play space is provided in all major developments and playable public space is provided in all development. The submission IIA did not explore alternatives which was raised by the Inspectors in their letter of 30 April 2020 (reference INS04). In the LBI response (reference LBI03) to the Inspectors the Council provided explanation for why no reasonable alternatives were identified for Policy SC2. The Inspectors letter asked if there were; 'any differing approaches or policy requirements that should have been assessed, such as different thresholds with each policy'.

The Social and Community Infrastructure Topic Paper (document reference SD25) provides further justification for Policy SC2, which protects existing playspaces and requires major development to provide further additional playspaces. The topic paper notes that Islington's Open Space, Sport and Recreation Assessment (2009) audited 276 play and youth facilities located within parks, gardens and other open spaces. The findings of the 2009 audit are still considered to be valid in terms of the general level of provision, although improvement works have taken place at a number of play spaces since the audit was carried out. The council considers that the evidence supports the retained policy requirement and the policy contains sufficient flexibility to require 'appropriate' on-site provision which 'must be proportionate to the anticipated increase in child population' resulting from the development. A higher or different threshold is not supported by the evidence and is accordingly not considered reasonable.

### **Consideration of alternative for Policy SC3: Health Impact Assessment**

Policy SC3 sets out when Health Impact Assessments will be required. The submission IIA did not explore alternatives which was raised by the Inspectors in their letter of 30 April 2020 (reference INS04). In the LBI response (document reference LBI03) the Council provided explanation for why no reasonable alternatives were identified for Policy SC2. The Inspectors letter asked if there were; 'any differing approaches or policy requirements that should have been assessed, such as different thresholds with each policy'.



The assessment of policy SC3 in the Sustainability Assessment in the submission IIA considers that the policy will have no effect. The policy asks for a screening assessment of all major and other applications where potential health issues arise. Because the policy requires a screening assessment in the first instance and there are no specific requirements associated with this it cannot be said to have any effect for the purposes of this assessment. Given the current policy requirement for HIAs, the continued need to improve health outcomes and address health inequalities in the borough, there were not considered to be any realistic alternative options. In addition, draft London Plan objective GG3 requires developments to assess the potential impact of proposals on the health and well-being of communities. The policy approach reflects current guidance and how this has been operating for a number of years and provides clarity but also flexibility. The screening assessment will generally be proportionate to the size of the development.



## 4. Inclusive Economy

### Consideration of alternatives for Policies SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

Policy SP3 is the Spatial Strategy for Vale Royal/Brewery Road, Islington’s largest LSIS, setting out the strategic approach for the protection of industrial land on this site. Policy B1 sets out the strategic approach to meeting employment needs in the borough and the aim to achieve an inclusive economy and identifies the most appropriate locations for new business and criteria E relates to industrial land. Policy B2 provides detail on the locational and design requirements for the different types of new business floorspace, including in relation to the LSISs. The additional assessment of alternatives requested by the Inspectors will assess the following alternatives based upon application of New London Plan policy E7.

Table 1.16: Alternative Description for Policies SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

Alternative Reference	Alternative Description
1.	the co-location of industrial uses with residential uses as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS.
2.	the co-location of industrial uses with office uses as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS.
3.	the co-location of industrial uses with mixed residential and office uses as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS.

Alternatives 1 and 2 assess the co-location of industrial floorspace with housing or offices. New London Plan policy E7 refers to boroughs exploring co-location of industrial with housing and/or other mixed uses. Co-location in this context refers to both intensification of industrial and housing and/or other mixed uses. Alternative 3 integrates the co-location of industrial with both housing and offices. The co-location of residential or other mixed uses with industrial is likely to lead to the intensification of all the uses in question, including industrial uses. . The intensification of industrial floorspace is a desired outcome to sustain the economic function of the Vale Royal and Brewery Road Strategic Spatial Area which is Islington’s most significant LSIS. In recent years, the Vale Royal/Brewery Road LSIS has seen increased pressure from applications proposing large-scale office buildings, mixed office with industrial and residential. Whilst most of the applications have re-provided existing industrial floorspace, the extent to which the industrial floorspace has been intensified is very small or marginal compared to the losses experienced in recent years. In addition, a characteristic of the Vale Royal/Brewery Road LSIS is that space is limited. Whilst there is still scope for intensification in some areas currently occupied by warehouse buildings of one or two storeys, there are other areas which are already more densely developed with existing four storey buildings (particularly along Brewery Road and some sections of Brandon Road and Tileyard Road). The area has a distinctive industrial character and design features which are clearly linked to the industrial function of its business cluster. In addition, most of its internal routes have narrow to very narrow street profiles. Although the co-location of non-industrial uses with

residential, offices or other mixed uses could in theory lead to the intensification of industrial uses, the assessments of alternatives 1, 2 and 3 consider the already constrained nature of the Vale Royal/Brewery Road LSIS. The long term sustainability of the LSIS as an industrial business cluster depends on the extent to which other uses are intensified along with industrial uses. Further, whilst residential use can be compatible with some industrial activities such as light industrial uses, this is less the case with other industrial uses such as warehousing and distribution/logistics. Similarly to the alternatives considered in this part of the assessment for policy SP3, the various uses considered within class E could have impacts in the operation of industrial businesses, which could lead to issues such as lack of space for loading facilities and negative effects on air quality and amenity. The assessment of potential impacts of Class E for this policy is included in part 2 of this IIA addendum.

Table 1.17 Assessment of Alternatives for Policies SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	-	-	<p>Policy SP3 would have a minor positive effect because the proposed policy aims to protect the primary economic function of the industrial cluster. There is a minor positive effect for policy SP3. The policy provides specific guidance on building heights within the area, informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.</p> <p>Alternative 1 could have a minor negative effect on the preservation of the Vale Royal and Brewery Road LSIS as it would introduce development that is contrary to the area's primary economic function. This area is already significantly constrained and it is the borough's only significant reservoir of industrial land, occupies only a 1% of the borough and many of the existing industrial sites tend to be smaller in size (&lt;3,000sqm). The co-location of industrial with residential could have potential impact on the size and type of spaces that can be accommodated alongside residential, and this could have effects on existing activities due to the constrained nature of the LSIS. Industrial buildings demand a different scale of design and there is a risk that these could be made to replicate residential units, without complementing the industrial character of the area. For example on smaller sites, the co-location of such uses could result in residential buildings overlooking operational yard spaces. The lack of open and green spaces within this area would also reduce the quality of residential amenity. Whilst in theory industrial and housing can be co-located and design mitigation measures put in place, in reality it many industrial functions will be constrained by the presence of residential – not only in terms of build footprint/design put in terms of operation – especially B2 and B8 uses</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>which would in turn impact negatively on future residential amenity and safety. Whilst there are instances of B2/B8 uses being designed into mixed use schemes these are exceptions and generally intended at retaining specific existing or intended end uses rather than on an area wide basis such as this.</p> <p>Whilst Alternative 1 could lead to an increase in residential car-free development, the co-location of industrial with residential would lead to a higher population density and potential issues of safety with conflicts between access for pedestrians and industrial business requirements for parking and loading requirements.</p> <p>Alternative 2 would help optimising previously developed land and could introduce more flexibility for buildings to be adaptable for evolving economic needs. However, this approach can have minor negative effects on the preservation of the industrial character of the LSIS through the introduction of building design features that could limit future industrial operations..</p> <p>Development including co-location of housing and office with industrial could introduce positive design features such as improvements in the connectivity between buildings and public realm contributing to safer spaces. However, the LSIS has a distinctive industrial character. Significant intensification of mixed uses such as housing and office could place further limitations to the capacity of industrial space in the area, considering the small nature of the LSIS and its</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>unique design features. Therefore, on balance alternative 3 has minor negative effects for this objective.</p> <p>Overall, the alternatives have the potential to undermine the industrial character of the LSIS and affect its primary function.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	-	0	-	<p>There is a minor positive effect for Policy SP3 as it focuses development in the most appropriate areas by making specific reference to retaining and strengthening industrial floorspace to protect the economic activity in the Vale Royal and Brewery Road LSIS. Policy SP3 will have a minor positive effect in the LSIS as it supports the economic activity in this area. The proposed policy protects existing industrial activity and promotes the intensification of industrial activity in the area akin to B8, B2 and light industrial uses. It is noted that the rise of e-commerce and distribution activities has been significant in recent years.</p> <p>For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have minor negative effects on the balance of uses and industrial activities in the LSIS and could have negative effects on the economy (these are explained further in the assessment against objective 8 below).</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated with parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that housing needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 3, the co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be viable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area.</p>
3. Conserve and enhance the	0	0	0	0	New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from minor positive to neutral.



IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
significance of heritage assets and their settings, and the wider historic and cultural environment.					<p>Whilst the policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area the updated assessment considers that some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings. This would depend on the wider historic environment and on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</p> <p>Alternatives 1,2 and 3 are assumed to have a similar effect to the assessment for policy SP3.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	0	-	<p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</p> <p>Alternative 1 would overall have a minor negative effect against the objective to promote liveable neighbourhoods. It may have a minor positive effect as the co-location of industrial with residential development may provide opportunities to connect to other neighbourhoods nearby with residents access to nearby Caledonian Road's shopping area. It could also provide opportunities to improve pedestrian access and develop further the sustainable transport networks in the area. The area also has a primary school. However, these benefits would need to be balanced against the existing industrial nature of the neighbourhood which</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>would impact in particular on alternative 1 and the amenity of residential use. The presence of loading facilities and 24 hour operation are essential for many of the industrial activities which take place in the LSIS and result in amenity impacts, in particular noise, not compatible with residential use.</p> <p>No effect identified for alternative 2 to policies SP3, B1 and B2.</p> <p>Similarly, alternative 3 would have a minor negative effect against this objective. The mix of residential and office uses could promote more liveable neighbourhoods and bring opportunities to improve sustainable transport networks in the area. However, this is likely to impact on the extent to which industrial activities operate and has the potential to undermine the primary function of the LSIS.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	++	0	+	<p>There is no effect for policy SP3. There could be a minor negative impact in the supply of affordable housing. However, the LSIS is a functional industrial cluster, which includes some more traditional industrial uses that cannot coexist with housing. In addition other policies in the plan will help to meet housing targets in other locations. The assessment for policies B1 and B2 consider there is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough, through prioritising business floorspace. However the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met.</p> <p>There would be a significant positive effect from Alternative 1 in that allowing residential uses in the LSIS would increase land available for housing and therefore affordable housing contributing to meeting housing need. In addition industrial land has relatively lower values so would be expected to be able to</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>exceed affordable housing targets. The development of housing in the LSIS may present greater challenges than elsewhere for ensuring high quality design given the mitigation which may be required to address the amenity impacts of developing in LSIS.</p> <p>No effect for alternative 2. It could be considered that the alternative would have a minor negative impact in the supply of affordable housing. However, the LSIS is a functional industrial cluster, which include some more traditional industrial uses that cannot coexist with housing. Therefore, the LSIS it is not generally considered suitable location for the maximisation of affordable housing in the borough.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	0	0	0	<p>The assessment of Policy SP3 considers that there are effects. Policy B1 has a significant positive effect with the policy aim in line with the Local Plan objective to deliver an inclusive economy which the policy does through delivering policy supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society. New text has been added following review of the IIA as part of the examination process. Policy B2 The maximisation of new business floorspace will strengthen the local economy. New business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs. Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>improve employment opportunities and increase the skills of residents. The requirements around the quality of new business floorspace will also support community cohesion, inclusion, equality and diversity by ensuring that new spaces are accessible to everyone.</p> <p>Alternatives 1 and 2 should deliver intensification of employment space as well as either office or residential floorspace. For alternative 2 this should both support the economy in Islington and help share success across different sections of society, in the short and medium term. The intensification of new business floorspace will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. However this would need to be balanced with the potential negative effects on the evolving economic industrial needs of the area because it would limit the availability of premises suitable for industrial land uses and could potentially displace the primary economy activity of the area. Overall this is considered a neutral impact.</p> <p>For alternative 1, which would provide affordable housing this would increase the delivery of affordable housing which could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. Similar to alternative 2 this would have to be balanced potential impact on limiting wider industrial needs so is considered neutral overall. Alternative 3 is considered neutral as it would have similar effects to alternatives 1 and 2.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	0	0	<p>There is a minor positive effect identified for Policy SP3 as it will protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</p> <p>New effects have been identified for Policies B1 to B2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. New effects have been identified following review of the IIA as part of the examination process. Policies B1 to B2 support a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people. The type of employment supported by the policies has the potential to protect health and contribute to reduced health inequalities. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health.</p> <p>For alternative 1 it is recognised that there are health benefits from housing development, however, there would be negative effects from co-location of industrial with housing as there is a risk of late night or early morning noise</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>arising from industrial uses, which rely on large-scale deliveries. This would have negative effects on those living in new housing development in the LSIS which it may not be possible to mitigate. Considering this, alternative 1 would have a neutral effect overall.</p> <p>For alternative 2 there would be no effect. There is no evidence to suggest that industrial uses have any more significant impact on air quality compared to office uses or vice versa. Therefore, an alternative that allowed more office uses instead of industrial uses, would have no pronounced effect on health and wellbeing.</p> <p>Alternative 3 will have combined effects from alternatives 1 and 2 which on balance, have neutral effects for this objective. However, with intensification of all, mixed residential and offices with industrial, there is a risk of combining uses which could have negative effects on housing quality.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	0	0	<p>Policy SP3 would continue to protect existing businesses in the LSIS and would promote the intensification and renovation of old industrial sites. This would attract a wider range of different sized occupiers in need of industrial premises. The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in Islington's Employment Land Study (2016), this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses which are based primarily in industrial units and support Islington's wider creative sector. Proposed policy reflects the Council's commitment to support creative production industries where is more needed in the borough. Policy B2 will have a significant positive effect. Protecting the</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps reduce the need for goods and services to travel reducing congestion and air pollution. These areas also offer a range of jobs providing greater employment opportunity.</p> <p>Alternative 1 would have a minor negative effect on economic growth and to the sustainability of the diverse range of businesses sectors that operate in the LSIS for reasons explained for the assessment against objectives 1 and 2. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not result in long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>For Alternative 2 there would be a neutral effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>other locations for housing and offices to be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial uses is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. As noted in the employment topic paper, the LSIS serves an important function in terms of Islington’s economy, something that the Mayor of London reflects in the London Plan.</p> <p>For Alternative 2 there would be a neutral effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices to be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. As noted in the employment topic paper, the LSIS serves an important function in terms of Islington’s economy, something that the Mayor of London reflects in the London Plan.</p>



IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Considering this, a neutral effect has been identified overall.</p>
9. Minimise the need to travel and create accessible, safe and	+	-	-	-	<p>There is a minor positive effect for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Policy SP3 would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
sustainable connections and networks by road, public transport, cycling and walking					<p>has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Similarly Policy B1 and B2 will have a significant positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices.</p> <p>Whilst alternatives 1, 2 and 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.</p> <p>For alternatives 1 and 3, residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. For alternatives 2 and 3, office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	No effect for policy or alternatives to policies SP3, B1 and B2.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	No effect for policy or alternatives to policies SP3, B1 and B2.

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	-	-	<p>There is a minor positive effect identified for Policy SP3. Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London’s economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Policy B1 and B2 will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.</p> <p>As noted in objective 9, alternative 1 could lead to some displacement of industrial activities of the LSIS. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p> <p>For alternative 2 office uses have no fundamental climate change benefits compared to industrial uses experienced in Islington (as noted above), hence this would not balance out the effects due to increased vehicle mileage.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					Alternative 3 would have the similar combined effects as alternatives 1 and 2.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	No effect for policy or alternatives to policies SP3, B1 and B2.
14. Maximise protection and enhancement of natural resources	+	-	-	-	Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
including water, land and air					<p>role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Policy B1 and B2 will have a minor positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices, which can in turn improve air quality.</p> <p>It should be acknowledged that B2, which support the intensification of industrial land in the LSIS could have the potential to have a negative impact on air quality, if they lead to an increase in vehicular movements or support activities that lead to an increase in air pollution. However other strategic policies in the Plan such as SP3, S7, T2, T3 and T5, which will ensure new industrial land does not impact natural resources adversely. The impact on the policy is therefore still a minor positive.</p> <p>As noted in objective 12, Alternative 1 would lead to some displacement of industrial activities of the LSIS. This could increase vehicle mileage through Islington and beyond, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>Alternatives 2 Similar to the conclusions for objective 12, offices have no fundamental air quality benefits compared to industrial uses experienced in Islington, hence this would not balance out the effects due to increased vehicle mileage.</p> <p>Alternative 3 would have the same combined effects as alternatives 1 and 2.</p>

## Summary

The assessment recognises that the co-location of industrial floorspace with residential and/or office uses could lead to some intensification of industrial floorspace but that this depends on the extent to which these uses are intensified in relation to one another and to the individual sites. The LSIS has a distinctive industrial character which is linked to its primary economic function. Whilst intensification can bring building design improvements to make these more adaptable to future economic demands, there is a risk of losing essential design features which are key for industrial activities to accommodate residential and office uses.

The success of the Vale Royal and Brewery Road LSIS relies on its proximity to the CAZ and on the diversity of its industrial activities, which include the full range of industrial uses B2, B8 and light industrial as well as some Sui Generis uses akin to industrial. The co-location with offices would bring additional jobs and opportunities for economic growth but depending on the extent to which offices are intensified it could lead to the displacement of existing industrial operations to Outer London locations, causing negative effects on supply chains for central London and leading to impacts on air quality and climate change. The co-location with residential would widen the scope to secure affordable housing in the borough but would lead to the same issue regarding the displacement of industrial activities, and promotion of certain industrial uses over others due to their potential impacts on amenity and safety of residents. Whilst there are land use benefits from the co-location of office and residential uses with industrial, housing and office needs can be met elsewhere in the borough, the LSIS is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. The protection assigned by the proposed policy mitigates the risk of displacement of this important and unique cluster of industrial businesses.

## Consideration of alternatives to Policy B2: New business floorspace

Policy B2 provides detail on the locational and design requirements for the different types of new business floorspace. The alternative to Policy B2 part A (ii) in respect to the element of policy which considers maximising business floorspace within the CAZ fringe spatial areas (Angel and Upper Street; and Kings Cross and Pentonville Road) and Priority Employment Locations was considered. The alternative would be encouraging maximisation of business floorspace rather than the preferred approach of requiring. It was decided that this was not realistic alternative to appraise given the overriding need for employment floorspace generally and the CAZ fringe / Angel town centre location.



The alternative for employment policy B2 part A (iii), which protects the employment locations outside the CAZ fringe area; the Priority Employment Locations was also considered unrealistic because this space has to be protected for business uses only. The alternative was the possibility of other land uses such as community or town centre uses being introduced in these locations however it was considered that this would be inappropriate and contrary to other policies in the Local Plan.

### **Consideration of alternatives to Policy B3: Existing business floorspace**

Policy B3 sets out the approach to protecting existing business floorspace. No alternatives were considered reasonable for policy B3.

### **Consideration of alternatives to Policy B4: Affordable workspace**

Policy B4 sets out the requirements for the provision of affordable workspace. The Inspectors questioned why alternatives were not considered (document reference INS04) and the Council provided explanation for why no reasonable alternatives were identified for Policy B4. The Employment Topic Paper (document reference SD16) identifies that Policy B4 builds on the existing affordable workspace policy; but adds more detail, specifically in terms of the amount, duration of the term, type of space requirements in relation to quality. Considering the alternative, 'a no policy approach' would not have been reasonable. The other alternative considered but discounted was looking at considering the effects of various different percentage levels of affordable workspace. The viability evidence tested the provision of 5%, 10% and 20% affordable workspace for 10, 15 and 20 year periods and concluded that floorspace at 10% of floorspace let at a peppercorn rent for 20 years should be viable on most office developments. The viability topic paper in paragraph 6.34 notes that the results of the viability testing of the larger office development typologies adopted in the study demonstrates a clear correlation showing that the greater the quantum of B1a floorspace, the greater the disposition to viably absorb a greater provision of affordable workspace for a longer peppercorn period, especially in spatial areas where office values are high. This supports the longer period sought.

### **Consideration of alternatives to Policy B5: Jobs and training opportunities**

Policy B5 sets out the requirements for providing jobs and training opportunities from new development especially new business floorspace. In the LBI response (document reference LBI03) to the Inspectors fourth letter (document reference INS04) dated 30 April 2020 the Council provided explanation for why no reasonable alternatives were identified for Policy B5. The policy relates to jobs and training requirements and follows on from existing policy set out in the Core Strategy Policy CS13 part C. There is no change in the policy approach from that adopted in 2011 therefore removing the policy position would not be reasonable. Amending the levels of contribution or quantum of development which contributed were not considered possible to assess with any degree of certainty with regards the significance of the outcomes therefore as an alternative this was not possible to consider.

**Consideration of alternatives to Policy R1 – Primary Shopping Areas**

Policy R1 sets out the strategic vision for retail, leisure and services, culture and visitor accommodation uses. The additional assessment of alternatives requested by the Inspectors will assess the following alternative to one aspect of policy R1.

Table 1.18 Alternative Description for Policy R1 SP3, B1 and B2

Alternative Reference	Alternative Description
1.	A more permissive approach to housing as part of mixed use schemes in primary shopping areas

Table 1.19 Assessment of Alternatives for Policy R1 – Primary Shopping Areas s SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

IIA Objective	Policy R1	Alternative 1 to Policy R1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	<p>Text updated following review of the IIA as part of the examination process. Policies R1 and R2 will have a minor positive effect in terms of directing appropriate retail, services and leisure development to key locations in the borough in line with the retail hierarchy, particularly the core of town centres, the Primary Shopping Areas. This will help to achieve an appropriate balance and mix of uses within a public realm that is most capable of supporting these commercial functions. R1 seeks to actively manage streets within retail areas to balance demand on the public realm, whilst both R1 and R2 promote active frontages which can contribute to a more attractive, functional and sustainable public realm within retail areas.</p> <p>Policy R1 will support and manage a thriving and safe night time economy. Policy R1 would likely increase the amount of visitor accommodation delivered, which by itself would be a minor negative; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through the Policy R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible. Overall, policy R1 is considered to have a minor positive effect.</p> <p>Although Islington's Town Centres are not devoid of any residential uses, they are fundamentally commercial in character, particularly the PSA. Introducing residential uses would erode this commercial character over time, limiting the ability for the built environment to adapt to evolving commercial needs in the future. More residential use in the PSA would also introduce potential for greater concerns for amenity considerations, further diminishing the commercial function.</p>

IIA Objective	Policy R1	Alternative 1 to Policy R1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>The inclusion of residential uses in PSAs could have a minor positive effect in certain circumstances in reducing crime or fear of crime through an increase in natural surveillance. This may contribute to an increase in safety, especially in relation to the night time economy but it is also likely cause adverse noise impacts for residents. The degree to which these effects are felt would differ depending on how much existing residential existed. Overall though the potential erosion of the commercial nature in town centres and the PSA is considered to outweigh this positive effect and result in a minor negative effect for the alternative.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	0	<p>Policies R1 and R2 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres. Development will be focused in the most appropriate locations through town centres, primary shopping areas and LSAs. Outside a PSA there will be more flexibility and adaptability for non-A1 use which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. Within the PSA there will be a condensed and more focused retail (A1) area. New effects have been identified for policy R2 following review of the IIA as part of the examination process. This includes the two-year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative effect could potentially arise from a downturn in viability of A1 retailing resulting in an increase of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term means the benefits of this are considered to outweigh this potential short term negative effect.</p> <p>Policy R1 could result in more visitor accommodation being permitted, which could reduce the availability of land to meet other more pressing development needs, and therefore it could potentially not effectively balance competing demands for land use. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. The policy also ensures that intensification of existing hotels must demonstrate that additional business floorspace is not possible which allows other priorities to take precedent and optimise the use of previously developed land. Overall policy R1 is considered to have a significant positive effect even taking into account the assessment of the visitor accommodation element of the policy.</p>

IIA Objective	Policy R1	Alternative 1 to Policy R1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>The alternative approach to permit residential in existing high accessibility locations in the core of town centres would reduce opportunities to meet commercial, cultural and civic activity needs which may not balance competing land uses effectively. Although housing is a priority land use, it's location in the PSA could detract from the ability of other land uses to take advantage of the PSA location. However, there may be specific opportunities on upper floors which are not attractive opportunities for commercial development, for example, because of the historical nature of the building design. In these instances, there could be an opportunity for residential floorspace, however providing any opportunity for residential runs the risk of releasing floorspace which could be viable for commercial uses therefore the alternative is considered neutral overall.</p>
<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	0	0	<p>No effect for the alternative to policy R1 or policy R1.</p>
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	++	-	<p>Policies R1, R2 and R3 will have significant positive effects on enabling town centres and LSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by striking the right balance of retail, leisure and business uses. The PSA approach improves access and legibility to essential services through concentrating A1 uses in the core of the town centre which enjoy the best transport links. The increased flexibility of uses in the secondary shopping area will support the expansion of cultural provision and encourage a vibrant environment for residents and visitors alike. Policy R1 will support and manage a thriving and safe cultural and high-time economy, directing appropriate cultural and NTE development to town centres and CAZ locations and cultural quarters .and ensuring appropriate design which is safer and more inclusive. The agent of change principle is highlighted and applies in town centres and allows for vibrant town centre uses that attract visitors to be maintained.</p> <p>R1 could also have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor</p>

IIA Objective	Policy R1	Alternative 1 to Policy R1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision.</p> <p>Conversely, the visitor accommodation element of the policy could have negative effects, as it could also dilute the land available for meeting more priority development needs, which could reduce access to essential services. However, on balance the restriction of visitor accommodation to specific sites would not cumulatively obstruct the meeting of other development priorities.</p> <p>For the residential uses in the PSA this would provide increased accessibility to services for some residents living within the PSA but this could limit the already constrained land supply to provide commercial, cultural and civic activity for all Islington residents which on balance is considered to have a minor negative effect.</p> <p>Cultural uses and night time economy uses are important to promote a diverse, vibrant and economically thriving town centre and the PSA is where higher concentrations of night time economy uses tend to locate. Allowing residential in these locations can create amenity impacts which will need to be mitigated and in the long term reduce the ability of cultural uses to expand and flourish without the operational limitations that can occur when residential uses cumulatively constrain this. This would have a negative effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	<p>For policy R1 there is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough. However, the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met. The policies set out circumstances where residential would be suitable in town centres and LSAs.</p> <p>There would be a minor positive effect in that allowing residential uses in the PSA would increase land available for housing and therefore affordable housing contributing to meeting housing need. The PSAs are highly accessible locations with a wide range of services available for residents. The development of housing in the PSA may present greater challenges than elsewhere for ensuring high quality design of housing given the density and existing commercial nature of the location.</p>

IIA Objective	Policy R1	Alternative 1 to Policy R1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>New effects have been identified for Policy R1 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The protection and enhancement of the retail hierarchy as set out in policy R1 could have a minor positive effect by ensuring main town centre uses remain accessible and abundant which in turn help foster community cohesion. Retail and cultural uses can act as informal spaces for communities to meet and strengthen local connections as well as selling a range of goods for the diverse population of Islington.</p> <p>No effect for the alternative to policy R1.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies R1-R4 will provide a framework to support facilities which can meet the needs of communities and the benefits this can provide e.g. health, recreation and leisure. The policies also provide a framework for taking into account cumulative impacts to provide against the proliferation of activities which can have/or have the potential to have negative health impacts.</p> <p>No effect for the alternative to policy R1.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	-	<p>Policies R1, R2, and R3 will have a significant positive effect. The policies aim to strike the right balance between retail, leisure and businesses uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development. Town Centres provide the employment opportunities outside the CAZ and help provide job opportunities for local residents. An enhanced cultural NTE role will increase employment opportunities and contribute to the local economy.</p> <p>Policy R1 could provide opportunities for employment related to visitor accommodation, particularly for local people, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as office; this more indirect economic benefit therefore limits the scale of any positive effect. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business. New effects have been identified following review of the IIA as part of the examination process. This includes the two year vacancy and marketing</p>



IIA Objective	Policy R1	Alternative 1 to Policy R1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</p> <p>The alternative approach would have a minor negative effect on the ability for town centres to foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes. Although residential uses in theory can support the economic growth of town centres by creating a localised customer base, increasing footfall and contributing to the vibrancy of a place, this is far more profound in smaller towns and rural areas that have fewer external factors in the viability of their shopping cores. Islington has four town centres in good health, supported by a population of 236,000 residents and significant flows of workers and tourists travelling into Islington. The vitality of town centres in Islington is more reliant on commercial growth to take place than the need to entice people to the town centres. Class E also increases the commercial opportunities on all floors in the PSA, which if were to provide residential use would inhibit this growth in the long term. This is especially important in the PSA to allow for retail to have as much opportunity as possible to establish in an increasingly restricted framework for planning policy to achieve this. Therefore whilst the inclusion of additional housing in the PSA could be considered to have a positive effect generally, in the Islington context it is considered on balance to have a minor negative effect by stifling the commercial growth of PSAs and thus economic growth of the borough.</p> <p>As previously mentioned, introducing residential uses in the PSA would reduce the space available for ground floor retail and other commercial uses to operate effectively by using ancillary space above the ground floor limiting the ability for the built environment to adapt to evolving commercial needs in the future. This negative effect would increase as space was lost to residential use and in the long term could become significant.</p> <p>Town Centres and the PSAs in particular are the focus for commercial activity outside of the CAZ. If residential development is allowed in the PSA core then commercial growth that creates employment maybe more limited – having a detrimental impact on Islington’s residents in terms of the employment opportunities and the economy as a whole.</p>

IIA Objective	Policy R1	Alternative 1 to Policy R1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	<p>New effects have been identified for Policies R1-R5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A positive effect of enhancing and protecting the retail hierarchy is that retail and leisure development will be directed to town centres that enjoy the best transport connections. Additionally, protection of retail in LSAs ensures access to essential goods and services for local residents is retained, reducing the need for private vehicular and public transport to access these goods. Minor positive impacts have therefore been identified for policies R1-R4.</p> <p>Support of residential uses in the PSA would have a positive effect on minimising the need to travel to town centres for the people living in the PSA, but cumulatively and in the long term this approach could see an increase in the need for travel by limiting the ability for commercial growth in town centres pushing this growth into areas with less sustainable connections. Overall, the effect is not clear and is considered neutral.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for the alternative to policy R1 or policy R1.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for the alternative to policy R1 or policy R1.

IIA Objective	Policy R1	Alternative 1 to Policy R1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for the alternative to policy R1 or policy R1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for the alternative to policy R1 or policy R1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for the alternative to policy R1 or policy R1.

## Summary

The appraisal supports the submission approach in respect of the majority of (relevant) SA objectives; however, it does notably highlight that the alternative approach of allowing housing in PSAs is preferable in respect of housing objectives, and also highlights several other arguments in support of housing in PSAs. Arguments include:

- PSAs are highly accessible locations with a wide range of services available for residents;
- Residential can help with reducing crime or fear of crime through an increase in natural surveillance, which is a consideration in light of the vibrant night time economy;
- There may be specific opportunities on upper floors [in PSAs] which are not attractive opportunities for commercial development, for example, because of the historical nature of the building design.

Notwithstanding this the assessment considers that Islington's PSAs are vibrant and expected to remain so over coming years, hence there are limited arguments for a change in strategy. Despite shifting retail trends it is anticipated that Islington's PSAs will remain primarily associated with concentrations of retail.

## Assessment of alternative to Policy R2: Retain primary and secondary frontages

Policy R2 defines Primary Shopping Areas and seeks to protect and enhance the retail function of Islington's four town centres Primary Shopping Areas. The alternative considered for Policy R2: Primary Shopping Areas relates to how A1 use class shops are protected in the town centres. The submission IIA considered the following alternative.

Table 1.20 Alternative Descriptions for Policy R2:

Alternative Reference	Alternative Description
1.	The alternative would identify specific primary and secondary frontages within which certain proportions of A1 retail would be protected – similar or the same to the current adopted policy approach.

The other alternative considered but discounted was looking at considering the effects of various different percentage levels of A1 retail use protected in the PSA across each of the town centres. This was considered to have too many variants to be able to define the effects and also to be a potentially inconsistent approach with little justification in evidence for the variations.

The minimum A1 percentages for the four town centres Primary Shopping Areas have been devised using analysis of the Retail Survey 2017 and 2019 and the findings from the retail and leisure study 2017 (document reference EB7). The percentage thresholds seek to retain the predominant shopping function of PSAs as the most connected and accessible parts of town centres with underground and bus services. The percentages are considered achievable, whilst acknowledging the variety of other leisure and service uses that occupy and contribute to the PSAs vitality and vibrancy.

The percentage thresholds for each town centre are different because of varying needs and functions of the different town centres. Considering different percentages would not be consistent with the evidence base and would not be appropriate.

Table 1.21: Assessment of Alternatives for Policy R2: Retain primary and secondary frontages

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	0	<p>Policy R2 will have a minor positive effect in terms of directing appropriate retail development to the core of the town centres, the primary shopping areas. Text updated following review of the IIA as part of the examination process. Policies R1 and R2 will have a minor positive effect in terms of directing appropriate retail, services and leisure development to key locations in the borough in line with the retail hierarchy, particularly the core of town centres, the Primary Shopping Areas. This will help to achieve an appropriate balance and mix of uses within a public realm that is most capable of supporting these commercial functions. R1 seeks to actively manage streets within retail areas to balance demand on the public realm, whilst both R1 and R2 promote active frontages which can contribute to a more attractive, functional and sustainable public realm within retail areas.</p> <p>No effect for alternative to Policy R2. Primary and secondary frontages may allow for less flexibility in terms of change of use from A1, which may lead to an increase in vacancy rates and therefore affect the attractiveness of centres and potentially lead to an increase in ASB. However, this would very much depend on the extent of frontages and the A1 thresholds chosen, which is why it is considered to have no effect.</p>

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	++	0	<p>Policy R2 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres. Retail development will be focused in the most appropriate location, in the primary shopping area, to provide a retail core.</p> <p>New effects have been identified for policy R2 following review of the IIA as part of the examination process. This includes the two-year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative effect could potentially arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term means the benefits of this are considered to outweigh this potential short term negative effect.</p> <p>There is a neutral effect for the alternative to policy R2 as Primary and secondary frontages can be considered less effective at managing competing demands between a wider variety of town centre use classes, as protection is skewed towards A1 uses. By extension, they are less flexible than a Primary Shopping Area approach which focuses protections on a smaller core area with greater flexibility elsewhere in town centres although it is acknowledged that this would depend on the flexibility contained in the policy.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment	0	0	No effect for policy R2 or alternative to policy R2.

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	0	<p>R2 will have significant positive effects on enabling town centres to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by striking the right balance of retail, leisure and business uses. The PSA approach improves access and legibility to essential services through concentrating A1 uses in the core of the town centre which enjoy the best transport links. The increased flexibility of uses in the secondary shopping area will support the expansion of cultural provision and encourage a vibrant environment for residents and visitors alike.</p> <p>There is a neutral effect for the policy alternative to R2. Primary and secondary retail frontages could effect town centres ability to thrive and provide retail and services that meets a broad range of residents needs and enhance wellbeing. They are likely to restrict the establishment of a greater amount of non-A1 essential services in the town centre, compared to a PSA but on the other hand they could help to maintain existing A1 retail services in more peripheral locations helping maintain shops and services for residents and visitors, although it is considered this could be a more marginal effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for policy R2 or alternative to policy R2.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for policy R2 or alternative to policy R2.



IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies R1-R4 will provide a framework to support facilities which can meet the needs of communities and the benefits this can provide e.g. health, recreation and leisure. The policies also provide a framework for taking into account cumulative impacts to provide against the proliferation of activities which can have/or have the potential to have negative health impacts. Policy R3 part F in particular is clear that proposals must provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated</p> <p>No effect for alternative to policy R2.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	+	<p>Policy R2 will have a significant positive effect as the policies aim to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development. New effects have been identified following review of the IIA as part of the examination process. This includes the two year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</p> <p>There is a minor positive effect for the alternative to policy R2. Frontages are likely to cover a greater extent of town centres than a PSA, therefore whilst they are likely to limit the number of non-A1 businesses in centres they would maintain the overall quantity commercial floorspace. While retaining A1 is important to retain the function of centres, and can have economic benefits in terms of agglomeration of uses, it is considered that the alternative depending on the flexibility in policy might not strike the right level of flexibility in terms of A1 and non-A1 uses and could preclude other businesses which may have economic benefit. Although it is acknowledged that supporting A1 uses could potentially still support a variety of businesses, providing variety and a range of different jobs that local people can access.</p>

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	<p>No effect for alternative to policy R2.</p> <p>New effects have been identified for Policies R1-R5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A positive effect of enhancing and protecting the retail hierarchy is that retail and leisure development will be directed to town centres that enjoy the best transport connections. An erosion of these uses in town centre and PSA locations would see an increase in the need to travel further afield to meet these needs. Additionally, protection of retail in LSAs ensures access to essential goods and services for local residents is retained, reducing the need for private vehicular and public transport to access these goods. Minor positive impacts have therefore been identified for policies R1-R4. Providing access to dispersed shops close to where people live can also help to reduce the need for vehicular travel, a minor positive is also identified for policy R5.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	<p>No effect for alternative to policy R2.</p>

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for alternative to policy R2.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for alternative to policy R2.

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for alternative to policy R2.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for alternative to policy R2.

### Summary

The appraisal finds there to be strong support for the submission approach. PSAs are considered to be an appropriate scale at which to define, monitor and seek to maintain a specified retail core, including because these are typically the most connected and accessible parts of town

centres. Primary and secondary retail frontages are considered less positive as they would stretch into parts of town centres where it would not be appropriate to restrict non-retail town centre uses. However there are still benefits as they would maintain the overall quantity commercial floorspace and whilst this might not strike the right level of flexibility in terms of A1 and non-A1 uses it could potentially still support a variety of businesses, providing variety and a range of different jobs that local people can access.

### **Consideration of alternatives for Policy R3: Islington's Town Centres**

Policy R3 sets out the approach to development in town centres, including the retail hierarchy, town centre first approach ensuring high quality development which ensures accessibility, amenity and sustainability is considered. Policy R3 addresses a number of 'development management' areas of policy, for example promoting town centre uses to town centres, the retail hierarchy, the sequential test/edge of centre locations, accessibility, amenity and design considerations as well as policy specific to the CAZ. None of these were considered possible to change to any degree of significance. The alternative identified for Policy R2 and assessed in the IIA can also be considered an alternative to Policy R3 part F. The policy alternative for R2 would identify specific primary and secondary frontages within which certain proportions of A1 retail would be protected – similar or the same to the current adopted policy approach. Policy R3 part F replaces the 'secondary' frontage aspect of policy. Policy R3 policy also sets out the approach to restricting residential uses (at ground floor level, and allowing on upper floor levels only where certain criteria are met); however, it is considered that the merits of potentially taking a more permissive approach to residential in town centres are appropriately explored through the assessment of alternatives for Policy R1, as discussed above.

### **Consideration of alternatives for Policy R4: Local Shopping Areas**

Policy R4 sets out the approach to which seeks to maintain and enhance the retail and service function of LSAs. Various alternatives to Policy R4: Local Shopping Areas were considered for assessment but there was issue with identifying a reasonable variant so no alternative was assessed. The potential to consider a variant on marketing period was considered, for example using the current policy (Development Management Policy DM 4.6) which has a 2 year marketing instead of 6 months however it was considered unreasonable as evidence suggests a balance is needed between protection and flexibility and requiring two years marketing is overly onerous. Another alternative considered was the complete relaxation of the marketing requirement but this was considered unreasonable as it would undermine the primary retail role of the LSAs. Another alternative was identifying different sizes of centre and then different percentage thresholds for each centre but this was discounted as there was no effective discernible pattern which allowed formulation of percentage thresholds.

### **Consideration of alternatives for Policy R5: Dispersed retail and leisure uses**

Dispersed retail and leisure uses: Policy R5 seeks to protect retail and café/restaurant uses in locations not covered by a retail designation such as town centres and LSAs. No alternatives were considered reasonable for policy R5.

### Consideration of alternatives for Policy R6: Maintaining and enhancing Islington’s unique retail character

Policy R6 seeks to protect and promote the provision of small shops that contributes to the local character of Islington and maintain a retail environment with units which provide for local convenience, business and employment. Policy R6’s main concern is with protecting small shops, which are a feature of the boroughs character. The only alternative which could have been considered would have been removal of this policy but this was not actively considered so is not reasonable to consider as an alternative.

### Assessment of alternative for Policy R7: Markets and Specialist Shopping Areas (SSA)

Policy R7 protects and supports Islington’s two Specialist Shopping Areas in Angel (Camden Passage) and Finsbury Park (Fonthill Road) and an array of markets. The following alternative was considered.

Table 1.22: Alternative Description for Policy R7

Alternative Reference	Alternative Description
1.	Have a more relaxed Specialist Shopping Area approach alongside the thresholds for the PSA within which the SSA is located.

The alternative to the policy of having a high percentage threshold to protect these areas as A1 use class is to have a more relaxed Specialist Shopping Area approach alongside the thresholds for the Primary Shopping Area ie to have a more relaxed Specialist Shopping Area approach. So for Finsbury Park instead of the 75% threshold it would be 55% and in Angel it would be a 60% threshold alongside a relaxed approach specific to these locations which would allow a judgement to be made on the impact on the specialist shopping function from a proposal.

Table 1.23: Assessment of Alternatives for Policy R6: Maintaining and enhancing Islington's unique retail character

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	0	<p>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A minor positive has been identified for policy R7 as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough. It will also help to ensure activity and natural surveillance within these locations which can help to create a safer and more inclusive environment.</p> <p>There is no effect for policy R7 alternative. Its noted that alternative policy R7 may have an effect in the short term where the quality of architecture may be affected as the specialist shopping areas change in response to the relaxation of planning control which would allow more non A1 retail uses but this would reduce.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	0	<p>Policy R7 will have minor positive effect. It will help support the vitality and viability of the rest of town centre through protecting both markets and SSAs.</p> <p>There is a neutral effect for the policy R7 alternative as it would increase the number of non-specialist A1 and non-A1 uses in the existing SSA thereby diluting the function of the SSA. This could also affect the vitality and viability of the rest of town centre as it could see a reduction in trade attracted by the specialist function which would see a wider shift in retail patterns across the town centre. However the positive effect of a more flexible approach would be to allow more freedom for businesses to respond to changing circumstances with the introduction of new uses which could support the continuation of the SSA.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	0	<p>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A minor positive has been identified as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough including in relation to Islington's heritage assets.</p> <p>No effect for alternative to policy R7.</p>

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	<p>Policy R7 will have a minor positive effect, as it will help support the vitality and viability of the rest of town centre through protecting SSAs. SSAs provide a niche retail offer for residents and visitors.</p> <p>There is a minor negative effect for the policy alternative to R7. Allowing a wider range of uses in SSAs could potentially see increased provision of other retail and services, albeit adding to those already provided in Finsbury Park and Angel, however this would also likely diminish the function and character of SSAs and affect their unique selling proposition which is important to attracting customers and visitors from outside the borough.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for policy R7 and alternative to policy R7.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R7 will have a minor positive effect due to markets providing places for informal interaction, reduce social exclusion and increase social cohesion. The provision of markets also provides the spaces to enable the establishment of local businesses from different demographics of Islington's population.</p> <p>No effect for alternative to policy R7.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for policy R7 and alternative to policy R7.



IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	<p>Policy R7 will have a minor positive effect as SSAs contribute to the local economy of town centres and act as specific pull factors for visitors and residents to visit town centres. The agglomeration of these retail uses provides a <i>unique selling proposition</i> to Angel and Finsbury Park, contributing to a character that benefits other town centre uses. New effects have been identified following review of the IIA as part of the examination. This includes the two-year vacancy and marketing period for change of use away from A1 in the SSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing potentially resulting in vacant units in the SSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</p> <p>It is considered there could be a neutral effect of the alternative to policy R7 on the borough economy as on the one hand it would diminish the function of the SSAs. SSAs not only provide a unique retail function and they also contribute to the character of town centres which in turn is likely to attract visitors to the wider town centre areas of Finsbury Park and Angel. On the other hand the positive effect of a more flexible approach would be to allow more freedom for businesses to respond to changing circumstances with the introduction of new uses which could support the continuation of the SSA.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	<p>No effect for alternative to policy R7.</p> <p>Policy R7 could see a minor positive effect by protecting markets and SSAs in accessible locations that help to promote local trips by sustainable and active travel transport modes.</p>

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy R7 and alternative to policy R7.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy R7 and alternative to policy R7.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy R7 and alternative to policy R7.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy R7 and alternative to policy R7.

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy R7 and alternative to policy R7.

### Summary

The assessment notes that allowing a wider range of uses in SSAs could potentially see increased provision of other retail and services, albeit adding to those already provided in Finsbury Park and Angel; however, on the other hand, the appraisal notes that the alternative policy approach would also likely diminish the function and character of SSAs and affect their unique selling proposition which is important to attracting customers and visitors from outside the borough. On balance whilst the positive effect of a more flexible approach would be to allow more freedom for businesses to respond to changing circumstances with the introduction of new uses which could support the continuation of the SSA the submission policy provides more certainty and protection which ultimately is considered more positive for the wider town centre.

### Assessment of alternative to Policy R8: Location and Concentration of Uses

Policy R8 seeks to manage the detrimental concentrations of specific town centre uses that negatively impact public health and wellbeing, and cause harm to character and function, and vitality and viability of places. The following alternative was considered.

Table 1.24: Alternative Description for Policy R8:

Alternative Reference	Alternative Description
1.	Have no quantitative restrictions on hot food takeaways and betting shops across the boroughs town centre and local centres.

The reasonable alternative to Policy R8: Location and concentration is to have no quantitative restrictions on hot food takeaways and betting shops across the boroughs town centre and local centres (i.e. which limit percentage or quantum of units). A stronger alternative to the policy approach with lower percentage thresholds was discounted as being unreasonable as it would effectively be a ban on new hot food takeaways and betting shops.

Table 1.25: Assessment of Alternatives for Policy R8: Location and Concentration of Uses

IIA Objective	Policy R8	Alternative 1 to Policy R8	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	0	<p>Policy R8 has a minor positive effect. It seeks to manage the detrimental concentrations of uses that hinder public health and wellbeing, amenity, character and function, and affect the vitality and viability of places. There is some evidence that increased numbers of betting shops can lead to increases in crime and ASB, including fear/perceptions of crime and ASB therefore managing the concentration of such uses could have positive effects on the built environment.</p> <p>No effect for alternative. There is some qualitative evidence that increased numbers of betting shops can lead to increases in crime and ASB, including fear/perceptions of crime and ASB. The alternative could lead to more betting shops being developed although as the policy approach would retain the case-by-case qualitative assessment of overconcentration, issues of crime and ASB could still be considered.</p>

IIA Objective	Policy R8	Alternative 1 to Policy R8	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
2. Ensure efficient use of land, buildings and infrastructure	0	0	No effect for alternative. There is no specific need for hot food takeaways, betting shops and adult gaming centres, and they could potentially displace retail uses which do have a defined need over the plan period. However, there is no guarantee that the alternative would exacerbate this over and above the proposed policy approach.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy R8 or alternative to policy R8.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	-	<p>There is a significant positive effect for Policy R8. There is no specific need for hot food takeaways, betting shops and adult gaming centres; and evidence suggests that they can undermine vitality, viability and vibrancy of town and local centres. A quantitative restriction within centres will help prevent a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook.</p> <p>There is a minor negative effect for the policy alternative. There is no specific need for hot food takeaways, betting shops and adult gaming centres; and evidence suggests that they can undermine vitality, viability and vibrancy of town and local centres. Without a quantitative restriction within certain centres, this could lead to a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook.</p>

IIA Objective	Policy R8	Alternative 1 to Policy R8	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for alternative to policy R8.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for alternative. There is evidence that betting shops locate in more deprived areas, areas which are also more likely to see a higher prevalence of problem gambling. Incidences of problem gambling correlates with higher unemployment and very severe financial problems, which is directly relevant to any assessment of poverty. However, there is no guarantee that the alternative would exacerbate this over and above the proposed policy approach.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	-	Policy R8 will have a minor positive effect. The policy working in tandem with other health initiatives should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular, reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.  There is a minor negative effect for the policy alternative. Although there is no guarantee that hot food takeaways, betting shops and adult gaming centres would increase as a result of the alternative, this would be a possibility, for one if not all the uses. Each of these uses brings about potential impacts on health and wellbeing, both physical and mental, hence the cumulative impact of the alternative is considered to be negative, in terms of the impact on health inequalities, mental and physical health and wellbeing and the level of activities with negative health externalities.

IIA Objective	Policy R8	Alternative 1 to Policy R8	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	+	<p>Policy R8 will have neutral effect by providing a quantitative restriction within centres which will help prevent a level of hot food takeaways, betting shops and adult gaming centres. On a purely economic basis the policy could have minor negative impact by limiting jobs in the betting and hot food takeaway industries, however from a sustainable economic development point of view the adverse economic impacts caused by obesity and personal debt is a far greater negative effect than the restrictions on these sectors growth. Controls on the location and concentration of uses can also have wider economic benefits by supporting a range of businesses by mitigating the cumulative adverse impacts some uses can have on the viability and vitality of areas which can include impacts on character and rents.</p> <p>There is a minor positive effect for the policy alternative. Additional hot food takeaways, betting shops and adult gaming centres would add to the range of local businesses and would provide a range of employment opportunities, including provision of opportunities for lower skilled jobs. Whilst this might not constitute sustainable economic development, due to the potential adverse social impacts, in purely in economic terms they could have a minor positive impact.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for alternative to policy R8. It may lead to more hot food takeaways, betting shops and adult gaming centres being developed, but this would be in the same location as the policy approach, therefore there would be no additional benefit.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative to policy R8.

IIA Objective	Policy R8	Alternative 1 to Policy R8	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for alternative to policy R8.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for alternative to policy R8.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for alternative to policy R8.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for alternative to policy R8.



## Summary

The assessment considers that whilst the alternative might not constitute sustainable economic development, due to the potential adverse social impacts, in purely in economic terms a more relaxed approach could have a minor positive economic impact. However, the overall conclusion under this SA objective is that the reasonable alternative (i.e. a more relaxed approach) would lead to negative effects, once account is taken of wide ranging socio-economic considerations discussed under other SA objective headings.

### **Consideration of alternative for Policy R9: Meanwhile/temporary uses**

Policy R9 sets out the approach that encourages making use of vacant buildings/sites for temporary (6 month) commercial use. The potential alternatives to Policy R9; would be variations in the period for which the temporary use is considered. Variations were not considered possible to assess as the assessment would not be able to provide a meaningful comparison of the various effects and the significance that different periods of time that a vacant unit could be used for flexible uses. There could be an alternative to the range of uses. It was not considered realistic to expand the range of uses further as the approach adopted was already permissive. A more limited range of uses was a possible alternative however this was considered unreasonable given the flexibility the policy is seeking to promote.

### **Consideration of alternative for Policy R10: Culture and Night-Time Economy (also relevant parts of policies R1 and BC2 (Cultural Quarters))**

Policy R10 focuses on the protection and enhancement of cultural and night time economy uses, directing new uses to Cultural Quarters, Town Centres, and the CAZ. The Inspectors questioned why alternatives were not considered (document reference INS04) and the Council has provided explanation of the alternatives made previously in the submission IIA.

The existing Core Strategy in policy CS14A recognises that Islington will have strong cultural and community provision with a number of major attractions in the borough and that the council will protect and enhance cultural uses and encourage new arts and cultural uses within town centres. As an approach the identification of cultural quarters is seen to be an evolution of this current plan approach. This also helps build on the local recognition of this sectors important contribution to the boroughs economy as well as enhancing the lives of visitors and residents.

As to the cultural quarter designations themselves and their boundaries, it is considered unrealistic for the IIA to consider alternatives. Boundaries for Archway and Angel cultural quarters are identified as the town centre boundaries and these are set, albeit amendments to Angel town centre boundary are made in response to changes over time from development. The boundaries cover the whole of Archway and Angel town centres as the policy intends to promote development to consider its contribution to the cultural offer of these centres that operate as a connected spatial locality. To designate only part of the town centres as cultural quarters could have a limiting effect on enhancing the

cultural capital. The findings from the retail study identify the role culture has to play in the future of town centres. This increased cultural and leisure function seems inevitable with online shopping reducing the demand for traditional A1 retailing which is a trend which may well have been accelerated by the Covid-19 crisis. The cultural quarter approach is an evolution of policy in the existing Local Plan and should apply to the whole of the town centre.

The question would then be whether Archway and Angel should be designated rather than say Nags Head or Finsbury Park. The reason Angel and Archway were selected as Cultural Quarters is that Angel has an existing cultural scene through its theatres, galleries and music venues that needs retention and enhancement. Archway conversely has limited cultural uses accessible to town centre visitors but has a range of cultural and artistic organisations and institutions that could be enhanced through a cultural quarter designation and encourage a wider range of cultural uses accessible to town centre visitors.

The boundary for the Farringdon cultural quarter could have considered an alternative, although it was judged that this would not be a meaningful assessment. The boundary was identified in collaboration with officers with a responsibility for culture who advised on where was considered appropriate in terms of existing venues and likely future growth based on knowledge of the area and expertise. In addition policy BC2 contains flexibility with a sequential approach to cultural development which permits where appropriate cultural development outside the cultural quarter in other areas of the CAZ.

Elsewhere when the boroughs other town centres were considered in line with the broad remit given by Policy HC5 in the London Plan which expects Cultural Quarters to be defined around existing clusters of cultural uses or be used to develop new clusters the Nag's Head and Finsbury Park, apart from single cultural facilities of significance, were not identified to have the wider cultural momentum and potential of either Angel or Archway. Therefore it was considered unnecessary to identify these centres as alternatives.

### **Consideration of alternative for Policy R11: Public Houses**

Policy R11 seeks to protect pubs and provides detail on subservient use as visitor accommodation. The Inspectors questioned why alternatives were not considered (document reference INS04) and the LBI response (document reference LBI03) provided the following explanation for why no reasonable alternatives were identified for Policy R11. The approach for Policy R11: Public Houses builds on the current public house policy DM4.10, which seeks to provide a more detailed assessment of the public houses that warrant protection against change of use; and the conditions that public houses must demonstrate to show reasonable measures have been taken to retain viability of the pub. This approach provides appropriate balance in terms of protecting pubs and encouraging development of economic, social or cultural value. Whilst the policy approach goes further than for other cultural uses, this is considered to be justified given the scale of closure and the contributions pubs can make to the community. The only alternative which could have been considered would be a more permissive approach which would allow more circumstances where a loss of pubs could occur, through a shorter period of marketing for example 12 or 6 months/and a shorter vacancy period or lessor vacancy period. This is not considered reasonable by the council as it would not strike the appropriate balance in that it would provide insufficient protection for pubs.

## Assessment of Policy alternative to Policy R12: Visitor accommodation

Policy R12 restricts visitor accommodation to site allocations and sets criteria for re-development of existing visitor accommodation and ensures appropriate design of any accommodation. The following alternative was considered.

Table 1.26: Alternative Description for Policy R12

Alternative Reference	Alternative Description
1.	To allow a more permissive approach to the development of visitor accommodation in Town Centres and the CAZ, and on allocated sites

Table 1.27: Assessment of Alternatives for Policy R12: Visitor accommodation

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	-	-	There is a minor negative effect for both Policy R12 and the policy alternative to R12. Both policy approaches would likely increase the amount of visitor accommodation delivered; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. The more permissive alternative policy approach to visitor accommodation would increase the significance of this effect. This is partially mitigated through the policy R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible.
2. Ensure efficient use of land, buildings and infrastructure	0	-	There is a minor negative effect for the policy alternative. The alternative would likely result in a greater amount of visitor accommodation being permitted, which could reduce the availability of land to meet other more pressing development needs, and therefore it would not effectively balance competing demands for land use. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices.

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy R12 and alternative to policy R12.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	<p>It is considered that on balance there is a neutral effect for both the policy and the alternative. New visitor accommodation could have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision. Conversely, both the policy and the alternative could have negative effects. While it may attract visitors to the borough, it could also dilute the land available for meeting more priority development needs such as affordable housing, so in that sense it would not respect the needs of local residents.</p> <p>A more permissive approach to visitor accommodation would reduce the ability to provide land for other uses which support liveable neighbourhoods, including essential services and amenities within town centres which has the potential to impact on the vibrancy and vitality of town centres. Overall, the policy is considered to have no effect given the balance of potential positive and negative effects.</p> <p>The alternative would allow development of visitor accommodation anywhere within Town Centres, which would create more pressure on town centre uses, both existing uses and potential uses which may not be able to develop due to scarcity of space. This could affect the ability of town centres to meet the needs and wellbeing of the population.</p> <p>Overall, both the policy and the alternative are considered to have no effect given the balance of potential positive and negative effects. The more permissive alternative policy approach to visitor accommodation would increase the significance of this effect.</p>

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for policy R12 and alternative to policy R12.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for policy R12 and alternative R12. An increase in hotels could increase the transience of various localities, which could undermine policies and other land uses which promote social cohesion and integration. However, the alternative focuses hotels in mixed use areas where other uses may be acceptable (in line with other proposed policies) which would also not benefit social cohesion. Therefore, it is considered that the overall effect is neutral. The policy approach has less of an effect with less land identified.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for policy R12 and alternative to policy R12.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	<p>There is a minor positive effect for policy R12. It could provide opportunities for employment, particularly for local people, in this industry, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as office; this more indirect economic benefit therefore limits the scale of any positive effect. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business.</p> <p>This is considered neutral effect for the policy alternative. Whilst it could provide opportunities for employment, particularly local people, in this industry, albeit lower-skilled jobs at a relatively low employment density, a more permission approach could affect delivery of other more economically advantageous land use so on balance it is considered neutral.</p>

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for alternative to policy R12. It may lead to more visitor accommodation being developed, but this would be in the same location (Town Centres and the CAZ) as the policy approach, therefore there would be no additional benefit.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy R12 and alternative to policy R12.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy R12 and alternative to policy R12.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	-	-	There is a minor negative effect for both the policy R12 and the policy R12 alternative. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use. The more permissive alternative policy approach to visitor accommodation would increase the significance of this effect.

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	-	There is a minor negative effect for both the policy R12 and the policy R12 alternative. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use. The more permissive alternative policy approach to visitor accommodation would increase the significance of this effect.
14. Maximise protection and enhancement of natural resources including water, land and air	-	-	There is a minor negative effect for both the policy R12 and the policy R12 alternative. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.

### Summary

The assessment did not find the alternative to be preferable in respect of any of the SA objectives; however, it did highlight several specific positive effects, including:

- New visitor accommodation “*could have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement...*” However, this positive effect is caveated, in that it “*would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision.*”
- New visitor accommodation “*could provide opportunities for employment, particularly local people, in this industry*”; however, this is again caveated, in that jobs would “*lower-skilled jobs at a relatively low employment density*” and on the basis that “*a more permission approach could affect delivery of other more economically advantageous land uses...*”

## 5. Green Infrastructure

### **Consideration of alternative for Policy G1: Green infrastructure**

Policy G1 sets the strategic approach to the protection and enhancement of the network of green spaces, street trees, green roofs, and other assets such as natural drainage features and introduces Urban Greening Factor. For the purposes of the Local Plan, the term 'green infrastructure' is inclusive of 'blue infrastructure' too. Alternatives to policy G1: Green infrastructure were sought although it was considered that London plan policy G1 which promotes Green Infrastructure would constrain any realistic options. An example of an alternative considered was to take a qualitative approach to requiring urban greening in a development rather than apply the urban greening factor set out in the London Plan. This was considered to create inconsistency with the London Plan and questions around reasonableness given varying context and site sizes.

### **Consideration of alternative for Policy G2: Protecting open space**

Policy G2 seeks to protect public and significant private open space. Sets out the policy approach to protecting open space on housing estates. The only alternative considered but discounted was a more restrictive approach which didn't allow flexibility for improvements / rationalisation of open space on housing estates. In addition the current policy approach set out in Development Management Policy DM6.3: Protecting Open space allows other planning benefits to be considered but this was also discounted as it was considered unreasonable to allow potential loss of open space without reasonable efforts to retain and improve the existing quantum of open space.

### **Consideration of alternative for Policy G3: New public open space**

Policy G3 focuses on in what circumstances new public open space is required and criteria on the type of space provided. An alternative to policy G3: New public open space was considered but discounted; a policy with no specific threshold where the Council would require provision of public open space on site where each development would contribute open space appropriate to site specific characteristics. Developments under the threshold may need to provide open space and some over the threshold may not need to provide open space. The proposed approach was discounted because it was considered that it would not be reasonable for many smaller sites in Islington (which make up the majority of sites which come forward) to provide public open space on-site.

### **Consideration of alternative for Policy G4: Biodiversity, landscape design and trees and G5: Green roofs and vertical greening**

Policy G4 requires all development to protect and enhance site biodiversity and the surrounding area and demonstrate this through the submission of a Landscape Design Strategy. Policy G5 sets out the requirements for the installation of green roofs and vertical



greening. There are no reasonable policy alternatives to G4: Biodiversity, landscape and trees and G5: Green Roofs and Vertical Greening.

## 6. Sustainable Design

### Consideration of alternative for Policies S1: Delivering Sustainable Design, S2: Sustainable Design and Construction, S3: Sustainable Design Standards, S4: Minimising greenhouse gas emissions

A large number of alternatives to and within the Sustainable Design policies can feasibly be envisaged; however, the submission IIA only identified one reasonable alternative to Policy S5. Policy S1 strategically sets out the requirements for sustainable design to create energy and resource efficient development to tackle waste and climate change and take an integrated approach to water management. Policy S2 requires all development proposals to submit a Sustainable Design and Construction Statement and policy sets out the details required for different scale of development. Policy S3 sets out the various environmental standards that different development types should meet. Policy S4 focuses on the specific requirements of development to minimise greenhouse gas emissions to meet zero carbon targets including application of the Fabric Energy Efficiency Standards. There are no reasonable policy alternatives to Policies S1: Delivering Sustainable Design, S2: Sustainable Design and Construction. An alternative to Policy S3 was considered which would have amended the requirement to achieve the BRE home quality mark for major and minor new build housing development but it was discounted as it was considered necessary to retain in order to promote quality design and deliver high quality housing. There are no reasonable policy alternatives to Policy S4: Minimising greenhouse gas emissions given the context of policy set out in the London Plan.

### Assessment of alternative to Policy S5: Energy Infrastructure

Policy S5 sets out the requirements for the implementation and connection of heat networks in development. The following alternative was considered reasonable.

Table 1.28: Alternative Description for Policy R12: Visitor accommodation

Alternative Reference	Alternative Description
1.	Not setting a requirement for minor developments.

The alternative to Policy S5 would remove the requirement for any minor developments to connect to a heat network, regardless of distance. Other alternatives were not considered necessary given the context of policy set out in the London Plan.

Table 1.29: Assessment of Alternatives for Policy R12: Visitor accommodation

IIA Objective	Policy S5:Energy Infrastructure	Alternative to Policy S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	No effect for policy S5 and alternative to policy S5.
2. Ensure efficient use of land, buildings and infrastructure	+	-	<p>For policy S5 there is a minor positive effect as it will ensure that low-carbon energy infrastructure is provided in the right locations. In particular, this policy promotes the development and extension of the borough's heat networks so that connection is possible for a greater number of developments.</p> <p>There is a minor negative effect for the policy alternative. In relation to provision of infrastructure, by not requiring any minor developments to connect to a heat network, the alternative policy may potentially limit the development and extension of heat networks in the borough because opportunities for minors (especially larger minors) located very near to a network to connect would not be realised. This in turn could potentially limit the availability of low and zero carbon heat sources for all development.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	<p>There is a neutral effect for both the policy and the policy alternative. Connection to a heat network may have a more limited impact on a heritage asset compared to other low carbon heat sources, such as air source heat pumps which affect the exterior of a building. Therefore the alternative by not requiring any minor developments to connect may indirectly result in an increased risk of harm to heritage assets. Not requiring any minors to connect may also indirectly lead to some larger minors that could have connected to a network being more likely to install solar PV panels, which affect the exterior of a building, in order to meet carbon reduction targets. However, these potential impacts would depend on the specific proposal and heritage assets, and may be able to be mitigated. The policy approach reduces the potential for these impacts.</p>

4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	No effect for alternative.
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	No effect for alternative.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	No effect for alternative.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	-	<p>Policy S5 will have a significant positive effect and help to ensure that all residents have access to good quality housing by supplying energy efficiently and cleanly which will help to reduce fuel poverty.</p> <p>There is a minor negative effect for the alternative to policy S5. Not requiring any minor developments to connect to a heat network may have an indirect impact on fuel poverty for people living in new-build minor developments that could connect to a network (i.e. larger minors located very close to a network) as connection to a network may affect heating costs. The cost impacts, in comparison to other heating options such as individual gas boilers or electric air source heat pumps, will vary depending on the particular development, and therefore it is difficult to generalise. A heat network may appear more expensive when comparing the cost of heat alone, but often offers reduced costs elsewhere, for example through avoidance of servicing, maintenance and gas safety checks associated with individual boilers. Therefore, the alternative policy may have indirect positive and negative impacts on fuel poverty depending on the particular development and heating system. This alternative policy may also in some cases have an indirect impact on improving air quality, as minor developments that could connect to a network (especially larger minors</p>

			located very close to a network) may instead opt for gas boilers which could worsen air pollution.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	<p>Policy S5 will have a minor positive effect and support the development of green industries and a low-carbon economy through its use of low and zero carbon heating options, particularly heat networks and secondary heat sources.</p> <p>There is a minor negative effect for the policy alternative. Not requiring any minor developments to connect to a heat network may affect the development and expansion of green industries and a low carbon economy, particularly opportunities related to the heat network itself, including opportunities to link with other networks to achieve wider agglomeration benefits.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for alternative.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for alternative.

<p>12. Reduce contribution to climate change and enhance community resilience to climate change impacts.</p>	<p>++</p>	<p>-</p>	<p>Policy S5 will have a significant positive effect. It will directly contribute to minimising Islington's contribution to climate change by ensuring that developments prioritise energy efficient low and zero carbon heating options. This will contribute to the decarbonisation of heat and the reduction of carbon emissions.</p> <p>There is a minor negative effect for the alternative to policy S5. In relation to contribution to and impacts of climate change, the level of heat loss means that in the majority of low density developments other low carbon heat options are likely to be more efficient and result in lower carbon emissions compared to connection to a heat network. Removing the requirement for minor developments to connect may encourage applicants to consider other low carbon heat options instead of connecting to heat networks.</p> <p>There will, however, be some larger minor developments which are higher density and also located very close to a heat network, so therefore should not have significant heat losses. For these developments connection to a heat network is likely to be the lowest carbon option, although this will depend on the distance to a network and the specific development type, e.g. residential can have a higher heat demand than commercial. Removing the requirement for minors to connect to a heat network would therefore prevent these particular opportunities from being captured, leading to missed opportunities to reduce carbon emissions, decarbonise heat, increase energy security, and reduce fuel poverty.</p>
<p>13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</p>	<p>+</p>	<p>-</p>	<p>Policy S5 will have a minor positive effect as it will support the use of low and zero carbon heating options, which will encourage use of non-renewable resources.</p> <p>There is a minor negative effect for the alternative to policy S5. Not requiring any minor developments to connect to a heat network may have a negative effect on promoting the use of renewable sustainable energy sources, and would limit the development and extension of heat networks (especially if larger minor developments were not captured).</p>
<p>14. Maximise protection and enhancement of</p>	<p>0</p>	<p>-</p>	<p>There is no effect for Policy S5.</p>

natural resources including water, land and air			There is a minor negative effect for the alternative to policy S5. Not requiring any minor developments to connect to a heat network may have an indirect impact on improving air quality, as minor developments that could connect to a network (especially larger minors located very close to a network) may instead opt for gas boilers which could worsen to air pollution.
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## Summary

The assessment is broadly supportive of the submission policy, although it does note that: “Removing the requirement for minor developments to connect may encourage applicants to consider other low carbon heat options instead of connecting to heat networks.” This is an important consideration in light of the recent but rapid trend towards low temperature heat networks. The assessment makes particular reference to the greater negative effect that larger minors has and it may also be fair to highlight that the alternative could lead to benefits for development viability; however, there is no reason to suggest that any benefits would be significant. The Local Plan Viability Study (2018) did not explicitly examine the viability implications of Policy S5 criterion F.

## Consideration of alternatives for Sustainable Design (policies S6 to S10)

- Policy S6: Managing heat risk - focuses on the requirements for development proposals to minimise internal heat gain and the impacts of the ‘urban heat island effect’ through design, layout, orientation and materials.
- Policy S7: Improving Air Quality - requires new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible.
- Policy S8: Flood Risk Management - sets out when a site specific Flood Risk Assessment (FRA) is required and what should be included in the assessment.
- Policy S9: Integrated Water Management and Sustainable Drainage - will ensure development adopts an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and will maximise biodiversity and water use efficiency alongside other benefits including amenity and recreation.
- Policy S10: Circular Economy and Adaptive Design - sets out the approach to circular economy and materials re-use.

No alternatives to policies S6 to S10 were considered reasonable.

## 7. Public Realm and Transport

### Consideration of alternatives for Public Realm and Transport (policies T1 to T5)

- Policy T1: Enhancing the public realm and sustainable transport: sets out the strategic approach to public realm and transport which supports promotion of active travel over other transport modes, taking design led approach to transport with development to consider its impact between land use, building design, transport accessibility and connectivity.
- Policy T2: Sustainable Transport Choices: focuses on how development should incentivise walking and cycling, including cycle parking standards and minimise the impact of unsustainable transport modes. The policy also sets out how the Council will work with TfL and other stakeholders regarding public transport and associated infrastructure.

An alternative for Policy T2C: Sustainable Transport Choices with regards to shared surfaces was considered – taking a more neutral stance for smaller sites where shared space maybe beneficial in order to create a more efficient use of land. However it was discounted on the basis that it was not supported by guidance issued by Department for Transport and Transport for London.

- Policy T3: Car-free development: focuses on ensuring all new development is car free and the criteria related to ensuring accessible parking spaces are provided.

An alternative for Policy T3: Car free development was considered but discounted. The London Plan policy allows development in areas of low PTAL 0 to 3 to apply maximum parking standards and for PTAL 4 to 6 to apply car free policies. This would apply in pockets of Islington mainly in the north however it was discounted as unreasonable given the current Development Management Policy DM8.5: Vehicle Parking, which is a car free approach to development and is already applied borough wide.

- Policy T4: Public realm: focuses on how development should engage with and enhance the public realm.
- Policy T5: Delivery, servicing and construction: focuses on the requirements for new development to consider and manage delivery and servicing and mitigate the negative effects related to the construction of development.

No alternatives to policies T1, T4 and T5 were considered reasonable.



## 8. Design and Heritage

A large number of alternatives to and within the Design and Heritage policies can feasibly be envisaged; however, the submission IIA determined that it was appropriate and reasonable to explore alternatives only in respect of Policy DH3 Building Heights.

The other policies in this section are:

- Policy DH1: Fostering innovation and conserving and enhancing the historic environment - Policy DH1 sets out the strategic approach to design and heritage supporting innovative approaches to development as a means to increasing development capacity to meet identified needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.
- Policy DH2: Heritage assets - Policy DH2 sets out the requirements for protecting heritage assets and their setting including Conservation Areas, Listed Buildings; Historic Green Spaces, Archaeology, Views, Non-designated Heritage Assets.
- Policy DH4: Basement development - Policy DH4 sets the approach to basement development restricting basements that are disproportionately large, out of character with the site and host building. Sets criteria where basement development is permissible
- Policy DH5: Agent of change, noise and vibration - Policy DH5 aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity through requirement to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. The policy also sets out how all development should reduce the impacts of noise and vibration from new noise generating uses.
- Policy DH6: Advertisements - Policy DH6 sets ensures that advertisements should contribute to a safe and attractive environment.
- Policy DH7: Shopfronts - Policy DH7 focuses on ensuring shopfronts are accessible and contribute positively to the character of an area.
- Policy DH8: Public art - Policy DH8 encourages new public art and the requirements of this.

### Assessment of alternative for Policy DH3: Tall Buildings

Policy DH3: Building heights - Policy DH3 defines tall buildings, identifies where tall buildings will be permitted and how the design of tall buildings will take account of visual, functional and environmental impacts. The additional assessment of alternatives requested by the Inspectors will assess the following alternatives.

Table 1.30: Alternative Description for Policy DH3: Tall Buildings

Alternative Reference	Alternative Description
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1.	to permit tall buildings solely based on a set of design criteria without locational restrictions.
2.	A more permissive approach based on broad areas or zones where tall buildings might be acceptable

The following explains the broad zones which could be considered for the alternative 2 approach. The Islington Tall Buildings Study identified the 'Strategic Search Areas'. These areas are:

- A Archway
- B Finsbury Park
- C Upper Holloway / Caledonian Road / Emirates Stadium Corridor
- D Highbury Corner
- E Dalston Fringe
- F Kings Cross Fringe
- G Central Activity Zone and City Fringe

A map of these areas is available in the Tall Buildings Study Figure 5.5 on page 77.

The Strategic Search areas are locations which are potentially appropriate for development of tall buildings in accordance with London Plan Policy 7.7 (C). This comprises the Central Activities Zone, opportunity areas, areas of intensification, and town centres. In addition, the study included three areas which did not meet this definition but were considered appropriate due to their built form, location and accessibility, these are the corridor from Caledonian Road Station to Holloway Road and the Emirates Stadium, Highbury Corner, and Dalston Fringe. In addition large areas were excluded from the strategic search at an early stage due to their built form and heritage constraints. These areas were the western part of the CAZ including Clerkenwell and Angel Town Centre. Alternative 2 considered these broad areas where development of tall buildings is potentially appropriate in these locations, subject to individual impacts and assessments, and where tall buildings are not permitted from being developed in other areas of the borough. It was not considered possible to consider the merits of each these broad areas as distinct areas to be assessed individually so as a variation of alternative 2: broad areas was not taken forward for assessment.

Another approach to the broad area approach was also considered, where broad areas are based on the London Plan Policy 7.7 criteria alone (i.e. without the benefit of further refinement as set out in the Islington Tall Buildings Study as set out above). This was not considered a reasonable alternative as the Strategic Search Areas include London Plan policy 7.7 areas (with some modification).

Table 1.31: Assessment of Alternatives for Policy DH3: Tall Buildings

IIA Objective	Policy DH3	Alternative 1 to Policy DH3	Alternative 2 to Policy DH3	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment  Page 335	++	-	+	<p>Policy DH3 will have a significant positive effect on the built environment because it takes a plan led approach to tall buildings. It restricts tall buildings across the vast majority of the borough, and directs them to potentially suitable locations (subject to a range of additional detailed assessments). The locations have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness, taking into account heritage assets as well as considering transport accessibility, infrastructure and land use. The policy seeks to promote exceptional design with high quality design details in terms of tall buildings visual impact and considering any local design principles.</p> <p>Alternative 1 will have a minor negative effect. Not restricting potential tall buildings to specific sites/locations only, and the use of design criteria alone (without locational and maximum height restrictions for buildings over 30 metres) would not be sufficient to adequately address potential tall buildings in possibly unacceptable locations. It does not proactively identify the appropriate locations for landmark buildings as part of a co-ordinated and holistic approach, which creates uncertainty regarding the enhancement of local character and distinctiveness. A design criteria only approach may allow some tall buildings to be developed which are considered acceptable when considered as part of a planning balance but where they have some negative impacts on the character and amenity of their setting.</p> <p>Alternative 2 will have a minor positive effect, because it takes a part plan-led approach to tall buildings, directing them to areas where they are potentially more suitable, subject to a range of additional assessments. The broad areas or zones are assumed to be identified based on an assessment of transport accessibility, infrastructure, land use, as well as local character and the historic environment to ensure that tall buildings are located where they are most appropriate. However the less precise nature of broad areas or zones would introduce some uncertainty in respect to local character and distinctiveness where a specific tall building proposal might create a negative effect, for example at the edge of the broad area or zone.</p>

<p>2. Ensure efficient use of land, buildings and infrastructure</p>	<p>++</p>	<p>-</p>	<p>++</p>	<p>Policy DH3 will have a significant positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness. The approach also focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. By their very nature a tall building will optimise the use of land.</p> <p>Alternative 1 is likely to have a minor negative effect. Due to their high-density form, tall buildings can put further pressure on the local infrastructure and the immediate surrounding if their locations are not strategically planned. It is not certain that a criteria-based approach will ensure efficient use of land, building and infrastructure because it is more focused on the analysis of the immediate locality. A criteria-based approach is less likely to consider the most appropriate location for development, albeit locational criteria could be part of a policy. As an approach it is less likely to holistically investigate the possibilities and opportunities in relation to transport accessibility, infrastructure and land use.</p> <p>Alternative 2 will have significant positive effects. Under this policy alternative tall buildings would be directed to the areas with the highest transport accessibility and with adequate supporting infrastructure, using these resources efficiently and also using land efficiently by building at high densities in these locations. By their very nature a tall building will optimise the use of land.</p>
<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	<p>++</p>	<p>-</p>	<p>+</p>	<p>Policy DH3 is likely to have a significant positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness. The approach included excluding areas of heritage value – conservation areas, and the suitable locations identified have considered proximate heritage assets therefore ensuring heritage assets are conserved and enhanced. Part F of the policy ensures that the design is of a high quality and does not adversely impact the surrounding context including heritage assets.</p> <p>Alternative 1 is likely to have a negative effect. Use of design criteria alone (without locational and maximum height restrictions for buildings over 30 metres) may not be sufficient to adequately restrict potential tall buildings in unacceptable locations. As an approach it does not proactively identify the appropriate locations for landmark buildings as part of a co-ordinated and holistic approach, which creates uncertainty regarding the enhancement of local character and distinctiveness. Indeed tall buildings could be developed in areas which should be safeguarded from development of tall buildings such as conservation areas or within the setting of listed buildings</p>

				Alternative 2 is likely to have a minor positive effect. This alternative will direct tall buildings to broad areas or zones presumably where the impacts on historic assets is less than in the remainder of the borough. However as this is a broad area or zone approach and not a site based policy, and with historic assets densely developed throughout the borough, some specific heritage assets may still be impacted under this policy therefore there is some uncertainty, for example at the edge of the broad area or zone.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	No effect for policy alternatives to Policy DH3.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	<p>New assessment detail has been added following review of the IIA as part of the examination process: Policy DH3 may limit opportunities for tall buildings which can provide housing on specific sites which could impact to some degree on housing delivery. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. In addition under DH3 some sites identified as potentially appropriate for tall buildings are allocated to include residential development, therefore also delivering affordable housing.</p> <p>No effect for policy alternatives to Policy DH3.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	No effect for policy alternatives to Policy DH3.
7. Improve the health and	0	0	0	No effect for policy alternatives to Policy DH3.

wellbeing of the population and reduce health inequalities				
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	-	0	0	<p>New effects have been identified which changes the effects from neutral to minor negative following review of the IIA as part of the examination process. Policy DH3 may have a minor negative effects on economic development as the development of tall buildings will be directed to key locations where they are most appropriate, which may result in a lower overall quantum of floorspace delivery than an approach where tall buildings could be developed in more locations across the borough. These effects are minor as lower rise buildings will meet the vast majority of this need, and on many sites lower rise buildings can rival tall buildings for floorspace delivery.</p> <p>No effect for policy alternatives to Policy DH3.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	+	<p>Proposed Policy DH3 will have a minor positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. The policy criteria ensure that tall buildings do not prejudice the ongoing functionality of sites in the local area including the functionality of the existing transport network.</p> <p>No effect for alternative 1 to Policy DH3.</p> <p>Policy Alternative 2 will have a minor positive effect. The broad locations for tall buildings would be selected based partly on their transport accessibility, ensuring that tall buildings, which generate large numbers of trips, are located where these trips can be made by public transport, walking and cycling.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible	0	-	+	<p>New effects have been identified which changes the effects from positive to neutral effect following review of the IIA as part of the examination process. New analysis has been added following review of the IIA as part of the examination process: Policy DH3 will have no significant effect on open spaces. Policy DH3 ensures that where tall buildings are developed they do not harm nearby open spaces including through overshadowing and</p>

and multi-functional				<p>microclimate. This will ensure no negative impacts are caused as the impacts are addressed by policy but will not be scored as a positive impact.</p> <p>The alternative 1 to Policy DH3 will have a minor negative effect. The impact on open space depends on how robust any policy criteria are; however, a criteria-based approach creates uncertainty and opens up greater potential for case-by-case decisions which would harm particular open spaces.</p> <p>Policy alternative 2 will have a minor positive effect. The broad locations for tall buildings would be selected partly based on their impacts to open spaces, so their development would not impact negatively on open spaces.</p>
<p>11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.</p>	+	0	0	<p>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. New effect has been added following review of the IIA as part of the examination process: Policy DH3 requires that development of tall buildings does not adverse impact biodiversity. This will have a minor positive effect on protecting habitats and species diversity.</p> <p>No effect for policy alternatives to Policy DH3.</p>
<p>12. Reduce contribution to climate change and enhance community resilience to climate change impacts.</p>	+	0	0	<p>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect on reducing climate change by requiring new tall buildings to be of exceptional design standards.</p> <p>No effect for policy alternatives to Policy DH3.</p>
<p>13. Promote resource efficiency by decoupling waste generation</p>	+	0	0	<p>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have minor positive effects by limiting the overall number of tall buildings, which are more resource intensive and less adaptable than low rise buildings with longer lifespans. The complex engineering and use specific design of tall buildings make repair and adaptation over time</p>

from economic growth and enabling a circular economy that optimises resource use and minimises waste				challenging or uneconomic, often resulting in demolition, and associated construction waste impacts.  No effect for policy alternatives to Policy DH3.
14. Maximise protection and enhancement of natural resources including water, land and air	+	0	0	New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect by ensuring that development of tall buildings does not impact impacts on the wider environmental including watercourses and water bodies and their hydrology.  No effect for policy alternatives to Policy DH3.

### Summary

The assessment highlights that the choice between the alternatives is quite finely balanced, but there are limited arguments for favouring the design led approach. Alternative 2, which would involve taking a permissive approach to tall buildings within the eight 'Strategic Search Areas' identified by the Islington Tall Buildings Study and representing the broad zones represents a plan-led approach. There could be said to be confidence in respect of avoiding negative effects and realising opportunities which could provide benefits in respect of optimising use of land / delivering higher densities in those parts of the borough associated with the highest levels of connectivity and transport accessibility. However, as explained in the appraisal: "... the less precise nature of broad areas or zones would introduce some uncertainty in respect to local character and distinctiveness where a specific tall building proposal might create a negative effect, for example at the edge of the broad area or zone." Variations to these zones could be envisaged, but this approach was ruled out as unreasonable to define.



## 9. Strategic Infrastructure

The policies in this section are:

- Policy ST1: Infrastructure Planning and Smarter City Approach - Policy ST1 sets out how the Council will identify and deliver infrastructure to support development growth over the plan period and puts in place measures to develop the Smart Cities approach in Islington.
- Policy ST2: Waste - Policy ST2 sets out the requirements for development to provide waste and recycling facilities, sets how the Council will work with other north London boroughs on the North London Waste Plan and safe guards the Hornsey Street facility.
- Policy ST3: Telecommunications, communications and utilities equipment - Policy ST3 focuses on when Telecommunications, communications and utilities equipment will be permitted and the relevant standards.
- Policy ST4: Water and wastewater infrastructure - Policy ST4 seeks to ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments.

There were no reasonable alternatives considered and assessed in this section.

## 10. Bunhill and Clerkenwell Area Action Plan

The policies in this section are Policy BC1: Prioritising office use, which sets out the land use priority in the area for office use and the limited circumstances where there would be an exception. Policy BC2: Culture, retail and leisure uses, directs new uses to Cultural Quarters and identifies Clerkenwell/Farringdon a cultural quarter, setting criteria for relevant uses. The only reasonable alternative considered and assessed in this section was for Policy BC1: Prioritising office use.

The Inspectors questioned why alternatives were not considered for the approach to cultural uses (document reference INS04) and the Council has provided explanation around alternatives in respect to cultural uses which is set out under Policy R10 and is relevant to BC2. In addition the boundary for the Farringdon cultural quarter could have considered an alternative, although it was judged that this would not be a meaningful assessment. The boundary was identified in collaboration with officers with a responsibility for culture who advised on where was considered appropriate in terms of existing venues and likely future growth based on knowledge of the area and expertise. In addition policy BC2 contains flexibility with a sequential approach to cultural development which permits where appropriate cultural development outside the cultural quarter in other areas of the CAZ.

The area spatial strategies for Bunhill and Clerkenwell (Policies BC3 to BC8) help to deliver the Local Plan and AAP objectives and are assessed in full. The discussion which considers reasonable alternatives for the area spatial strategies is included above under the Local Plan area spatial strategy section. All the site allocations in the BCAAP have been assessed and where relevant alternatives have been considered. For completeness and consistency the area spatial strategy policies have been considered against the whole assessment framework. The principle of the consideration of alternatives for the spatial strategies for Bunhill and Clerkenwell was considered as part of this for the overarching policy SP1 and no reasonable alternatives were identified and considered.

The following alternative was considered and assessed for BC1: Prioritising office use.

Table 1.32: Alternative description for BC1: Prioritising office use.

Alternative Reference	Alternative Description
1.	Still seek maximisation of office development but not specify a specific percentage of office

Local Plan Policy BC1 requires that any development providing more than 500sqm of uplift in floorspace is office led, meaning the net additional development must be a minimum of 90% in office use in the City Fringe area, or 80% in the remainder of the Bunhill and Clerkenwell

AAP area. An alternative which was considered and discounted was a residential mixed use led approach to the balance of uses. Given the location and support in the evidence base for employment land use in this location it would have been unreasonable to consider residential as a priority. In addition residential is considered as part of the mix of uses in the alternative assessment.

Table 1.33: Assessment of Alternatives BC1: Prioritising office use.

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>New effects have been identified for Policy BC1 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period.</p> <p>The alternative to policy BC1 will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. The alternative requires different mixes of uses to be provided in development in the Bunhill and Clerkenwell Area. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	+	<p>Policy BC1 and the alternative to policy BC1 will have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. Development will be located in areas with excellent public transport accessibility including to the underground and Crossrail. The Islington Employment Study states that the Central Activities Zone is the location with the most demand for Grade A office space and this will be the priority. Maximisation of business floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. Local evidence currently indicates that there is a significant shortfall in supply of employment land. This policy will maximise development of floorspace in this most appropriate location ensuring the efficient use of the land. But in terms of balancing the competing demands between land uses, the alternative requires employment-led development, which means some of the floorspace must be in business use. It therefore allows for the development of non-business</p>

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			uses, provided these do not make up more than the majority of floorspace, which could have a positive impact on its own but in comparison to BC1 is considered a less positive effect.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy BC1 and the alternative to policy BC1.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	<p>Policy BC1 will have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, a number of sites are allocated for other (non-office) uses. These factors combined with the existing mixed-use character of the area means the mix of uses which support liveable neighbourhoods will not be affected.</p> <p>The alternative to policy BC1 will have a likely minor positive effect on liveable neighbourhoods providing a mix of uses with some office space allowing sufficient flexibility to provide sufficient floorspace for different uses on a number of floors.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	<p>Policy BC1 will likely have a minor negative effect on the provision of affordable housing. The policy requires that most new development in Bunhill and Clerkenwell is office-led. This will lead development of less housing as it will prevent some residential-led schemes coming forward. In addition, it also means that less affordable housing will be developed, as it is required to be provided as a proportion of new residential developments. However the Council has assessed future housing delivery and considers that it can meet its housing target with this policy in place.</p> <p>The alternative to policy BC1 will likely have a neutral effect on the provision of affordable housing. The alternative may mean that more housing and affordable housing will likely be developed.</p>

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			However Bunhill and Clerkenwell has some of the highest land values in the borough and indeed in the country. The market housing developed in this area is unaffordable to the vast majority of Islington residents and will not meet Islington's housing needs in any significant way. The alternative may also affect wider land supply by encouraging residential which is the biggest threat to the supply of employment land as employment led development are outbid by residential led developments.
6. Promote social inclusion, equality, diversity and community cohesion	+	-	<p>Policy BC1 will have a minor positive effect, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. The Council has policies whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>The alternative will lead to minor negative effects in terms of social inclusion, equality, diversity, and community cohesion in comparison to policy BC1. Whilst the alternative will focus development of employment uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport it does not maximise the amount of employment floorspace in a location which the Islington Employment Study states is the location with the most demand for Grade A office space.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for policy BC1 and the alternative to policy BC1.
8. Foster sustainable economic growth and increase employment opportunities	++	+	Policy BC1 will have significant positive effects on economic growth and providing employment opportunities. The policy will provide much needed floorspace for employment uses, in particular office uses. There is high demand in Islington for office floorspace, which is projected to exceed supply, restricting economic growth and employment in the borough. The biggest threat to the supply of employment land is likely to be from restricted supply caused by a lack of sites as they are outbid by residential developments. In addition, the loss of office stock within the CAZ to residential

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
across a range of sectors and business sizes			<p>development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>The alternative to policy BC1 will likely have minor positive effect on economic growth. The alternative will help to address the need for employment space but in comparison to BC1 it will not maximise delivery so is considered inefficient use of land which could restrict economic growth and employment in the borough. This will potentially reduce the opportunity for the local economy to grow, reducing the amount of new jobs provided by development and reducing the amount of affordable workspace and training and apprenticeships opportunities for local residents in comparison to BC1. Other Local Plan policies will ensure provision of a range of employment opportunities for example the provision of affordable workspace and space suitable for small and medium enterprises.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	Both Policy BC1 and the alternative to BC1 will have a minor positive effect as both policies promote development in areas with excellent public transport accessibility, including to the underground and Crossrail. The alternative may lead to more residential or non-office employment uses being developed, but this would be in the same equally accessible location (the CAZ) as the policy approach, therefore there would be no additional benefit.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy BC1 and the alternative to policy BC1.

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy BC1 and the alternative to policy BC1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy BC1 and the alternative to policy BC1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy BC1 and the alternative to policy BC1.
14. Maximise protection and	0	0	No effect for alternative.

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
enhancement of natural resources including water, land and air			

### Summary

The assessment recognises that both Policy BC1 and the alternative to policy BC1 will have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. The approach is in line with the Islington Employment Study and the location with the most demand for Grade A office space. The alternative requires employment-led development, which means some of the floorspace will be in non-business use, which will have a positive impact but in comparison to policy BC1 is considered a less positive effect in terms of land use priorities and economic growth. The assessment considers the alternative to BC1 outperforms the submission policy in terms of two SA objectives, relating to liveable neighbourhoods (objective 4) and housing (objective 5). Providing a mix of uses will have a minor positive effect on liveable neighbourhoods. In relation to housing the positive effect is caveated with the potential provision of affordable housing but given the land values in this part of the the borough the provision of market housing in this area would be unaffordable to the vast majority of Islington residents and will not meet Islington’s housing needs in any significant way. It is also noted that the alternative may also affect wider land supply by encouraging residential which is the biggest threat to the supply of employment land more generally.





# Part 1: Updated Policy Assessments

## **Introduction**

The assessment of the Local plan policies has been reviewed and additional effects identified. Further clarification in the assessment text has also been added. Changes to policies since Regulation 19 are addressed in part 2 of the IIA addendum.

Table 1.34: Policy PLAN1 assessment

IIA Objective	Policy PLAN1: Site appraisal, design principles and process	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	<p>Policy PLAN1 will have a significant positive effect. The policy requires all development to be of high quality and make a positive contribution to local character, legibility and distinctiveness of an area, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. The policy focuses on four development principles which will help to ensure delivery of inclusive, connected, contextual and sustainable development. It also aims to restrict value engineering approaches which can lead to poor quality of completed schemes relative to permitted standards and detailing.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. As part of ‘connected’ design principles proposals must improve safety, whilst the criteria for a site appraisal also requires consideration of safety, design quality and accessibility which will also contribute to the overall positive effect identified.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	++	<p>Policy PLAN1 will have a significant positive effect. Development must reflect the four development principles including contextual, which requires efficient use of sites/buildings, responding to and enhancing the existing site context (which could extend beyond the site itself) and not undermining the quality of existing development and streetscape. The sustainable principle requires development to be durable and adaptable. Consideration of infrastructure provision is part of the process of developing and designing a proposal which addresses this and other development principles.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. As part of a site appraisal proposals are required to consider the details of existing and planned infrastructure and impacts development will have on planned provision which will also contribute the overall positive effect identified.</b></p>
3. Conserve and enhance the significance of heritage	++	<p>Policy PLAN1 will have a significant positive effect. Development must respond to the site context as part of the contextual development principle, which would include reflecting heritage assets. As part of any site appraisal which details how a proposal has responded to the four development principles, details of historic context must be provided,</p>

IIA Objective	Policy PLAN1: Site appraisal, design principles and process	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
assets and their settings, and the wider historic and cultural environment.		such as distinctive local built form, significance and character of any designated and non-designated heritage assets, scale and details that contribute to its character as a place. The appraisal should also include assessment of the visual context, particularly strategic, local and other site specific views.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	<p>Policy PLAN1 will have a significant positive effect. Development must reflect the four development principles including connected, which states that development should improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings; and should sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan. Through the site appraisal which details how a proposal has responded to the four development principles, existing features and patterns of use including housing, retail, entertainment, commercial, community and play activities must be investigated. Addressing the relevant aspects of the connected principle will help to ensure access to various services and facilities.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process... as part of a site appraisal proposals are required to consider the details of existing and planned infrastructure and impacts development will have on planned provision. This would include social infrastructure provision which will also contribute the overall positive effect identified.</b></p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	Policy PLAN1 will have a minor positive effect. It supports other Local Plan policies, requiring proposals to reflect the inclusive development principle and respond to the spatial, social and economic needs of the borough's increasingly diverse communities and their different and evolving demands. This includes sustaining and reinforcing a variety and mix of uses in line with any relevant land use priorities of the Local Plan.
6. Promote social inclusion, equality, diversity and community cohesion	++	Policy PLAN1 will have a significant positive effect. The four development principles work together to deliver reductions in inequality and promote social cohesion and integration, in particular the connected principle aims to improve safety and promote positive social contact, behaviours and community cohesion.

IIA Objective	Policy PLAN1: Site appraisal, design principles and process	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
		<b>New effects have been identified following review of the IIA as part of the examination process. The inclusive principle has a positive effect against the need for design of development to respond to diverse social needs and helps add to the positive effect to the objective by ensuring development is adaptable, functional and resilient and responsive to community needs which will be reinforced through other policies in the plan.</b>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	Policy PLAN1 will have a significant positive effect. The four development principles work together to improve the health of Islington's population in a variety of ways, including ensuring and improving access to key facilities and services, and limiting amenity impacts which could affect health. Such issues are key aspects of any site appraisal which must inform development proposals.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	Policy PLAN1 will have a minor positive effect. The sustainable and inclusive development principles include consideration of economic needs alongside social and environmental. In line with the connected principle, development should sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	Policy PLAN1 will have a minor positive effect. In line with the connected principle, development should improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings. The site appraisal must include assessment of route and place qualities. This will assist with measures to improve connectivity and encourage modal shift, on an individual and cumulative basis.
10. Protect and enhance open spaces that are high quality,	+	Policy PLAN1 will have a minor positive effect. All development must respond to and enhance the existing site context (which could extend beyond the site itself) and not undermine the quality of existing development and streetscape. Through the site appraisal which details how a proposal has responded to the four development principles, proposals

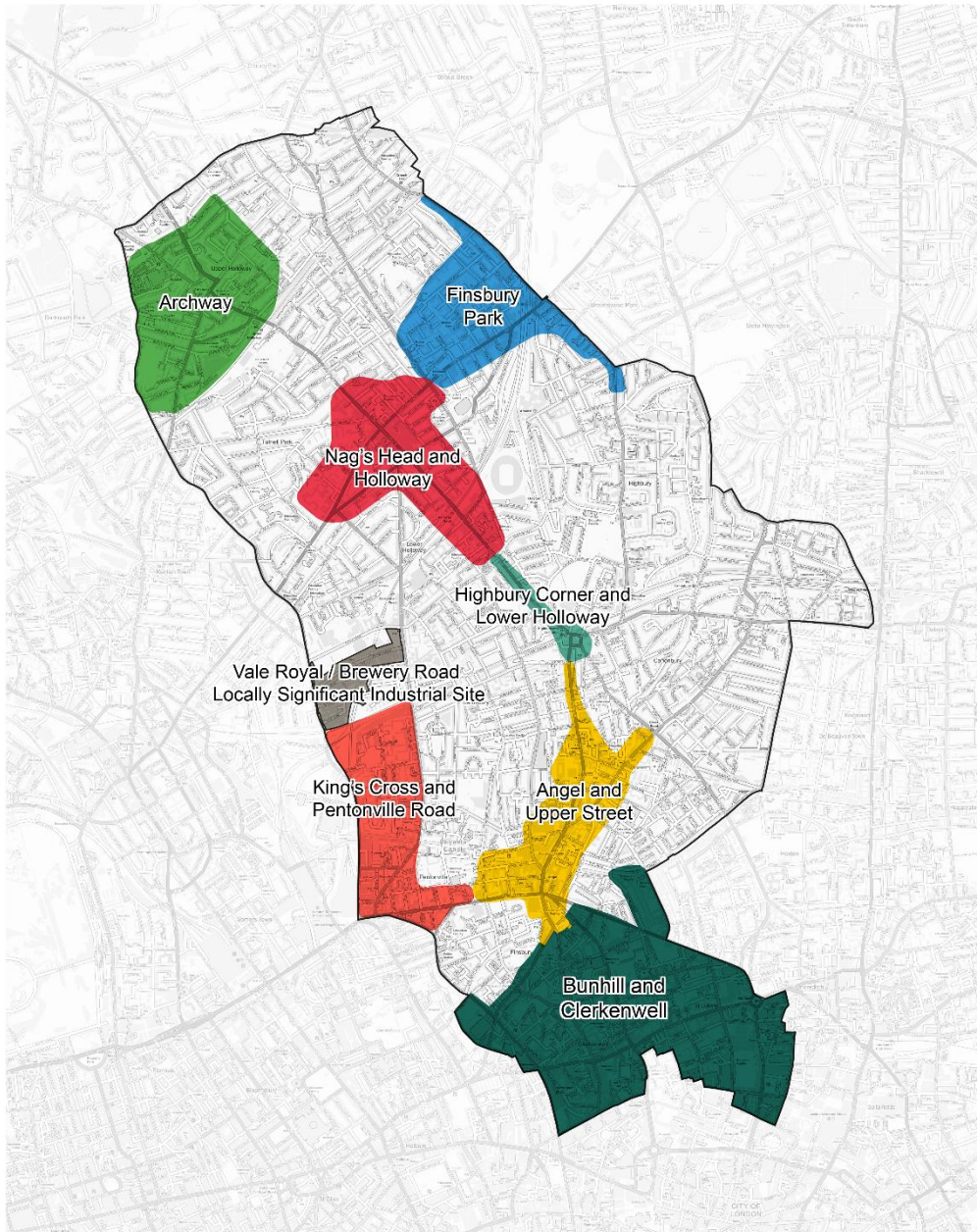
IIA Objective	Policy PLAN1: Site appraisal, design principles and process	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
networked, accessible and multi-functional		<p>must consider the local landscape and natural features, such as topography, trees, boundary treatments, planting and biodiversity.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process... as part of a site appraisal proposals are required to consider local landscape and natural features informed by analysis of local ecology and green links which would have a positive effect In terms of considering wider green infrastructure context and provide opportunity for improving the functionality of open spaces.</b></p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	+	Policy PLAN1 will have a minor positive effect. See assessment against objective 10.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	Policy PLAN1 will have a minor positive effect. It supports other Local Plan policies, requiring proposals to reflect the sustainable development principle whereby development must be durable and adaptable, and contribute to the creation of a vibrant, liveable, enduring city.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	+	Policy PLAN1 will have a minor positive effect. See assessment against objective 12. In addition, the inclusive principle requires development to be functional, including integrating the design and management of development from the outset and over its lifetime and therefore minimising the need for awkward, costly and unsightly alteration in the future.

IIA Objective	Policy PLAN1: Site appraisal, design principles and process	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
optimises resource use and minimises waste		
14. Maximise protection and enhancement of natural resources including water, land and air	+	Policy PLAN1 will have a minor positive effect. It supports other Local Plan policies, requiring proposals to reflect the sustainable development principle whereby development must be durable and adaptable, and contribute to the creation of a vibrant, liveable, enduring city. Through the site appraisal which details how a proposal has responded to the four development principles, proposals must consider the local landscape and natural features, such as topography, trees, boundary treatments, planting and biodiversity; and surface water flows and opportunities to capture them.



## Assessment of likely effects of Local Plan Area Spatial Strategies

The Local Plan contains a number of spatial strategies for various parts of the borough where growth and change is expected to occur within the plan period. These are shown on figure xx below. Each spatial strategy policy sets out the key priorities and requirements for the respective areas, with a detailed spatial strategy map visualising these. All development proposals within the spatial strategy areas must be actively consider how they will address the Local Plan objectives, from the very first stage of the proposal through to any eventual permission.



**Figure 4.1: Map showing Area Spatial Strategies**

- 1.1 The area spatial strategies help deliver the Local Plan objectives and are the spatial expression of the Local Plan policies which are assessed in full. All site allocations in the area spatial strategies have been assessed. For completeness and consistency the spatial strategy policies have been considered against the whole assessment framework.
- 1.2 The spatial strategies in Islington are based on key areas where the level of change expected over the plan period requires specific spatial policies for managing growth. The Core Strategy which was adopted in 2011 featured seven key area policies including Bunhill and Clerkenwell, the borough's four town centres and two other key areas of change around key transport hubs and regeneration areas. These seven key areas have been carried forward into the Local Plan with policies which contain a broad vision and strategic approach for each area. The Vale Royal/Brewery Road industrial area is included as a standalone area (having previously been part of the wider King's Cross/Pentonville Road key area) because of its significance as the largest concentration of industrial land / warehousing / employment land in the borough.

## Area Spatial Strategies policy assessment

Table 1.35: Assessment of Area Spatial Strategies for SP1, SP2 and SP3

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	+	+	<p>There is no effect for Policy SP1. SP1 identifies the spatial strategy areas for the Bunhill and Clerkenwell area. The Bunhill and Clerkenwell Area Action Plan (AAP) has policies for each Spatial Strategy area, which set out the key strategic considerations. The AAP spatial strategy policies (BC3 to BC8) have been assessed separately.</p> <p><b>New effects have been identified for Policy SP2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to repair, improve and unify existing frontages on Caledonian Road which will help to secure high quality architecture and attractive public realm. In addition the policy seeks general improvements to the public realm to improve walking and cycling experience which will contribute towards making a safer built environment.</b></p> <p>Policy SP3 would have a minor positive effect because the proposed policy aims to protect the primary economic function of the industrial cluster. Whilst industrial activities may not be traditionally linked to the creation of sustainable and safe built environments, proposed policy T5 requires businesses to explore potential for delivery and servicing by non-motorised sustainable modes, such as cargo cycles and 'clean' vehicles. The policy also encourages delivery activities to take place outside peak hours for delivery and servicing. The strategic</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				policy protection assigned to this area will nurture the future sustainability of the industrial cluster and will ensure that new development supports the economic activity of the area. There is a minor positive effect for policy SP3. The policy provides specific guidance on building heights within the area, informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	<p>There is a minor positive effect for policies SP1, SP2 and SP3. These areas are considered to be the most appropriate locations for development, being the areas where growth and change is expected to occur within the plan period. The areas are located in close proximity to key infrastructure such as public transport hubs and/or are located on key commercial routes. Opportunities for continued cross boundary working with London Borough of Camden are identified for SP2.</p> <p><b>SP2 focuses development in the most appropriate areas by recognising existing priority employment locations and the need for employment intensification in them, the relevance of the Knowledge Quarter and the need to maintain and enhance the retail and service the Local Shopping Areas.</b></p> <p>There is a minor positive effect for Policy SP3 as it focuses development in the most appropriate areas by making specific reference to retaining and strengthening industrial floorspace to protect the economic activity in the Vale Royal and Brewery Road LSIS. Policy SP3 will have a minor positive effect in the</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				LSIS as it supports the economic activity in this area. The proposed policy protects existing industrial activity and promotes the intensification of industrial activity in the area akin to B8, B2 and light industrial uses. It is noted that the rise of e-commerce and distribution activities has been significant in recent years.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	0	<p>There is no effect for policy SP1.</p> <p><b>New effects have been identified for Policy SP2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy makes reference to the distinct character of Kings Cross and the heritage assets making clear these will be protected and enhanced.</b></p> <p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. Whilst the policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area the updated assessment considers that some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings. This would depend on the wider historic environment and on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
				such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	+	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is a minor positive effect for Policy SP2 as the policy recognises the need to continue to provide important services for local communities along Caledonian Road. Improvements to permeability are also identified with reference to removing barriers a key priority for the whole area.</p> <p><b>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</b></p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	0	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence.</p> <p>There is no effect for policy SP3. It could be considered that there could be a minor negative impact in the supply of affordable housing. However, the LSIS is a functional</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				industrial cluster, which includes some more traditional industrial uses that cannot coexist with housing. In addition other policies in the plan will help to meet housing targets in other locations. The assessment for policies B1 and B2 consider there is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough, through prioritising business floorspace. However the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	++	There is no effect for policy SP1 or SP2.  The assessment of Policy SP3 considers that there are effects. Policy B1 has a significant positive effect with the policy aim in line with the Local Plan objective to deliver an inclusive economy which the policy does through delivering policy supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society. New text has been added following review of the IIA as part of the examination process. Policy B2 The maximisation of new business floorspace will strengthen the local economy. New business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs.



IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
				<p>Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to improve employment opportunities and increase the skills of residents. The requirements around the quality of new business floorspace will also support community cohesion, inclusion, equality and diversity by ensuring that new spaces are accessible to everyone.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	+	<p>There is no effect for policy SP1.</p> <p><b>New effects have been identified for Policy SP2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to remove barriers to movement which will help support health and recreation and promote active travel. Also the Regent's canal corridor is recognised as a recreational space. There is also a minor positive effect for policy SP2 as the policy sets out specific criteria for residential moorings on Regent's Canal in relation to air pollution which can be an issue with residential moorings and helps reduce health impact.</b></p> <p>There is a minor positive effect identified for Policy SP3 as it will protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				<p>the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. New effects have been identified for Policies B1 to B2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. New effects have been identified following review of the IIA as part of the examination process. Policies B1 to B2 support a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people. The type of employment supported by the policies has the potential to protect health and contribute to reduced health inequalities. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	+	<p>There is a minor positive effect for policy SP1. There is specific reference to the importance of the area to providing office floorspace which helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP2. There is specific reference to the importance of the area to providing office floorspace which helps contribute to economic growth.</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				<p>There is a minor positive effect for policy SP3. Policy SP3 would continue to protect existing businesses in the LSIS and would promote the intensification and renovation of old industrial sites. This would attract a wider range of different sized occupiers in need of industrial premises. The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in Islington's Employment Land Study (2016), this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses which are based primarily in industrial units and support Islington's wider creative sector. Proposed policy reflects the Council's commitment to support creative production industries where is more needed in the borough. Policy B2 will have a significant positive effect. Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps reduce the need for goods and services to travel reducing congestion and air pollution. These areas also offer a range of jobs providing greater employment opportunity.</p>
9. Minimise the need to travel and create accessible, safe and sustainable	0	+	+	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2 which will help encourage a shift to more sustainable forms of travel with</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
connections and networks by road, public transport, cycling and walking				<p>reference to specific improvements to the public realm along York Way and Caledonian Road, with the aim to create a safer and better-quality environment for pedestrians and cyclists.</p> <p>There is a minor positive effect for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Policy SP3 would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Similarly Policy B1 and B2 will have a significant positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices.</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space in to protect use and function of this space.</p> <p>There is no effect for policy SP3.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	0	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space in to protect use and function of this space. <b>Also the policy recognises the Regent's Canal's importance as a wildlife corridor and need for development which increases access for recreational purposes and should not cause detrimental impacts.</b></p> <p>There is no effect for policy SP3.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	+	<p>There is no effect for policy SP1.</p> <p>There is no effect for policy SP2.</p> <p>There is a minor positive effect identified for Policy SP3. Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Policy B1 and B2 will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	There is no effect for policy SP1.  There is no effect for policy SP2.  There is no effect for policy SP3.
14. Maximise protection and enhancement of natural resources	0	+	+	There is no effect for policy SP1.  There is a minor positive effect for policy SP2 as the policy sets out specific criteria for residential moorings on Regent's

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
including water, land and air				<p>Canal in relation to air pollution which can be an issue with residential moorings.</p> <p>There is a minor positive effect for Policy SP3. Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Policy B1 and B2 will have a minor positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices, which can in turn improve air quality.</p> <p>It should be acknowledged that B2, which support the intensification of industrial land in the LSIS could have the potential to have a negative impact on air quality, if they lead to an increase in vehicular movements or support activities that lead to an increase in air pollution. However other</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
				strategic policies in the Plan such as SP3, S7, T2, T3 and T5, which will ensure new industrial land does not impact natural resources adversely. The impact on the policy is therefore still a minor positive.



Table 1.36: Assessment of Area Spatial Strategies for SP4 to SP8

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	++	<p><b>New effects have been identified for Policies SP4 to SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy SP4 seeks to prioritise opportunities for public realm improvements for walking and cycling experience which will contribute towards making a safer built environment. Reference is made in particular in relation to Crossrail 2 and Angel station but also reducing the dominance of through traffic on main road junctions.</b></p> <p><b>Policy SP5 strongly encourages public realm and environmental improvements throughout Nag's Head town centre which will contribute towards making a safer built environment.</b></p> <p><b>Both policy SP6 and SP7 support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience.</b></p> <p><b>Policy SP8 supports the transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists. In addition the policy also supports improvements to the current station and accessibility including potential use of the former entrance.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	+	+	<p>There is a minor positive effect for policies SP4, SP5, SP6, SP7 and SP8. These areas are considered to be the most appropriate locations for development, being the areas where growth and change is expected to occur within the plan period. The areas are located in close proximity to key</p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>infrastructure such as public transport hubs and/or are located on key commercial routes.</p> <p><b>SP4 focuses development in the most appropriate areas by recognising the area as appropriate for a range of commercial uses with office intensification in White Lion Street, retail, service and leisure uses across the town centre and the market and Camden passage identified for protection. In addition the role of the area for cultural and night-time economy uses is also recognised.</b></p> <p><b>SP5 focuses development in the most appropriate areas by recognising the area as appropriate for for retail, encouraging increased night time economy, housing on specific sites and new office floorspace.</b></p> <p><b>SP6 expects development to maintain the predominant commercial role of the area with a focus on retail and services recognised on ground floors, the specialist shopping area of Fonthill Road and the potential of the area to develop as a CAZ satellite for office floorspace. The leisure and cultural attraction of the area is also recognised.</b></p> <p><b>SP7 expects development to maintain the predominant commercial function of the area with a focus on retail and services recognised on ground floors. The leisure function and identification of the area as a cultural quarter is also recognised.</b></p> <p><b>SP8 supports maintaining the function of the existing Local Shopping Areas and encourage new office floorspace in the employment areas.</b></p>
3. Conserve and enhance	+	+	+	0	+	<p><b>New effects have been identified for policies SP4, SP5, SP6 and SP8 following review of the IIA as part of the examination. These are identified below.</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
the significance of heritage assets and their settings, and the wider historic and cultural environment.						<p>For Policy SP4 the effects have been changed from neutral to minor positive. The policy makes reference to the historic character of the Angel and Upper Street area, making specific reference to the Islington Tunnel that runs underneath the spatial strategy area.</p> <p>For Policy SP5 the effects have been changed from neutral to minor positive. The policy makes reference to the heritage assets of the area, making specific reference to key buildings.</p> <p>For Policy SP6 the effects have been changed from neutral to minor positive. The policy makes reference to the heritage assets of the area, making specific reference to key buildings.</p> <p>For Policy SP8 the effects have been changed from neutral to minor positive. The policy makes reference to the heritage assets of the area, making specific reference to key buildings and views of local landmark building.</p> <p>No effect was identified for policy SP7.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	+	+	<p>New effects have been identified for Policy SP4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP4 focuses development in the most appropriate locations by recognising the area as appropriate for a range of commercial uses including retail, leisure, service, and office uses which will help to promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population. In addition the policy seeks to prioritise opportunities for public realm improvements to improve walking and cycling experience which improve connections of neighbourhoods to facilities/amenities.</p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>New effects have been identified for Policy SP5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP5 focuses development in the most appropriate locations by recognising the area as appropriate for a range of commercial uses including retail and office uses which will help to promote diverse, vibrant and economically thriving town centres that serve the needs and wellbeing of the population. In addition the role of the London Metropolitan University is recognised which will help improve access of this facility for residents.</b></p> <p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP6 recognises the rich offer of community uses and cultural spaces that are available and seeks to protect and enhance these. This is alongside the recognition of the area as appropriate for a range of commercial uses including retail, leisure, service, and office uses which will help serve the needs and wellbeing of the population. Opportunities for continued cross boundary working with both neighbouring boroughs are identified with regards the SP6: Finsbury Park town centre in order to support access to services.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP7 focuses development in the most appropriate locations by recognising the area as appropriate for a range of commercial uses including retail and also cultural uses. This will help serve the needs and wellbeing of the population.</b></p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP8 focuses development in the most appropriate locations by recognising the area as appropriate for commercial uses</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						including retail and business use. This will help serve the needs and wellbeing of the population.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	+	+	0	<p>There is no effect for Policies SP4, and SP8.</p> <p><b>New effects have been identified for Policy SP5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP5 includes reference to Holloway Prison as a key site which will help to meet identified housing need in the borough and contribute towards affordable housing need.</b></p> <p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP6 includes reference to residential development only being suitable on upper floors and therefore provides some opportunity for new housing to meet identified needs.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP7 includes reference to residential development only being suitable on upper floors and sites allocated for this purpose.</b></p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	+	+	0	<p>There is no effect for Policies SP4, SP5, and SP8.</p> <p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to improve permeability and prioritise opportunities to increase access to Finsbury Park open space which will contribute towards encouraging people to access the space which will benefit physical health and wellbeing.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy supports the re-provision of the St Pancras Mental health hospital on the Whittington hospital site which will improve access to health facilities/social infrastructure in the borough.</b></p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	+	+	+	<p>There is a minor positive effect for policy SP4 Angel and Upper Street which identifies business use as the priority land use with specific areas identified which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP5 Nags Head which aims to diversify the local economy which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP6 Finsbury Park which identifies the centre as having potential to develop as a satellite location for B use classes which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policies SP7 Archway, and SP8 Highbury Corner and Lower Holloway, which reinforces the Inclusive Economy policies, notably policies B2 and R3, and helps contribute to economic growth.</p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	++	<p><b>New effects have been identified for Policies SP4 to SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy SP4 seeks to prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>Policy SP5 seeks to prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel. In addition there is reference to removing the gyratory system and junction improvements to improve cycle route linkages.</b></p> <p><b>Policy SP6 seeks to improve permeability and prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>Policy SP7 seeks to improve permeability and prioritise opportunities for public realm and road safety improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to significant positive. The policy supports the transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists with creation of dedicated cycle lanes as part of road junction improvements. In addition the policy also supports improvements to the current station and accessibility including the former entrance.</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	+	<p>There is no effect for Policies SP4, SP6 and SP7.</p> <p><b>New effects have been identified for Policy SP5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. There is reference to providing public open space as part of redevelopment of the Morrisons site which will contribute to meeting the need for open space.</b></p> <p>There is a minor positive for policy SP8 which recognises the important function that Highbury Fields which aims to protect and enhance the open space.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	<p>There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.</p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Although not in the spatial area the policy seeks to protect or enhance the function of Highbury Fields recognising the uniqueness of this asset in Islington. This would include protecting and enhancing the biodiversity value of the site.</b></p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.



IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.

### **SP1: Bunhill and Clerkenwell**

Is the area in the borough expected to see the most significant levels of growth, particularly business floorspace but also cultural, and entertainment uses. The area is the key commercial and employment centre in Islington, and is also home to a variety of education, cultural, and medical uses. It is a focus for creative and tech clusters including Tech City. Bunhill and Clerkenwell has a rich variety of entertainment and leisure uses, restaurants, bars, pubs, and cafes.

The Sustainability Appraisal identified few effects for Policy SP1 as SP1 identifies the spatial strategy areas for the Bunhill and Clerkenwell area. The assessment did identify a minor positive effect for SP1 as the most appropriate location for development, being the area where growth and change is expected to occur within the plan period. A positive effect for economic growth was also identified with specific reference to the importance of the area to providing office floorspace which helps contribute to economic growth.

The Bunhill and Clerkenwell Area Action Plan (AAP) has policies for each Spatial Strategy area, which set out the key strategic considerations. The AAP spatial strategy policies (BC3 to BC8) have been assessed separately.

### **SP2: King's Cross and Pentonville Road**

The Spatial Policy **SP2: King's Cross and Pentonville Road** is continuing to develop as a key commercial destination and important transport hub. High-density development delivering office, retail and leisure space, as well as housing, has taken place on both sides of the Camden/Islington boundary. Given the central London location, and excellent local, national and international transport links, this has enabled the high quality regeneration of the area to successfully attract high profile commercial tenants and the area is expected to continue to develop supporting the spatial strategy to help manage this growth. Opportunities for continued cross boundary working with London Borough of Camden are identified by the assessment.

The Sustainability Assessment of spatial strategy SP2 identified a minor positive effect against the objective for built environment as the policy seeks to repair, improve and unify existing frontages on Caledonian Road which will help to secure high quality architecture and attractive public realm. In addition the policy seeks general improvements to the public realm to improve walking and cycling experience which will contribute towards making a safer built environment. The policy also recognises the distinct character of Kings Cross which is positive against the heritage objective. The policy focuses development in the most appropriate areas by recognising existing priority employment locations and the need for employment intensification in them, the relevance of the Knowledge Quarter and the need to maintain and enhance the retail and service the Local Shopping Areas. The Sustainability Assessment of spatial strategy SP2 identified a minor positive effect against the objective for liveable neighbourhoods as the policy recognises the need to continue to provide important services for local communities along Caledonian Road. Improvements to permeability are also identified with reference to

removing barriers a key priority for the whole area. The policy seeking to remove barriers to movement which will help support health and recreation and promote active travel - the Regent's canal corridor is recognised as a recreational space. Unrelated is the minor positive effect against the objective for access to housing for SP2 as the policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence. Related to this aspect of the policy there are also minor positive effects against objectives for open space and natural resources as the policy will consider air pollution and the use and function of the open space. This is also a benefit against health objective.

There is also a minor positive effect for policy SP2 against the objective for economic growth with specific reference to the importance of the area to providing office floorspace which reinforces the policy position set out in policy B2 and helps contribute to economic growth. There is also a minor positive effect against the objective for minimising the need to travel for policy SP2 which will help encourage a shift to more sustainable forms of travel with reference to specific improvements to the public realm along York Way and Caledonian Road, with the aim to create a safer and better-quality environment for pedestrians and cyclists.

### **SP3 Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS)**

The LSIS has been identified as a spatial strategy area to help maintain and intensify the industrial function of the LSIS. This will also ensure that businesses can continue to benefit from being located in close proximity to one another. The LSIS is the largest concentration of industrial uses in the borough. The unique function of the area should be protected and nurtured to allow for an intensification of industrial uses which is considered justification for the spatial strategy.

The Sustainability Assessment identified minor positive effect against the objective for the built environment as SP3 focuses development in the most appropriate areas by making specific reference to retaining and strengthening the area for providing industrial floorspace. The policy is positive against heritage as it provides specific guidance on building heights within the area, which is informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.

There is a minor positive effect for policy SP3 against the objective for economic growth with specific reference to retaining and strengthening the area for providing industrial floorspace which reinforces the policy position set out in policy B2 and helps contribute to economic growth.

There is a minor positive effect against the objective minimising the need to travel for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Improving pedestrian connections throughout the LSIS could improve connections for residents with the primary school which is located in the LSIS helping create a positive effect for the objective to more liveable neighbourhoods.

**Policy SP4: Angel and Upper Street**

Angel and Upper Street spatial area is the most significant, distinctive and vibrant Town Centre in Islington. Angel and Upper Street have an important role as the largest Town Centre and commercial area within the borough that is part of the CAZ and is one of the most important areas for employment and economic growth in Islington.

There is a minor positive effect for policy SP4 against the objectives for the built environment and need to travel as the policy will contribute towards making a safer built environment and public realm, also improvements will occur in relation to Crossrail 2. The heritage objective is also positive with reference to the historic character of the Angel and Upper Street area. There is a minor positive against both economic growth and the objective for use of land with specific reference to the importance of the area to providing office floorspace which reinforces the policy position set out in policy B2 and helps contribute to economic growth. In addition SP4 recognises the importance of retail, service and leisure uses across the town centre and the market and Camden passage are identified for protection as well as the role of the area for cultural and night-time economy.

**SP5 Nag's Head and Holloway**

This area is a busy and vibrant major Town Centre offering a range of both independent and national retailers. There is potential for improving the Town Centre's food and beverage offer which could significantly increase the attraction of both daytime and night-time economies for different customers and support the wider Town Centre retail function. New office floorspace will be encouraged to support diversity in the local economy.

There is a minor positive effect for policy SP5 against the objectives for the built environment and need to travel as the policy will contribute towards making a safer built environment and public realm, with reference to cycling improvements and aspiration to remove the gyratory. There is a minor positive effect for policy SP5 against the objective for economic growth with specific reference to diversify the local economy which reinforces the policy position set out in policy B2 and helps contribute to economic growth. SP5 also focuses commercial retail development in the most appropriate locations which will help meet needs and wellbeing of the population. In addition the role of the Metropolitan University is recognised which will help improve access of this facility for residents.

The effect identified against objective 5 is considered positive as Holloway Prison is considered a key site which will help meet identified housing need in the borough. Holloway Prison is also assessed as site allocation NH7. The assessment also has a positive effect

against objective 10: open space with reference to providing public open space as part of redevelopment of the Morrisons site which will contribute to meeting the need for open space.

### **SP6 Finsbury Park**

Finsbury Park is a busy, multi-cultural area with cafes and shops that reflect this diversity and is spread across the three boroughs of Islington, Haringey and Hackney. It has a predominant commercial role with significant potential to develop as a unique satellite location, outside the CAZ, for additional B-Use Class uses, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. Opportunities for continued cross boundary working with both neighbouring boroughs are identified with regards the town centre and provision of services.

There is a minor positive effect for policy SP6 against the objectives for the built environment and need to travel as the policy will support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience. The policy also recognises the rich offer of community uses and cultural spaces that are available and seeks to protect and enhance these supporting liveable neighbourhoods objective. There is a minor positive effect for policy SP6 against the objective for economic growth in reference to the policy identifying the centre as having potential to develop as a satellite location for B use classes which reinforces the policy position set out in policy B2 and helps contribute to economic growth. In addition to this effect with respect to the objective; use of land, SP6 also focuses development in the most appropriate areas by recognising the area as appropriate for retail, encouraging increased night time economy, housing on specific sites and new office floorspace. The effect on Objective 7 and health and wellbeing is positive as the policy seeks to improve permeability and prioritise opportunities to increase access to Finbury Park open space which will contribute towards encouraging people to access the space which will benefit physical health and wellbeing.

### **SP7 Archway**

The area should support the commercial function of the area reinforcing the Inclusive Economy policies, particularly the retail function of the Town Centre. There is a growing reputation for culture in Archway, which is a designated cultural quarter. The area currently has a diverse cluster of community-led arts, culture organisations and music venues, providing a dynamic, inclusive cultural offer.

There is a minor positive effect for policy SP7 against the objectives for the built environment and need to travel as the policy will support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience. The Sustainability Assessment highlighted that SP7 identifies support for Archway town centres role as a cultural quarter and focuses development in the most appropriate locations by recognising the area as appropriate for

a range of commercial uses including retail and leisure uses which is positive against objective 2. This will help serve the needs and wellbeing of the population which is positive for objective 4.. The effect on Objective 7 and health and wellbeing is positive as the policy supports the reprovision of the St Pancras Mental health hospital on the Whittington hospital site which will improve access to health facilities/social infrastructure in the borough.

### **SP8 Highbury Corner and Lower Holloway**

The station is the focal point of the Highbury Corner and Lower Holloway Spatial Strategy area with existing business uses and cultural uses protected.

There is a minor positive effect for policy SP8 against the objective for use of land and economic growth as policy for Highbury Corner and Lower Holloway reinforces the policy position set out in policy B2 and helps contribute to economic growth and protects the existing employment areas and supports the function of the existing Local Shopping Areas. There is also positive effect against heritage assets of the area, making specific reference to key buildings and views of local landmark building. Policy SP8 has significant positive effects against the need to travel as the policy supports the Highbury Corner transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists with creation of dedicated cycle lanes as part of road junction improvements. In addition the policy also supports improvements to the current station and accessibility including the former entrance.

There is a minor positive for against framework objective for open space for policy SP8 which recognises the important function that Highbury Fields and aims to protect views to and from the open space. There is also a positive effect on objective 11 and biodiversity value as the policy seeks to protect or enhance the function of Highbury Fields recognising the uniqueness of this asset in Islington.

## Thriving Communities: Housing Policies

The following housing policies have been assessed in the same Sustainability Appraisal table:

- Policy H1: Thriving communities - Policy H1 sets out the strategic policy approach to meeting the range of various housing needs in the borough and meeting need for social and community infrastructure.
- Policy H2: New and existing conventional housing - Policy H2 is focused on housing delivery; quantity of units, new build, protection of existing, conversion of and unit size mix.
- Policy H3: Genuinely affordable housing - Policy H3 focuses on securing affordable housing from all development and suitable tenure mixes to meet local housing need.
- Policy H4: Delivering high quality housing - Policy H4 sets out how high quality housing will be delivered in the borough including requirements covering space standards, accessibility, aspect, ceiling heights, noise and vibration, natural light and tenure blind principles. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe, where noise impacts and vibration is mitigated, and natural ventilation is promoted.
- Policy H5: Private outdoor space - Policy H5 sets out how private outdoor amenity space should be provided in the borough which is an important issue given the deficiency of open space in the borough.

**Table 1.37: Assessment of policies H1 to H5**

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	0	++	+	Policies H1 and H2 will have a significant positive effect. H1 promotes high quality new homes which fully integrate within, and relate positively to, the immediate locality. Both policies promote optimal densities having regard, inter alia, to the specific site context, which will allow for location sensitive density levels to be determined. Gated development - which can isolate new development and impact on local character, as well as reducing opportunities for crime reduction through increased passive surveillance – is explicitly identified as unsuitable in policy H1. Policy H1 sets out the expectation that new homes should be adaptable over their

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>lifetime and meet a variety of needs, which contributes to the positive effect.</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for Policy H2 which does not change the overall effect. Policy H2 restricts bedsits on the basis that there is no evidence of need so they are not a priority unit size and the approach sets out priorities for larger unit sizes, in particular 2 bedroom units. Larger unit sizes are more likely to create robust and adaptable dwellings and buildings.</b></p> <p>There are no effects for policy H3.</p> <p>Policy H4 will have a significant positive effect. Delivery of the policy requirements will create inclusive, robust and adaptable buildings that can respond to changes over their life, for example, ensuring minimum space standards and wheelchair accessible/adaptable standards will enable a unit to be occupied by families with young children, and older people. The standards set out in H4 are people-focused to ensure that the needs of individuals and families are at the heart of new housing in the borough.</p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements for private amenity space provided via gardens, balconies or shared private amenity space, including accessibility requirements, which is positive and will help create robust and adaptable dwellings and buildings which respond to evolving social needs.</b></p>



IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	++	++	+	++	+	<p>Policy H1 will have significant positive effect against the objective to ensure efficient use of land. The policy promotes optimal density levels, in reference to high density housing with specific reference to other Development Plan policies, and specific site context meaning that optimisation will be an active consideration and balancing of competing demands between land uses and considering a sites location. H1 also promotes homes that are designed to be adaptable over their lifetime to meet a range of needs that can arise at various stages of the buildings life. <b>Text updated as part of the review of the IIA during the examination process: The policy also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply and sustainable use of land. The approach aims to balance competing demands for land use and these forms of housing in most cases would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need..</b></p> <p>Policy H2 will have significant positive effect. It requires development proposals involving new housing to optimise the use of the building/site. This includes consideration of competing demands from other land uses. The policy resists smaller studio and bedsit units, and high concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing</p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>need and can be more easily adapted to evolving social and economic needs more generally. H2 also prevents housing supply being wasted by ensuring new homes will be occupied; this is a direct measure to ensure that land will actually be used for its permitted purpose, and hence directly leads to the efficient use of land.</p> <p>Policy H3 will have minor positive effect. It provides a strong requirement for the delivery of affordable housing, which ensures that this key priority is appropriately factored in to any judgement on balancing competing development needs. Delivery of affordable housing is one of the key development needs of the area.</p> <p>Policy H4 will have significant positive effect. It ensures that where housing is developed, it is high quality which makes the most out of land available. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. These standards link with other plan policies including sustainable design requirements to ensure that development contributes to a broad range of plan priorities and hence meets a broad range of identified needs. <b>It is noted that H4 includes minimum space standards which have an impact on how efficiently land is used and mitigates the impact of potentially low quality small units/person.</b></p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements private amenity space provided via gardens, balconies or shared private amenity space, including accessibility requirements, which is positive and will help create flexible and adaptable dwellings and buildings which respond to evolving social needs and which can also help to support green infrastructure.</b></p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	0	0	0	0	<p>There are no effects for policies H2 to H5.</p> <p><b>New effects have been identified for Policy H1 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H1 promotes optimal density levels, in reference to high density housing with specific reference to other Development Plan policies, and specific site context meaning that optimisation will be an active consideration alongside other aspects such as considering Islington’s historic environment is protected.</b></p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	0	0	<p>Policies H1 and H3 will have a minor positive effect. The core aim of policy H1 is the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. It also seeks new housing development that is fully integrated within, and relates positively to, the immediate locality; this would include consideration of access to services. <b>H1 in particular will support the provision of necessary social infrastructure to support residents, workers and visitors helping meet needs and improve access to essential services in the right locations.</b></p> <p>Policy H3 requires delivery of affordable housing, but will deliver similar effects as it provides an important component of mixed and balanced communities.</p> <p>Policy H2 will have a minor positive effect. The requirement for new housing to be occupied could help to support local services and facilities, for example through increased custom from new occupiers. H2 requires the optimal use of sites/buildings; when considering what constitutes ‘optimal’ for a specific proposal, consideration should be given to social</p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>infrastructure requirements and the impact on existing social infrastructure. This will help to ensure that the appropriate level of SI is available for the local population.</p> <p>Policies H4 and H5 will have no effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	++	++	++	+	<p>Policy H1 will have significant positive effect. It includes delivery of genuinely affordable housing as a key priority, and specifies that such housing must be affordable for those in need. Financial contributions are also sought from the policy. Overall, the policy is likely to significantly increase the supply of AH, both directly and through spending of any financial contributions secured to deliver AH elsewhere in the borough. <b>The policy promotes optimal density levels, size mix which reflects local need, and also references meeting needs of vulnerable older people and gypsies and travellers.</b></p> <p>Policy H2 will have significant positive effect. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that affordable housing provision can meet the broadest range of need possible. H2 also seeks the optimum use of sites/buildings, informed in part by housing density.</p> <p>Policy H3 will have significant positive effect. It will increase the delivery of affordable housing through implementation of robust policy and the refusal of applications which do not provide the appropriate level of AH; and through collection of financial contributions which will go toward measures to further increase AH supply. The policy requires that the majority of AH secured is social rent, which reflects housing need established by evidence.</p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>Policy H4 will have significant positive effect. It will ensure that all housing is of a high quality through requirement to meet specific design standards, including minimum space standards. Taken together and with other policy requirements of the Local Plan, the standards in H4 will deliver homes that are adaptable to meet the diverse and changing needs of Islington's population. The policy requires adherence to tenure blind principles to ensure that affordable and market housing is integrated.</p> <p>Policy H5 will have a minor positive effect. It will ensure the delivery of private outdoor space which helps improve the quality and diversity of housing and enables occupiers to benefit from outdoor space which addresses their needs, for example the needs of families with children could be met through provision of outdoor space where children can play in a safe environment.</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	+	+	++	+	<p>Policy H1 will have a significant positive effect. The policy aims to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. It also seeks new housing development that is fully integrated within, and relates positively to, the immediate locality, and resists gated development. These measures combined are likely to be of significant benefit in terms of creating a fairer, more integrated Islington. <b>The policy seeks to meet needs of general housing and for gypsies and travellers which promotes equity between population groups and those with protected characteristics helping reduce social exclusion.</b></p> <p><b>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes</b></p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that housing provision can meet the broadest range of need possible and reduce equality providing more opportunity and potentially addressing overcrowding issues.</b></p> <p>Policy H3 will have minor positive effects. Increased delivery of AH could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. AH is also an important component in delivering mixed and balanced communities which will improve social cohesion and integration.</p> <p>Policy H4 will have a significant positive effect. The requirement for new development to be 'tenure blind' will promote social cohesion and integration. This requirement, and others included in H4 such as requiring certain proportions of wheelchair accessible and adaptable properties, could lead to greater equity between population groups and those with protected characteristics.</p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements for private amenity space provided via gardens, balconies or shared private amenity space. Ensuring provision of private amenity space is positive and will help support active communities and cohesive communities where shared space is provided.</b></p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	++	+	<p>Policy H1 will have minor positive effect. The delivery of mixed and balanced communities and high quality housing can have a number of benefits (both direct and indirect) in terms of improving health and wellbeing, e.g. policy explicitly highlights the importance of designing the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health .</p> <p><b>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. H2 requires the optimal use of sites/buildings and consideration of social infrastructure (SI) requirements and impact on existing SI. This will help to support existing facilities and ensure that the appropriate level of SI is available for the local population.</b></p> <p>Policy H3 will have minor positive effect. By providing greater amounts of affordable accommodation, greater amounts of people are less likely to experience financial hardship, which can be a key contributor to poor mental and physical health. By reducing the proportion of income spent on accommodation, this frees up a greater proportion of income for other living costs such as utilities bills, which could reduce fuel poverty.</p> <p>Policy H4 will have significant positive effect. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe. Delivery of high quality homes in line with H4 is therefore likely to improve health and wellbeing. H4 has specific requirements relating to noise and vibration to ensure that potential impacts are identified and mitigated. The policy also includes detailed measures to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage); this could assist with reducing fuel poverty. <b>The policy requires</b></p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights create a sense of space and improve quality of accommodation and also help keep rooms cooler in summer, which help improve peoples' health and wellbeing.</p> <p>Policy H5 will have minor positive effect. It will improve access to outdoor space which improves amenity, can encourage more activity/exercise and can have positive impacts on health and wellbeing. Islington has a lot of sources of noise in close proximity to residential uses, so in principle any space which increases outdoor activity could be detrimental to health; however, the policy allows for alternatives where the level of noise impact would be significant, which would mitigate noise impacts but still deliver private space. Outside space could also be utilised for food growing which could assist with healthier lifestyles.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	+	+	0	0	<p>There are no effects for policies H1, H4 and H5.</p> <p><b>New effects for Policy H2 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy H2 considers the interaction with other policy priorities in particular new business floorspace helping ensure sufficient space is provided in the right locations where appropriate.</b></p> <p><b>New effects for Policy H3 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. There are is a minor positive effect for provision of policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service</b></p>



IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	+	0	0	There are no effects for policies H1 to H5.  <b>A new effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process. There are is a minor positive effect for Policy H3 provision of affordable housing. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel.</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	+	<b>Reduced effects for Policy H5 have been identified which changes the effects from significant positive to minor positive following review of the IIA as part of the examination process.</b> Provision of private outdoor space will help address the deficiency of open space in the borough and help reduce the pressure on existing spaces. While the policy does not prescribe green private outdoor space, such space could include gardens <b>which could</b> contribute to delivery of green infrastructure.  There are no effects for policies H1 to H4.
11. Create, protect and	0	0	0	0	+	There are no effects for policies H1 to H4.

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
enhance suitable wildlife habitats wherever possible and protect species and diversity.						<b>A new effect has been identified which changes the effects from neutral to minor positive for H5 following review of the IIA as part of the examination process. The policy prioritises the integration of biodiversity benefits where roofs are used for amenity purposes.</b>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	+	+	+	<p>There are minor positive effects for policies H1 and H4. Both policies promote high quality housing which is comfortable, improves the quality of life of residents and contributes to improvements in health. What constitutes 'comfortable' is ever changing given the increasing impacts of climate change, but the policies promote the mitigation and adaptation of climate change impacts through design without reliance on technological and/or retrofitted solutions. For example, Policy H4 includes detailed housing standards including measures to reduce impacts of noise and vibration and to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage). <b>The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights help keep rooms cooler in summer reducing need for mechanical ventilation and maximising light reduces period when electrical light is used.</b></p> <p><b>New effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process. There are is a minor positive effect for Policy H3 provision of affordable housing. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The</b></p>

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel and contribution to climate change.</p> <p>A new effect has been identified which changes the effects from neutral to minor positive for H5 following review of the IIA as part of the examination process. The policy recognises the need to seek to balance the use of green roofs for amenity purposes with renewable energy equipment which helps development meet their priorities to reduce carbon emissions.</p> <p>There are no effects for policies H2.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	0	0	++	0	<p>Policy H1 will have a minor positive effect. It promotes homes that are designed to be adaptable over their lifetime to meet a range of needs that can arise at various stages of life.</p> <p>Policy H4 will have significant positive effect. The policy requires new homes to consider how recycling and waste arising from occupation of the development will be stored, collected and managed, which could contribute to increased levels of recycling. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. This will contribute to the delivery of a circular economy.</p> <p>There are no effects for policies H2, H3 and H5.</p>
14. Maximise protection and	0	0	0	0	0	There are no effects for policies H1 to H5.

IIA Objective	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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
enhancement of natural resources including water, land and air						

## Assessment of policies H6 to H12

The following housing policies have been assessed in the same Sustainability Appraisal table:

- Policy H6: Purpose built Student Accommodation - Policy H6 restricts new development to allocated site and redevelopment and/or intensification of existing purpose-built student accommodation and ensures a high standard of amenity for future occupiers.
- Policy H7: Meeting the needs of vulnerable older people - Policy H7 sets out policy to meet the need for accommodation for older people and provides related design quality.
- Policy H8: Self-build and Custom Housebuilding - Policy H8 sets out the need for and requirements that proposals including Self-build and Custom build unit(s) must meet.
- Policy H9: Supported Housing - Policy H9 defines the wide range of supported housing types including permanent, long term and shorter term accommodation which meets temporary need. The policy states when the Council will support and resist supported housing.
- Policy H10: Houses in Multiple Occupation (HMOs) - Policy H10 focuses on when HMOs will be protected and supported as well as requirements for their size and quality and generally resists large-scale HMO
- Policy H11: Purpose Built Private Rented sector development - Policy H11 resists purpose built Private Rented Sector (PRS) development and sets out requirements if it is to be built.
- Policy H12: Gypsy and Traveller accommodation - Policy H12 identifies how the need for Gypsy and Traveller accommodation will be met and the requirements of these sites.

Table 1.38: Assessment of policies H6 to H12

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	-	+	0	0	-	0	<p>There are no effects for policies H6, H7 and H9 to H12.</p> <p>Whilst some of the policies require a high quality design response in terms of internal design for the occupants the objective seeks consideration of the response of a proposal to the policy in the wider context.</p> <p><b>New effects have been identified which improve the effects for H6 and H10 following review of the IIA as part of the examination process. The policies will have minor positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to a safer environment.</b></p> <p><b>New effects have been identified which improve the effects for neutral to minor positive for H7 following review of the IIA as part of the examination process. The policy will have minor positive effects as it expects the suitability of a site for older persons accommodation to consider the context of the surrounding neighbourhood and the development of other priority land uses and creation of mixed and balanced communities.</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p><b>New effects have been identified which changes the effects from neutral to minor positive for H8. The policy promotes the most efficient use of land and optimal densities having regard to the specific site context thereby helping to promote location.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IIA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</b></p> <p><b>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</b></p> <p><b>Overall considering the above minor negative effects for H6 and H10 around flexible and adaptable buildings together with the minor positive effects for site management plans is</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								considered to have an overall neutral effect for these policies.
2. Ensure efficient use of land, buildings and infrastructure	-	-	+	0	-	-	0	<p>There is a minor negative effect for the policies H6, H7, H10 and H11. The <b>land uses</b> would not be sufficiently flexible and adaptable <b>in most cases</b> to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Policy H11 would reduce the ability of development to meet wider development needs through likelihood of delivering less affordable housing. Providing these forms of accommodation would therefore not optimise the use of land.</p> <p>Policy H9 and H12 have no effects.</p> <p><b>New effects have been identified which have a minor positive for H7 following review of the IIA as part of the examination process. There is a positive effect from policy H7 as it focuses</b></p>



IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p>development of older peoples accommodation in the right locations appropriate to the needs of the occupiers. The policy alternative will have the same positive effect.</p> <p>New effects have been identified which changes the effects from neutral to minor positive for H8. The policy for self-build housing promotes the most efficient use of land and optimal densities having regard to the specific site context.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	0	0	No effect for the policies H6 to H12.
4. Promote liveable	+	+	0	+	+	0	0	No effect for the policies H8 and H10 to H12.

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
neighbourhoods which support good quality accessible services and sustainable lifestyles								<p><b>New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policy will have minor positive effects through the requirement for a site management plan which will in part manage potential for noise related anti-social behaviour which can help contribute to a safer environment. In addition the policy makes clear that change of use on a temporary basis to visitor accommodation is not acceptable.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H7 and H9 following review of the IIA as part of the examination process. The policies will have minor positive effects as they expect sites for older persons accommodation / supported housing to be easily accessible to shops, services and community facilities which helps provide access to and support to existing services.</b></p>
5. Ensure that all residents have	-	0	+	+	-	-	+	There is a minor negative effect for the <b>land uses</b> H6, H10 and H11. They would likely provide less genuinely affordable housing overall than conventional models of housing <b>although it is</b>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
access to good quality, well-located, affordable housing								<p><b>noted that they expect application of policy H4;</b> in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. <b>Whilst Policy H6 expects provision of affordable student accommodation, its recognised that this is not meeting affordable housing need so can't be considered to help meet an identified need in the borough. In addition it is unclear whether affordable student accommodation would be likely to meet accommodation needs of Islington students. Therefore effect is considered negative.</b></p> <p>Policy H7 strongly resists market extra care accommodation and is supportive of social rent extra care so is considered neutral. <b>New explanation has been identified as part of the assessment of the alternative to Policy H7. Policy H7 strongly resists market extra care, therefore provides more conventional housing and avoids difficulties around social rented provision. Policy H7 is also supportive of social rent extra care is considered neutral because it does not maximise the quantum of housing provided compared to conventional housing.</b></p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which</p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p>is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future and do not represent a diversity of housing sizes.</p> <p>There is a minor positive effect assumed for policies H8 and H9 in that they help to diversify housing types.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H12 following review of the IIA as part of the examination process. Policy H12 is considered to have a minor positive effect as it seeks to meet needs for gypsy and travellers which will help to meet the diverse and changing needs of Islington.</b></p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	0	++	0	0	+	<p>No effect for policies H8, H10 and H11.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which contributes to reducing inequality.</b></p> <p>Policy H7 could be conceived to reduce the opportunity to provide market extra care homes but</p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p>is considered to have no discernible effect on inclusion given the support that older people have for remaining in their own homes and living independently. This is considered in light of the Councils intention to support older people to remain in their own homes and live independently, with the assumption made that the Council will further develop ways and means of enabling this. Therefore it is considered to have no discernible effect.</p> <p>Policy H9 will have a significant positive effect as it protects existing supported housing and supports the provision of new supported housing would have a positive effect on inclusion and social cohesion helping improve peoples' opportunity for independence for those more disadvantaged.</p> <p>There is a minor positive effect for Policy H12 on promoting social inclusion as the Council is seeking to meet needs for gypsies and travellers, through use of its own sites and/or working sub-regionally with the GLA/other boroughs to identify sites.</p>
7. Improve the health and wellbeing of the population and reduce	-	+	0	++	-	+	0	<p>No effect for policies H8, and H12.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for Policy H11 following review of the IIA as part of the examination process. The policy expects high quality housing in line with H4 which has</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
health inequalities								<p><b>various aspects to which is overall likely to improve health and wellbeing.</b></p> <p>Policy H7 has a minor positive effect. The policy would enable people to stay in their own home which can have positive benefits in terms of mental and physical health. Policy H7 would also have a minor positive effect as care home accommodation has to demonstrate compliance with various design issues including providing access to communal outdoor space.</p> <p>H9 would have a significant positive effect as it aims to improve peoples' opportunity for independence for those more disadvantaged.</p> <p>Policy H6 and H10 are both minor negative as they do not provide the same quality of residential accommodation as conventional housing with no private outdoor space for example undermining the concept of the home as a place of retreat. <b>In addition trends in student accommodation are seeing studios preferred over communal flats reducing the opportunity for social interaction between students.</b></p>
8. Foster sustainable economic growth and	+	0	0	0	0	0	0	<p>No effect for the policies H7, H8, H9, H10, H11 and H12.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H6</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
increase employment opportunities across a range of sectors and business sizes								<b>following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which can also contribute towards training support for local people helping to increase their employment opportunities.</b>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	+	0	+	0	0	0	No effect for the policies H6, H8, H10, H11 and H12.  There is a minor positive effect for policies H7 and H9 which ensures that proposals have easy access to public transport, shops, services and community facilities.
10. Protect and enhance open spaces that	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
are high quality, networked, accessible and multi-functional								
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
12. Reduce contribution to climate change and enhance community resilience to climate	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.



IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
change impacts.								
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	-	0	0	-	0	0	No effect for alternative to policies H7, H8, H9, H11 and H12.  There is a minor negative effect for policies H6, <b>H7</b> and H10. Due to their design, student accommodation, <b>older persons accommodation</b> and large-scale HMOs may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs.
14. Maximise protection and	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
enhancement of natural resources including water, land and air								

**Policy H1: Thriving communities**

Policy H1 is the strategic policy approach to meeting housing needs so the **Sustainability Appraisal** identified that it will have a particularly significant positive effect against the societal objectives contained in the Sustainability Framework. The aim of policy is to improve fairness and integration and tackle social exclusion through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. High quality new homes which fully integrate within, and relate positively to, the immediate locality and promotes optimal density levels are required and policy promotes high quality housing which is comfortable, improves the quality of life of residents and contributes to improvements in health. Delivery of genuinely affordable housing is a key priority which addresses inequality. The policy promotes optimal densities in regard to the specific site context, which will allow for location sensitive density levels to be determined. The policy promotes high density housing, an efficient use of land but considers this alongside other policy aspects such as Islington’s historic environment. At the same time the policy also has another positive effect on efficient use of land as it resists inefficient forms of development such as student accommodation and large HMO on the basis of land supply and sustainable use of land.

**Policy H2: New and existing conventional housing**

Policy H2 is focused on housing delivery; quantity of units, new build, protection of existing, conversion of and unit size mix. The **Sustainability Appraisal** of Policy H2 will have significant positive effects against the efficient use of land objective through providing a

mix of housing sizes informed by evidence of need and optimising housing and the use of a building/site. The policy resists smaller studio and bedsit units, and high concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing need and can be more easily adapted to evolving social and economic needs more generally. Policy H2 also has a positive effect against the objective for liveable neighbourhoods as it seeks the consideration of social infrastructure requirements and impact on existing social infrastructure. H2 also prevents housing supply being wasted by ensuring new homes will be occupied. This aspect of the policy has an alternative policy approach, considered below.

### **Policy H3: Genuinely affordable housing**

The **Sustainability Appraisal** of Policy H3 considered it would have a significant positive effect against the objectives to; deliver mixed and balanced communities; balancing competing land use needs; and helping reduce poverty. Setting a robust requirement for the delivery of as much genuinely affordable housing as possible from every site and requiring the majority of provision at social rent level will increase the amount of affordable housing delivered which helps reduce living costs and addressing inequality. Other benefits identified included in particular health benefits and also positive effects on the economy as affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment.

### **Policy H4: Delivering high quality housing**

Policy H4 sets out how high quality housing will be delivered in the borough. The **Sustainability Appraisal** results demonstrate the policy will have a significant positive effect against the objectives by creating inclusive, robust and adaptable buildings that can respond to changes over their life, helping meet the needs of individuals and families whilst making the most out of land available. The policy applies tenure blind principles which will promote social cohesion and integration and require a proportion of wheelchair accessible and adaptable properties, and could lead to greater equity between population groups and those with protected characteristics.

### **Policy H5: Private outdoor space**

- 1.3 Policy H5 is considered to have a minor positive effect by the **Sustainability Appraisal** as it has positive effects against the objective to improve diversity of housing, improves amenity and has positive impacts against the objective for health and wellbeing. The delivery of private outdoor space will enable occupiers to benefit from outdoor space helping address needs, for example the needs of families with children could be met through provision of outdoor space where children can play in a safe environment and helps create robust and adaptable dwellings which respond to evolving social needs. The policy is flexible as it allows for alternatives where the level of noise experienced by private outdoor space would exceed relevant standards. A minor change to policy between Regulation 18 and Regulation 19 which removed regard to be had to adverse noise impacts on adjacent land is not considered to have an effect as it is covered by existing policy DH5 which deals with noise impacts.

## **Thriving Communities: Housing Policies (policies H6 to H12)**

The following policies have been assessed in the same Sustainability Appraisal table:

### **Policy H6: Purpose built Student Accommodation**

### **Policy H10: Houses in Multiple Occupation (HMOs)**

Policy H6 and H10 are considered together because the assessment results in similar overall negative impacts against the framework for these policies as a result of the affect created by the accommodation which the policies are trying to mitigate. There is an overwhelming need to provide housing and affordable housing with limited amount of developable land in the borough, and conventional housing meets the broadest spectrum of need, so any form of housing that detracts from meeting this overwhelming need is going to have a negative impact on use of land in the Sustainability Appraisal. This negative impact against the efficient use of land is extended in the Sustainability Appraisal for the alternatives to both policy H6 and H10. The two policy alternatives would apply the London Plan policy which would permit more student housing in well-connected accessible locations such as town centres with local services. For large scale HMOs the London Plan is also supportive and considers that this kind of accommodation may have a role in meeting housing needs in London. Note that the Local Plan is supportive of small scale HMO – those considered C4 use class and resists large scale purpose built HMO – those considered sui generis.

The Sustainability Appraisal for policies H6 and H10 considers there is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term. Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs and does not respond to changing needs over a buildings life. They do not provide the same quality of residential accommodation with no private outdoor space for example undermining the concept of the home as a place of retreat. The assessment also considered the policies would also likely provide less genuinely affordable housing overall in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. Finally the appraisal considered these forms of accommodation undermined community cohesion through potentially creating a more itinerant community as they are not designed for long term occupation. The assessment identified positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to objective 1 and helping create a safer environment for both H6 and H10. In addition, H6 has positive effects

against the objective for inclusion and economy as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which contributes to reducing inequality and improving employment opportunities.

### **Policy H7: Meeting the needs of vulnerable older people**

The issue of meeting needs again comes into play with Policy H7 as the approach supports affordable extra care but the policy could be conceived to reduce the opportunity to provide market extra care homes. The policy also is not sustainable in terms of the ability to meet a range of needs and extra care homes are less able to respond to changing needs over a buildings life. The policy is considered to have minor positive effects as it expects the suitability of a site for older persons accommodation to consider the context of the surrounding neighbourhood, access to shops and services and the development of other priority land uses and creation of mixed and balanced communities. However the policy approach is clear that where there is evidence of local unmet need in the social sector then it would be possible to provide a care home or extra care home so the Sustainability Appraisal considers that it will have no discernible effect against the inclusion objective. This is also considered in light of the Councils intention to support older people to remain in their own homes and live independently, with the assumption made that the Council will further develop ways and means of enabling this - the assessment considers this will have a minor positive effect on mental and physical health. Policy H7 also has positive impact through good quality care and extra care accommodation through compliance with various design issues including providing access to communal outdoor space, and easy access to public transport, shops, services and community facilities.

### **Policy H8: Self-build and Custom Housebuilding**

Policy H8 creates minor positive effect when assessed, and there is little actual evidence of interest in self build in the borough. The policy is considered by the Sustainability Appraisal to be positive given that self-build housing would be built in accordance with policies H3 and H4 – providing high quality and delivery of affordable housing and the policy also responds to the objective to ensure efficient use of land by referencing use of optimal densities with regard to the specific site context. A possible alternative would be no policy but this would be an unreasonable alternative given the need to consider the self-build duty, so it has not been assessed. Legislation has been introduced to support self-build and custom build with the Council required to have regard to the self-build register when undertaking planning.

### **Policy H9: Supported Housing**

Policy H9 is considered by the Sustainability Appraisal to have a significant positive effect against the sustainability appraisal objective for social cohesion as it protects existing supported housing and supports the provision of new supported housing in suitable locations in terms of services. This would have a positive effect on inclusion and social cohesion helping improve peoples' opportunity for independence in particular for those more disadvantaged.

### **Policy H11: Purpose Built Private Rented Sector development**

The Sustainability Appraisal considers that the negative impact of Policy H11 is the inability of the policy to entirely restrict purpose built private rented sector housing with the consequence that less genuinely affordable housing is provided overall than if conventional housing were to be built. Providing these forms of accommodation would therefore not optimise the use of land and have a negative effect against the objective to make best use of land. In particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. In addition promoters of this type of development often claim to have 'distinct economics' due to the fact that homes are rented not sold, which in turn is used as an argument for a more flexible approach to policy requirements including provision of affordable housing. Apart from the issue of land use and efficient use of land and provision of affordable housing there are no other significant effects considered against the sustainability objectives.

### **Policy H12: Gypsy and Traveller Accommodation**

**Policy H12** is considered positive by the Sustainability Appraisal as it promotes social inclusion with the Council seeking to meet the defined needs of gypsies and travellers as set out in the Gypsy and Traveller Needs Assessment and will consider finding suitable land either through the Councils ongoing house building programme and/or through a potential review of the Site Allocations document, and/or working sub-regionally with the GLA and other boroughs.

## Social and community infrastructure

The following social and community infrastructure policies have been considered in the same sustainability appraisal table:

- Policy SC1: Social and Community Infrastructure - Policy SC1 focuses on protecting, supporting, assessing and meeting needs for social and community infrastructure.
- Policy SC2: Play space - Policy SC2 seeks to protect existing play space and ensure playspace is provided in all major developments and playable public space is provided in all development.
- Policy SC3: Health Impact Assessment - sets out when Health Impact Assessments will be required.
- Policy SC4: Promoting Social Value - Policy SC4 encourages development to maximise social value and sets requirement for major development proposals to undertake a Social Value self-assessment.

**Table 1.39: Assessment of policies SC1 to SC4**

IIA Objective	SC1: Social and Community Infrastructure	SC2: Play space	SC3: Health Impact Assessment	SC4: Promoting Social Value	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	0	0	<p>Policy SC1 will have a significant positive effect as it will ensure that new social and community infrastructure is built in an accessible location which is convenient to the users and also that the design is inclusive, accessible, flexible and sustainable. In particular reference is made to ensuring that the design responds to the needs of the users of the social and community infrastructure.</p> <p>Policy SC2 will ensure play space is provided in all major developments and playable public space is provided in all development which will make development more sustainable. This will have a positive effect helping create high quality development which provides families with convenient access encouraging healthy and active lifestyles for children.</p> <p>There is no effect for policy SC3. While the policy does potentially apply to all major and health related applications through a screening assessment there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment.</p>

					There is no effect for policy SC4. While the policy does encourage all development to maximise social value and, for certain development, set out exactly what social value is added by the development, there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment, although it is noted that the policy could deliver additional social value benefits by encouraging developers to consider at the outset whether the planned development can be approached in a different way which could add additional social value.
2. Ensure efficient use of land, buildings and infrastructure	++	+	0	0	<p>Policy SC1 will have a significant positive effect on the efficient use of land, buildings and infrastructure. The policy provides the opportunity to redevelop social and community infrastructure sites where justified through meeting tests of market demand and community need thereby ensuring genuinely redundant land and buildings are released for alternative uses. The policy identifies estates rationalisation of recognised public sector bodies as an exception to marketing demand although ensuring community needs are considered remains.</p> <p>Policy SC2 will have a minor positive effect. It requires new playspace to be provided in line with best practice standards, helping to provide the necessary infrastructure to support development.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	<p>No effect for policy SC1. Although various social infrastructure are identified heritage assets for example Finsbury Health Centre is a Grade 1 listed building, and was the first healthcare centre of its kind, policy SC1 does not explicitly protect heritage; this is covered by other plan policies.</p> <p>No effect for policy SC2.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
4. Promote liveable neighbourhoods which support good	++	++	0	0	Policy SC1 will have a significant positive effect as it will ensure that both new social and community infrastructure are built in accessible locations convenient to users and it will protect existing social and community facilities



quality accessible services and sustainable lifestyles					<p>where there is a need both from market demand and community need. This should mean that the range of community facilities necessary for the community are protected.</p> <p>Policy SC2 will have a significant positive effect. It will ensure play space is both maintained through protecting existing play space and new play space is provided in all major developments.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	<p>No effect for policies SC1 and SC2.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	0	0	<p>Policies SC1 and SC2 will have a minor positive effect. Social infrastructure and play space can contribute to social cohesion and integration by providing buildings and spaces where different groups of people can come together.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	0	0	<p>Policy SC1 will have significant positive effects as it will seek to protect existing social and community infrastructure, and ensure new facilities are built to be accessible and inclusive. Where policy identifies estates rationalisation for recognised public sector bodies the proposals will be required to evidence community needs through a community impact assessment which will help ensure that health needs are met in the borough.</p> <p>Policy SC2 will have significant positive effects as it will seek to ensure there are sufficient play facilities and play space provided as part of new development and where proposals would result in a loss of play space, replacement provision is required. The adventure playgrounds in the borough will be protected.</p>

					There is no effect for policy SC3. See assessment against objective 1.
					There is no effect for policy SC4. See assessment against objective 1.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	<p><b>The effects have been updated for Policy SC1 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. There may be indirect economic benefits of various social and community infrastructure which may help to maintain and improve the range of employment opportunities for people but these positive effects are considered to be uncertain and dependent on individual proposals coming forward. Community centres and third sector spaces provide a wide range of support to help people gain experience and achieve skills to help improve employment prospects.</b></p> <p>Policy SC2 will have no effect.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	0	0	<p>Policy SC1 will have minor positive effects as it will seek to protect existing social and community infrastructure, and ensure new facilities are built to be accessible and inclusive. This should help reduce the need for people to travel further afield to access social and community infrastructure.</p> <p>Policy SC2 will have no effect.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	0	<p>Policy SC1 will have no effect.</p> <p>Policy SC2 will have a minor positive effect as it aims to both protect existing play spaces and adventure playgrounds and also provide additional play space where required. Developments are required to provide playable public space in addition to any formal play space provision which connects to formal play provision and open spaces. This will help enhance and improve quality of open spaces for purposes of play as well as connections to them.</p>

					There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	No effect for policies SC1 and SC2. There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	No effect for policies SC1 and SC2. There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	No effect for policies SC1 and SC2. There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	No effect for policies SC1 and SC2. There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.

### Policy SC1: Social and community infrastructure

The **Sustainability Appraisal** considered Policy SC1 will have a significant positive effect as it will ensure that new social and community infrastructure facilities are built in accessible locations convenient to users as well as protecting existing social and community facilities. The policy approach will also allow redevelopment where it is justified through an assessment of both community need and market demand. This should mean that the range of community facilities necessary to meet community need are protected but will ensure efficient use of land where they are genuinely redundant. The policy recognises that certain public sector users wish to rationalise their estate, although evidence that community need is still being met will be retained through provision of a 'Community Impact Assessment'. The assessment recognised there may be indirect economic benefits of various social and community infrastructure which may help to maintain and improve the range of employment opportunities for people but these positive effects are considered to be uncertain and dependent on individual proposals coming forward.

New social and community infrastructure will be built in accessible locations which are convenient to their intended users and the design is required to be inclusive, accessible, flexible and sustainable. Particular reference is made to ensuring that design responds to the needs of users of social and community infrastructure. For these factors in particular the **EqIA** considered social and community policies are entirely positive for all groups with protected characteristics.

### **Policy SC2: Play space**

Policy SC2 will ensure play space is provided in all major developments and playable public space is provided in all development. This will have a positive effect against the sustainability objectives for the built environment and health and wellbeing, helping to create high quality development which provides families with convenient access to play and encouraging healthy and active lifestyles for children. Provision of play space also helps social cohesion and integration by providing buildings and spaces where different groups of people can come together. Where proposals would result in a loss of play space, replacement provision to meet the needs of the local population is required

### **Policy SC3: Health Impact Assessment**

There is no effect for policy SC3. While the policy does potentially apply to all major and health related applications through a screening assessment there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment.

### **Policy SC4: Promoting Social Value**

Policy SC4 has no effect against delivery of the **Sustainability Appraisal** objectives. While the policy does encourage all development to maximise social value and, for certain development, set out exactly what social value is added by the development, there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment, although it is noted that

the policy could deliver additional social value benefits by encouraging developers to consider at the outset whether the planned development can be approached in a different way which could add additional social value.

## Inclusive economy: Business floorspace

The following business related policies have been considered in the same Sustainability Appraisal table:

- B1: Delivering business floorspace - Policy B1 sets out the strategic approach to meeting employment needs in the borough and the aim to achieve an inclusive economy and identifies the most appropriate locations for new business.
- B2: New business floorspace - Policy B2 provides detail on the locational and design requirements for the different types of new business floorspace.
- B3: Existing business floorspace - Policy B3 sets out the approach to protecting existing business floorspace.
- B4: Affordable workspace - Policy B4 sets out the requirements for the provision of affordable workspace.
- B5: Jobs and training opportunities - Policy B5 sets out the requirements for providing jobs and training opportunities from new development especially new business floorspace.

**Table 1.40: Assessment of policies B1 to B5**

IIA Objective	B1: Delivering business floorspace	B2: New business floorspace	B3: Existing business floorspace	B4: Affordable workspace	B5: Jobs and training opportunities	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	0	+	+	<p>Policies B1 and B2 will have minor positive effect by encouraging development which primarily supports the existing economic function of an area. It will reinforce the economic sustainability of an area and may see design which complements the existing character of an area. For example, Grade A offices in the Central Activities Zone; co-working space in Priority Employment Locations. The policies require incorporation of inclusive design features and also ensure safety and inclusivity as part of the design process.</p> <p>Policy B3 has no effect</p> <p>Policy B4 will have a minor positive effect requiring affordable workspace to be of a high standard of amenity for occupiers.</p>

						<p><b>New effects have been identified for Policy B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy B5 requires the creation of employment and training opportunities for Islington residents and financial contributions which help tackle worklessness in the borough. Participation in education and training provides young disadvantaged residents the opportunity to gain qualifications which make a difference to future life chances and can help tackle problems of anti-social behaviour. Therefore, the policy promotes inclusive communities, which lead to safer build environments.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	++	++	+	+	0	<p>Policies B1 and B2 will have significant positive effects as they require maximisation of new business floorspace for a range of types of space to support the primary function of an area of existing relevant economic activity, for example, Grade A offices in the Central Activities Zone; co-working space in Priority Employment Locations. Policy B2 will optimise use of land through requiring the maximisation of business floorspace and development of business space will be designed to be flexible to meet a variety of business needs.</p> <p>Policy B3 will have a minor positive effect. It protects existing business floorspace including older / secondary business stock which is generally more affordable / suitable for occupation by SMEs and will help to meet the needs of local businesses and also help maintain a balance of employment land across the borough meeting a range of business needs.</p> <p>Policy B4 will have a minor positive effect. It will ensure provision of affordable workspace to meet the needs of local businesses. The policy specifies the types of space and locations where affordable workspace is required.</p> <p>Policy B5 has no effect</p>
3. Conserve and enhance the significance of heritage assets and their	0	0	0	0	0	<p><b>New text has been added following review of the IIA as part of the examination process. It could be considered that some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings, and the wider historic environment depending on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an</b></p>

settings, and the wider historic and cultural environment.						<p><b>extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</b></p> <p>There are no effects for policies B3 to B5</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	+	0	<p>Policies B1 and B2 will direct new employment floorspace to the CAZ and town centres with a range of units in terms of size and type expected which will help support diversity in town centres and should benefit existing services in these locations. Policy B4 will have similar minor positive effects given its associated with provision of new floorspace in these locations.</p> <p>Policy B3 will have a minor positive effect through protecting existing business floorspace, which will help maintain diversity outside the CAZ and town centres and counter predominantly residential neighbourhoods, promoting economic activity in these locations.</p> <p>Policy B5 will have no effect as this policy is concerned with securing jobs and training opportunities from new development.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	<p>There are no effects for policies B1 to B5. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough, through prioritising business floorspace. However the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met.</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	+	+	++	++	<p>Policy B1 has a significant positive effect with the policy aim in line with the Local Plan objective to deliver an inclusive economy which the policy does through delivering policy supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society.</p> <p><b>New text has been added following review of the IIA as part of the examination process. Policy B2 The maximisation of new business floorspace</b></p>



					<p><b>will strengthen the local economy. New business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs. Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to improve employment opportunities and increase the skills of residents. The requirements around the quality of new business floorspace will also support community cohesion, inclusion, equality and diversity by ensuring that new spaces are accessible to everyone.</b></p> <p>Policy B3 The protection of existing business floorspace will likely have a minor positive effect. Maintaining local jobs in Islington can contribute to a more equitable society.</p> <p>Policy B4 will have a significant positive effect as affordable workspace is provided in the Borough and leased to the Council who will in turn sub-lease the space to an organisation, in return for social value. These organisations will be selected in relation to the extent in which they support local businesses and provide training and education outcomes to remove barriers to employment therefore the policy is directly seeking to address social exclusion and promotes fairness.</p> <p>Policy B5 will have a significant positive effect with jobs and training opportunities secured from the development of new business floorspace which will help local people access job and training opportunities from new development. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	<p><b>New effects have been identified for Policies B1 to B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. New effects have been identified following review of the IIA as part of the examination process. Policies B1 to B5 support a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people. The type of employment supported by the policies has the potential to protect health and contribute to reduced health inequalities. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health.</b></p>

<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	<p>++</p>	<p>++</p>	<p>+</p>	<p>++</p>	<p>++</p>	<p>Policy B1 has a significant positive effect with the policy aim in line with the Local Plan objective to deliver an inclusive economy which the policy does through supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society and promote growth and sustain the economy. The policies also support a variety of businesses through ensuring there is a range of business space to meet varying business needs, and focus development in the most appropriate locations. Opportunities for local residents to access employment are widened through the collection contributions towards jobs and training opportunities, including apprenticeships and construction jobs.</p> <p>Policy B2 will have a significant positive effect. The development of new business floorspace sustains and improves Islington’s economy. New business floorspace will be required to provide a range of units, in terms of size and type, which can support a range of businesses. Space will be directed to certain areas including the Central Activities Zone and existing business clusters, this will allow agglomeration benefits to be felt and will allow businesses to grow and thrive. New business floorspace in the CAZ will contribute towards sustaining the London and national economy. Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps reduce the need for goods and services to travel reducing congestion and air pollution. These areas also offer a range of jobs providing greater employment opportunity.</p> <p>Policy B3 will have a significant positive effect. The protection of existing business floorspace will support Islington’s economy and can allow existing business and sectors to continue to grow within the Borough. Protection of existing space can ensure a sufficient supply of secondary business space, which generally meets the needs of local businesses and SMEs. Small and micro businesses make up a large proportion of Islington’s enterprises and make a significant contribution to the success of the local economy, reinforcing the need to ensure they are able to remain within the Borough.</p> <p><b>New effects have been identified for Policy B3 following review of the IIA as part of the examination and changed the effects from significant positive to minor positive. A potential negative impact of Policy B3 is identified where requirements to market existing business space for 24 months before any net-loss of business space could lead to reduced footfall and further vacancy in neighbouring business floorspace and might be more likely during periods</b></p>
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						<p><b>of economic uncertainty. However this potential immediate temporary minor negative impact is offset by the fact that the 24 months period plays a key role in helping protect and sustain business floorspace to support businesses of different types and sizes. In the medium and long term it is likely to have benefits in helping to protect business floorspace for which there is evidenced demand.</b></p> <p>Policy B4 will have a significant positive effect. The development of affordable workspace contributes towards creating a strong and diverse economy. The provision of affordable workspace allows a variety of businesses to locate in the Borough's most unaffordable locations. It can contribute to ensuring a supply of space for different types of businesses, including start up or SMEs, who are usually more sensitive to cost changes. The policy seeks to address social exclusion and promotes fairness. As part of the commissioning process, the Council will maximise the potential for removing barriers to employment, increasing skills for residents and creating opportunities for learning and vocational learning, through apprenticeships.</p> <p>Policy B5 will have a significant positive effect. Jobs and training opportunities from new business development widens opportunities for local residents and can address worklessness. Training opportunities can address barriers to employment, such as skill levels. Opportunities for vocational learning, in construction for example, could also be increased. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	++	+ +	+	+	+	<p>Policy B1 and B2 will have a significant positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices.</p> <p>Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people's journeys to work albeit to less connected locations.</p> <p><b>New effects have been identified for Policies B4 and B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This suppresses the need to travel and could have a minor positive impact on transport.</b></p>

10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	There are no effects for policies B1 to B5
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	There are no effects for policies B1 to B5
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	+	+	+	+	<p>Policy B1 and B2 will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.</p> <p><b>New effects have been identified for Policy B3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people’s journeys to work, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p> <p><b>B3 also has a positive impact on air quality as it protects LSISs which are located strategically in inner London to ‘service’ the CAZ, which shortens</b></p>

						<p><b>supply chains and the length of vehicular journeys to deliver goods, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p> <p><b>New effects have been identified for Policies B4 and B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and has a minor positive impact on transport, which can in turn have the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	There are no effects for policies B1 to B5

<p>14. Maximise protection and enhancement of natural resources including water, land and air</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p><b>New effects have been identified for Policies B1 to B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy B1 and B2 will have a minor positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices, which can in turn improve air quality.</b></p> <p><b>It should be acknowledged that B2, which support the intensification of industrial land in the LSIS could have the potential to have a negative impact on air quality, if they lead to an increase in vehicular movements or support activities that lead to an increase in air pollution. However other strategic policies in the Plan such as SP3, S7, T2, T3 and T5, which will ensure new industrial land does not impact natural resources adversely. The impact on the policy is therefore still a minor positive.</b></p> <p><b>Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people’s journeys to work, which can have a positive impact on air quality.</b></p> <p><b>B3 also has a positive impact on air quality as it protects LSISs which are located strategically in inner London to ‘service’ the CAZ, which shortens supply chains and the length of vehicular journeys to deliver goods, and therefore has a positive impact on air quality.</b></p> <p><b>Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.</b></p>
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### **B1: Delivering Business Floorspace & B2: New business floorspace**

**The Sustainability appraisal** considered that **Policy B1 and policy B2** are in tandem given the similar effects with both creating a significant positive effect against the **Sustainability Appraisal objectives**. The policy aim is in line with the Local Plan objective to deliver an inclusive economy which the policy does through supporting creation of a variety of new business floorspace, protecting existing floorspace, in particular industrial land through new LSIS designations and securing affordable workspace and jobs/training opportunities from development. This will support the economy in Islington and help share success across different sections of society.

The policies have a significant positive effect against the **sustainability objective for the efficient use of land** and meeting needs as the policies require maximisation of new business floorspace for a range of types of space to support the primary function of an area of existing relevant economic activity. Industrial uses are protected which will help. For example, a large quantum of office space in the Central Activities Zone including Grade A offices; and co-working space in Priority Employment Locations. Policy B2 will optimise use of land through requiring the maximisation of business floorspace and development of business space will be designed to be flexible to meet a variety of business needs and requires incorporation of inclusive design features as part of the design process. Maximisation of employment space could have a minor negative impact on the significance of heritage assets and their settings depending on implementation although this was considered neutral as it is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3. Also, to an extent SP3 which favours refurbishment projects. Policies B1 to B5 will help improve health and wellbeing by supporting a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people.

Policy B2 will help positive effects against the inclusive objective where new business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health. Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to improve employment opportunities and increase the skills of residents.

Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps reduce the need for goods and services to travel reducing congestion and air pollution. The assessment notes that supporting the intensification of industrial land in the LSIS could have the potential to have a negative impact on air quality, if it leads to an increase in vehicular movements or support activities that lead to an increase in air pollution. However other strategic policies in the Plan such as SP3, S7, T2, T3 and T5, will ensure new industrial land does not impact natural resources adversely and the impact of the policy is therefore still a minor positive. In addition directing business development outside LSIS to the most appropriate and accessible locations in the borough, also reduces the need to travel by car and encourages more sustainable transport choices, which can in turn improve air quality. These areas also offer a range of jobs providing greater employment opportunity.

### **B3: Existing business floorspace**

**The Sustainability Appraisal** considers that Policy B3 has a positive effect overall, principally against the sustainability objective to meet needs and facilitate economic growth. The policy approach protects existing business floorspace which helps to meet the needs of local businesses and also help maintain a balance of employment land across the borough meeting a range of business needs. This will support

Islington's economy and allow existing business and sectors to continue to grow within the Borough and will help maintain diversity of employment space outside the CAZ. Protection of existing space can ensure a sufficient supply of secondary business space, which generally meets the needs of local businesses and SMEs. Small and micro businesses make up a large proportion of Islington's enterprises and make a significant contribution to the success of the local economy, reinforcing the need to ensure they are able to remain within the Borough. However the protection of business floorspace is considered to result in a potential negative impact of Policy B3 where requirements to market existing business space for 24 months before any net-loss of business space could lead to reduced footfall and further vacancy in neighbouring business floorspace and might be more likely during periods of economic uncertainty. However this potential immediate temporary minor negative impact is offset by the fact that the 24 months period plays a key role in helping protect and sustain business floorspace to support businesses of different types and sizes. In the medium and long term it is likely to have benefits in helping to protect business floorspace for which there is evidenced demand. Policy B3 is also considered to have a positive effect on reducing contribution to climate change through protecting existing business floorspace which help maintain diversity outside the CAZ and town centres and help counter predominantly residential neighbourhoods, and reduce people's journeys to work which will also have a positive impact on air quality. Protecting LSIS also has a similar effect as they are located strategically in inner London to 'service' the CAZ, which shortens supply chains and the length of vehicular journeys to deliver goods, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.

#### **B4: Affordable workspace**

Policy B4 requires provision of affordable workspace which the **Sustainability Appraisal** identifies will have a significant positive effect against the objective addressing social exclusion and promoting fairness. Affordable workspace is space leased to the Council at peppercorn rate and who will in turn sub-lease the space to operators through a commissioning process. These organisations will be selected in relation to the extent in which they support local businesses and provide training and education outcomes to remove barriers to employment. The development of affordable workspace also contributes towards creating a strong and diverse economy, allowing a variety of businesses to locate across the Borough meeting a range of business needs. Both policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This suppresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.

#### **B5: Jobs and training opportunities**

Policy B5 is considered by the **Sustainability Appraisal** to have a significant positive effect against the objective addressing social exclusion and promoting fairness. The Policy secures jobs and training opportunities from development of new business floorspace. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities. The creation of employment and training opportunities for Islington residents and financial contributions which help tackle worklessness in the borough. Participation in education and training provides young disadvantaged residents the opportunity to gain qualifications which make a difference to future life chances and help tackle problems of anti-social behaviour. Therefore, the policy promotes inclusive communities, which can help lead to safer build environments. Both policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This suppresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.





## Inclusive Economy: Retail policies

The following retail policies have been considered in the same Sustainability Appraisal table:

- R1: Retail, leisure and services, culture and visitor accommodation - Policy R1 sets out the strategic vision for retail, leisure and services, culture and visitor accommodation uses.
- R2: Primary Shopping Areas - Policy R2 defines Primary Shopping Areas and seeks to protect and enhance the retail function of Islington's four town centres Primary Shopping Areas.
- R3: Islington's Town Centres - Policy R3 sets out the approach to development in town centres, including the retail hierarchy, town centre first approach ensuring high quality development which ensures accessibility, amenity and sustainability is considered.
- R4: Local Shopping Areas - Policy R4 sets out the approach to which seeks to maintain and enhance the retail and service function of LSAs.
- R5: Dispersed retail and leisure uses - Policy R5 seeks to protect retail and café/restaurant uses in locations not covered by a retail designation such as town centres and LSAs.

**Table 1.41: Assessment of policies R1 to R5**

IIA Objective	R1: Retail, leisure and services, culture and visitor accomodation	R2: Primary Shopping Areas	R3: Islington's Town Centres	R4: Local Shopping Areas	R5: Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
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<p>1. Promote a high quality, inclusive, safe and sustainable built environment</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p><b>Text updated following review of the IIA as part of the examination process. Policies R1 and R2 will have a minor positive effect in terms of directing appropriate retail, services and leisure development to key locations in the borough in line with the retail hierarchy, particularly the core of town centres, the Primary Shopping Areas. This will help to achieve an appropriate balance and mix of uses within a public realm that is most capable of supporting these commercial functions. R1 seeks to actively manage streets within retail areas to balance demand on the public realm, whilst both R1 and R2 promote active frontages which can contribute to a more attractive, functional and sustainable public realm within retail areas.</b></p> <p>Policy R1 will support and manage a thriving and safe night-time economy. Policy R1 would likely increase the amount of visitor accommodation delivered, which by itself would be a minor negative; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence can be a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through the Policy R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible. Overall, policy R1 is considered to have a minor positive effect.</p> <p><b>The effects have been updated for Policy R3 following review of the IIA as part of the examination and changed the effects from significant positive to minor positive. The effect of the policy will focus appropriately scaled development in line with the retail hierarchy. This will help to achieve an appropriate balance and mix of uses within a public realm that is capable of supporting these commercial functions – the public realm in the major town centres is generally more expansive. Policy R3 also ensures high quality development, accessibility, amenity and sustainability are considered</b></p>
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					<p><b>which can contribute to a more attractive and sustainable public realm.</b></p> <p>Policies R4 and R5 will have a minor positive effect as they seek to protect LSA's and dispersed shops which helps to protect and enhance the local character of Islington and maintain a retail environment where units provide active frontages and engagement with the street scene providing safety and convenience.</p>
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<p>2. Ensure efficient use of land, buildings and infrastructure</p>	<p>++</p>	<p>++</p>	<p>++</p>	<p>+</p>	<p>+</p>	<p>Policies R1 and R2 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres. Development will be focused in the most appropriate locations through town centres, primary shopping areas (PSAs) and LSAs. Outside a PSA there will be more flexibility and adaptability for non-A1 use which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. Within the PSA will be a condensed and more focused retail (A1) area. <b>New effects have been identified for policy R2 following review of the IIA as part of the examination process. This includes the two-year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative effect could potentially arise from a downturn in viability of A1 retailing resulting in an increase of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term means the benefits of this are considered to outweigh this potential short term negative effect.</b></p> <p>Policy R1 could result in more visitor accommodation being permitted, which could reduce the availability of land to meet other development needs, and therefore it could potentially not effectively balance competing demands for land use. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. The policy also ensures that intensification of existing hotels has to demonstrate that additional business floorspace is not possible which allows other priorities to take precedent and optimise the use of previously developed land. Overall policy R1 is considered to have a significant positive</p>
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						<p>effect even taking into account the assessment of the visitor accommodation element of the policy.</p> <p>Policy R3 will have a significant positive effect focusing appropriately scaled development in line with the retail hierarchy but also ensuring high quality development which ensures accessibility, amenity and sustainability are considered.</p> <p>Policy R4 will have a minor positive effect through protecting existing retail and service function of uses in LSAs helping ensure needs are met. <b>New effects have been identified following review of the IIA as part of the examination process. There may be a minor short term temporary negative effect for LSAs where the change of use from A1 to other appropriate main town centre requires marketing and vacancy evidence which could potentially negatively impact on LSAs.. However, the 6 month marketing period is deliberately short enough to not facilitate an unduly long period of vacancy, whilst also helping to facilitate the protection and ongoing use of viable retail premises in the medium to long term to support the vitality and function of LSAs.</b></p> <p>Policy R5 will have a minor positive effect by protecting dispersed A1 and A3 premises which are often located in amongst residential areas and can provide an important local service.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	+	0	0	<p>No effect for policies R1, R2, R4, and R5.</p> <p>Policy R3 will have a minor positive effect in that Part F(iii) requires historic shopfronts to be retained therefore, preserving the historical environment that adds to the cultural environment of the borough.</p>
4. Promote liveable neighbourhoods	++	++	++	++	++	<p>Policies R1, R2 and R3 will have significant positive effects on enabling town centres and LSAs to continue to serve the needs</p>

<p>which support good quality accessible services and sustainable lifestyles</p>					<p>and wellbeing of the local residents across different retail catchment areas by striking the right balance of retail, leisure and business uses. The PSA approach improves access and legibility to essential services through concentrating A1 uses in the core of the town centre which enjoy the best transport links. The increased flexibility of uses in the rest of the town centre will support the expansion of cultural provision and encourage a vibrant environment for residents and visitors alike. Policy R1 will support and manage a thriving and safe cultural and night time economy, directing appropriate cultural and NTE development to town centres and CAZ locations and cultural quarter's and ensuring appropriate design which is safer and more inclusive. The agent of change principle is highlighted and applies in town centres and allows for vibrant town centre uses that attract visitors to be maintained.</p> <p>R1 could also have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision.</p> <p>Conversely, the visitor accommodation element of the policy could have negative effects, as it could also dilute the land available for meeting greater priority development needs, which could reduce access to essential services. <b>However, on balance the restriction of visitor accommodation to specific sites would not cumulatively obstruct the meeting of other development priorities.</b></p> <p>Policy R4 will have a significant positive effect, enabling LSAs to continue to serve the needs of local residents across local retail catchment areas.</p> <p>Policy R5 will have a significant positive effect through ensuring that essential dispersed convenience and café services are</p>
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						protected. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly beneficial.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	No overall effect for policies R1 to R5. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough. Policies R2 and R3 may have a minor negative effect on access to housing because of the more restrictive approach in these locations. However, the assessment considers this to have no effect overall as other policies ensure housing is delivered outside the retail designations identified which will ensure housing targets are met. The protection of retail, services and leisure uses across town centres, LSAs and dispersed locations is vital for new housing to have access to these amenities. The policies set out circumstances where residential would be suitable in town centres and LSAs.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	0	0	0	Minor positive effect for policies R1 to R5.  <b>New effects have been identified for Policy R1 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The protection and enhancement of the retail hierarchy as set out in policy R1 could have a minor positive effect by ensuring main town centre uses remain accessible and abundant which in turn help foster community cohesion. Retail and cultural uses can act as informal spaces for communities to meet and strengthen local connections as well as selling a range of goods for the diverse population of Islington.</b>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	<b>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies R1-R4 will provide a framework to support facilities which can meet the needs of communities and the benefits this can provide e.g. health, recreation and leisure. The policies also provide a framework for taking into account cumulative impacts to provide against the proliferation of activities which can have/or have the potential to have negative health impacts.</b>

						<p><b>Policy R3 part F in particular is clear that proposals must provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated.</b></p> <p>Policy R5 aims to protect local cafes and dispersed shops, these facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly relevant and considered to have a positive effect against this objective.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	++	+	+	<p>Policies R1, R2, and R3 will have a significant positive effect. The policies aim to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development. Town Centres provide the employment opportunities outside the CAZ and help provide job opportunities for local residents. An enhanced cultural NTE role will increase employment opportunities and contribute to the local economy.</p> <p>Policy R1 could provide opportunities for employment related to visitor accommodation, particularly for local people, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as offices; this provides a more indirect economic benefit. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business. <b>New effects have been identified following review of the IIA as part of the examination process. This includes the two year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL</b></p>

						<p>rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</p> <p>Policy R4 and policy R5 will both have a minor positive impact as they are both aiming to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	+	<p>No effect for policies R1 to R5.</p> <p><b>New effects have been identified for Policies R1-R5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A positive effect of enhancing and protecting the retail hierarchy is that retail and leisure development will be directed to town centres that enjoy the best transport connections. Additionally, protection of retail in LSAs ensures access to essential goods and services for local residents is retained, reducing the need for private vehicular and public transport to access these goods. Minor positive impacts have therefore been identified for policies R1-R4. Providing access to dispersed shops close to where people live can also help to reduce the need for vehicular travel, a minor positive is also identified for policy R5.</b></p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	No effect for policies R1 to R5.

11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	No effect for policies R1 to R5.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	0	No effect for policies R1 to R5.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	No effect for policies R1 to R5.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	No effect for policies R1 to R5.



### Inclusive Economy, Local retail and specialist retail policies

The following retail policies have been considered and assessed in the same Sustainability Appraisal table:

- R6: Maintaining and enhancing Islington's unique retail character - Policy R6 seeks to protect and promote the provision of small shops that contributes to the local character of Islington and maintain a retail environment with units which provide for local convenience, business and employment.
- R7: Markets and specialist shopping areas - Policy R7 protects and supports Islington's two Specialist Shopping Areas in Angel (Camden Passage) and Finsbury Park (Fonthill Road) and an array of markets.
- R8: Location and concentration of uses - Policy R8 seeks to manage the detrimental concentrations of specific town centre uses that negatively impact public health and wellbeing, and cause harm to character and function, and vitality and viability of places.
- R9: Meanwhile/ temporary uses - Policy R9 sets out the approach that encourages making use of vacant buildings/sites for temporary (6 month) commercial use.

#### 1.42: Assessment of policies R6 to R9

IIA Objective	R6: Maintaining and enhancing Islington's unique retail character	R7: Markets and SSAs	R8: Location and concentration of uses	R9: Meanwhile/	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	+	+	<p>Policy R6 will have a positive effect as it helps to protect and enhance the local character of Islington and maintain a retail environment where units provide active frontages and engagement with the street scene providing safety and convenience.</p> <p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A minor positive has been identified for</b></p>

					<p><b>policy R7 as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough. It will also help to ensure activity and natural surveillance within these locations which can help to create a safer and more inclusive environment.</b></p> <p>Policy R8 has a minor positive effect. It seeks to manage the detrimental concentrations of uses that hinder public health and wellbeing, amenity, character and function, and affect the vitality and viability of places. There is some evidence that increased numbers of betting shops can lead to increases in crime and anti-social behaviour (ASB), including fear/perceptions of crime and ASB therefore managing the concentration of such uses could have positive effects on the built environment.</p> <p>Policy R9 will have a minor positive effect by bringing back into use, albeit on a temporary basis, buildings and spaces. This could help reduce crime and fear of crime associated with vacant buildings/spaces. It will also help maintain and improve the quality of the built environment.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	0	++	<p>Policy R6 will have a positive effect. It optimises the existing urban form of retail centres in the borough with flexibility to amalgamate units being carefully controlled.</p> <p>Policy R7 will have minor positive effect. It will help support the vitality and viability of the rest of town centre through protecting both markets and SSAs.</p> <p>Policy R8 has no effect.</p> <p>Policy R9 will have a significant positive effect by bringing back into use, albeit on a temporary basis, buildings and spaces.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic	+	+	0	0	<p>Policies R7, R8 and R9 will have no effect</p> <p>Policy R6 will have a minor positive effect through the retention of small shops and resistance of amalgamation which will retain the unique retail character of Islington which is part of the boroughs heritage.</p>

<p>and cultural environment.</p>					<p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A minor positive has been identified as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough including in relation to Islington’s heritage assets.</b></p>
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	<p>++</p>	<p>+</p>	<p>++</p>	<p>+</p>	<p>Policy R6 will have a significant positive effect. It will protect small shops which often provide the essential services outside of supermarket chain developments and also provide requirement to provide small shops as part of larger developments.</p> <p>Policy R7 will have a minor positive effect, as it will help support the vitality and viability of the rest of town centre through protecting both markets and SSAs. Existing and new markets will contribute to the diversity of retail in town centres and the CAZ which provide access to a wide range of goods and services to some residents. SSAs provide a niche retail offer for residents and visitors. Together, the protection and enhancement of these assets can provide a vibrant social environment and a sense of place.</p> <p>There is a significant positive effect for Policy R8. There is no specific need for hot food takeaways, betting shops and adult gaming centres; and evidence suggests that they can undermine vitality, viability and vibrancy of town and local centres. A quantitative restriction within centres will help prevent a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook.</p> <p>Policy R9 will have a minor positive effect as it will support a wide range of possible temporary uses increasing services available to residents.</p>



5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	Policies R6 to R9 will have no effect.
6. Promote social inclusion, equality, diversity and community cohesion	0	+	0	0	<p>Policies R6, R8 and R9 will have no effect.</p> <p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R7 will have a minor positive effect due to markets providing places for informal interaction, reduce social exclusion and increase social cohesion.</b> The provision of markets also provides the spaces to enable the establishment of local businesses from different demographics of Islington's population.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	+	0	<p>Policies R6, R7 and R9 will have no effect</p> <p>Policy R8 will have a minor positive effect. The policy working in tandem with other health initiatives should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	0	+	<p>Policy R6 will have a minor positive effect. It will protect small shops which will help to maintain a supply of space for small business which is important as they form a large part of Islington's economy. <b>New effects have been identified following review of the IIA as part of the examination process. In theory, a protective approach to small shops could have a minor negative effect by limiting the economic expansion of individual retail and other main town centre uses. However, Policy R6 recognises that in order to maintain a strong local economy and support small and independent businesses, the unique character of Islington as a whole needs to be maintained and the benefits of this are recognised.</b></p>

					<p>Policy R7 will have a minor positive effect as SSA and markets make a contribution to the local economy of town centres and act as specific pull factors for visitors and residents to visit town centres. <b>New effects have been identified following review of the IIA as part of the examination. This includes the two year vacancy and marketing period for change of use away from A1 in the SSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing potentially resulting in vacant units in the SSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</b></p> <p>Policy R8 will have neutral effect by providing a quantitative restriction within centres which will help prevent a level of hot food takeaways, betting shops and adult gaming centres. On a purely economic basis the policy could have a <b>minor negative impact by limiting jobs in the betting and hot food takeaway industries, however from a sustainable economic development point of view the adverse economic impacts caused by obesity and personal debt is a far greater negative effect than the restrictions on these sectors growth. Controls on the location and concentration of uses can also have wider economic benefits by supporting a range of businesses by mitigating the cumulative adverse impacts some uses can have on the viability and vitality of areas which can include impacts on character and rents.</b></p> <p>Policy R9 will have a minor positive effect through allowing space to be used for a wide range of potential uses helping contribute to the local economy.</p>
9. Minimise the need to travel and create accessible, safe and sustainable	0	+	0	0	<p>Policies R6, R8 and R9 will have no effect</p> <p><b>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the</b></p>

connections and networks by road, public transport, cycling and walking					<b>effects from neutral to minor positive. Policy R7 could see a minor positive effect by protecting markets and SSAs in accessible locations that help to promote local trips by sustainable and active travel transport modes.</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	Policies R6 to R9 will have no effect
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	Policies R6 to R9 will have no effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	Policies R6 to R9 will have no effect
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	Policies R6 to R9 will have no effect
14. Maximise protection and	0	0	0	0	Policies R6 to R9 will have no effect

enhancement of natural resources including water, land and air					
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## Inclusive Economy; Culture, Public Houses and Visitor Accommodation Policies

The following culture policies have been considered and assessed in the same Sustainability Appraisal table:

- R10: Culture and Night-Time Economy - Policy R10 focuses on the protection and enhancement of cultural and night time economy uses, directing new uses to Cultural Quarters, Town Centres, and the CAZ.
- R11: Public Houses - Policy R11 seeks to protect pubs and provides detail on subservient use as visitor accommodation
- R12: Visitor Accommodation - Policy R12 restricts visitor accommodation to site allocations and sets criteria for re-development of existing visitor accommodation and ensures appropriate design of any accommodation.

**Table 1.43: Assessment of policies R10 to R12**

IIA Objective	R10: Culture and NTE	R11: Public Houses	R12: Visitor accommodation	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	-	<p>Policy R10 will have a minor positive effect principally through seeking to support and manage a thriving and safe night time economy. Policy R10 provides detail on how the night time economy will respond with appropriate design which is high quality, safer and more inclusive potentially reducing crime and anti-social behaviour. In addition the agent of change principle is highlighted to ensure that the impact that other development has on culture and NTE is considered as well as the potential negative effect it can have on amenity. <b>New effects have been identified following review of the IIA as part of the examination process. The effect of Cultural Quarters could have a minor positive effect on the built environment by requiring development to enhance the cultural function whether that be through adaptable buildings or enhanced public realm for visitors.</b></p> <p><b>New effects have been identified for Policy R11 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R11 will have a minor positive effect by protecting pubs that contribute to the character and local distinctiveness of a variety of different areas including town centres, LSAs and areas of predominantly in residential use.</b></p> <p>There is a minor negative effect for policy R12 as it would likely increase the amount of visitor accommodation delivered; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor</p>

				private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through the policy R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible.
2. Ensure efficient use of land, buildings and infrastructure	++	+	0	<p>Policy R10 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and NTE uses and are appropriate given the commercial character which can better absorb the potential impacts.</p> <p>Policy R11 will have a minor positive effect as it will protect the use of pubs and potentially allow subservient visitor accommodation to help sustain the viability of public houses. This also allows development of pubs to be flexible and adapt to changing social and economic needs.</p> <p>There is a neutral effect for policy R12 as it would likely result in visitor accommodation being permitted, which could reduce the availability of land to meet other development needs, and therefore it could potentially not effectively balance competing demands for land use. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. The policy also ensures that intensification of existing hotels has to demonstrate that additional business floorspace is not possible which allows other priorities to take precedent and optimise the use of previously developed land.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	++	0	<p>No effect for policies R10 and R12.</p> <p>Policy R11 will have a significant positive effect as it aims to protect against redevelopment, demolition or change of use of a pub, especially with historical or heritage features which will help maintain the wider historic and cultural character of the borough.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and	++	+	0	Policy R10 will have a significant positive effect principally through seeking to support and manage a thriving cultural and night time economy, directing appropriate cultural and NTE development to town centres and CAZ locations and cultural quarters, ensuring access to these cultural facilities that serve the needs and wellbeing of the population. The agent of

sustainable lifestyles				<p>change principle is highlighted and applies in town centres, allowing for vibrant town centre uses that attract visitors to be maintained.</p> <p>Policy R11 supports the protection of pubs which will contribute to diverse, vibrant and economically vibrant town centres and neighbourhoods.</p> <p>It is considered that on balance there is a neutral effect for policies R12. New visitor accommodation could have a positive effect by facilitating an increase in the number of visitors and footfall which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision. Conversely, the policy could have negative effects.</p> <p><b>A more permissive approach to visitor accommodation would reduce the ability to provide land for other uses which support liveable neighbourhoods, including essential services and amenities within town centres which has the potential to impact on the vibrancy and vitality of town centres. Overall, the policy is considered to have no effect given the balance of potential positive and negative effects.</b></p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	No effect for policies R10, R11 and R12
6. Promote social inclusion, equality, diversity and community cohesion	+	+	0	<p>No effect for policies and R12</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy R10 will have a minor positive effect in that supporting and protecting cultural uses allows spaces that act as informal meeting places to thrive, strengthening local connections and fostering skills/learning in the creative industries.</b></p> <p>Policy R11 will have a minor positive effect. Pubs can promote social cohesion and integration, especially pubs with demonstrable community value. Such pubs can meet specific community needs, e.g. by acting as a focal point for events.</p>
7. Improve the health and	+	+	0	No effect for policies R12

wellbeing of the population and reduce health inequalities				<p><b>New effects have been identified for Policies R10 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R10 will have a minor positive effect in terms of encouraging social interaction and providing facilities for the community. This has benefits of improving mental health and combatting loneliness and social isolation.</b></p> <p>Policy R11 will have a minor positive effect. See assessment against objective 6.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	+	<p>Policy R10 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing cultural and Night Time Economy (NTE) venues and directing new cultural and NTE venues to these locations. An enhanced cultural NTE especially will increase employment opportunities and increase the boroughs contribution to the local economy.</p> <p>Policy R11 will have a minor positive effect, as it will help to protect pubs which contribute to the NTE.</p> <p>There is a minor positive effect for policy R12. It could provide opportunities for employment, particularly for local people, in this industry, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as office; this more indirect economic benefit therefore limits the scale of any positive effect. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	0	<p>No effect for policies R11 and R12</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy R10 particularly would see a positive effect from requiring cultural uses to locate in the CAZ or Town Centres. This takes advantage of the most accessible parts of the borough, especially for public transport at night.</b></p>
10. Protect and enhance open spaces that are	0	0	0	No effect for policies R10, R11 and R12



high quality, networked, accessible and multi-functional				
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	No effect for policies R10, R11 and R12
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.

## **R1: Retail, leisure and services, culture and visitor accommodation**

The Sustainability Appraisal considers Policy R1 will have significant positive effects against meeting needs and wellbeing of local residents through enabling town centres and LSAs to continue to serve the local residents across different retail catchment areas by striking the right balance of retail, leisure, culture and business uses to enable response to changing retail patterns. This provides a framework filtering through policies R1-R4 that meets the needs of residents benefiting health and ability to enjoy recreational activities. This is also positive for the wider economy with town centre uses key drivers in both the local service provision and the London economy. In addition the enhanced cultural NTE role will increase employment opportunities and contribute to the local economy focusing commercial, cultural and civic activity in town centres. The Sustainability Appraisal considers that Policy R1 will have a significant positive effect on the framework objective to optimise the use of developed land by focusing commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and night-time economy (NTE) uses and are appropriate given the commercial character which can better absorb the potential impacts.

Policy R1 could also have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision.

Conversely, the visitor accommodation element of the policy could have negative effects, as it could also dilute the land available for meeting more priority development needs, which could reduce access to essential services. Therefore policy R1 could result in more visitor accommodation being permitted, which could reduce the availability of land to meet other more pressing development needs, and therefore it could potentially not effectively balance competing demands for land use. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. Overall policy R1 is considered to have a significant positive effect even taking into account the assessment of the visitor accommodation element of the policy.

## **R2: Primary Shopping Areas**

The Primary Shopping Area (PSA) approach is considered by the assessment to improve access and legibility to essential services through concentrating A1 uses in the core of the town centre which also enjoys the best transport links therefore supporting reduced numbers of journeys. The increased flexibility of uses in the secondary shopping area is considered by the Sustainability Appraisal to support the expansion of other TC uses helping encourage a vibrant environment for residents and visitors alike which allows town centres to accommodate evolving social and economic needs. This helps town centres respond to changing shopping behaviours as functions of town centres shift to more leisure and experience based activities. Minor negative effects of Policy R2 on housing supply could be argued to exist

from a restrictive approach, however, this is considered to be neutralised by other policies that sufficiently address housing supply and sites. In addition, a viable and vibrant PSA benefits the access to goods of all existing and future residents. A two year vacancy and marketing period for change of use away from A1 in the PSA if below the strategic thresholds potentially limit a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.

### **R3: Islington's Town Centres**

The Sustainability Appraisal considered the approach to have a significant positive effect focusing appropriately scaled development in line with the retail hierarchy which benefits from a public realm well suited to support commercial uses, but also ensuring high quality development which ensures accessibility, amenity and sustainability considered. Restricting residential uses at ground floor in town centres could be perceived to be a negative effect on housing supply but this is considered on balance to not be a negative when the protection of ground floor units provides access to goods and services for existing and future residents of the borough. The protection of historic shopfronts also ensures Islington's heritage can continue to contribute to its character and appeal. Policy R3 promotes a range of main town centre uses that benefit from a flexible approach to their change of use, providing significant areas of land to respond to changes to economic circumstances and the functions of town centres to more leisure based activities.

### **R4: Local Shopping Areas**

The Sustainability Appraisal identifies a significant positive effect against the framework objective relating to needs and wellbeing of the local residents across local retail catchment areas by striking the right balance of retail, leisure and business uses. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses. The six month marketing period for change of use from A1 to non-A1 commercial uses on balance allows viability to be assessed without applying overly onerous periods of vacancy in an LSA that provides localised retail needs but is third in the retail hierarchy behind PSAs and Town Centres.

### **R5: Dispersed retail and leisure uses**

The approach will have a minor positive effect against the framework objective to create liveable neighbourhoods by ensuring that essential dispersed convenience and café services are protected. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly beneficial and assessed as positive by the Sustainability Appraisal.

### **R6: Maintaining and enhancing Islington's unique retail character**

The Sustainability Appraisal considers that the policy has an overall positive effect against the sustainability objectives as it protects small shops which will help to protect and enhance the local character of Islington and maintain a retail environment with units which provide active frontages and engagement with the street scene providing safety and convenience for people. In character and heritage terms it protects against amalgamation of units into larger units. Small shops often provide the essential services outside of supermarket chain developments which maintains facilities for residents and also helps to maintain a supply of space for small business which is important as they form a large part of Islington's economy. New effects have been identified following review of the IIA as part of the examination process. In theory, a protective approach to small shops could have a minor negative effect by limiting the economic expansion of individual retail and other main town centre uses. However, Policy R6 recognises that in order to maintain a strong local economy, the unique character of Islington as a whole needs to be maintained in order to retain perceptions and reality of a place that fosters independent businesses. This therefore does not change the overall positive effect the policy would have.

### **R7: Markets and Specialist Shopping Areas (SSA)**

The appraisal identified the approach in Policy R7 would have a positive effect against the framework objective for economic growth and increasing employment opportunities, as SSA and markets make a significant contribution to the local economy of town centres and act as specific pull factors for visitors and residents to visit town centres. They also contribute to the diversity of retail offer in town centres. Protecting SSA and markets also will also help support the character, vitality and viability of the rest of town centre. Other positive effects include: contributing to natural surveillance; conserving the setting heritage assets are within; facilitating access to goods and services, especially for lower income residents; contribute to a sense of place; encourage informal interactions, reducing social exclusion; and encouraging shopping trips to be made locally. A two year vacancy and marketing period for change of use away from A1 in SSAs if below the strategic thresholds potentially limit a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the SSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.

### **R8: Location and Concentration of Uses**

The Sustainability Appraisal of the policy considered there is no specific need for hot food takeaways, betting shops and adult gaming centres; with evidence suggesting that they can undermine vitality, viability and vibrancy of town and local centres. A quantitative restriction within centres will help prevent a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook. Although it is acknowledged that by restricting hot food takeaways and betting shops, a minor negative effect could be felt on the economic prosperity of those industries, it is considered on balance that the economic benefits from betterment of health outweighs this minor negative effect. The policy also supports businesses by mitigating the negative cumulative impacts brought about by the proliferation of certain uses.

The Sustainability Appraisal considered that policy R8 approach should work in tandem with other health initiatives and should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.

### **R9: Meanwhile/temporary uses**

The Sustainability Appraisal considered that Policy R9 will have a minor positive effect against the framework objective to create a sustainable built environment by bringing back into use, albeit on a temporary basis the use of buildings and spaces which will help reduce crime and fear of crime associated with vacant buildings/spaces. It will also help maintain and improve the quality of the built environment if vacant buildings are brought back into use. A wide range of possible temporary uses are supported increasing services available to residents which will also contribute to the local economy. The Sustainability Appraisal notes that this is a temporary effect.

### **R10: Culture and Night-Time Economy**

The Sustainability Appraisal considers that Policy R10 will have a significant positive effect on the framework objective to optimise the use of developed land by focusing commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and night-time economy (NTE) uses and are appropriate given the commercial character which can better absorb the potential impacts. Policy R10 also provides benefits in providing informal meeting spaces that can encourage social interaction which benefits mental health. Such spaces and uses also enable skills and education to be obtained in the creative and cultural industries. Policy R10 provides further detail on how the night time economy will respond with appropriate design which is safer and more inclusive potentially reducing crime and anti-social behaviour. An enhanced cultural and NTE especially will increase employment opportunities and increase the boroughs contribution to the local economy.

### **R11: Public Houses**

The Sustainability Appraisal of Policy R11 consider the policy will have a significant positive effect on various framework objectives through the protection of pubs which ensures their contribution to diverse, vibrant and economically vibrant town centres and also neighbourhoods outside town centres contributing to local distinctiveness and punctuating the urban form with pubs that add to a sense of place. They are also important as meeting places/community hubs; pubs can promote social cohesion and integration, especially pubs with demonstrable community value. This will also help maintain the wider historic and cultural character of the borough.

### **Policy R12: Visitor Accommodation**

The Sustainability Appraisal considered that the approach set out in Policy R12 would overall have a neutral impact – albeit with some minor negative environmental impacts recognised. Permitting more visitor accommodation reduces the availability of land to meet other more pressing development needs, therefore it would not effectively balance competing demands for land use. This is considered to outweigh potential benefits of increased footfall. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices – it would also create additional pressure on land supply for other town centre uses. However, this effect is partially mitigated by the restrictive approach taken in R12 which limits hotel development to specific sites or the intensification of existing visitor accommodation in town centres and the CAZ. This restrictive approach is considered to balance the need to consider competing land use as it also allows other priorities to take precedent on existing hotel sites and optimise the use of previously developed land.

In regards the impact against the framework objective to create a high quality built environment visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible. As with land supply the reasonable alternative to policy R12 would increase the amount of less flexible accommodation.

The Sustainability Appraisal considered that new visitor accommodation could have a positive effect against the economic growth framework objective and supporting town centres by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; although the assessment considered this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision. With the effect on land supply discussed above there could be a negative effect on the ability of town centres to meet the needs and wellbeing of the population affecting the wider vibrancy of the town centre. There is a minor positive effect for policy R12 in that it could provide opportunities for employment, particularly local people, in the hotel industry, albeit lower-skilled jobs at a relatively low employment density.

The Sustainability Appraisal identified a minor negative effect against the framework objectives for environment as visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses; therefore the reasonable alternative to policy R12 would increase the environmental impact from hotel accommodation.

## Green Infrastructure policy assessments

Table 1.44: Assessment of Policies G1 to G3

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	+	<p>Policies G1 and G2 will have a significant positive effect on promoting a high quality, inclusive, safe, and sustainable built environment by ensuring that open spaces are preserved. Open spaces in Islington are an essential and highly valued component of local character and distinctiveness. They also improve the appearance and functionality of the public realm.</p> <p><b>New effects have been identified following review of the IIA as part of the examination: Policy G1 will also result in more trees, plants, green walls and roofs being provided which will improve the appearance and thermal comfort of the built environment.</b></p> <p>Policy G3 will have a minor positive effect on promoting a high quality, inclusive, safe, and sustainable built environment by ensuring that large developments provide new open spaces. The new open spaces will help create neighbourhoods that are more attractive, functional, and sustainable.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	0	<p>Policies G1 and G2 will have a minor positive effect. They will ensure that much needed open space continues to be provided, balancing against the need for other development.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process: Policy G1 will ensure that green infrastructure is provided making efficient use of the built environment – for example green roofs changing roof space from wasted space to a biodiversity asset.</b></p> <p><b>Effect changed from positive to neutral as part of the review of the IIA as part of the examination process: Policy G3 will have a neutral effect: Policy G3 will have neutral effect on the efficient use of land and buildings by reducing the amount of land that can be built to its highest economic use. However this effect is mitigated by the positive effects that open spaces bring in terms of appearance, character, biodiversity, and health and wellbeing.</b></p>

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	0	<p>No effects for policy G1 and G3</p> <p>Policy G2 will have minor positive effects on the historic environment by ensuring these spaces and their heritage value is protected. Many open spaces in Islington are heritage assets. The borough is home to two spaces listed on Historic England's Register of Parks and Gardens (Bunhill Fields Burial Ground and part of the Barbican Estate), 42 squares are protected by the London Squares Preservation Act 1931, and 105 spaces are on the London Garden's Trust Inventory of Historic Green Spaces. In addition, many open spaces form the setting for listed buildings, or are essential components of the value of Conservation Areas.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	+	<p>Policies G1 and G2 will have significant positive effects on liveable neighbourhoods by ensuring that existing open spaces are preserved. Open spaces are an essential and highly valued asset for local communities. They provide space for relaxation, exercise, and socialising. They are free and open to everyone.</p> <p><b>Effect changed from positive to minor positive as part of the review of the IIA as part of the examination process. G3 will have minor positive effects on liveable neighbourhoods by providing new open spaces. Open spaces are an essential and highly valued asset for local communities. They provide space for relaxation, exercise, and socialising. They are free and open to everyone. Large areas of Islington are deficient in access to open space. With the population increasing there is a need to provide new open spaces to help meet this new demand. However only a few large developments will be able to provide additional open spaces so the effect is considered minor.</b></p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	-	0	<p>No effects for policies G1 and G3</p> <p><b>Effect changed from neutral to negative as part of the review of the IIA as part of the examination process.</b> Policy G2 has a minor negative effect. It will protect semi private amenity spaces on estate land from development. These spaces could be developed for additional affordable housing, however does allow development on estates provided some higher quality space is retained/re-provided. This has been marked as a minor negative as</p>



IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				an approach which did not require re-provision of open space would result in more affordable housing, but at the cost of the amenity for existing residents.
6. Promote social inclusion, equality, diversity and community cohesion	0	+	+	No effects for policy G1. <b>Effects have been changed from neutral to minor positive following review of the IIA as part of the examination process: Minor positive effects for Policies G2 and G3 as open spaces promote community cohesion by providing a space that is used by everyone and promotes interaction between people outside of their usual social groups and without cost.</b>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	++	Policies G1, G2 and G3 will have significant positive effects on the health and wellbeing of the population by protecting and increasing the amount of green open space, plants, trees, green walls and roofs in the urban environment. This will improve the air quality and encourage people to participate in more active travel, sport and recreation in the borough. Access to nature has been demonstrated to improve physical and emotional wellbeing, and plays an important role in the healthy development of children. Green infrastructure including trees, green roofs, and vegetation help reduce urban heat island effect by shading surfaces, deflecting the sun's radiation, and releasing moisture into the atmosphere. This will have benefits to comfort and wellbeing.  Policy G2 supports enhancements to open spaces on council estates providing a policy framework for redevelopment which ensures the enhancement of such spaces. The policy recognises the importance of these spaces on housing estates to residents and the benefit these spaces provide as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	No effects for policy G1, G2 and G3

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	+	<p>No effects for policy G1 and G2.</p> <p><b>Effects have been changed from neutral to minor positive following review of the IIA as part of the examination process: G3 has a minor positive effect as it requires that new open space is designed to promote walking and cycling and to improve the appearance, amenity, and microclimate of the urban environment which increases the appeal of active transport.</b></p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	++	++	<p>Policy G1 will have a significant positive effect on open spaces by setting out a strategic approach to green infrastructure, encouraging development to provide green open space and also linking open spaces together with other green infrastructure for example planting, trees, green walls and roofs.</p> <p>Policy G2 is likely to have significant positive effects on open spaces by offering a very high level of protection and preserving open space in the borough. The policy not only protects designated open spaces but also contains protections for significant private open spaces and open space on housing estates. Whilst not formally designated open space the policy recognises the importance of these spaces on housing estates to residents and the benefit these spaces provide as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates. A set of criteria are set out in policy providing a framework for decision making which allows redevelopment where there is re-provision and enhancement of these spaces.</p> <p>Policy G3 is likely to have significant positive effects on open spaces by ensuring that new large developments provide new open space in the borough. Islington is a densely developed urban area and large areas of Islington are deficient in open space. These small increases in open space provided by development are in demand and will likely be very well used.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and	++	++	++	<p>Policies G1 to G3 are likely to have significant positive effects on biodiversity by requiring developers to incorporate as much biodiversity habitat into development as is reasonably possible, and by protecting existing open space. The preservation of existing open spaces</p>

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
protect species and diversity.				is the most effective strategy for preserving and improving biodiversity value (which works in conjunction with other policies including policy G4).
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	++	+	<p>Policies G1 and G2 will have significant positive effects on reducing climate change and impact of climate change. The main positive effect of the green infrastructure policy is that it will contribute to mitigating the effects of climate change by protecting open spaces and vegetation in the urban environment, thus helping to reduce the urban heat island effect. Vegetation will also have a small effect of adsorbing some carbon dioxide in the atmosphere Green walls and roofs also will have a small effect in reducing heat reflected back in to the atmosphere. Green infrastructure also helps reduce peak water runoff, reducing the impact of flooding events which are likely to be more severe due to climate change.</p> <p>Policy G3 will have a minor positive effect on reducing climate change through provision of new open space.</p> <p><b>New analysis has been added following review of the IIA as part of the examination process: Whilst in some instances, providing new open space may limit some opportunities for development in highly accessible locations - which can have carbon reduction benefits. The lost opportunity for development will be a small proportion of the overall proportion of development and the provision of open space will help to ensure new development can mitigate climate change impacts and other policies in the plan work to optimise development in accessible locations.</b></p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	No effects for policy G1, G2 and G3

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	<p>Policies G1 and G2 will have significant positive effects on natural resources mainly by retaining open space and vegetation in the urban environment which will help clean the air. This will also have some positive effects on water and soil by reducing stormwater runoff, and retaining and increasing permeable surfaces.</p> <p>Policy G3 will have a minor positive effects on natural resources mainly by improving local air quality through the increased amount of vegetation in the urban environment which will help clean the air. New open space will also have some positive effects on water and soil by preserving permeable surfaces and therefore maintaining lower levels of stormwater runoff.</p>

Table 1.45: Assessment of Policies G4 to G5

IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	<p>Policy G4 requires developments to submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage will promote a high quality and sustainable built environment. The Landscape Design Strategy should demonstrate a holistic approach including numerous requirements which will ensure an integrated approach to hard and soft landscaping design that contributes to high quality urban design and enhances local character and distinctiveness, and a functional, attractive and inclusive design. This will have significant positive effects in terms of promoting a high quality and sustainable built environment.</p> <p><b>Effects have been changed from neutral to minor positive following review of the IIA as part of the examination process. Policy G5 will have a minor positive effects in promoting a high quality and sustainable built environment by ensuring that buildings integrate green roofs and walls which will make buildings more attractive, will improve the microclimate, reducing the urban heat island effect.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	++	<p><b>New effects have been identified which change the effect from neutral to minor positive following review of the IIA as part of the examination process: Policy G4 will have a minor positive effect on the efficient use of land by using developed land and existing buildings to locate new green infrastructure.</b></p> <p>Policy G5 has a significant positive effect by maximising the use of often dead space to provide new green infrastructure.</p>
3. Conserve and enhance the significance of heritage assets and their settings,	0	0	<p>Policies G4 and G5 have no effect. Policy G5 could, in some individual circumstances, have potential impacts on heritage assets or the setting of heritage assets, e.g. where a green roof is visible from the street or neighbouring properties, but this would be subject to other planning considerations, including balancing relevant design and heritage policies during the planning application process to ensure that the historic environment is not impacted significantly. Similar considerations for vertical greening. There is no 'in principle' effect on objective 3.</p>

IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
and the wider historic and cultural environment.			
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	<p>Policy G4 will have a minor positive effect. It will promote the creation of high quality green spaces and food growing spaces, and as a result will help to promote liveable neighbourhoods. This policy will result in some positive effects on objective 4 over the short and long term.</p> <p>Policy G5 has no effect</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	Policies G4 and G5 have no effect
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p><b>New effects have been identified which change the effect from neutral to minor positive following review of the IIA as part of the examination process: Policy G4 will have a minor positive effect on promoting social inclusion and community cohesion by providing food growing opportunities such as allotments which are places of social interaction.</b></p> <p>Policy G5 has no effect.</p>

IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	<p>Policy G4 will have a minor positive effect. It will help to create high quality green spaces, and in turn, increase use and ease of access to green spaces, nature, and food growing, including for those with physical and mental and health concerns. This policy will result in some positive effects on objective 7. The green infrastructure provided will also help adapt to the impacts of climate change by reducing the urban heat island effect and improving the microclimate.</p> <p>Policy G5 will have a minor positive effect. It will provide cooling and sustainable drainage benefits, which will contribute to climate change adaptation. This may have a positive effect on wellbeing in terms of reducing the negative impacts of climate change of people's lives. Vertical greening has a visible greening effect which provides an attractive design feature and important visual amenity provision especially in built-up areas with a lack of green space, allowing people to experience biodiversity. This may have a positive impact on mental wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	Policies G4 and G5 have no effect.
9. Minimise the need to travel and create accessible, safe and sustainable	+	+	<p><b>New effects have been added which change the effect from neutral to minor positive following review of the IIA as part of the examination process:</b> Provision of green infrastructure under policies G4 and G5 will improve the appearance, amenity, and microclimate of the urban environment which increases the appeal of active transport. Policy G4 requires that landscape design is integral to the design and functioning of the whole development and the wider area, which would include connectivity for walking and cycling.</p>

IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
connections and networks by road, public transport, cycling and walking			
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	0	<p>Policy G4 will have a significant positive effect. It requires that all developments must protect, enhance and contribute to the landscape, of the development site and surrounding area, and submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage. These requirements will help to meet the increasing need for open space and improve the quality of open space. The policy will also ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits, including sustainable drainage, biodiversity, urban cooling and air quality. Policy G4 works alongside Policy G2 and G3 (which relate to the quantum of open space) by directing the design, qualities, and features of the space. This policy will result in significant positive effects on objective 10.</p> <p>Policy G5 has no effect.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	++	++	<p>Policy G4 will have a significant positive effect. It requires that all developments must protect and enhance site biodiversity, including wildlife habitats and trees, and take measures to reduce deficiencies in access to nature. This must be demonstrated through the submission of the Landscape Design Strategy. Biodiversity benefits and ecological connectivity must be maximised and support the council's Biodiversity Action Plan. As a result, this policy will have a direct impact on this objective, particularly increasing protection and improving opportunities for biodiversity, ensuring that development resulting in biodiversity net gain is given priority, improving access to nature, and improving connectivity. A key aim of the policy is to minimise impacts and damage to existing trees, hedges, shrubs and other significant vegetation, so this will also have direct impact on achieving this objective. The submission of the Landscape Design Strategy requires that appropriate maintenance arrangements will be put in place from the outset of the development, and this will help to support positive management of green infrastructure for biodiversity.</p>



IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			<p>Policy G5 will have a significant positive effect. It requires that developments maximise the incorporation of green roofs and vertical greening, primarily to enhance biodiversity and provide suitable wildlife habitats. Green roofs and green walls are required to promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan. The maintenance of green roofs is required to ensure continuing biodiversity value. This policy will therefore create and enhance suitable wildlife habitats and protect species and diversity with strong positive effects on objective 11 over the short and long term.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	+	<p>Policy G4 will have a minor positive effect. It requires the submission of a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage will contribute to reducing the impacts of climate change, including flooding and urban heat island effect. The strategy is required to incorporate Sustainable Urban Drainage Systems (SUDS) into the landscape design which will help to reduce surface water flood risk, and to consider the impact of existing and proposed vegetation on sustainable drainage and urban cooling. The requirement to maximise green infrastructure will also help to reduce the urban heat island effect.</p> <p>Policy G5 will have a minor positive effect. Green roofs will be designed to maximise benefits for sustainable drainage and cooling. Green roofs will minimise flood risk by reducing surface water runoff, and improve thermal efficiency and cooling of buildings through the insulation they provide. They also provide urban cooling to mitigate the 'heat island effect'. Similarly, green walls provide benefits in terms of thermal efficiency and cooling, and they can have flood risk alleviation benefits where they are irrigated via rainwater runoff, reducing surface water run-off. This policy will contribute to enhancing community resilience to climate change impacts.</p>
13. Promote resource efficiency by decoupling waste generation from	0	0	Policies G4 and G5 have no effect

IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
economic growth and enabling a circular economy that optimises resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	Policies G4 and G5 have no effect

## Green Infrastructure policies

The following green infrastructure policies have been considered in the same Sustainability Appraisal table:

- G1: Green infrastructure - Policy G1 sets the strategic approach to the protection and enhancement of the network of green spaces, street trees, green roofs, and other assets such as natural drainage features and introduces Urban Greening Factor. For the purposes of the Local Plan, the term 'green infrastructure' is inclusive of 'blue infrastructure' too.

- G2 Protecting open space - Policy G2 seeks to protect public and significant private open space. Sets out the policy approach to protecting open space on housing estates.
- G3 New public open space - Policy G3 focuses on in what circumstances new public open space is required and criteria on the type of space provided.
- G4: Biodiversity, landscape design and trees - Policy G4 requires all development to protect and enhance site biodiversity and the surrounding area and demonstrate this through the submission of a Landscape Design Strategy.
- G5: Green roofs and vertical greening - Policy G5 sets out the requirements for the installation of green roofs and vertical greening.

### **Policy G1: Green infrastructure**

The Sustainability Appraisal considered Policy G1 is likely to have significant positive effects in particular against the framework objectives for open spaces, biodiversity, reducing climate change, and promoting a high quality, inclusive, safe, and sustainable built environment by setting out a strategic approach to green infrastructure which requires developers to incorporate as much green infrastructure into development as is reasonably possible providing new open spaces, new trees, plants, green roofs and walls. This green infrastructure will improve the appearance of the built environment, improve the microclimate, reduce the urban heat island effects, store carbon, and provide habitat for biodiversity. This in turn will have significant positive effects on the health and wellbeing of the population by providing access to nature, improving the air quality, and encourage people to participate in more active travel, sport, and recreation. The policies will have positive effects on the efficient use of land and buildings by adding green infrastructure to already developed land.

### **Policy G2: Protecting open space and Policy G3: New public open space**

The Sustainability Appraisal considers Policy G2 and G3 are likely to have significant positive effects against the framework objectives for open spaces by offering a very high level of protection and preserving open space in the borough, and by providing new open spaces on larger developments. Policy G2 not only protects designated open spaces but also contains protections for significant private open spaces and open space on housing estates. Whilst not formally designated open space the policy recognises the importance of these spaces on housing estates to residents and the benefit these spaces provide as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates. A set of criteria are set out in policy providing a framework for decision making which allows redevelopment where there is re-provision and enhancement of these spaces.

Policies G2 and G3 will have significant positive effects on the objective for biodiversity by protecting existing open space and providing new open spaces, therefore protecting and expanding the largest natural habitats in the borough. There are also minor positive effects on the objective for preserving natural resources for policies G2 and G3 by retaining open space which will help lower air pollution and

slow stormwater runoff. There will be positive effects for reducing climate change by vegetation storing carbon and effects on mitigating the effects of climate change by reducing the urban heat island effect.

Policies G2 and G3 will likely have significant positive effects against the framework objectives for health and wellbeing, and promoting a high quality, inclusive, safe, and sustainable built environment by ensuring that open spaces are preserved and new spaces are created. Open spaces in Islington are an essential and highly valued component of local character. They provide space for relaxation, exercise, access to nature, and socialising. They improve the appearance and functionality of the public realm. For these reasons the assessment identified significant positive effects under Policy G2 and minor positive effects Policy G3 for liveable neighbourhoods. Policy G2 will have minor positive effects in protecting heritage value.

Policies G2 and G3 will have minor positive effects on social inclusion and community cohesion provided by the retention and provision of open space which provides opportunities for the community to interact.

The Sustainability Appraisal of G2 and G3 are likely to have significant positive effects against the framework objective for biodiversity by offering high levels of protection to open space in the borough. G3 will have significant positive effects on liveable neighbourhoods by providing new open spaces. Open spaces are an essential and highly valued asset for local communities. They provide space for relaxation, exercise, and socialising. They are free and open to everyone. Large areas of Islington are deficient in access to open space. With the population increasing there is a need to provide new open spaces to help meet this new demand. This will also have a minor positive effect against the framework objective for reducing climate change and impact of climate change by increasing the vegetation in the urban environment and helping reduce the urban heat island effect. The retained vegetation will also have a small effect of adsorbing some carbon dioxide in the atmosphere. This will also benefit air quality.

#### **Policy G4: Biodiversity, landscape design and trees**

The Sustainability Appraisal of Policy G4 considered it will have significant positive effects against the framework objectives for enhancing wildlife habitats as it requires all development to protect and enhance site biodiversity and demonstrate this through the submission of a Landscape Design Strategy. This assessment also highlighted the positive contribution to high quality urban design which enhances local character and distinctiveness, a functional, attractive and inclusive design which helps promote liveable neighbourhoods. The assessment also recognises the multiple benefits on reducing the impacts of climate change, creating positive benefits for health, sustainable drainage, biodiversity, urban cooling and air quality. Well-designed spaces and also food growing opportunities secured under Policy G4 promote social inclusion and cohesion. Both policies help active travel by creating more attracting and comfortable routes for walking and cycling.

#### **G5: Green roofs and vertical greening**

The Sustainability Appraisal identified that Policy G5 will create and enhance suitable wildlife habitats and protect species and diversity with strong positive effects against the framework objectives for wildlife and biodiversity creation over the short and long term. Development is required to maximise the incorporation of green roofs and vertical greening, primarily to enhance biodiversity and provide suitable wildlife habitats. Green roofs and green walls are required to promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan. Green roofs will provide cooling and sustainable drainage benefits, which will contribute to climate change adaptation. Finally Policy G5 has a significant positive effect against the objective to use land efficiently by maximising the use of often dead space to provide new green infrastructure.

Policy G5 could, in some individual circumstances, have potential impacts on heritage assets or the setting of heritage assets, e.g. where a green roof is visible from the street or neighbouring properties, but this would be subject to other planning considerations, including balancing relevant design and heritage policies during the planning application process to ensure that the historic environment is not impacted significantly. Similar considerations for vertical greening. There is no 'in principle' effect on objective 3 in the Sustainability Appraisal framework.

## Sustainable Design policy assessment

The following sustainable design policies have been considered in the same Sustainability Appraisal table:

- S1: Delivering Sustainable Design - Policy S1 strategically sets out the requirements for sustainable design to create energy and resource efficient development to tackle waste and climate change and take an integrated approach to water management.
- S2: Sustainable Design and Construction - Policy S2 requires all development proposals to submit a Sustainable Design and Construction Statement and policy sets out the details required for different scale of development
- S3: Sustainable Design Standards - Policy S3 sets out the various environmental standards that different development types should meet.
- S4: Minimising greenhouse gas emissions - Policy S4 focuses on the specific requirements of development to minimise greenhouse gas emissions to meet zero carbon targets including application of the Fabric Energy Efficiency Standards.
- S5: Energy Infrastructure - Policy S5 sets out the requirements for the implementation and connection of heat networks in development.

**Table 1.46: Assessment of policies S1 to S5**

I/A Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	+	+	+	Policy S1 will have a significant positive effect. It seeks to deliver sustainable design and ensure the borough develops in a way that maximises positive effects on the built environment whilst minimising negative impacts. Policy S1 promotes a circular economy approach to design and construction, and seeks to ensure that developments are

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>designed to be flexible and adaptable to changing requirements and circumstances over their lifetime.</p> <p>Policy S2 will have a minor positive effect. The requirement for developments to submit a Sustainable Design and Construction Statement will contribute to the promotion of a sustainable built environment</p> <p><b>New effects have been identified for Policy S3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy S3 is requires all developments to achieve the highest feasible level of the relevant sustainable design standard which will contribute towards a more sustainable built environment.</b></p> <p><b>New effects have been identified for Policies S4 and S5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policies are likely to have a minor positive effect because they set out requirements for minimising greenhouse gas emissions and sustainable energy infrastructure which can contribute towards a more sustainable built environment and help to create buildings that are adaptable and can respond to change over their life.</b></p>
2. Ensure efficient use of land,	+	+	0	0	+	Policies S1 and S5 will ensure that low-carbon energy infrastructure is provided in the right locations. In particular, policy S5 promotes the development and extension of the borough's heat networks so that connection is possible for a

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
buildings and infrastructure						<p>greater number of developments. Policy S1 also seeks to ensure that developments are designed to be flexible and adaptable to changing requirements over their lifetime.</p> <p>Policy S2 will have a minor positive effect. The requirement for developments to submit an Adaptive Design Strategy will ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs.</p> <p>Policies S3 and S4 have no effect.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	<p>Policies S1 and S4 include the requirement for developments to maximise energy efficiency in accordance with the energy hierarchy, including consideration of building fabric energy efficiency as an integral part of the design. This may have an impact on heritage assets. Some developments may also seek to install air source heat pumps or solar panels which have the potential to impact upon heritage assets. However, alongside other policies in the plan, the effects will be considered and balanced so the effect on the conservation and enhancement of heritage assets is considered neutral overall.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 states that support for development of energy networks and energy centres is subject to meeting wider policy requirements including in relation to design. This will help to balance potential negative effects of developing</b></p>



IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>heat networks on heritage assets and their settings, overall the effect is considered to be neutral.</b></p> <p>No effects have been identified for Policies S2 and S3.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	0	0	<p>Policy S1, S2 and S3 will contribute to the promotion of liveable neighbourhoods by ensuring that new developments limit their contribution to air pollution, improve air quality as far as possible, and reduce exposure to poor air quality.</p> <p>Policy S4 has no effect.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 adopts an integrated approach to energy supply to take into account that heat sources that use natural gas can impact on air pollution and so seeks to ensure that the selection of heat sources will result in low or zero emissions of carbon dioxide and NOx, with CHP and ultra low NOx gas boiler communal or heat network systems designed to ensure they have no significant impact on local air quality. Overall a neutral effect has been identified.</b></p>
5. Ensure that all residents have access	++	++	++	++	++	<p>Policies S1, S2, S3, S4 and S5 will have a significant positive effect and help to ensure that all residents have access to good quality housing by requiring that all housing meets high standards of energy efficiency and relevant</p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
to good quality, well-located, affordable housing						sustainable design standards. Policies S1, S2, S4 and S5 require all development proposals to maximise energy efficiency in accordance with the energy hierarchy, particularly by reducing energy demand through fabric energy efficiency, followed by supplying energy efficiently and cleanly, and incorporating renewable energy. <b>Text updated following review of the IIA as part of the examination process. Policy S3 requires residential developments to achieve high ratings under BREEAM Domestic Refurbishment 2014 and the BRE Home Quality Mark scheme, which both include credits relating to energy efficiency.</b>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	+	+	+	Policies S1 to S5 have a minor positive effect. These policies will individually and cumulatively contribute to reducing fuel poverty in the borough, which has economic and health benefits for Islington residents.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	++	++	++	Policies S1, S2, S3, S4 and S5 will have a significant positive effect on wellbeing and the reduction of fuel poverty by requiring that developments meet high standards of energy efficiency and relevant sustainable design standards. The policies require all development proposals to maximise energy efficiency in accordance with the energy hierarchy, particularly by reducing energy demand through fabric energy efficiency, followed by supplying energy efficiently and cleanly, and incorporating renewable energy.

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>New text has been added following review of the IIA as part of the examination process.</b></p> <p><b>The use of low and zero carbon heating options, particularly heat networks and secondary heat sources will help to reduce fuel poverty and increase energy resilience.</b></p> <p><b>In addition, Policy S5 will have a significant positive effect because it will minimise fuel poverty linked to energy prices by requiring developments to assess energy supply prices at the planning stage to ensure the proposed low carbon heating system will not lead to high energy bills.</b></p> <p><b>Policies S1 and S2 will have a significant positive effect because they include requirements to ensure that new developments limit their contribution to air pollution and improve air quality as far as possible, as well as reducing exposure to poor air quality. Policy S3 will also have a significant positive effect by requiring developments to meet sustainable design standards relating to air quality.</b></p>
8. Foster sustainable economic growth and increase employment	+	0	0	+	+	Policy S1 will support the development of green industries and a low-carbon economy through its promotion of zero carbon development and a circular economy approach to design and construction.

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
opportunities across a range of sectors and business sizes						<p><b>Text updated following review of the IIA as part of the examination process: Policy S4 and S5 will also support the development of green industries and a low-carbon economy by requiring on-site carbon emissions reductions in accordance with the energy hierarchy and the use of low and zero carbon heating options, including heat networks and secondary heat sources. The requirement to incorporate on-site renewable energy, such as air source heat pumps and solar panels, will also support this objective. A minor positive effect has therefore been identified.</b></p> <p>Policies S2 and S3 will have no effect.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	0	0	0	Policies S1 to S5 have no effect.
10. Protect and enhance open spaces	0	++	0	0	0	Policy S1, S3, S4 and S5 have no effect.

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
that are high quality, networked, accessible and multi-functional						Policy S2 will deliver benefits to wider green infrastructure as it requires development to submit Landscape Design Strategy to demonstrate an integrated approach to hard and soft landscape design which maximises urban greening, soft landscaping, biodiversity and sustainable drainage.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	++	+	0	0	<p>Policies S1, S4 and S5 has no effect.</p> <p>Policy S2 has a significant positive effect. It supports the protection and enhancement of suitable wildlife habitats and encourages development that implements strategic and connected green infrastructure through submission of a Landscape Design Strategy.</p> <p>Policy S3 has a minor positive effect. Developments are required to achieve the highest feasible level of the relevant sustainable design standard. This will contribute to the creation, protection and enhancement of suitable wildlife habitats, and the protection of particular species.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	++	++	++	++	<b>Text has been revised following review of the IIA as part of the examination process: Policy S1 will have a significant positive effect. This policy sets out the council's strategic approach to delivering sustainable design with the aim to reduce fuel poverty and enhance energy security, minimise contributions to climate change and ensure that developments are designed to mitigate the effects of climate change. This policy includes the target that all buildings in Islington will be zero carbon by 2050 (with a Council aim to achieve this earlier, by 2030). and seeks to develop and extend the</b>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>borough's heat networks, The policy also promotes an integrated approach to water management, a circular economy approach and minimising the borough's contribution to air pollution, all of which will reduce the contribution of development in Islington to climate change and enhance community resilience to climate change impacts.</b></p> <p>Policies S2 and S3 will have a significant positive effect. Policy S2 requires developments to demonstrate how they directly contribute to reducing Islington's contribution to climate change and promote climate change adaptation by submitting a Sustainable Design and Construction Statement and accompanying information. Policy S3 requires developments to achieve the highest feasible level of the relevant sustainable design standard, such as BREEAM, in order to ensure high standards of sustainable design. Policy S4 will have a significant positive effect. It will directly contribute to minimising Islington's contribution to climate change by minimising greenhouse gas emissions from development, while also reducing fuel poverty and improving long term energy resilience. All development proposals are required to demonstrate how carbon emissions will be reduced in accordance with the energy hierarchy, with a focus on reducing energy demand through fabric energy efficiency in the first instance. The policy will apply to major developments and minor new-build residential developments of one unit or more. The assessment considers that Policy S4 is a minor positive short term impact which is more positive in the medium to long term as the short term requirement for development is to comply with the less stringent interim Fabric Energy</p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>Efficiency Standard (FEES) until 2022 after which the full FEES standards will apply.</p> <p>Policy S5 will have a significant positive effect. It will directly contribute to minimising Islington’s contribution to climate change by ensuring that developments prioritise energy efficient low and zero carbon heating options. This will contribute to the decarbonisation of heat and the reduction of carbon emissions.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	++	++	+	+	+	<p>Policy S1 and S2 will have a significant positive effect. These policies contribute to the promotion of resource efficiency by enabling a circular economy approach that optimises resource use and minimises waste through requirement for developments to submit an Adaptive Design Strategy. New developments will reduce carbon emissions in accordance with the energy hierarchy, which includes a requirement to generate, store and use renewable energy on-site.</p> <p>Policy S3 will have a minor positive effect. The requirement for developments to achieve the highest feasible level of the relevant sustainable design standard includes standards relating to the sustainable procurement and use of materials, which will promote resource efficiency and a circular economy approach.</p> <p><b>Text has been revised following review of the IIA as part of the examination process: Policies S4 and S5 will have a minor positive effect. The policies will minimise the use of non-renewable energy sources by requiring</b></p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<b>developments to reduce carbon emissions in accordance with the energy hierarchy. The policies will promote the use of renewable sustainable energy sources by supporting the use of low and zero carbon heating options, including heat networks and secondary heat sources. The policies will also encourage the use of renewable energy including air source heat pumps and solar panels.</b>
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	0	0	<p>Policy S1, S2 and S3 will have a minor positive effect. Policy S1 will promote the sustainable use of water resources and the protection of water quality, minimise air pollution and reduce exposure to poor air quality, especially among vulnerable people. Policies S2 and S3 will ensure all developments demonstrates the relevant sustainable design policies and standards have been met.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 adopts an integrated approach to energy supply to take into account that heat sources that use natural gas can impact on air pollution and so seeks to ensure that the selection of heat sources will result in low or zero emissions of carbon dioxide and NOx, with CHP and ultra low NOx gas boiler communal or heat network systems designed to ensure they have no significant impact on local air quality. Overall a neutral effect has been identified.</b></p>



IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						Policies S4 will have no effect

## Sustainable Design: Assessment of Policies S6 to S10

The following sustainable design policies have been considered in the same Sustainability Appraisal table:

- S6: Managing heat risk - Policy S6 focuses on the requirements for development proposals to minimise internal heat gain and the impacts of the 'urban heat island effect' through design, layout, orientation and materials.
- S7: Improving Air Quality - Policy S7 requires new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible.
- S8: Flood Risk Management - Policy S8 sets out when a site specific Flood Risk Assessment (FRA) is required and what should be included in the assessment.
- S9: Integrated Water Management and Sustainable Drainage - Policy S9 will ensure development adopts an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and will maximise biodiversity and water use efficiency alongside other benefits including amenity and recreation.
- S10: Circular Economy and Adaptive Design - Policy S10 sets out the approach to circular economy and materials re-use.

**Table 1.47: Assessment of policies S6 to S10**

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	+	<p>Policies S6 to S9 have a minor positive effect. They work to make buildings more robust and create a sustainable public realm. They also ensure the built environment is safer by protecting from risk of increased heat and flooding, and poor air quality.</p> <p>Policy S10 will have a positive effect by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use through provision of an Adaptive Design Strategy.</p>
2. Ensure efficient use of land, buildings and infrastructure	0	0	0	0	+	<p>Policies S6 to S9 have no effect</p> <p>Policy S10 will have a minor positive effect by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use through provision of an Adaptive Design Strategy. This will help to ensure efficient use is made of buildings over their lifetime.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	Policies S6 to S10 have no effect
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	0	0	0	<p>Policy S6, S8, S9 and S10 have no effect.</p> <p>Policy S7 has a minor positive effect. It will require new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible. All development should also seek to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	0	0	0	+	<p>Policy S6 will have a minor positive effect, by requiring developments to reduce the potential for overheating and reliance on air conditioning systems accordance with a cooling hierarchy, which will therefore contribute to ensuring all housing meets a high standard of energy efficiency.</p> <p>Policies S7, S8 and S9 will have no effect</p> <p>Policy S10 will have a minor positive effect. It requires developments to be flexible and adaptable to changing requirements over their lifetime which will contribute to ensuring the provision of housing that meets the diverse and changing needs of the population.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	Policies S6, S7, S8, S9 and S10 has no effect

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	0	+	0	<p>Policy S6 will have a significant positive effect. It will help to improve the health and wellbeing of the population and reduce health inequalities through minimising the impacts of the urban heat island effect with high temperatures causing or worsen serious health conditions, particularly among vulnerable people including children and older people.</p> <p>Policy S7 will have a significant positive effect. It will require new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible. All development will be required to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people and people living in deprived areas where the risk of exposure to air pollution is often worse due to the fact that these areas are often located near to busy roads and lack green spaces.</p> <p>Policies S8 and S10 have no effect</p> <p>Policy S9 will ensure that land affected by contamination will not create unacceptable risks to human health and the wider environment, protect water quality and demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	+	<p>Policies S6, S7, S8 and S9 have no effect</p> <p>Policy 10 will have a minor positive effect. The adoption of a circular economy approach will support the development of local green industries that seek to save resources, improve resource efficiency and help to reduce carbon emissions.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	+	0	0	0	<p>Policies S6, S8, S9 and S10 have no effect</p> <p>Policy S7 will have a minor positive effect, as it will help to reduce the impact of harmful emissions from transport, for example through the design of development proposals.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	+	0	<p>Policies S6, S7, S8 and S10 will have no effect</p> <p>Policy S9 will require SUDS to be designed and implemented as a central part of the Landscape Design Strategy using an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	0	+	0	<p>Policies S6, S8 and S10 will have no effect</p> <p>Policy S7 will have a minor positive effect through reducing negative effects of air pollution on the quality of water, soil and ecosystem health, which can be very damaging for biodiversity and wildlife.</p> <p>Policy S9 will have a minor positive effect. It will ensure development adopts an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site will help to protect and enhance wildlife habitats and encourage a strategic approach to green infrastructure. In accordance with the drainage hierarchy, developments are required to manage surface water runoff through the use of green roofs and other green infrastructure where possible, both of which must maximise biodiversity in line with Policy G5.</p>



12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	0	++	++	++	<p>Policy S6 will have a significant positive effect. It will enhance resilience to the impacts of climate change through measures to minimise internal heat gain and the impacts of the urban heat island through maximising the incorporation of passive design measures relating to design, layout, orientation and materials, in accordance with a cooling hierarchy which will reduce the potential for overheating and to avoid the need for energy intensive air conditioning which contributes to reducing carbon emissions. The policy also encourages developments to be designed to respond to changing conditions in the context of climate change.</p> <p>Policy S7 has no effect.</p> <p>Policy S8 will have a significant positive effect. It will directly reduce the impacts of climate change and enhance resilience to these impacts by requiring developments to be designed to manage and adapt to flood risk as a result of climate change.</p> <p>Policy S9 will have a significant positive effect. It will directly contribute to reducing the impacts of climate change and enhancing resilience to these impacts by requiring development to manage surface water runoff as close to its source as possible in accordance with a drainage hierarchy. Major developments must achieve particular standards and new development must also demonstrate that they have minimised the use of mains water and have been designed to be water efficient, which will also help to enhance resilience to climate change impacts.</p> <p>Policy S10 will have a significant positive effect. It will reduce the contribution of development in the borough to climate change by requiring developments to adopt a circular economy approach which will save resources, improve resource efficiency and help to reduce carbon emissions, including from the embodied energy of building materials and components. This policy will also require the flexible design of developments to enable them to respond to changing conditions in the context of climate change.</p>
13. Promote resource efficiency by	0	0	0	0	++	Policies S6, S7, S8 and S9 have no effect.

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste						Policy S10 have a significant positive effect by requiring developments to adopt a circular economy approach to building design and construction. It will ensure that development design is appropriate for the lifetime of a development by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances. The use of local, sustainable materials and resources will also be required, including the use of components and materials that can be reused or recycled. The volume of construction and deconstruction waste will be minimised by requiring materials to be re-used and/or recycled where demolition and remediation works are necessary.

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	++	0	++	+	<p>Policies S6, S8 and S10 have no effect</p> <p>Policy S7 will have a significant positive effect. It will minimise air pollution and its negative impacts on human health, as well as improving air quality in line with national and international standards, including the Air Quality Standards Regulations 2010.</p> <p>Policy S9 have a significant positive effect. It will require all developments to adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and in the context of links with wider-than-site level plans. This will ensure the sustainable use of water resources. In addition, developments are required to ensure that land affected by contamination will not create unacceptable risks to the wider environment, and to demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development.</p> <p><b>New effects have been identified for Policy S10 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy S10 is likely to have a minor positive effect on the protection and enhancement of natural resources through keeping materials in use as long as possible and requiring buildings to be designed for materials to be re-used as well as made from recycled/reused content. Part F specifies development must minimise environment impact of materials through the use of sustainable sourcing, low impact and recycled materials which will contribute to better use of natural resources</b></p>



### **Policies S1: Delivering Sustainable Design**

Assumptions around the sustainability benefits of development have been made. Whilst policy to reduce energy demand and address climate change are precise in the level of carbon reductions expected the outcome of new policy such as that which deals with resource use has to be assumed.

Policy S1 will ensure that low-carbon energy infrastructure is provided in the right locations ensuring the efficient use of land. The policy will also have health benefits through promoting the sustainable use of water resources, the protection of water quality, minimising air pollution and reducing exposure to poor air quality, especially beneficial for more vulnerable people. Finally S1 will have positive effects against the built environment objective as it aims to deliver sustainable design, promote a circular economy approach to design and construction, and seek to ensure that developments are designed to be flexible and adaptable to changing requirements and circumstances over their lifetime.

### **S2: Sustainable Design and Construction, S3: Sustainable Design Standards**

Policies S2 and S3 will deliver benefits to sustainable buildings as it requires development to provide various information which helps demonstrate the achievement of the sustainable design policies. Policy S2 will have a positive impact on health through requiring development to demonstrate how it will limit its contribution to air pollution, improve local air quality and reduce exposure to poor air quality, Policy S3 requires high standards of sustainable design which can contribute towards a more sustainable built environment. It also requires demonstration of compliance with various environmental accreditation schemes ensuring a positive effect against the framework objectives to reduce the contribution to climate change and promote resource efficiency. Both policies will have a significant positive effect on delivering the council's strategic approach to delivering sustainable design with the aim that all buildings in Islington will be zero carbon by 2050 which will also have positive effects against the framework objective to provide high quality housing which minimises fuel poverty and enhancing energy security. The policies also promotes an integrated approach to water management, a circular economy approach and minimising the borough's contribution to air pollution, all of which ensure a positive effect against the framework objectives to reduce the contribution to climate change and enhance community resilience to climate change impacts.

### **S4: Minimising greenhouse gas emissions and S5: Energy infrastructure**

Policies S4 and S5 both have a significant positive effect against the objective to contribute to minimising Islington's contribution to climate change by minimising greenhouse gas emissions from development and Policy S5 will ensure that developments prioritise energy efficient low and zero carbon heating options. Policy S4 is considered by the Sustainability Assessment as a minor positive short term impact which is more positive in the medium to long term as the short term requirement for development is to comply with the less stringent interim Fabric Energy Efficiency Standard (FEES) until 2022 after which the full FEES standards will apply. Policies S4 and S5

are likely to have a minor positive effect on creating a more sustainable built environment through setting out requirements for minimising greenhouse gas emissions and sustainable energy infrastructure, this can also help to ensure buildings are adaptable over the lifetime. Policy S5 can also have a significant positive effect on health by minimising fuel poverty linked to energy prices by requiring their assessment at planning stage to ensure low carbon heating systems will not lead to high energy bills. The **EqIA** identified the particularly positive impact of the S4 requirement to achieve 15% of emissions reduction through Fabric Energy Efficiency standards which is an immediate cost saving on fuel bills at no expense to residents through improvements in the thermal performance of homes. Having more energy efficient buildings can be particularly beneficial in helping to reduce fuel bills and therefore fuel poverty and will be particularly beneficial for the poorest and most vulnerable which may include children, older and disabled people who are most vulnerable to risk of effects of severe weather.

### **S6: Managing heat risk**

The assessment considered Policy S6 will have a positive effect against the framework objective to ensure all housing meets a high standard of energy efficiency and reduce contribution to carbon emissions by reducing the potential for overheating and reliance on air conditioning systems. This will also have a significant positive effect against the objective to improve the health and wellbeing of the population and reduce health inequalities through addressing the urban heat island effect with high temperatures causing or worsen serious health conditions, particularly among vulnerable people including children and older people.

### **S7: Improving Air Quality**

The assessment considered Policy S7 will require new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible therefore having a positive effect against these framework objectives. All development should also seek to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people and therefore reduce negative impacts on human health.

### **S8: Flood Risk Management**

The assessment considered Policy S8 will directly reduce the impacts of climate change and enhance resilience to these impacts by requiring developments to be designed to manage and adapt to flood risk as a result of climate change.

### **S9: Integrated Water Management and Sustainable Drainage**

The assessment considered Policy S9 will ensure development adopts an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and will maximise biodiversity and water use efficiency alongside other benefits including amenity and recreation. By managing surface water runoff as close to its source as possible this will directly contribute to a positive effect against the framework objectives to reduce the impacts of climate change and enhance resilience. In addition, developments are required to ensure that land affected by contamination will not create unacceptable risks to the wider environment, and to demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development.

**S10: Circular Economy and Adaptive Design**

The assessment considered Policy S10 will reduce the contribution of development in the borough to climate change by requiring developments to adopt a circular economy approach which will have a positive effect against the framework objectives to reduce the contribution to climate change and promote resource efficiency save resources, including from the embodied energy of building materials and components. This will also help developments to be flexible and adaptable to changing requirements over their lifetime which will contribute to ensuring the provision of housing that meets the diverse and changing needs of the population. The policy may also benefit the economy by supporting the development of local green industries. Policy S10 is also likely to have a minor positive effect on the protection and enhancement of natural resources through keeping materials in use as long as possible and requiring development to minimise environmental impact of materials.

## Transport and Public Realm policy assessment

The following transport and public realm policies have been considered in the same sustainability appraisal table:

- Policy T1: Enhancing the public realm and sustainable transport - Policy T1 sets out the strategic approach to public realm and transport which supports promotion of active travel over other transport modes, taking design led approach to transport with development to consider its impact between land use, building design, transport accessibility and connectivity.
- Policy T2: Sustainable transport choices - Policy T2 focuses on how development should incentivise walking and cycling, including cycle parking standards and minimise the impact of unsustainable transport modes. The policy also sets out how the Council will work with TfL and other stakeholders regarding public transport and associated infrastructure.
- Policy T3: Car free development - Policy T3 focuses on ensuring all new development is car free and the criteria related to ensuring accessible parking spaces are provided.
- Policy T4: Public Realm - Policy T4 focuses on how development should engage with and enhance the public realm.
- Policy T5: Delivery, servicing and construction - Policy T5 focuses on the requirements for new development to consider and manage delivery and servicing and mitigate the negative effects related to the construction of development.

**Table 1.48: Assessment of policies T1 to T5**

IIA Objective	T1: Enhancing the public realm and sustainable transport	T2: Sustainable Transport Choices	T3: Car free development	T4: Public realm	T5: Delivery, servicing & construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe	++	++	++	++	+	Policy T1, T2 and T4 will have significant positive effects on the built environment – the public realm between the buildings -as they seek to integrate development into the existing built environment in a way which ensures safe,



and sustainable built environment						<p>practical, convenient and efficient access by sustainable modes of transport. This will put people at the heart of the design process with a coherent and cohesive public realm identified as one of the key elements in delivering the Local plan objectives which will ensure people make more sustainable transport choices.</p> <p>Policy T2 has a significant positive effect on safety because it resists the use of shared space which can be detrimental to those with mobility, sensory and or cognitive impairments as these people find can find "shared space" schemes dangerous and difficult to navigate. <b>Update following review of the IIA as part of the examination process: T2 also supports high quality cycle parking which will allow more people to use that sustainable active mode.</b></p> <p>Policy T3 will have a significant positive effect. Car parking has negative impacts on the the built environment, particularly at street level where it reduces the ability to design multi-functional spaces which promote walking and cycling and other activities. T3 aims at reducingthe number of vehicles in Islington, which is also likely to reduce accidents and hence lead to a safer built environment.</p> <p>Policy T5 will have a minor positive effect. It requires Delivery and Servicing Plans where there may be an impact on amenity from likely vehicle movements which will have a minor positive effect; and promotes off-street delivery and servicing which is likely to improve the safety of the built environment. <b>Update following review of the IIA as part of the examination process: T5 also requires developments to explore more efficient and sustainable freight, delivery and servicing movements.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	++	0	+	<p>Policy T1 and T2 will have a minor positive effect as they encourage more sustainable modes of transport which require less land than private vehicle use so in that respect are encouraging a more optimal land use in relation to transport and the movement of people and goods. Although given the land constraints in Islington there is no possibility of further land being use for vehicles.</p>

						<p>Policy T3 will have a significant positive effect on the use of land for parking which is considered an unnecessary and inefficient use of land in the Islington context where other more sustainable transport options are available.</p> <p>Policy T4 has no effect</p> <p><b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 has a minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which could reduce the amount of space required on-site and off-site to accommodate these vehicular movements. Optimised and efficient vehicular movements for freight, delivery, servicing can also lead to positive impacts in terms of improvement congestion on the road network.</b></p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	Policies T1 to T5 have no effect.
4. Promote liveable neighbourhoods which support good quality accessible services and	++	++	+	++	+	Policy T1, T2 and T4 will have significant positive effects on the built environment – the public realm between the buildings - as they seek to integrate development into the existing built environment in a way which ensures safe, practical and convenient access by sustainable modes of transport. Increasing active transport and minimising the private vehicle use will positively enhance the liveability of neighbourhoods and improve access

sustainable lifestyles						<p>through an improved public realm with permeability and legibility opening up new access routes and connections to existing facilities and services.</p> <p>Policy T3 will have a minor positive effect. It will discourage car use through restricting car parking and therefore will reduce the impacts of pollution from vehicles.</p> <p><b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 has a minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which supports a reduction in vehicular movements, promotes non motorised modes, which can support better access to serices and sustainable lifestyles.</b></p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	<p>Policies T1 to T5 have no effect</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	+	+	0	<p><b>New effects have been identified for Policies T1, T2 and T4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies T1, T2 and T4 ensure that active travel and public transport users benefit from improved travel conditions. This supports equality as almost 70% of households in Islington do not have access to a private car. The policies aim at mitigating the negative impacts of private motorised transport on other transport modes. Together they have a minor positive impact on social inclusion, equality, diversity and community cohesion, by encouraging active, connected, strong and cohesive community.</b></p> <p><b>New effects have been identified for Policy T3 following review of the IIA as part of the examination and changed the effects from neutral to</b></p>

						<p><b>minor positive. Policy T3 ensures that wheelchair accessible parking is delivered for those blue badge holders who rely on private cars, which has a minor positive impact on inclusion, by promoting equity between different population groups and those with protected characteristics.</b></p> <p>T5 has no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	+	++	0	<p>Policies T1, T2 and T4 will have a significant positive effect through enabling and prioritising active travel and use of more sustainable transport modes, to help promote healthier lifestyles which will reduce health inequality among the residents. Policies T2 and T4 in particular will positively enhance the liveability of neighbourhoods and improve access through an improved public realm with permeability and legibility opening up new access routes and connections to existing facilities and services.</p> <p>Policy T3 will have a minor positive effect. It will discourage car usage and may therefore lead to an increase in the use of sustainable modes of travel.</p> <p>Policy T5 has no effect.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	+	<p>Policies T1 to T4 will have no effect.</p> <p>Policy T5 has minor positive effect as it will ensure that new development considers and mitigates where necessary through relevant modelling its impact on the wider transport system which will ensure that new development does not restrict or affect the economic function of a wider area. In particular, logistics in relation to LSIS industrial areas are identified.</p>
9. Minimise the need to travel and create accessible, safe and sustainable	++	++	+	++	+	<p>Policies T1, T2 and T4 will have a significant positive effect in that they encourage a shift to more sustainable modes of transport through improvements to the public realm which improve permeability and legibility and opening up new access routes and connections. In particular, policy T4 will ensure context is considered through appraisal to inform how a development</p>

connections and networks by road, public transport, cycling and walking						fits within its wider context which will help proposals make the best use of existing infrastructure.  Policy T3 requiring car free development will help to reduce the amount of travel by car which coupled with other policies to promote improved cycle parking and improvements to the public realm will encourage travel by more sustainable modes of transport.  Policy T5 requires Delivery and Servicing Plans which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system, and investigate non-motorised modes. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged which will have a positive effect.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	+	0	Policies T1 to T5 have no effect  Policy T4 will have a minor positive effect as they will require that where public realm is created as part of a development it contributes to the quality and quantity of green infrastructure and is based on a contextual appraisal.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	Policies T1 to T5 have no effect
12. Reduce contribution to climate change	++	++	++	++	+	Policies T1, T2, T3 and T4 will have a significant positive effect. They encourage active travel, including through improvements to the public realm which reduce the need to use fuel-based transport, reduce carbon emissions and improve

and enhance community resilience to climate change impacts.						<p>energy efficiency. Policy T3 requires car free development which will help to reduce the amount of travel by car, which, coupled with other policies to promote improved cycle parking and deliver improvements to the public realm, will encourage travel by more sustainable modes of transport which will reduce carbon emissions.</p> <p>Policy T5 will have a minor positive effect. It requires Delivery and Servicing Plans which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged, which could have a positive effect on reducing carbon emissions.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	+	+	0	+	<p><b>New effects have been identified for Policies T1, T2, T3 and T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies T1, T2, T3 and T5 could have a minor positive effect. This can help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels.</b></p> <p>Policy T4 has no effect.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	++	++	++	++	+	<p><b>New effects have been identified for Policies T1, T2, T3 and T4 following review of the IIA as part of the examination and changed the effects from neutral to significant positive. Policies T1, T2, T3 and T4 will have a positive effect. They encourage active travel, including through improvements to the public realm which reduce transport related emissions which contribute to air pollution. Policy T3 requires car free development which will help to reduce the amount of travel</b></p>

					<p><b>by car, which, coupled with other policies to promote improved cycle parking and deliver improvements to the public realm, will encourage travel by more sustainable modes of transport which will improve air quality.</b></p> <p><b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 will have a minor positive effect. It requires Delivery and Servicing Plans which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged, which could have a positive effect on air quality.</b></p>
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**Policy T1: Enhancing the public realm and sustainable transport, Policy T2: Sustainable transport choices and Policy T4: Public Realm**

The assessment considered Policy T1, T2 and T4 will have significant positive effects against the framework objective for the built environment – the public realm between the buildings -as they seek to integrate development into the existing built environment in a way which ensures safe, practical and convenient access by sustainable modes of transport. This will put people at the heart of the design process with a coherent and cohesive public realm identified as one of the key elements in delivering the Local plan objectives which will ensure people make more sustainable transport choices. Increasing active transport and minimising the private vehicle use will have a positive effect against the liveability of neighbourhoods by improving access through an improved public realm with permeability and legibility adding benefits of opening up new access routes and connections to existing facilities and services. Through enabling and prioritising active travel and use of more sustainable transport modes helps promote a healthier life style which will reduce health inequality among the residents and reduce carbon emission and improve energy efficiency.

As part of the assessment assumptions around modes of travel are made, whilst the approach seeks to encourage use of more sustainable modes it is not a given that people will respond to this. Many other factors may also affect future travel patterns such as ways of working, the cost of transport, new modes of transport and changing trends. Both T1 and T2 and T4 will have a positive effect on inclusion from improved travel conditions which supports equality as almost 70% of households in Islington do not have access to a private car. The policies aim at mitigating the negative impacts of private motorised transport on other transport modes. Together they have a minor positive impact on social inclusion, equality, diversity and community cohesion, by encouraging active, connected, strong and cohesive community. Both T1 and T2 also

help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels which also helps have a positive effect on objective 14 in relation to air quality.

### **Policy T2: Sustainable transport choices**

The Sustainability Appraisal considered Policy T2 has a particular positive effect against the framework objective for the built environment which considers safety because it resists the use of shared space which can be detrimental to those with mobility, sensory and or cognitive impairments as these people find “shared space” schemes dangerous and difficult to navigate. It is also positive as it supports high quality cycle parking which will allow more people to use that sustainable active mode.

### **Policy T3: Car free development**

The assessment considered Policy T3 will have a significant positive effect against the framework objective for the use of land as it will continue to reduce the use of land for parking cars in new development. Use of land for parking is considered an unnecessary and inefficient use of land in the Islington context where other more sustainable transport options are available as well as other priority land uses. Car parking can have a negative effect on the built environment, particularly at street level where it reduces the ability to design multi-functional spaces which promote walking and cycling and other activities. T3 will have positive impacts against the environmental framework objectives by reducing the amount of travel by private cars which will reduce the impact that cars have on air pollution and carbon emissions. Restricting car parking will also make neighbourhoods more liveable through reduced pollution impacts from vehicles. Policy T3 will also have appositive effect against the objective for inclusion as it ensures that wheelchair accessible parking is delivered for those blue badge holders who rely on private cars, which has a minor positive impact on inclusion, by promoting equity between different population groups and those with protected characteristics.

### **Policy T5: Delivery, servicing and construction**

The assessment considered Policy T5 will have a minor positive effect against the objective for travel as it will ensure that new development considers and mitigates where necessary through relevant modelling its impact on the wider transport system which will ensure that new development does not restrict or affect the function of a wider area. In particular logistics in relation to LSIS industrial areas are identified with developments required to explore more efficient and sustainable freight, delivery and servicing movements which is positive against safety in the built environment objective and may also lead to more efficient use of space and therefore positive against the use of land objective. The requirement for Delivery and Servicing Plans also encourages the use of low-emission vehicles, non-motorised transport modes and efficient and sustainable delivery systems which minimise motorised vehicle trips which will contribute to reducing carbon emissions and improving air quality. T5 also help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels which also helps have a positive effect on objective 14 in relation to air quality.





## Design and Heritage policy assessment

The following design and heritage policies have been considered in the same sustainability appraisal table:

- Policy DH1: Fostering innovation and conserving and enhancing the historic environment - Policy DH1 sets out the strategic approach to design and heritage supporting innovative approaches to development as a means to increasing development capacity to meet identified needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.
- Policy DH2: Heritage assets - Policy DH2 sets out the requirements for protecting heritage assets and their setting including – Conservation Areas, Listed Buildings; Historic Green Spaces, Archaeology, Views, Non-designated Heritage Assets.
- Policy DH3: Building heights - Policy DH3 defines tall buildings, identifies where tall buildings will be permitted and how the design of tall buildings will take account of visual, functional and environmental impacts.
- Policy DH4: Basement development - Policy DH4 sets the approach to basement development restricting basements that are disproportionately large, out of character with the site and host building. Sets criteria where basement development is permissible.

**Table 1.49: Assessment of policies DH1 to DH4**

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	++	+	Policy DH1 will have a significant positive effect. The policy promotes location sensitive density and design, noting that high density development can be accommodated throughout the borough, but the scale of development is dependent on a number of considerations, including design and heritage which would be considered on a case by case basis. The approach to tall buildings balances protection of local character with promotion of opportunities for development.

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>Policy DH2 will have a significant positive effect as it will ensure that architecture and urban design conserves heritage assets and the historic environment, which helps protect character and distinctiveness. It provides detailed policies which seek the conservation and enhancement of the historic environment, in part through protection of a range of heritage assets.</p> <p>Policy DH3 will have a significant positive effect on the built environment because it takes a plan led approach to tall buildings. It restricts tall buildings across the vast majority of the borough, and directs them to potentially suitable locations (subject to a range of additional detailed assessments). The locations have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness, taking into account heritage assets as well as considering transport accessibility, infrastructure and land use. The policy seeks to promote exceptional design with high quality design details in terms of tall buildings visual impact and considering any local design principles.</p> <p>Policy DH4 will have a minor positive effect by promoting a high quality, inclusive, safe, and sustainable built environment. The policy will prevent basements that are disproportionately large, out of character with the site and host building.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	+	++	-	Policy DH1 will have a significant positive effect. This policy makes efficient use of land by encouraging innovative ways to meet local plan objectives while preserving heritage, by requiring site density levels to be optimised in order to make the best use of the land, by directing tall buildings to appropriate locations, by introducing the agent of change

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>principal which in turn leads to more compatible and therefore efficient locations for uses.</p> <p><b>New effects have been identified which changes the effects from significant to minor positive following review of the IIA as part of the examination process. Policy DH2 will have a minor positive effect. Heritage has value in terms of cultural and historical interest but also economically, and in terms of aesthetics and function, with period buildings often commanding high values. DH2 ensures this value is retained over the long term, instead of being lost due to more short term pressures.</b></p> <p>Policy DH3 will have a significant positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness. The approach also focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. By their very nature a tall building will optimise the use of land.</p> <p><b>New effects have been identified which changes the effect from minor positive to minor negative following review of the IIA as part of the examination process: Policy DH4 will have a minor negative effect. The policy will restrict very large basements which are not proportionate to the host building and site. However the additional space which may be added in these large basements to existing dwellings and commercial buildings would add value, albeit at considerable cost to achieving other objectives.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	++	++	+	<p>Policy DH1 will have a minor positive effect. It protects a range of heritage assets in the borough, but recognises that Islington's character may need to evolve in order to accommodate the identified development needs, and ultimately deliver the Local Plan objectives holistically.</p> <p>Policy DH2 will have a significant positive effect. It ensures that heritage assets will be strongly protected while recognising the need to accommodate new development.</p> <p>Policy DH3 will have a significant positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness. The approach included excluding areas of heritage value – conservation areas, and the suitable locations identified have considered proximate heritage assets therefore ensuring heritage assets are conserved and enhanced. Part F of the policy ensures that the design is of a high quality and does not adversely impact the surrounding context including heritage assets.</p> <p>Policy DH4 will have a minor positive effect on conserving the historic environment. The policy will ensure that basement development does not harm the historic environment for example by introducing lightwells that harm the appearance of the building or conservation areas.</p>
4. Promote liveable	+	0	0	0	Policy DH1 will have a minor positive effect through ensuring site potential for development and site density levels must be fully

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
neighbourhoods which support good quality accessible services and sustainable lifestyles					<p>optimised and encouraging innovative approaches which will help the opportunity to provide various services, facilities and amenities which may be necessary to support development and meet needs.</p> <p>There is no effect for policies DH2, DH3 and DH4.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	0	0	0	<p>Policy DH1 will have a minor positive effect. Site density levels must be fully optimised which increases the delivery potential of the site and hence could lead to more affordable housing. The policy recognises that Islington's character may need to evolve in order to accommodate the identified development needs, and ultimately deliver the Local Plan objectives holistically.</p> <p><b>New assessment detail has been added following review of the IIA as part of the examination process: Policy DH3 may limit opportunities for tall buildings which can provide housing on specific sites which could impact to some degree on housing delivery. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. In addition under DH3 some sites identified as potentially appropriate for tall buildings are allocated to include residential development, therefore also delivering affordable housing.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>There is no effect for policies DH2, and DH4.</p> <p><b>New assessment detail has been added following review of the IIA as part of the examination process: With regard to DH4 while basement development can extend space in homes it generally does not result in creation of new dwellings.</b></p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	0	0	<p>Policy DH1 will have a minor positive effect. The policy supports innovative approaches to development as a means to increasing development capacity to meet needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough. Innovation goes beyond mere aesthetics; it is fundamentally about how we can accommodate new development – particularly delivery of affordable housing and other priorities - through intensification, achieving versatility and injecting life into an area. This balanced approach to design will assist with the creation of strong and cohesive communities.</p> <p>There is no effect for policies DH2, DH3 and DH4.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	0	+	<p>Policy DH1 will have a minor positive effect. It applies the agent of change principle which ensures that the individual/organisation proposing change is responsible for ensuring that existing uses in the area are not adversely impacted, including through noise and vibration impacts.</p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>There is no effect for policies DH2 and DH3.</p> <p>Policy DH4 will likely have minor positive effects on the health and wellbeing of the population in the short term by reducing the impact of construction. Basement development generally requires excavation works which create significant noise and vibration. These works can take years to complete. Some neighbourhoods may experience a number of basement excavations in succession leading to the effect of a continuous inappropriate disturbance in a residential area. This policy seeks to limit the effects of basement construction by limiting the size of basement developments and also by managing the construction impacts through Construction Management Plan.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	-	0	<p>Policy DH1 will have a minor positive effect. The policy supports innovative approaches to development as a means to increasing development capacity to meet needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.</p> <p><b>New effects have been identified which changes the effects from neutral to minor negative following review of the IIA as part of the examination process. Policy DH3 may have a minor negative effects on economic development as the development of tall buildings will be directed to key locations where they are most appropriate, which may result in a lower overall quantum of floorspace delivery than an approach where tall buildings could be developed in more locations across the borough. These effects are minor as lower rise buildings will meet the vast</b></p>



IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>majority of this need, and on many sites lower rise buildings can rival tall buildings for floorspace delivery.</p> <p>There is no effect for policies DH2 and DH4.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	+	0	<p>There are no effects for policies DH1, DH2 and DH4.</p> <p>Policy DH3 will have a minor positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. The policy criteria ensure that tall buildings do not prejudice the ongoing functionality of sites in the local area including the functionality of the existing transport network.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	++	<p>There is no effect for policy DH1.</p> <p>Policy DH2 will have a minor positive effect. The policy protects heritage assets including historic open spaces.</p> <p><b>New effects have been identified which changes the effects from positive to neutral effect following review of the IIA as part of the examination process. New analysis has been added following review of the IIA as part of the examination process: Policy DH3 will have no significant effect on open spaces. Policy DH3 ensures that where tall buildings are developed they do not harm</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p><b>nearby open spaces including through overshadowing and microclimate. This will ensure no negative impacts are caused as the impacts are addressed by policy but will not be scored as a positive impact.</b></p> <p>Policy DH4 is likely to have significant positive effects on private open spaces by limiting the extent to which basements will be developed under private gardens, and preventing gardens being replaced by lightwells or sunken paved areas.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	+	++	<p>There are no effects for policy DH1.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH2 will have a minor positive effect. The policy protects heritage assets including historic open spaces.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. New effect has been added following review of the IIA as part of the examination process: Policy DH3 requires that development of tall buildings does not adverse impact biodiversity. This will have a minor positive effect on protecting habitats and species diversity.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement development	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					Policy DH4 is likely to have significant positive effects on biodiversity by limiting the extent to which basements will be developed under private gardens and requiring minima soil depth. Basement development generally requires removal of the existing garden and any trees. The replacement garden often has less soil depth and less ability to support large trees. Replacement gardens also often have larger areas of hard standing, are less natural, and have a less diverse range of vegetation.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	+	+	Policy DH1 will have a minor positive effect. The policy advocates an innovative approach to development which contributes to the delivery of the Local Plan objectives, including mitigating against the impacts of climate change.  There is no effect for policy DH2.  <b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect on reducing climate change by requiring new tall buildings to be of exceptional design standards.</b>  <b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH4 ensures that basement development does not harm the ground and water conditions of the area, reducing the likelihood and impact of surface water flooding cause by more extreme weather events which are the</b>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					result of climate change. The policy also preserves gardens from being entirely built beneath allowing more established and biodiverse gardens which will benefit the microclimate and reduce the urban heat island effect as well as storing some carbon through large trees.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	+	+	<p>There are no effects for policies DH1 and DH2.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have minor positive effects by limiting the overall number of tall buildings, which are more resource intensive and less adaptable than low rise buildings with longer lifespans. The complex engineering and use specific design of tall buildings make repair and adaptation over time challenging or uneconomic, often resulting in demolition, and associated construction waste impacts.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH4 will have minor positive effects by reducing the overall size of some basement developments. Basement development, through the extensive excavation and structural engineering required are more wasteful than comparably size above ground developments.</b></p>
14. Maximise protection and enhancement of natural	0	0	+	+	There is no effect for policies DH1 and DH2.

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
resources including water, land and air					<p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect by ensuring that development of tall buildings does not impact impacts on the wider environmental including watercourses and water bodies and their hydrology.</b></p> <p>Policy DH4 will have minor positive effects on natural resources by ensuring basement development does not harm the ground and groundwater conditions of the area. Basement development will only be permitted where it has been demonstrated by appropriately qualified engineers that no harm will be caused to the ground or water conditions of the area evidenced through a structural method statement.</p>

The following design and heritage policies have been considered in the same sustainability appraisal table:

- Policy DH5: Agent of change, noise and vibration Policy DH5 aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity through requirement to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. The policy also sets out how all development should reduce the impacts of noise and vibration from new noise generating uses.
- Policy DH6: Advertisements - Policy DH6 sets ensures that advertisements should contribute to a safe and attractive environment.
- Policy DH7: Shopfronts - Policy DH7 focuses on ensuring shopfronts are accessible and contribute positively to the character of an area.
- Policy DH8: Public art - Public art: Policy DH8 encourages new public art and the requirements of this

**Table 1.50: Assessment of policies DH5 to DH8**

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	++	+	<p>Policy DH5 will have a minor positive effect and will help create robust buildings which are designed to mitigate the noise impacts of an existing use rather than affect that use. Equally all new development which generates noise should ensure it considers and mitigates the impact on sensitive uses promoting an inclusive built environment through reducing amenity impacts.</p> <p>Policy DH6 will have minor positive effects on the built environment by ensuring that advertisements are high quality in terms of appearance, do not contribute to visual clutter, do not harm amenity with flashing elements, and respect the local context.</p> <p>Policy DH7 will have a significant positive effect as it will ensure that shops which are subject to redevelopment install accessible and inclusive shopfronts which ensure access for those less able and which will also benefit residents generally. Reference is also made to enhancing natural surveillance which is also important to creating a safer built environment.</p> <p>Policy DH8 will have a minor positive effect. It makes clear that new public art should not compromise inclusive design policy objectives and should consider impact on the local area and its character.</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	0	0	0	+	<p>Policy DH5 has no effect</p> <p><b>Effects have been amended which changes the effects from positive to neutral following review of the IIA as part of the examination process. Policy DH6 has no effect.</b></p> <p>Policy DH7 has no effect</p> <p>Policy DH8 has a minor positive effect in respect that the policy identifies that provision of public arts should not come at the cost of meeting other more important Local Plan objectives ensuring an efficient use of land and balance in terms of resources.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	++	+	<p>Policy DH5 has no effect</p> <p>Policy DH6 will have a minor positive effect. It makes clear advertisements should respect local context, including listed buildings and conservation areas so is considered minor positive.</p> <p><b>New effects have been identified which changes the effects from minor positive to significant positive following review of the IIA as part of the examination process. Policy DH7 will have a significant positive effect on protection of heritage assets and the historic environment, by ensuring the sensitive design of shopfronts which are an important component of the historic environment. Reference to Islington Urban Design Guide is made.</b></p> <p>Policy DH8 will have a minor positive effect. It makes clear that new public art should protect and enhance local character and demonstrate the relationship between the public art and the site.</p>



IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	0	0	0	<p>Policy DH5 will have a significant positive effect as it aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. In addition, the policy will reduce the impacts of noise and vibration from new noise generating development which will help contribute to maintaining amenity of neighbourhoods. This will support enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	0	0	<p>Policy DH5 will have a significant positive effect. It will ensure that new housing mitigates noise impacts from both within a development and also from external sources such as cultural uses or other sources.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	0	0	+	+	<p>Policies DH5 and DH6 will have no effect.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH7 requires new or refurbished shopfronts to be accessible and inclusive, which will remove barriers to employment and use of public spaces.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH8 will help support active engagement of the wider community in decisions that affect their area by requiring consultation with the community on public art.</b></p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	0	+	<p>Policy DH5 will have a significant positive effect as it will ensure the health impacts of noise and vibration are mitigated. Both through the 'agent-of-change' principle ensuring suitable mitigation is applied and ensuring impacts of noise and vibration from new noise generating development are mitigated will help contribute to managing noise affects and the impact on individual health.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH6 will improve health and wellbeing by ensuring that advertisements do not cause light pollution into adjoining sensitive land uses, including residential.</b></p> <p>Policies DH7 and DH8 will have no effect.</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	<p>Policy DH5 will have a minor positive effect. It will support the enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters through the application of the agent of change principle potentially helping these business to grow.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect

## Design and Heritage

### Policy DH1: Fostering innovation and conserving and enhancing the historic environment

The Sustainability Appraisal considered that Policy DH1 has a significant positive effect against the framework objectives for the built environment and for the efficient use of land by ensuring development is optimised, which helps to meet development needs in the borough. The policy sets out that high density development should be accommodated throughout the borough, but that the scale of development is dependent on a number of considerations, including design and heritage. The policy protects heritage value but allows evolving character where appropriate.

The policy will also have a minor positive effects against promoting liveable neighbourhoods, providing affordable housing, promoting social inclusion, improving health and wellbeing, economic development, and reducing and climate change.

### Policy DH2: Heritage assets

The Sustainability Appraisal considered that Policy DH2 will have a significant positive effects against the framework objectives for the built environment, efficient use of land and heritage through detailed policies which seek the conservation and enhancement of the historic environment. The assessment recognises that heritage has value in terms of cultural and historical interest but also economically, and in terms of aesthetics and function, with period buildings often commanding high values. DH2 sets out that other Local Plan policy requirements including affordable housing, affordable workspace, inclusive design and sustainability standards, are relevant considerations when determining whether significant harm to an asset is acceptable. DH2 will also have minor positive effects on protecting open space, including historic open spaces and biodiversity.

### Policy DH3: Building heights

The Sustainability Appraisal considered Policy DH3 will have a positive effect against the framework objective for the built environment, efficient use of land, and protecting heritage through the plan led approach to development of tall buildings. The policy restricts tall buildings across the vast majority of the borough, and directs them to potentially suitable locations (subject to a range of additional detailed assessments). The locations have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness, taking into account heritage assets as well as considering transport accessibility, infrastructure and land use. Whilst Policy DH3 may limit opportunities for tall buildings which can provide housing or employment floorspace on specific sites which could impact to some degree on housing delivery or meeting economic needs. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. The policy seeks to

promote exceptional design with high quality design details in terms of tall buildings visual impact and considering any local design principles. The policy will also have minor positive effects on biodiversity, reducing climate change, reducing waste, and preserving natural resources. The effect on climate change is considered to be limited by the policy which seeks to reduce the overall number of tall buildings; the assessment recognises that tall buildings are more resource intensive and less adaptable than lower rise counterparts.

#### **Policy DH4: Basement development**

The Sustainability Appraisal considered that Policy DH4 is likely to have significant positive effects on open space and biodiversity by limiting the extent to which basements will be developed under private gardens. The policy is also likely to have minor positive effects on the health and wellbeing of the population by reducing the impact of construction by limiting the size of basements. The assessment also showed minor positive effects against the framework objective to promote a high quality, inclusive, safe, and sustainable built environment by preventing basements that are disproportionately large, out of character with the site and host building. The policy has been shown to have some minor negative effects on the efficient use of land objective by reducing some developable floorspace for basements which are not proportionate to the host building and site however basements do not generally add additional homes so the objective for affordable housing has been marked as no effect. The policy also have minor positive effects on reducing waste (from construction) and preserving natural resources (impacts on ground conditions and water). The assessment also considers Policy DH4 has a positive effect on climate change and ensures that basement development does not harm the ground and water conditions of the area, reducing the likelihood and impact of surface water flooding cause by more extreme weather events which are the result of climate change.

#### **Policy DH5: Agent of change, noise and vibration**

The Sustainability Appraisal considered Policy DH5 will have a significant positive effects against the framework objectives for liveable neighbourhoods, affordable housing, health and wellbeing, and minor positive effects on economic development and the built environment. The policy aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity through requirement to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. In addition, the policy will reduce the impacts of noise and vibration from new noise generating development which will help contribute to maintaining amenity of neighbourhoods as well as the internal amenity of dwellings. Protecting existing cultural uses from change will also help support enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters.

#### **Policy DH6: Advertisements**

The Sustainability Appraisal considered Policy DH6 will have minor positive effects on the objectives for promoting a high quality built environment, protecting heritage, promoting social inclusion, and health and wellbeing. The policy achieves this by ensuring that advertisements are high quality in terms of appearance, do not contribute to visual clutter, do not harm amenity and health with flashing

elements, and respect the local context, including the historic environment. The policy helps achieve the health and wellbeing objective by not allowing advertisements to create light pollution into homes.

### **Policy DH7: Shopfronts**

The Sustainability Appraisal considered Policy DH7 will have a significant positive effect against the framework objective for built environment and inclusive accessibility as it will ensure that shops which are subject to redevelopment install accessible and inclusive shopfronts which will also benefit residents generally and remove barriers to employment and use of public spaces. Reference is also made to enhancing natural surveillance which is also important to creating a safer built environment. Policy DH7 will also have a significant positive effect on protection of heritage assets and the historic environment, by ensuring the sensitive design of shopfronts which are an important component of the historic environment.

### **Policy DH8: Public art**

The Sustainability Appraisal considered Policy DH8 to have minor positive effect against the framework objective for efficient use of land as it makes clear that provision of public arts should not come at the cost of meeting other more important Local Plan priorities. In addition DH8 makes clear that new public art should not compromise inclusive design policy objectives and should consider impact on the local character. Finally Policy DH8 will have a positive effect against objective 6 and help support active engagement of the wider community in decisions that affect their area by requiring consultation with the community on public art.



## Strategic Infrastructure

The following strategic infrastructure policies have been considered in the same sustainability appraisal table:

- Policy ST1: Infrastructure Planning and Smarter City Approach - Policy ST1 sets out how the Council will identify and deliver infrastructure to support development growth over the plan period and puts in place measures to develop the Smart Cities approach in Islington.
- Policy ST2: Waste - Policy ST2 sets out the requirements for development to provide waste and recycling facilities, sets how the Council will work with other north London boroughs on the North London Waste Plan and safe guards the Hornsey Street facility..
- Policy ST3: Telecommunications, communications and utilities equipment - Policy ST3 focuses on when Telecommunications, communications and utilities equipment will be permitted and the relevant standards .
- Policy ST4: Water and wastewater infrastructure - Policy ST4 seeks to ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments.

Table 1.51: Assessment of Policies ST1 to ST4

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	++	+	+	<p>New effects have been identified following review of the IIA as part of the examination process. A minor positive effect has been identified for ST1 through the support provided for robust and adaptable buildings by supporting in-building infrastructure capable of exceeding building regulation standards for digital connectivity.</p> <p>Policy ST2 has a significant positive effect. It requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in order to help people to recycle <b>which is positive and creates adaptable buildings which are more inclusive and contributes to a more sustainable built environment.</b> The policy cross references the housing policy H4 which provides more detailed guidance.</p> <p>Policy ST3 has a minor positive effect. It deals with the visual impact of telecommunications equipment. Both visual impact and impact on character and appearance, with the general approach to restrict siting equipment in locations which are visible from the public realm. This will help contribute to creating a high quality built environment and help to protect amenity.</p> <p><b>New effects have been identified for Policy ST4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy will ensure adequate water and wastewater infrastructure is provided which will help providing robust and adaptable buildings.</b></p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	++	++	0	++	<p>Policy ST1 will have a significant positive effect as it makes clear the Council will update the Infrastructure Delivery Plan and work with relevant providers to deliver the infrastructure necessary to support development. The policy lists the various potential infrastructure needs and the potential funding routes for them. This is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring the full range of development needs are met.</p> <p>Policy ST2 will have a significant positive effect. The policy protects the only waste management facility in the borough at Hornsey Street – the Hornsey Street reuse and recycling centre. It also makes clear in the policy that the borough will continue to work with the seven neighbouring boroughs on the North London Waste Plan to provide sufficient land to meet waste management needs across the seven North London boroughs. Therefore, the long term waste management needs of Islington will be met through delivery of a Joint Waste Plan.</p> <p>Policy ST3 has no effect.</p> <p>Policy ST4 will have a significant positive effect as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met.</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	++	0	<p>Policies ST1, ST2 and ST4 have no effect</p> <p>Policy ST3 will have a significant positive effect as it deals with the visual impact of telecommunications equipment; both visual impact and impact on character and appearance, therefore impact on heritage assets will be considered where relevant.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This will help ensure residents have access to the various essential services, facilities and amenities necessary and the policy will be supported by an evidence base; the updated Infrastructure Delivery Plan.</p> <p><b>New effects have been identified for Policy ST4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Protecting the Hornsey Street Re-use and Recycling centre will help to ensure access to this important facility/service within the borough for residents.</b></p> <p>Policies ST3 to ST4 will have no effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	Policies ST1 to ST4 will have no effect

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	++	0	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help ensure residents have equal opportunities to facilities and services across the borough. New effects have been identified following review of the IIA as part of the examination process for policy ST1 which supports in-building infrastructure capable of exceeding building regulation standards for digital connectivity which will help community cohesion by supporting a more connected community.</p> <p>Policies ST2 to ST4 will have no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to access open spaces and health facilities which will help to support residents needs.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which will contribute to improving air quality.</b></p> <p>Policies ST3 and ST4 will have no effect.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	<p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST1 which identify a minor positive effect through the support ST1 provides for in-building digital infrastructure capable of exceeding building regulation standards for digital connectivity which will help widen the opportunities for residents to work from home, access employment and support local businesses.</b></p> <p>Policies ST2 to ST4 will have no effect</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to the transport network. <b>In addition new effects have been identified following review of the IIA as part of the examination process for policy ST1 which identify a minor positive effect through the support ST1 provides for in-building digital infrastructure capable of exceeding building regulation standards for digital connectivity which will help widen the opportunities for residents to work from home, access employment and support local businesses.</b></p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre.</b></p> <p>Policies ST3 to ST4 will have no effect.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	0	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to the open space network and access to it.</p> <p>Policies ST2 to ST4 will have no effect.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	Policies ST1 to ST4 will have no effect

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to climate change resilience and energy infrastructure.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre.</b></p> <p>Policies ST3 to ST4 will have no effect.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	++	0	0	<p>Policies ST1, ST3 and ST4 have no effect.</p> <p>Policy ST2 will have a significant positive effect. It requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in order to help people to recycle. The policy highlights the need to refer to the Councils guidance and cross references to policy H4 which also provides further detail.</p> <p>The policy also requires that the long term waste management needs of Islington will be met through delivery of a Joint Waste Plan and protects the existing waste transfer station in the borough at Hornsey Street. The Joint Waste Plan will deal with ensuring that waste infrastructure needs are met across the seven north London boroughs. The North London Waste Plan is subject to a separate Integrated Impact Assessment.</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	0	++	<p>Policies ST1 and ST3 have no effect.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which will contribute to improving air quality.</b></p> <p>Policy ST4 will have a significant positive effect as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met.</p>

The **Sustainability Appraisal** considered **Policy ST1** will have a positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This will help ensure residents have access to the various essential services, facilities and amenities necessary. The policy will be supported by an evidence base; the updated Infrastructure Delivery Plan. The policy will help provide equality of access to facilities and services and fund improvements to various infrastructure across the borough. New positive effects have been identified following review of the IIA as part of the examination process for policy ST1 which supports in-building infrastructure capable of exceeding building regulation standards for digital connectivity. This helps community cohesion by supporting a more connected community, provides a positive effect for the built environment by providing robust and adaptable buildings and support economic growth by widening the opportunities for residents to access employment and support local businesses. Policy ST1 also has a clear synergistic effect with a link in policy to the Islington Infrastructure Delivery Plan which will enable infrastructure needs to be updated which contributes to the objective for efficient use of land and infrastructure.

The **Sustainability Appraisal** considered **Policy ST2** positive against the framework objective for built environment as it requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in



order to help people to recycle. This will help residents contribute towards increasing the proportion of waste recycled. The policy also protects the only waste management facility in the borough – the Hornsey Street reuse and recycling centre and makes clear that the borough will continue to work with the seven neighbouring boroughs on the North London Waste Plan. This joint Waste Plan aims to provide sufficient land to meet waste management needs across the seven North London boroughs, satisfying the long term waste management needs of Islington. New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which reduces peoples need to travel and associated emissions and should help improve air quality. Policy ST2 also has a synergistic effect with the North London Joint Waste Strategy through protecting the Hornsey Street facility that contributes to the objective to promote resource efficiency.

The **Sustainability Appraisal** considered Policy ST3 positive against the framework objective for built environment as it will ensure the visual impact and impact on character and appearance, of telecommunications equipment is minimised which will help contribute to creating a high quality built environment and help to protect amenity.

The **Sustainability Appraisal** considered Policy ST4 will have a positive effect against the framework objective for natural resources as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met. New effects have been identified for Policy ST4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy will ensure adequate water and wastewater infrastructure is provided which will help providing robust and adaptable buildings.

### **Synergistic effects**

Added in summary text to ST1 and ST2 above – should they go in the table?

## Bunhill and Clerkenwell AAP Policy Assessments

The following policies for Bunhill and Clerkenwell AAP have been considered by the sustainability appraisal:

- Policy BC1: Prioritising office use
- Policy BC2: Culture, retail and leisure uses

**Table 1.52: Assessment of Policies BC1 and BC2**

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p><b>New effects have been identified for Policy BC1 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period.</b></p> <p>Policy BC2 will have no effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	+	<p>Policy BC1 will have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. Development will be located in areas with excellent public transport accessibility including to the underground and Crossrail. The Islington Employment Study states that the Central Activities Zone is the location with the most demand for Grade A office space and this will be the priority. Maximisation of business floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. Local evidence currently indicates that there is a significant shortfall in supply of employment land. This policy will maximise development of floorspace in this most appropriate location ensuring the efficient use of the land. The policy also acts, in combination with other plan policies, to balance demand for uses across the borough in accordance with identified needs, with housing prioritised in other locations.</p>

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			Policy BC2 will have a minor positive effect on the efficient use of land, buildings, and infrastructure by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	Policies BC1 and BC2 will have no effect.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	<p>Policy BC1 will likely have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, there are number of sites are allocated for other (non-office) uses. These factors combined with the existing mixed use character of the area means the mix of uses which support liveable neighbourhoods will not be significantly affected.</p> <p>Policy BC2 will likely have a minor positive effect. It helps to ensure that retail, cultural, entertainment and food and drink uses are located in areas where they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping expand the cultural role of this area and of London as a whole.</p>

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	<p>Policy BC1 will likely have a minor negative effect on the provision of affordable housing. The policy requires that most new development in Bunhill and Clerkenwell is office-led. This will lead development of less housing as it will prevent some residential-led schemes coming forward. In addition, it also means that less affordable housing will be developed, as it is required to be provided as a proportion of new residential developments. However the Council has assessed future housing delivery and considers that it can meet its housing target with this policy in place.</p> <p>Policy BC2 will have no effect.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>Policy BC1 will have a minor positive effect, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. The Council has policies whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>Policy BC2 will have no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	+	<p>Policy BC1 will have no effect.</p> <p>Policy BC2 will have a minor positive effect on the health and wellbeing of the population by directing uses with potential for negative effects on amenity to the most appropriate locations to minimise harmful effects. In particular, the policy ensures that retail, cultural, entertainment, and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour.</p>
8. Foster sustainable economic growth and	++	++	<p>Policy BC1 will have significant positive effects on economic growth and providing employment opportunities. The policy will provide much needed floorspace for employment uses, in particular office uses. There is high demand in Islington for office floorspace, which is projected to exceed supply, restricting economic growth and employment in the borough. The biggest threat to the supply of</p>

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
increase employment opportunities across a range of sectors and business sizes			<p>employment land is likely to be from restricted supply caused by a lack of sites as they are outbid by residential developments. In addition, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>Policy BC2 will have a significant positive effect. It will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate. However, the policy will have overall positive effects on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	Policies BC1 and BC2 will have a minor positive effect. Both policies promote development in areas with excellent public transport accessibility, including to the underground and Crossrail, as well as excellent conditions for walking and cycling.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	Policies BC1 and BC2 will have no effect.

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	Policies BC1 and BC2 will have no effect.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	Policies BC1 and BC2 will have no effect.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	0	0	Policies BC1 and BC2 will have no effect.

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
optimises resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	Policies BC1 and BC2 will have no effect.

**Table 1.53: Assessment of Policies BC3 to BC8**

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	+	+	<p><b>New effects have been identified for Policies BC4, BC5, BC6, BC7 and BC8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>The spatial policies in the BCAAP contain area specific policies to improve the built environment, which all are likely to have minor positive effects. These include:</b></p> <p><b>BC3: Public realm improvements identified at Old Street roundabout., development in character with scale and massing, and protection of views.</b></p> <p><b>BC4: Improved public realm, improved links across City Road, improved City Road corridor.</b></p> <p><b>BC5: Improved environment around Farringdon Station, improved public realm, links to spaces including Clerkenwell Green, retail and leisure uses on Cowcross Street.</b></p> <p><b>BC6: Public realm improvements to Exmouth Market, improved routes to Spa Green.</b></p>



IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p><b>BC7: Development to protect character including of the Spa Green Estate, provision of high quality and connected public realm, better pedestrian and cycle access.</b></p> <p><b>BC8: Preservation of the fine grained historic character, active ground floor uses.</b></p> <p>.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for these policies which does not change the overall effect. There is a minor positive effect for policies BC3 to BC8. The spatial policies set out the locations which are considered to be the most appropriate locations for larger scale development such as some areas within the City Fringe Opportunity Area as well as guiding more moderate development in sensitive areas such as Historic Clerkenwell. These policies will ensure development makes the best use of the qualities of different areas across the AAP area, making efficient use of the land.</b></p>
3. Conserve and enhance the significance of heritage	+	+	+	+	+	++	<p>All spatial strategy areas include area specific policies which protect the historic environment in that area. The effects are likely to be minor in scale for all areas except for BC8 where</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
assets and their settings, and the wider historic and cultural environment.							<p>development is to be heritage led, and this area has been recorded as a significant positive effect for this objective. The key policy points for these areas are set out below:</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for Policy BC3 to BC7 which does not change the overall effect.</b></p> <p><b>BC3: Development proposals must preserve or enhance heritage assets, Bunhill Fields, Wesley's Chapel, the Honourable Artillery Company grounds and the area's three protected local landmarks.</b></p> <p><b>BC4: Preservation of the waterway and Graham Street Gardens.</b></p> <p><b>BC5: Preservation of the history and heritage of the wider area (including the Smithfield Market in the City of London), preservation of the open character across the railway lines.</b></p> <p><b>BC6: Preservation of the listed Clerkenwell Fire Station, the Rosebery Avenue Conservation Area, the Church of the Holy Redeemer, various shopfronts on Exmouth Market and Rosebery Avenue, and the listed Finsbury Health Centre.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p><b>BC7: Design to respond to local context, to be human in scale, following predominant building heights, re-establish traditional building lines. Preservation of the Grade II* listed Spa Green Estate.</b></p> <p>BC8. Preserving heritage assets is the starting point for development in this area, reflecting character and historic value. The area has a rich historic townscape pattern of development and includes Conservation Areas, a scheduled ancient monument, listed buildings, historic shopfronts, and strategic and local views to St. Paul's Cathedral.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	0	+	+	0	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC4, BC6, and BC7 which changes the effect from neutral to minor positive. Spatial strategy areas BC3, BC4, BC6, and BC7 include area specific policies to promote liveable neighbourhoods in that area. They key policy points for these areas are set out below. The effects for these policies are considered likely to have minor positive effects against this objective.</b></p> <p><b>BC3: Provision of the Moorfields Eye Hospital and Institute of Ophthalmology legacy eye</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p>clinic facility, GP or community health hub, or all of these uses.</p> <p><b>BC4: Retention of the Islington Boat Club.</b></p> <p>BC5: No specific policies related to this objective.</p> <p><b>BC6: Retention of the Finsbury Health Centre.</b></p> <p><b>BC7: Retention of the Ironmonger Row Baths. Retention and improvement of the Finsbury Leisure Centre to include a new leisure centre, healthcare, childcare, and energy facilities into one new civic development.</b></p> <p>BC8: No specific policies related to this objective.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	0	+	+	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is a minor positive effect for policy BC4. The policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence.</p> <p><b>New effects have been identified for Policy BC6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. BC6 will have minor</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p><b>positive effects through development of affordable housing at site allocation site BC24 the Clerkenwell Fire Station.</b></p> <p>Policy BC7 will have minor positive effects. The redevelopment of Finsbury Leisure Centre referenced in the policy will deliver a significant amount of affordable housing. Finsbury Leisure Centre is also assessed as site allocation BC4.</p> <p>There is no effect for policies BC5, and BC8. See response to IIA Objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is no effect for policies BC4 to BC8. See response to IIA Objective 1. There are opportunities for cross boundary working exist with the City of London and the Cultural Mile for BC5.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas which changes the effect from neutral to minor positive. The Spatial Strategy areas contribute minor positive effects for health and wellbeing through improvements to open space and also through improvements to the public realm to improve opportunities for walking and cycling.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p><b>Refer to objectives 9 and 10 for the summaries of these policies.</b></p> <p>In addition Policy BC7 will have minor positive effects. The redevelopment of Finsbury Leisure Centre referenced in the policy will deliver improved sporting facilities which will benefit local people and encourage more sporting activity. Finsbury Leisure Centre is also assessed as site allocation BC4.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	+	+	+	+	+	<p>There is a significant positive effect for policy BC3. This area is the most significant location for new office floorspace in the borough and correlates with the London Plan Opportunity Area. There is specific reference to the Moorfields site which will deliver a significant quantum of office space and which reinforces the policy position set out in policy B2 and helps contribute to economic growth. The Opportunity Area reflects the importance of cross boundary working with neighbouring London Borough of Hackney and the City of London.</p> <p>There is a minor positive effect for policies BC4 to BC8. There is specific reference to the economic/commercial importance of these areas which reinforces the policy position set out in other Local Plan policies including policy B2, and helps contribute to economic growth.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas which changes the effect from neutral to minor positive.</b></p> <p><b>All Spatial Strategy Areas include policies to improve the public realm to create a safe and convenient network for walking and cycling. The key policies for each area are:</b></p> <p><b>BC3: Major public realm scheme at Old Street Roundabout to remove the gyratory and improve conditions for walking and cycling. All development to improve permeability.</b></p> <p><b>BC4: Improve City Road corridor with active frontages, enhanced public realm, new pedestrian crossings, and tree planting.</b></p> <p><b>BC5: Improved interchange between modes at Farringdon Station and surrounding area, a single station environment, improved public realm in surrounding streets linking to Smithfield Market and Clerkenwell Green.</b></p> <p><b>BC6: Public realm improvements at Exmouth Market improving the pedestrian priority, improvements to Farringdon Road and</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
							<p>Rosebury Avenue to make walking and cycling easier and safer, provision of green infrastructure. Improved routes to Spa Fields.</p> <p><b>BC7: Public realm improvements to facilitate easy pedestrian and cyclist access through and within the area, in line with pedestrian and cycle desire lines.</b></p> <p><b>BC8: Development to positively reinforce the street space, increased permeability, active uses at ground floor.</b></p> <p>These improvements are likely to have significant positive effects on this objective however they have been marked as minor positive under this assessment as these policies will also rely on other mechanisms including action through the Council's Local Implementation Plan (including funding) for implementation.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	+	+	0	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC6, BC7 and BC8 which changes the effect from neutral to minor positive. All Spatial Strategy Areas apart from BC5 include policies to improve the open spaces. The key policies for each area are set out below. Each of these have been marked as minor positive.</b></p>



IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p><b>BC3: Enhancement of the public open space at Finsbury Square. Creation of a new public space at Old Street Roundabout.</b></p> <p>BC4: The policy sets out criteria for residential moorings on Regent's Canal, a designated open space. The criteria ensure that moorings do not harm the open space. Protection of the City Road Basin as a place of relaxation and recreation.</p> <p>BC5: No policies specific to improving open spaces.</p> <p><b>BC6: Proposals in proximity to Spa Fields must ensure avoid adverse impacts and maximise opportunities to enhance its multifunctional role, improvement to routes leading to Spa Fields.</b></p> <p><b>BC7: The area includes Radnor Street Gardens, King Square Gardens and Fortune Street Gardens, as well as other informal green spaces on housing estates. Development to improve and better connect these green spaces. New green spaces should be provided including pocket parks.</b></p> <p><b>BC8: Encourages creating additional public space by transferring underused roads and</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							parking areas into pedestrian use. Proposal to create a green space at Clerkenwell Green in place of car parking.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC5, BC6, BC7 and BC8 which changes the effect from neutral to minor positive. All Spatial Strategy Areas include policies which will improve biodiversity and introduce more green infrastructure and habitat for wildlife. The key policies for each area are set out below. Each of these have been marked as minor positive.</b></p> <p><b>BC3: Improvements to the quality of Finsbury Square, particularly in terms of green infrastructure. New green infrastructure along Old Street and at Old Street Roundabout.</b></p> <p>BC4: Protection of the Regent's Canal, a designated open space, to protect use and function of this space. Protection of the biodiversity value of Graham Street Gardens.</p> <p><b>BC5: Greening of public spaces.</b></p> <p><b>BC6: Greening of Farringdon Road and Rosebery Avenue. Protection of Spa Fields and links to the space.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							<p><b>BC7: Preservation of existing green spaces including parks and the grounds of housing estates, improved connections between these spaces from new developments. Provision of new open spaces including pocket parks. Incorporation of new tree planting to reinforce the street hierarchy.</b></p> <p><b>BC8: Increased biodiversity and green infrastructure in the public realm. Conversion of carriageway space and car parking to green space. Conversion of the car parking at Clerkenwell Green to green space.</b></p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	+	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for BC4. There is a minor positive effect for policy BC4. The spatial strategy sets out that the City Road Basin is a potential location for the expansion of Islington’s Heat Network, and supports delivery of the Bunhill Phase 2 energy centre at the Junction of City Road and Central Street, and the delivery of Bunhill Phase 3 at the City Road Basin. These actions will help to reduce carbon emissions and assist with the transition to zero carbon.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							There is no effect for policies BC5 to BC8. See response to IIA Objective 1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	0	There is no effect for policy BC3. See response to IIA Objective 3.  There is no effect for policies BC4 to BC8. See response to IIA Objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	0	0	0	0	There is no effect for policy BC3. See response to IIA Objective 3.  There is a minor positive effect for policy BC4 as the policy sets out specific criteria for residential moorings on Regent's Canal in relation to air pollution which can be an issue with residential moorings.

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b>  <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
							There is no effect for policies BC5 to BC8. See response to IIA Objective 1.

## Bunhill and Clerkenwell AAP

**Table 1.54: Assessment of Policy AAP1: Delivering development priorities**

IIA Objective	AAP1: Delivering development priorities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	There is no effect for policy AAP1. The policy relates to site allocations making clear that uses which are inconsistent with allocations will not be permitted. There are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment. The site allocations have been subject to individual assessment.
2. Ensure efficient use of land, buildings and infrastructure	0	There is no effect for policy AAP1. See assessment against objective 1.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	There is no effect for policy AAP1. See assessment against objective 1.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	There is no effect for policy AAP1. See assessment against objective 1.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	There is no effect for policy AAP1. See assessment against objective 1.
6. Promote social inclusion, equality, diversity and community cohesion	0	There is no effect for policy AAP1. See assessment against objective 1.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	There is no effect for policy AAP1. See assessment against objective 1.

IIA Objective	AAP1: Delivering development priorities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	There is no effect for policy AAP1. See assessment against objective 1.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	There is no effect for policy AAP1. See assessment against objective 1.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	There is no effect for policy AAP1. See assessment against objective 1.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	There is no effect for policy AAP1. See assessment against objective 1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	There is no effect for policy AAP1. See assessment against objective 1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	There is no effect for policy AAP1. See assessment against objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	There is no effect for policy AAP1. See assessment against objective 1.

### **Policy BC1: Prioritising office use**

The Sustainability Appraisal of BC1 considered that the policy approach will have a significant positive effect against the framework objective for the efficient use of land. The approach will focus development of employment uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport and which has a mixed use character with specific concentrations of employment use. The approach delivers maximisation of employment floorspace in the CAZ which the Islington Employment Study states is the location with the most demand for Grade A office space.

In terms of balancing the competing demands between land uses, policy BC1 provides a specific percentage minimum of 90% in office use in the City Fringe area, or 80% in the remainder of the Bunhill and Clerkenwell AAP area which clearly prioritises the majority of floorspace must be in business use. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period. The policy approach still allows a small amount of alternative floorspace too therefore overall its effect on the sustainability objective to ensure efficient use of land was considered to be significantly positive.

With regards economic growth local evidence currently suggests a significant shortfall in supply of employment land which BC1 will address by maximising employment land delivery. Demand for employment floorspace is projected to far exceed supply which could restrict economic growth and employment in the borough. BC1 will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth as well as providing affordable workspace and training and apprenticeships opportunities for local residents.

The assessment considered the effect of the BC1 policy approach to have a positive effect against the framework objective for liveable neighbourhoods providing a mix of uses with maximisation of office space also allowing sufficient flexibility to provide some floorspace for different uses on ground floor level at least if not a number of floors.

### **Policy BC2: Culture, retail and leisure uses**

The Sustainability Appraisal of Policy BC2 considered it will have positive effects against the framework objective for the efficient use of land by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti social behaviour on residential uses. The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall



mixed use character of the AAP area during the plan period. The policy will have positive effects on health and wellbeing by directing uses with potential for negative effects on amenity to the most appropriate locations – more commercial areas - to minimise harmful effects. Directing cultural uses to these locations will also help support the existing cultural economic function of these areas.

The Sustainability Appraisal of the Spatial Strategy Area policies (BC3 to BC8) found minor positive effects across most spatial strategy areas against the objectives for the built environment, efficient use of land and buildings, conserving heritage, liveable neighbourhoods, health and wellbeing, economic growth, sustainable transport, open spaces, biodiversity. These positive effects are achieved through area specific policies including policies for the development of key sites, proposals for public realm schemes, improvements to open spaces, new links, and protection of specific historic assets. The detail is set out in the table above.

### **Policy BC3: City Fringe Opportunity Area**

The SA highlighted the specific minor positive effect against the framework objective for the built environment from the environmental improvements identified at Old Street roundabout and related public realm work and development in character with scale and massing, and protection of views. The assessment recognises a minor positive effect against the built environment and heritage as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land and references the areas heritage assets. Policy BC3 also has a specific positive effect against the economic growth objective because of specific reference to the Moorfields site and the significant quantum of office which will be delivered – this helps reinforce the policy position set out in policy B2. There is also a positive effect against liveable objective identified with reference to legacy community health provision as part of the Moorfields Eye Hospital site. The area is the most significant location for new office floorspace in the borough which correlates with the London Plan Opportunity Area. The Opportunity Area reflects the importance of cross boundary working with neighbouring London Borough of Hackney and the City of London. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC3 seeking permeability improvements, improvements to the public realm to create a safe and convenient network for walking and cycling, the Old Street roundabout scheme and improvement and the enhancement of the public open space at Finsbury Square. Green infrastructure improvements of Finsbury Square will also have positive effect on biodiversity objective.

### **Policy BC4: City Road**

The SA highlighted the specific minor positive effect against the framework objective for the built environment from policy requirement for improved public realm, improved links across City Road, improved City Road corridor. The assessment recognises a minor positive effect against the built environment and heritage as the policy will ensure development makes the best use of the qualities of different areas across the

spatial area, making efficient use of the land and references the areas heritage assets. There is also a positive effect against liveable objective identified with reference to retention of the Islington boat club. The SA of identified positive effect against objectives for housing, open space and enhancement of natural resources because it sets out criteria for residential moorings, which will help address the housing need for boat dwellers, protect the function of the open space and consider the effect of air pollution. Finally BC4 has minor positive effect against the objective for climate change as City Road Basin is identified as an important location for the expansion of Islington's Decentralised Energy Network, which will help to reduce carbon emissions and assist with the transition to zero carbon. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC4 seeking to improve City Road corridor with active frontages, enhanced public realm, new pedestrian crossings, and tree planting.

### **Policy BC5: Farringdon**

The has a specific positive effect against the objective related to the built environment and heritage assets with specific references to integration and linking of high quality neighbouring public space, improved environment around Farringdon Station, improved public realm, links to spaces including Clerkenwell Green, retail and leisure uses on Cowcross Street. There are also references to the history and heritage of the wider area. The assessment recognises a minor positive effect against the built environment as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land. There was also a positive effect against liveable neighbourhoods as the policy includes requirements related access to services, through preservation and enhancement of Exmouth market Local Shopping Area. The opportunities for cross boundary working exist with the City of London and the Cultural Mile. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC5 recognising the improved interchange between modes at Farringdon Station and surrounding area, a single station environment, improved public realm in surrounding streets linking to Smithfield Market and Clerkenwell Green as well as the greening of public spaces. Green infrastructure improvements of the public realm will also have positive effect on biodiversity objective.

### **Policy BC6: Mount Pleasant and Exmouth Market**

The has a specific positive effect against the objective related to the built environment and heritage with specific references to Public realm improvements to Exmouth Market, improved routes to Spa Green and references the areas heritage assets. The assessment recognises a minor positive effect against the built environment as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land. There is also a positive effect against liveable objective identified with reference to retention of the Finsbury Health Centre. BC6 will have minor positive effects against the objective for affordable housing through development of affordable housing at site allocation site BC24 the Clerkenwell Fire Station. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC6 recognising public realm improvements at Exmouth Market and Farringdon Road / Rosebury Avenue to

make walking and cycling easier and safer, as well as provision of green infrastructure. The importance of Spa Fields is also recognised by the assessment. Cross boundary working opportunities are noted with London Borough of Camden. Green infrastructure improvements of the public realm will also have positive effect on biodiversity objective.

### **Policy BC7: Central Finsbury**

The has a specific positive effect against the objective related to the built environment with specific references to protect character including of the Spa Green Estate, provision of high quality and connected public realm, better pedestrian and cycle access. The assessment recognises a minor positive effect against the built environment and heritage as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land and designing to respond to local context. Reference to the preservation of the Grade II\* listed Spa Green Estate is also identified in the assessment. The SA of identified the positive effect against the objective for liveable neighbourhoods through the redevelopment of Finsbury Leisure Centre referenced in BC7 which will deliver improved sporting facilities which will benefit local people and encourage more sporting activity which will have a minor positive effect. Finsbury Leisure Centre is also assessed as site allocation BC4. The retention of Ironmonger Road baths is also positive. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC7 recognising in the assessment the benefits of and need for informal green spaces on housing estates and how development should improve and better connect these green spaces as well as provide new green spaces. Green infrastructure improvements of these informal spaces will also have positive effect on biodiversity objective.

### **Policy BC8: Historic Clerkenwell**

The has a specific positive effect against the objective related to the built environment with specific references to preservation of the fine grained historic character, active ground floor uses. The assessment recognises a minor positive effect against the built environment as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land. The SA of identified a positive effect against the heritage objective through the approach which identifies preserving heritage assets as the starting point for development in this area, reflecting its uniqueness. There are also specific heritage assets identified for this area. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC8 encouraging the creation additional public space by transferring underused roads and parking areas into pedestrian use and the proposal to create a green space at Clerkenwell Green in place of car parking. Such changes are likely to reinforce the street space and increase permeability as well have positive effect on biodiversity objective with increased biodiversity and green infrastructure in the public realm.

# Part 1: Updated Assessment of Site Allocations

## Introduction

This section sets out the assessment of site allocations and where relevant the alternatives to those site allocations. The presentation of the site assessment has been revised and includes assessment against the full set of appraisal objectives as requested by the Inspectors. Reasonable alternatives are considered alongside site assessments where relevant or explanations of where there are no alternatives. The assessment of site allocations has been revised and the text updated where relevant. This section replaces the assessment of site allocations in appendix 7 of the submission IIA.

All modifications to the site allocations made since the submission IIA are addressed in part 2 of the examination IIA. There are several sites where updates have been made which are assessed in part 2 – these are:

- Page 576
- AUS8: 161-169 Essex Road, N1 2SN -
  - FP5: Conservative Club, 1 Prah Road
  - NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG
  - OIS10: Hornsey Road and Grenville Works, 2A Grenville Road
  - ARCH1: Vorley Road/Archway Bus Station, N19
  - ARCH5: Archway Campus, Highgate Hill, N19
  - BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage

**Table 1.55: Assessment of Policy SA1/AAP1: Delivering development priorities**

IIA Objective	SA1/AAP1: Delivering development priorities	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	There is no effect for policy SA1. The policy relates to site allocations making clear that uses which are inconsistent with allocations will not be permitted. There are no explicit requirements attached to the policy. As such, it is not considered to have an effect in relation to this objective for the purposes of this assessment. Each site allocations has been subject to individual assessment which considers relevant effects.
2. Ensure efficient use of land, buildings and infrastructure	0	There is no effect for policy SA1. See assessment against objective 1.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	There is no effect for policy SA1. See assessment against objective 1.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	There is no effect for policy SA1. See assessment against objective 1.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	There is no effect for policy SA1. See assessment against objective 1.
6. Promote social inclusion, equality, diversity and community cohesion	0	There is no effect for policy SA1. See assessment against objective 1.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	There is no effect for policy SA1. See assessment against objective 1.

IIA Objective	SA1/AAP1: Delivering development priorities	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	There is no effect for policy SA1. See assessment against objective 1.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	There is no effect for policy SA1. See assessment against objective 1.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	There is no effect for policy SA1. See assessment against objective 1.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	There is no effect for policy SA1. See assessment against objective 1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	There is no effect for policy SA1. See assessment against objective 1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	There is no effect for policy SA1. See assessment against objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	There is no effect for policy SA1. See assessment against objective 1.

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**Table 1.56: Site Assessment KC1: King’s Cross Triangle Site**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>KC1: King’s Cross Triangle Site, bounded by York Way, East Coast Main Line &amp; Channel Tunnel Rail Link, N1</b>	+	++	0	+	+	+	+	+	0	+	-	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC1 is allocated for mixed use development including residential, business, retail, leisure and community uses. The intensification/provision of business floorspace is a priority in this location but the site has extant planning permission for a residential-led, mixed use scheme providing leisure, community and retail uses as well as open space. The allocation also identifies that the northern part of the site overlaps with land deemed suitable for a district landmark building of up to 20 storeys, although the land is currently operational railway land and unlikely to come forward for development in the foreseeable future.</p> <p>The development considerations suggest that the site is a challenging location for residential development as it is surrounded by major road and rail infrastructure, which could expose future occupants to the negative effects of noise and vibration if not adequately addressed. The larger scale of development proposed by the allocation would have positive or significant positive effects on economic growth by providing a large quantum of employment floorspace, and would have positive effects on housing by providing additional homes. In turn this could have a positive effect on social inclusion through the provision of good quality housing and a diverse range of employment opportunities at the site. Similarly, the provision of affordable housing, leisure and community facilities and new open space could have a positive effect on health and wellbeing. The allocation could have a significant positive effect on the efficient use of land by proposing a significant uplift in floorspace on a site most recently use for storage (B8) and car parking (Sui Generis). New development on the disused former railway lands can help to enhance the local character of the area and promote a high quality built environment.</p> <p>There is potential for development to have a negative impact on biodiversity as the site is partially within a SINC. Impacts should be carefully considered and managed.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for mixed use development and has planning permission that accords with the uses proposed in the draft allocation.</p>													

**Table 1.57: Site Assessment KC2: 176-178 York Way**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC2: 176-178 York Way, N1 0AZ	+	++	0	0	+	0	0	++	0	0	-	0	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC2 is allocated for business-led, mixed use development. The intensification of business uses is the priority on this site, with an element of residential development also likely to be acceptable.</p> <p>The Islington Tall Building Study suggests the north-western part of 176-178 York Way would be an appropriate location for a local landmark building of up to 12 storeys (37m). Specific permeability improvements are identified which will help create a safer and more inclusive built environment opening the area up to new pedestrian routes. The larger scale of development proposed on this site would have positive or significant positive effects on economic growth by providing a large quantum of employment floorspace in an area well connected to public transport.</p> <p>The site is in a challenging location for residential development as it is located above railway land and the London Underground, which could expose future occupants to the negative effects of noise and vibration if not adequately addressed. Delivery of quality housing which addresses the challenging environment would be an important consideration to ensure a good standard of living for residents that encouraged a sense of community, and good health and wellbeing in accordance with objectives 6 and 7. If this could be satisfactorily achieved, the allocation would have a positive effect on housing by providing additional homes including affordable housing. The allocation makes efficient use of land by proposing a significant uplift in floorspace in an accessible location. Development of the site can help to enhance the local character of the area and promote a high quality built environment. The permeability improvements could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy KC2 remain unchanged, for example, for a local landmark building of up to 12 storeys and permeability improvements.</p>													

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Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.

The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.

Alternative 1 should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.

The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. Alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.

It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.

<p>Reasonable Alternative 2: Residential-led Development</p>	+	0	0	+	++	+	+	--	0	0	0	0	0	0	0
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**Commentary on assessment of likely significant effects of Alternative 2**

This alternative is for residential-led development. The other provisions of policy KC2 remain unchanged, for example, for a local landmark building of up to 12 storeys and permeability improvements.

Allocating this site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. Although the site has been identified as suitable for development, the site falls partly within the CAZ, a key employment location. A residential-led allocations is unlikely to adequately balance the competing demands for land in the borough and provide for the full range of development needs. The intensification of the site could help to make more efficient use of the land. Therefore overall a neutral effect has been identified for objective 2.

A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities.

The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion and

	<p>on health and wellbeing by helping people out of overcrowded or poor quality housing, combatting some of the negative consequences of relative poverty.</p> <p>Whilst residential-led development could bring residents into town centres, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site – which is in existing business and employment use – will no longer be contributing towards the borough’s economy or supporting a range of jobs.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>The proposed allocation allows for an element of housing, whilst recognising the site is in a challenging location for residential development, with a strong emphasis on business use given its location. Two reasonable alternatives to the business-led allocation for KC2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough’s identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its proximity to King’s Cross and the CAZ and the borough’s need for additional employment floorspace.</p>

**Table 1.58: Site Assessment KC3: Regents Wharf**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1</b>	0	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC3 is allocated for retention and reprovision of business floorspace, with potential for limited intensification of business use, and small scale commercial uses at ground floor level. The site has planning permission for additional business floorspace with flexible A1/A3/B1/D1/D2 ground floor uses.</p> <p>It is considered the provision of business and other commercial uses on site will have minor positive effects in relation to economic development and the efficient use of land.</p>													

<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is allocated for retention, re-provision and limited intensification of business floorspace and has planning permission that accords with the uses proposed in the draft allocation.
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**Table 1.59: Site Assessment KC4: Former York Road Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC4: Former York Road Station, 172-174 York Way, N1	+	+	+	+	+	+	+	+	0	+	0	+	+	0
Commentary on assessment of likely significant effects of site allocations	<p>KC4 is allocated for business-led development with an element of residential use.</p> <p>The allocation states that the locally listed former underground station should be retained on site, which will likely have positive effects on the historic environment and built environment. There will also be potential for creation of a safer and more inclusive built environment with creation of new public open space, which could also be positive for health and wellbeing. The allocation for business led use will have positive effects on economic growth, and positive effects on housing quality and social inclusion if it includes an element of residential use which will also deliver affordable housing. The allocation should have positive effects on the efficient use of land by bringing a vacant building back into use and the development considerations recognise the opportunity for site assembly with the neighbouring site. This site may also have a positive effect in terms of reducing the effects of climate change and increasing resource efficiency as there is potential for the site to support the expansion of the council's decentralised energy network.</p>													
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	+	+	+	0	0	+	0	+	0	+	+	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for mixed use commercial and residential development. The other provisions of policy KC4 remain unchanged, for example, the retention of the existing locally listed station, potential for connection to a decentralised energy network and incorporation of public open space.</p> <p>The alternative could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs, particularly high-value residential uses, may be chosen at the expense of delivering the employment</p>													

	<p>floorspace needed to support Islington’s projected economic growth. However, given there would be likely to be some commercial use on the site a minor positive effect has been identified overall.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. The provision of affordable housing is also likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: residential-led development</b>	+	0	+	+	++	+	0	-	0	+	0	+	+	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development.</p> <p>The other provisions of policy KC4 remain unchanged, for example, the retention of the existing locally listed station, potential for connection to a decentralised energy network and incorporation of public open space.</p> <p>The intensification of the site for residential could help to make more efficient use of the site, however the site is partially within the CAZ where employment uses are prioritised and there are existing employment uses on the site and so residential development may not help to focus development in the most appropriate locations. On balance a neutral effect on the efficient use of land has been identified.</p> <p>A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities. However, having no commercial uses it could also have a minor negative effect on economic growth.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for KC4 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough’s identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it</p>													

was considered that business-led development was most appropriate for this site given its proximity to King's Cross and the CAZ and the borough's need for additional employment floorspace.

**Table 1.60: Site Assessment KC5: Belle Isle Frontage**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC5: Belle Isle Frontage, land on the east side of York Way	+	+	0	0	0	0	0	++	0	0	-	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The allocation for KC5 states that the rear of the site accommodates a UKPNS feeder station providing power to HS1, but the frontage of the site is under-utilised and does not create a positive street frontage. It is considered that the front portion of the site could accommodate office uses linking to King's Cross. The development of offices in this location would mark the end of the King's Cross office cluster, and signal the start of the Vale Royal / Brewery Road industrial area.</p> <p>The Islington Tall Building Study suggests this site would be an appropriate location for a local landmark building of up to 15 storeys (46m).</p> <p>The allocation will have significant positive effects on economic development by delivery of a substantial commercial led scheme on a site including a taller building. This will make more efficient use of land compared to the current low density infrastructure use. A new quality building will also improve the local environment, provide an active frontage and ground floor uses which will create a safer and more inclusive environment creating a more sustainable neighbourhood. The site falls partially within the Copenhagen Junction SINC, there is potential for development to have a negative impact on biodiversity as the site is partially within a SINC. Impacts should be carefully considered and managed.</p>													
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	0	0	+	+	0	-	0	0	0

<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy KC4 remain unchanged, for example, the opportunity for a local landmark building of up to 15 storeys and the impact a new building could make on improving the local built environment.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The site is within the CAZ which prioritises employment uses. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. However, given the a mixed use development would lead to the provision of some employment use on the site, overall a minor positive effect is identified.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating the sites for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. The provision of additional housing, particularly affordable housing, could also have a positive effect in terms of reducing health inequalities if it enables some people to move out of overcrowded or inappropriate dwellings into new, good quality homes.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<p><b>Reasonable Alternative 2: residential-led development</b></p>	+	-	0	+	++	+	0	--	+	0	-	+	0	+
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>This alternative is for residential-led development. The other provisions of policy KC4 remain unchanged, for example, the opportunity for a local landmark building of up to 15 storeys and the impact a new building could make on improving the local built environment.</p> <p>Allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations because the site is within the CAZ which prioritises employment uses.</p> <p>Given the location of the site in the CAZ where employment uses are prioritised, a residential-led allocation is likely to have a significant negative effect on economic growth by not contributing towards the boroughs need for additional employment floorspace and jobs associated with that.</p> <p>A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities.</p>													

	<p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for KC5 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location in the CAZ, its proximity to King's Cross and the borough's need for additional employment floorspace.</p>

**Table 1.61: Site Assessment KC6: 8 All Saints Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC6: 8 All Saints Street, N1 9RJ	0	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC6 is allocated for retention and re-provision of business floorspace, and potential for limited intensification of business use. Small scale commercial uses at ground floor level.</p> <p>The existing building is an acceptable context building. The allocation will likely have positive effects on economic development by providing additional employment floorspace. Through protecting and potentially intensifying the use of the site for employment use, the allocation can contribute to the more efficient use of land and the wider economic growth of the King's Cross Priority Employment Location in which it sits.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0

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<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Given the site is already wholly in use as offices, a mix of uses on the site would lead to a reduction in employment use on the site which could also be damaging to the wider King's Cross Priority Employment Location within which the site sits and where employment uses are prioritised.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<p><b>Reasonable Alternative 2: Residential-led development</b></p>	0	-	0	0	++	+	0	--	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>Allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is located within the King's Cross Priority Employment Location (PEL) which prioritises employment uses. It is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site – which is in existing business use – will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the business-led allocation for KC6 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on</p>													



balance it was considered that business-led development was most appropriate for this site given its proximity to King's Cross and the CAZ and the borough's need for additional employment floorspace.

**Table 1.62: Site Assessment KC7: All Saints Triangle**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC7: All Saints Triangle, Caledonian Road, N1 9RR	+	+	0	+	0	0	0	+	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC7 is allocated for redevelopment for business use.</p> <p>The existing building has large blank frontages and does not positively contribute to the character of the area. The allocation requires that a small pocket park on the corner of the site is retained and improved, which could have a minor positive effect on biodiversity. An improved building with an improved open space will have positive effects on the local environment and liveable neighbourhoods helping create a safer and more inclusive environment. The current use is quite low density and additional floorspace could be created on site making a more efficient use of land. A new larger building would have positive effects on economic development by providing more employment floorspace.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	0	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed commercial and residential development. The other provisions of policy KC7 remain unchanged, for example, improvements to the designated open space to the southern corner of the site.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The However the provision of some commercial use is likely to provide some employment benefits and so on balance a neutral effect has been identified in relation to objective 8.</p>													

	<p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating the site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: residential-led development</b>	+	0	0	0	++	+	+	--	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for mixed commercial and residential development. The other provisions of policy KC7 remain unchanged, for example, improvements to the designated open space to the southern corner of the site.</p> <p>The current use is quite low density and additional development could be accommodated on site making a more efficient use of land. Allocating the sites for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is located within the King's Cross Priority Employment Location which prioritises employment uses. Therefore on balance a neutral effect has been identified for objective 2. If developed for residential purposes, the site – which is in existing business use – will no longer be contributing towards the borough's economy or supporting a range of jobs. Given its potential for intensification, it will also not contribute towards future economic or jobs growth. A significant negative effect has therefore been identified in relation to economic growth.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion and on health and wellbeing by helping people out of overcrowded or poor quality housing, combatting some of the negative consequences of relative poverty.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for KC7 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within the King's Cross Priority Employment Location, the existing business use of the site and the borough's need for additional employment floorspace.</p>													

## Site Allocations: Vale Royal and Brewery Road Locally Significant Industrial Sites

Table 1.63: Site Assessment VR1: Fayers Site, 202-228 York Way

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, adjacent 196-200 York Way, N7 9AX	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation states that the site’s prominent corner location warrants a high quality, well designed building. The design of any building will be of high quality and will be in keeping with the site’s industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site’s industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p>													

	<p>The site is partially within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.

**Table 1.64: Site Assessment VR2: 230-238 York Way**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR2: 230-238 York Way, N7 9AG	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation states that the site's prominent corner location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment. The design of any building will be of high quality and will be in keeping with the site's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other</p>													

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uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.

The site is partially within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.

The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral.

+	-	+	-	+	-	0	-	-	0	0	-	0	-
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**Commentary on assessment of likely significant effects of Alternative 1**

This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys and that site’s location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment

The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.

Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional

industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative.

With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.

Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this

	way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).													
Reasonable Alternative 2 Office co-location	+	0	+	0	0	+	0	+	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 2</b>  Page 595	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys and that site's location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For Alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this</p>													

location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.

Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

Reasonable  
Alternative 3  
Office and housing  
co-location

+	-	+	-	+	0	0	-/0	-	0	0	-	0	-
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Commentary on  
assessment of  
likely significant  
effects of  
Alternative 3

Alternative 3 is for the co-location of industrial uses with mixed residential and office uses. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys and that site's location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment.

The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.



The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.

Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

## Conclusion

Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR2: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function.

**Table 1.65: Site Assessment VR3: Tileyard Studios**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR3: Tileyard Studios, Tileyard Road, N7 9AH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation states that the site's prominent corner location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment. The design of any building will be of high quality and will be in keeping with the site's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The site is partially within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													

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<b>Reasonable Alternative 1: Housing co-location</b>	0	-	+	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative.</p>													

With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.

Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).

<b>Reasonable Alternative 2 Office co-location</b>	0	0	+	0	0	+	0	+	-	0	0	-	0	-
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**Commentary on assessment of likely significant effects of Alternative 2**

This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.

For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.

For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.

Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

<b>Reasonable Alternative 3</b> <b>Office and housing co-location</b>	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
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This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.

The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.

The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

	<p>Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>
<b>Conclusion</b>	<p>Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR3: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function.</p>

**Table 1.66: Site Assessment VR4: 20 Tileyard Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR4: 20 Tileyard Road, N7 9AH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.													

The design of any building will be of high quality and will be in keeping with the site's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.

Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.

The site is within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.

The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.

<b>Reasonable Alternative 1: Housing co-location</b>	0	-	+	-	+	0	0	-	-	0	0	-	0	-
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<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1</p> <p>The provision of new housing, contributing to the borough's significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p>
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Although residential uses can be accommodated elsewhere in the borough to meet the borough's housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as 'bad neighbours'. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative.

With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.

Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).

<b>Reasonable Alternative 2</b> <b>Office co-location</b>	0	0	+	0	0	+	0	+	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London’s economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.</p>													

	<p>Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													
<p>Reasonable Alternative 3 Office and housing co-location</p>	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
<p>Commentary on assessment of likely significant effects of Alternative 3</p>	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p>													

The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative three could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.

Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

## Conclusion

Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR4: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function.

**Table 1.67: Site Assessment VR5: 4 Brandon Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR5: 4 Brandon Road, N7 9AA	+	++	+	0	0	+	0	++	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b> Page 609	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The design of any building will be of high quality and will be in keeping with the site's industrial character and the allocation sets out that building height will be limited to 5 storeys. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													
Reasonable Alternative 1: Housing co-location	0	-	+	-	+	0	0	-	-	0	0	-	0	-

This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1

The provision of new housing, contributing to the borough's significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.

Although residential uses can be accommodated elsewhere in the borough to meet the borough's housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as 'bad neighbours'. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative.

With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.

	<p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
<b>Reasonable Alternative 2</b> <b>Office co-location</b>	0	0	+	0	0	+	0	+	-	0	0	-	0	-
<b>Commentary on Assessment of likely significant effects of Alternative 2</b> <span style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 611</span>	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London’s economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p>													

For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.

Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

<b>Reasonable Alternative 3</b> <b>Office and housing co-location</b>	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
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**Commentary on assessment of likely significant effects of Alternative 3**

This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.



The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.

The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative three could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.

	Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).
<b>Conclusion</b>	Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR5: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function.

**Table 1.68: Site Assessment VR6: The Fitzpatrick Building**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR6: The Fitzpatrick Building, 188 York Way, N7 9AD	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site has planning permission for a mix of B1a and flexible B1 floorspace. Should the site be subject to further amendments or new planning applications, any proposal should seek to retain and intensify industrial uses (B1c, B2 and B8). Office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The design of any building will be of high quality. Where a subsequent planning application is approved, the development should be in keeping with the area's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. Any new business development will be designed to ensure that it is adaptable to meet the needs of a range of users. The allocation sets out that a building of up to 8 storeys may be appropriate. All proposals which would increase existing heights should address criteria in Policy DH3 Building Heights to ensure that high quality architecture is secured and that the design enhances local character and distinctiveness.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such industrial development should a</p>													

	<p>subsequent application be submitted. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The development of the site will support economic growth in the borough. Business space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy, reducing barriers to employment and supporting social inclusion objectives. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has an extant, implemented planning permission for a mix of B1(a) and flexible B1 floorspace. The allocation seeks to retain and intensify industrial uses should the permitted scheme be subject to amendment.

**Table 1.69: Site Assessment VR7: 43-53 Brewery Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>VR7: 43-53 Brewery Road, N7 9QH</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The design of any building will be of high quality and will be in keeping with the site's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p>													

	<p>The site is partially within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained. There is a locally listed building nearby, as such, Local Plan policies will apply; any development will be required to respect the heritage asset.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													
<b>Reasonable Alternative 1: Housing co-location</b>	0	-	+	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p>													

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative. With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.

Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).

<b>Reasonable Alternative 2 Office co-location</b>	0	0	+	0	0	+	0	+	-	0	0	-	0	-
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**Commentary on assessment of likely significant**

This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be

introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.

For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.

For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.

Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

<p><b>Reasonable Alternative 3</b> <b>Office and housing co-location</b></p>	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
<p><b>Commentary on assessment of likely significant effects of Alternative 3</b></p>	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative three could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace</p>													

can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.

Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

#### Conclusion

Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR7: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function.

**Table 1.70: Site Assessment VR8: 55-61 Brewery Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR8: 55-61 Brewery Road, N7 9QH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	The site has planning permission for the provision of additional B1 floorspace, including B1c. Should the site be subject to further amendments or new applications, any proposal should seek to retain and intensify industrial uses (B1c, B2 and B8). Office floorspace will only be acceptable as part of a hybrid workspace scheme.													



<b>effects of site allocations</b>	<p>The design of any building will be of high quality and will be in keeping with the site's industrial character. The allocation sets out that replacement business floorspace should be higher quality, more accessible and more flexible. Any industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that any subsequent planning application will deliver much needed industrial space.</p> <p>The site is within a protected viewing corridor. The allocation sets out that building heights will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.</p> <p>The development of the site will support economic growth in the Borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.</p>

**Table 1.71: Site Assessment VR9: Rebond House**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR9: Rebond House, 98-124	+	++	+	0	0	+	0	++	0	0	0	0	0	0

<b>Brewery Road, N7 9BG</b>	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The design of any building will be of high quality and will be in keeping with the site's industrial character and the allocation sets out that the building height will be limited to 5 storeys. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>There is a locally listed building nearby, as such, Local Plan policies will apply and any development will be required to respect the heritage asset.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.</p>

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**Table 1.72: Site Assessment VR10: 34 Brandon Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>VR10: 34 Brandon Road, N7 9AA</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The design of any building will be of high quality and will be in keeping with the site's industrial character and the allocation sets out that the building height will be limited to 5 storeys. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>														
<b>Reasonable Alternative 1: Housing co-location</b>	0	-	+	-	+	0	0	-	-	0	0	-	0	-	-

This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1

The provision of new housing, contributing to the borough's significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.

Although residential uses can be accommodated elsewhere in the borough to meet the borough's housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as 'bad neighbours'. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative. With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.

	<p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
<b>Reasonable Alternative 2</b> <b>Office co-location</b>	0	0	+	0	0	+	0	+	-	0	0	-	0	-
<b>Commentary on Assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London’s economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p>													

For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.

Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

**Reasonable Alternative 3**  
**Office and housing co-location**

0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
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**Commentary on assessment of likely significant effects of Alternative 3**

This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys.

Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.

The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.

The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.

	Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).
<b>Conclusion</b>	Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR10: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function.

## Angel and Upper Street

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Table 1.73: Site Assessment AUS1: Royal Bank of Scotland

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS1: Royal Bank of Scotland, 42 Islington High Street, N1 8EQ	+	+	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS1 is allocated for intensification of office use with active retail use on the ground floor.</p> <p>The allocation protects business use although the site has limited capacity for intensification. The net increase in business floorspace following development may be limited, but is considered to have a positive effect on the overall provision of business floorspace in the borough therefore having a positive effect in relation to economic growth as well as in relation to the efficient use of land. In addition, the allocation seeks improvements to the public realm in the Town Centre, public access to the building's currently private courtyards (if the current building is retained) and improved permeability between Islington High Street and Torrens Street. This will improve the quality of the town centre environment making it safer and more inclusive for people leading to positive effects in relation to objectives 1 and 4. An improved public realm and permeability could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													



Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of AUS1 remain the same, for example the public realm and permeability improvements.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings.</p> <p>The co-location of commercial and residential uses could have a minor positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a minor positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Furthermore, given the current employment nature of the site and limited scope for intensification a mix of uses would reduce the employment use that is currently on the site.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of AUS1 remain the same, for example the public realm and permeability improvements.</p> <p>Allocating the site for residential-led development could have a significant negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is within Angel Town Centre and CAZ where employment uses are prioritised and the site is in existing employment use. Whilst residential-led development on this site could bring more residents into the town centres, potentially</p>													

	<p>improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and not contribute towards economic growth.</p> <p>A residential-led allocations could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for AUS1 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ, the existing employment use of the site and the borough's need for a significant amount of additional employment floorspace.

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**Table 1.74: Site Assessment AUS2: Pride Court, 80-82 White Lion Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS2: Pride Court, 80-82 White Lion Street, N1 9PF	+	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS2 is allocated for intensification of business floor space.</p> <p>The allocation is intended to positively contribute to the provision of floorspace needed to meet Islington's projected employment growth. Although the net increase of business floor space achievable at the site might be limited, it is considered that it will have a minor positive effect on the overall provision of business floorspace in the borough and contribute towards the efficient use of land. Development of the site, including the provision of active frontages along White Lion Street, could help to enhance the local character of the area and promote a high quality built environment.</p>													

<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	-	0	+	++	+	+	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Although there is scope for the intensification of the site, allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is within Angel Town Centre and CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that this is likely to have a significant negative effect on economic growth. If developed for residential purposes, these site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p>													

	<p>A residential-led allocations could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion and on health and wellbeing by helping people out of overcrowded or poor quality housing, combatting some of the negative consequences of relative poverty.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the allocation for AUS2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that intensification for business use development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>

**Table 1.75: Site Assessment AUS3: Electricity substation, 84-89 White Lion Street**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS3: Electricity substation, 84-89 White Lion Street, N1 9PF</b>	+	++	0	0	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS3 is allocated for further intensification of business floorspace.</p> <p>The development will have a positive effect in optimising use of an underutilised site, which was previously used as an electricity substation. Allocating the site for business use will contribute to the provision of floorspace needed to support projected employment growth in the borough. Development of this underutilised site can help to enhance the local character of the area and promote a high quality built environment.</p>													

Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings on this underutilised site. Development of this underutilised site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth on a site that is located within the CAZ where employment uses are prioritised.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	--	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Development of this underutilised site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>Although development of this underutilised site for housing would help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p>													

	<p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS3 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>

**Table 1.76: Site Assessment AUS4: Land at 90-92 White Lion Street**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS4: Land at 90-92 White Lion Street, N1 9PF	+	++	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS4 has extant planning permission for mixed-use development. Should the planning permission be subject to further amendments, or new applications submitted, the priority use of the site should be intensification of office uses on upper floors with some active ground floor town centre uses.</p> <p>The development of the site will have a positive effect in optimising use of previously vacant land located in a central part of the town centre with good public transport connections. The allocation would contribute to the provision of business floorspace needed for economic growth and provide more opportunity for residents to access employment in the borough, which could have a minor positive effect in terms of social inclusion objectives. Also, it should have a positive effect on the quality of the environment given it is currently a vacant and cleared plot and through the provision of active frontages it will make the town centre a safer and more inclusive place to visit.</p>													

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Reasonable Alternative 1: Residential-led development	+	-	0	0	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The site is located within Angel Town Centre and the CAZ, where employment uses are prioritised and therefore residential-led development is not considered to focus development in the most appropriate location and be an efficient use of land.</p> <p>A residential-led allocation for the site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring housing in to a town centre location where residents could be close to facilities such as shops, libraries and other leisure activities. However, if the site was developed for residential uses at the expense of commercial uses it could also have a negative impact on the diversity, vibrancy and economic sustainability of the area. As such the effect of the allocation on liveable neighbourhoods is assessed as neutral.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs: the provision of additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion. Development should also have a positive effect on the quality of the environment given the site is currently a vacant and cleared plot, making the town centre a safer and more inclusive place to visit.</p>													
Reasonable Alternative 2: Mixed-use commercial and residential development	+	+	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The alternative of mixed-use commercial and residential development is broadly reflective of the planning permission for the site. Development should also have a positive effect on the quality of the environment given the site is currently a vacant and cleared plot, making the town centre a safer and more inclusive place to visit.</p> <p>A mix of commercial and residential uses positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. High-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth on a site that is located within the CAZ where employment uses are prioritised. However, a mix use development on this currently vacant site would deliver some employment floorspace which would contribute towards economic growth and therefore on balance a minor positive effect for economic growth is identified.</p>													

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<b>Conclusion</b>	<p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS4 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>

**Table 1.77: Site Assessment AUS5: 94 White Lion Street**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS5: 94 White Lion Street (BSG House), N1 9PF	+	+	0	0	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>AUS5 is allocated for intensification of business use.</p> <p>Allocating the site for business use will contribute to the provision of floorspace needed to meet projected employment growth in the borough. The allocation also aims to optimise the use of land by adding extra floorspace on site. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p>													



<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	+	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that Alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and not contribute towards economic growth.</p>													

	<p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS5 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>

**Table 1.78: Site Assessment AUS6: Sainsbury's, 31-41 Liverpool Road**

IA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS6: Sainsbury's, 31-41 Liverpool Road, N1 0RW</b>	++	++	0	+	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS6 is allocated for re-providing/ improving retail uses alongside provision of a significant amount of business floorspace which could contribute to meeting strategic office needs. The car park could be utilised for additional development of retail and business floorspace.</p> <p>The development of the site could have a significant positive effect in optimising use of a previously developed building and the adjacent underutilised land, currently used for car parking and storage units. The site would make a significant contribution to the provision of business and retail floorspace needed to support the borough's projected economic growth. Prioritising delivery of employment space in this town centre location within the CAZ is considered appropriate and helps meet wider needs for employment growth in the borough. Policy B2 identifies that office use is an important land use in Angel town centre. The allocation for commercial uses balances competing demands between land uses and ensures that much needed business and retail floorspace should be delivered in an appropriate location within the CAZ and Angel Primary Shopping Area.</p>													

	<p>The allocation should have a positive effect on the built environment by promoting a more inclusive and safer environment through its mix of uses and requiring maintained/improved permeability between White Conduit Street and Tolpuddle Street. The permeability improvements could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral. The site represents an opportunity for a more efficient use of land, and if the amount of car parking is reduced development could help to meet objectives to reduce dependence on cars which could also be positive in relation to reducing contributions to climate change and air quality however the extent of the effects will depend on the detail of the scheme that comes forward and so have been assessed as neutral.</p> <p>Development at the site has the potential to disrupt the operation of Chapel Market, as stallholders use storage units located on the site. The allocation is clear that storage units must be provided to ensure the continued operation of the market, which contributes to the variety and diversity of products and services available in the town centre to serve the needs of both residents and visitors to the area. Proposals for the site must also demonstrate that adverse impacts on the surrounding groundwater Source Protection Zone will be avoided to protect groundwater quality which will have a positive effect in relation to natural resources.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	-	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy AUS6 remain unchanged for example in relation to permeability and re-provision of storage units for Chapel Market stallholders.</p> <p>Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised.</p> <p>The site is located within the CAZ and Angel Town Centre (including Primary Shopping Area) where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres as well as provide for employment needs. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services as the provision of a residential-led development could lead to a reduction in key town centre services.</p> <p>The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

<b>Reasonable Alternative 2: Business-led development</b>	++	+	0	-	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation to permeability and re-provision of storage units for Chapel Market stallholders.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within the CAZ, where the delivery of business floorspace is a priority. Allocating this site for business-led development could help the towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council’s social inclusion objectives.</p> <p>The site is located within the CAZ and Angel Town Centre (including Primary Shopping Area) where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities. If no retail use is re-provided on the site this could have a minor negative effect on the promotion of liveable neighbourhoods</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed retail and business use allocation for AUS6 were identified: residential-led and business-led development. Whilst business-led development could have positive effects by supporting a specific identified development need, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that a mix of business and retail development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough’s need for a significant amount of additional employment floorspace.</p>													

**Table 1.79: Site Assessment AUS7: 1-7 Torrens Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS7: 1-7 Torrens Street, EC1V 1NQ</b>	+	+	0	++	0	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS7 is allocated for refurbishment for town centre uses such as retail, offices, cultural and community uses. The existing arts space should be retained. The refurbishment of the buildings can help to retain and enhance the local character of the area and promote a high quality built environment.</p> <p>Development of the site should have a positive effect in optimising use of a previously developed building. It will positively contribute to the provision of business floorspace needed for economic growth. The most significant positive effect will be on liveable neighbourhoods and the quality of the environment by protecting the existing community and cultural uses and promoting other town centre uses with active ground floor frontages encouraged. Cultural and community uses can have a positive impact on social inclusion, and support the mental and physical health and wellbeing of their patrons.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	+	-	0	-	++	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation the refurbishment of the site.</p> <p>The site is located within Angel town centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. There are also employment uses on the site currently. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a minor negative effect on economic growth.</p> <p>Allocating this sites for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Improved housing options would also have a positive effect in terms of social inclusion. However because of there would be not cultural and community uses provided, on balance a neutral effect has been identified in relation to social inclusion.</p>													

	The development of this site for housing could have a minor negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs.													
Reasonable Alternative 2: Business-led development	+	+	0	-	0	0	0	0	++	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation the refurbishment of the site.</p> <p>The loss of community and cultural uses as part of a business-led development is likely to have a minor negative effect on liveable neighbourhoods.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within the CAZ, where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives – although on balance this would be neutral given the loss of cultural and community uses.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for AUS7 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that the additional flexibility offered by a mixed-use allocation is appropriate for this site which currently comprises a range of uses.													

**Table 1.80: Site Assessment AUS8: 161-169 Essex Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>AUS8: 161-169 Essex Road, N1 2SN</b>	+	+	++	++	0	+	0	+	+	0	0	+	0	+	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS8 is allocated for a mix of retail, culture and leisure uses. There is an opportunity to develop the car park to the rear of the site; any development on this portion of the site should prioritise business floorspace, particularly offices.</p> <p>The most significant positive effect of the allocation will be on liveable neighbourhoods. The allocation protects the existing cultural uses which will attract people to the area and help sustain a vibrant and viable town centre in Angel. The building is Grade II* listed and this is protected in the allocation; bringing the building back into appropriate use could have a significant positive heritage impact. The allocation also positively contributes to creating a high quality environment and optimising the use of land by supporting the development of the car park to meet need for other priority uses in the area in particular employment which will help meet wider needs for employment growth in the borough. This also contributes to the council's strategic objective to encourage active modes of transport and reduce dependency on cars, which should have a minor positive effect in relation to the council's objectives to reduce contributions to climate change and improve air quality.</p>														
<b>Reasonable Alternative 1: Residential-led development</b>	+	+	++	-	++	+	0	-	+	0	0	+	0	+	
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for business-led development. The other provisions of policy AUS8 remain unchanged for example bringing the building back into use and optimising use of land by supporting the development of the car park.</p> <p>The site is located within Angel Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, and in relation to economic growth.</p> <p>Allocating this for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>														
<b>Reasonable Alternative 2: Business-led development</b>	+	+	++	-	0	+	0	++	+	0	0	+	0	+	
<b>Commentary on assessment of likely significant</b>															

<b>effects of Alternative 2</b>	<p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Although this option would meet a clearly defined need, it would be at the expense of other priority development needs and would not be the most advantageous way of balancing competing demands for land. The loss of cultural use on the site could have a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for AUS8 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, leisure and culture uses is appropriate for this site.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>

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**Table 1.81: Site Assessment AUS9: 10-14 White Lion Street**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS9: 10-14 White Lion Street, N1 9PD</b>	0	+	0	0	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS9 is allocated for, and has planning permission for, the intensification of business use.</p> <p>The allocation should have a positive effect in optimising the use of previously developed land and buildings. The intensification of business uses on site supports the economic growth of the Angel Town Centre and wider borough.</p>													
<b>Conclusion</b>	No reasonable alternative was identified, the allocation reflects the extant planning permission for the site.													

**Table 1.82: Site Assessment AUS10: 1-9 White Lion Street**



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS10: 1-9 White Lion Street, N1 9PD	0	+	0	0	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS10 is allocated for intensification of business use.</p> <p>The allocation should have a positive effect in optimising the use of previously developed land and buildings. The intensification of business uses on site supports the economic growth of the Angel Town Centre and wider borough.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

	It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.													
Reasonable Alternative 2: Residential-led development	0	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b> Page 646	<p>Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for AUS10 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.													

**Table 1.83: Site Assessment AUS11: Collins Theatre**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS11: Collins Theatre, 13-17 Islington Green, N1 2XN	+	+	+	++	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	AUS11 is allocated for protection of the site's cultural role and bringing the theatre back into use. The allocation should help to maintain an attractive, successful and vibrant centre which draws in visitors and contributes to the area's economic growth. The allocation details a number of heritage designations relevant to the site which should be considered as part of any development proposals.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The allocation supports the permitted theatre use of the site with the intention of securing and protecting a cultural use for the benefit of the borough in accordance with Local Plan policy.													

**Table 1.84: Site Assessment AUS12: Public Carriage Office, 15 Penton Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS12: Public Carriage Office, 15 Penton Street, N1 9PU	+	++	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	AUS12 is allocated for mixed-use development for re-provision and intensification of business floorspace with an element of residential use. The development of the site will have a positive impact in optimising the use of previously developed land and buildings. Increasing the density of business floorspace at the site will contribute to economic growth. The mixed-use development also contributes to the quality provision of housing in the borough while creating a liveable area where people can work and live. The site would provide affordable housing as part of any residential													

<b>effects of site allocations</b>	element which would help to meet need in the borough, and may have positive effects in terms of social inclusion. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. The provision of additional housing, particularly affordable housing, could also have a positive effect in terms of reducing health inequalities if it enables some people to move out of overcrowded or inappropriate dwellings into new, good quality homes.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	Development of the site can help to enhance the local character of the area and promote a high quality built environment. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs The site is located within the CAZ and the Northdown Street Priority Employment Location where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre,													

	<p>potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and lead to a negative effect economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for AUS12 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.

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**Table 1.85: Site Assessment AUS13: N1 Centre, Parkfield Street**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS13: N1 Centre, Parkfield Street, N1	+	+	0	+	0	0	0	+	+	+	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS13 is allocated, and has planning permission, for the protection and enhancement of the open space with some intensification of retail. The allocation should have a positive impact on the viability of the town centre by increasing the provision of retail floorspace. It supports the creation of a better quality environment by allocating car parking space to be used for other priority uses in the town centre, which also contributes to the council's strategic objective for sustainable modes of transport and should have a minor positive effect in relation to the council's objectives to reduce contributions to climate change and improve air quality. The protection of open space will contribute to liveable neighbourhoods since it provides a publicly accessible space for people in the centre.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified, the allocation reflects the extant planning permission for the site.													

**Table 1.86: Site Assessment AUS14: 46-52 Pentonville Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS14: 46-52 Pentonville Road, N1 9HF</b>	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	AUS14 has extant permission for intensification of business and business related education uses. Should the permission be subject to amendment or a new application submitted, business floorspace should be prioritised. The provision of B1a and D1 uses should have a positive impact on the liveability of the area by providing an additional educational facility, offering opportunities for residents to develop new skills, as well as further employment opportunities to support economic growth.													
<b>Reasonable Alternative 1: Education use</b>	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	The alternative supports the extant planning permission for the site which allows intensification of business and business-related education uses. The site is in an accessible location so education use could be viewed as an efficient use of the land, and as promoting liveable neighbourhoods by providing an essential service for residents. Education uses support economic growth and social inclusion by offering opportunities for people to learn and develop new skills. However the site is within the CAZ and the Baron Street PEL, where the priority land use is employment floorspace. Supporting education use in this location means forgoing employment floorspace necessary to meet the borough's requirements.													
<b>Conclusion</b>	The site has planning permission for intensification of business and business-related education uses. The allocation states that if the planning permission is subject to further amendment, or new proposals are submitted for the site, business floorspace should be prioritised. The reasonable alternative to the allocation for business-led development is considered to be an allocation for education use of the site. The site is within the CAZ and the Baron Street Priority Employment Location, where the priority land use is employment floorspace. Supporting education use in this location means forgoing employment floorspace necessary to meet the borough's requirements and therefore on balance the business-led allocation is deemed more appropriate.													

**Table 1.87: Site Assessment AUS15: Windsor Street Car Park**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS15: Windsor Street Car Park, N1 8QF</b>	+	+	0	+	++	+	+	0	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	AUS15 is allocated for residential development. The site has planning permission for the development of an 11-bedroom supported living scheme for people with learning disabilities. The most significant positive effect of the allocation would be the provision of good quality housing, designed to meet an identified need in the borough for supported living accommodation. The allocation will also have a positive impact in optimising the use of land previously used for car parking. The removal of car parking from the area would help to create a higher quality environment and contribute to the council's strategic objective to achieve sustainable modes of transport and reduce dependency on private car travel. The supported living scheme will positively contribute to the inclusivity and liveability of the area by providing a facility that residents may previously have had to leave the borough to access.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is owned by LBI and has extant planning permission for the delivery of a supported-living scheme. The draft allocation reflects the permission.													

**Table 1.88: Site Assessment AUS16: Angel Square**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS16: Angel Square, EC1V 1NY	+	+	+	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS16 is allocated for intensification of office use.</p> <p>The allocation protects the business use of the site which positively contributes to economic growth. It seeks improvements to the building façade and relationship to the High Street in the town centre which would make it a more pleasant place to visit. The improved connectivity sought by the allocation, could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral. The allocation details a number of heritage designations relevant to the site which should be considered as part of any development proposals.</p>													
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	+	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy AUS16 remain unchanged, for example, improvements to the façade and improved connectivity.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Flexibility is appropriate for some sites in the borough but in order to meet identified development needs it is necessary for some allocations to be more specific in their requirements. The site is located within the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>													



	<p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	+	-	+	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of policy AUS16 remain unchanged, for example, improvements to the façade and improved connectivity.</p> <p>Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and lead to a negative effect economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS16 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

## Nag's Head and Upper Holloway

**Table 1.89: Site Assessment NH1: Morrison's supermarket and adjacent car park**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 CAG	++	++	0	++	+	+	+	++	0	+	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>NH1 is allocated for mixed-use development, with residential use, retention of and improvements to existing retail floorspace and a significant amount of new office floorspace. Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and enhancement of the covered market will be supported. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation offers an opportunity to improve retail provision and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment as well as increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location. Permeability improvements at the site would promote liveable neighbourhoods by improving residents' connection to facilities and amenities. The potential delivery of new public open space would improve accessibility to public open space as well as have wider health benefits. Improvements to the public realm and open space could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
Reasonable Alternative 1: Residential-led development	0	-	0	-	++	+	+	-	0	+	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for residential-led development. The other provisions of policy NH1 remain unchanged, for example, the opportunity for the development of a local landmark building up to 15 storeys, permeability and open space improvements.</p> <p>The site is located within Nag’s Head Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The site is currently made up of predominantly retail uses and forms part of the Primary Shopping Area in the town centre where retail uses are prioritised. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development on the site has also been assessed as having a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<p><b>Reasonable Alternative 2: Business-led development</b></p>	0	+	0	-	0	+	0	++	0	+	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council’s social inclusion objectives. A business-led development on the site has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p>													
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the mixed-use allocation for NH1 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, office and residential uses is appropriate for this prominent site in the Nag’s Head Town Centre.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

**Table 1.90: Site Assessment NH2: 368-376 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH2: 368-376 Holloway Road (Argos and adjoining shops), N7 6PN	++	+	0	++	+	+	+	++	0	0	0	0	0	0
<p>Commentary on assessment of likely significant effects of site allocations</p>	<p>NH2 is allocated for retail use at ground floor with business and residential uses above. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation is an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth and social inclusion through providing additional opportunity for employment, and increase the supply of residential floorspace all of which result in positive effects. The corner location is prominent and offers a design opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. Public realm improvements are also identified which could further contribute towards a high quality environment. The site would provide affordable housing as part of any residential element. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location.</p>													
Reasonable Alternative 1: Residential-led development	++	-	0	-	++	+	0	-	0	0	0	0	0	0
<p>Commentary on assessment of likely significant effects of Alternative 1</p>	<p>This alternative is for residential-led development. The other provisions of policy NH2 remain unchanged, for example, the opportunity for the development of a local landmark building up to 15 storeys and public realm improvements.</p> <p>The site is located within Nag's Head Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The site is currently made up of predominantly retail uses and forms part of the Primary Shopping Area in the town centre where retail uses are prioritised. The development of this site for housing could have a negative effect with regards to the efficient use of land as it may not</p>													

	<p>focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development on the site has also been assessed as having a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	++	+	0	-	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy NH2 remain unchanged, for example, the opportunity for the development of a local landmark building up to 15 storeys and public realm improvements.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough in a town centre location. This would help create employment opportunities that would support the council’s social inclusion objectives. A business-led development on the site has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for NH2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, business and residential uses is appropriate for this prominent town centre site.</p>													

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**Table 1.91: Site Assessment NH3: 443-453 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH3: 443-453 Holloway Road, N7 6LJ</b>	+	+	+	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH3 is allocated for intensification of business uses and commercial uses along Holloway Road with retention of existing arts/cultural uses. The allocation is an opportunity to intensify business floorspace in a Priority Employment Location. Both office and warehouse space is expected to be provided and will help support economic growth and provide more opportunity for residents to access employment in the borough. Intensification of the site will optimise use of previously developed land. The introduction of commercial uses along Holloway Road and public realm improvements will help create a safer and more sustainable environment where there is currently no active frontage. Retention of the locally listed buildings is highlighted as a development consideration. The retention of existing arts/cultural uses is identified as having a positive effect in relation to liveable neighbourhoods.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	+	-	+	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy NH3 remain unchanged, for example, public realm improvements.</p> <p>The site is located within the Holloway Road North Priority Employment Location where competing demands for land have to be carefully balanced. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of employment or other arts/cultural uses and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

<b>Reasonable Alternative 2: Business-led development</b>	+	-	+	-	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy NH3 remain unchanged, for example, public realm improvements.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Although this option would meet a clearly defined need, it would be at the expense of other priority development needs and would not be the most advantageous way of balancing competing demands for land. The loss of existing arts/cultural uses is likely to have a minor negative impact in relation to liveable neighbourhoods.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for NH3 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, commercial and arts/cultural uses is appropriate for this site.</p>													

**Table 1.92: Site Assessment NH4: Territorial Army Centre, 65-69 Parkhurst Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH4: Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP	++	++	0	+	+	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH4 is allocated, and has planning permission, for residential development. Any proposal should ensure continued Ministry of Defence use on part of the site (for cadets).</p> <p>The allocation is for redevelopment of a redundant territorial army centre. The most significant positive effect will be to optimise use of previously developed land and buildings providing residential use in an appropriate location, and depending on the final design this should have a positive effect on enhancing local character and distinctiveness. There will be a positive effect on both liveable neighbourhoods and inclusion/equality through re-provision of the cadet facility on the site. The site would provide affordable housing as part of any residential element which is considered likely to have positive effects on social inclusion and health and wellbeing by providing people with access to better quality housing.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The draft allocation reflects the extant planning permission for residential development of the site.													

**Table 1.93: Site Assessment NH5: 392A Camden Road and 1 Hillmarton Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road, N7	++	+	0	0	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of</b>	NH5 is allocated for mixed use residential and business use.													



likely significant effects of site allocations	The allocation is for redevelopment of a vehicle repair depot and warehouse and represents an intensification of use of the site. This would have a positive effect in terms of optimising use of previously developed land and buildings and will enhance local character and distinctiveness, as would a consistent design approach between sites, depending on the final scheme. This is a challenging environmental location which suffers from traffic related pollution – although given the nature of the borough this is a common issue for many site allocations. Negative effects on the physical health of the population can be mitigated through design and other measures, hence the effect on health would be neutral. The site allocation has a positive effect on economic growth in the borough through retaining existing employment uses. The site would provide affordable housing as part of any residential element which is considered to have a positive effect with regards to social inclusion.													
Reasonable Alternative 1: Residential-led development	++	+	0	0	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b> Page 661	<p>The development of previously developed land and buildings and a consistent design approach between sites will enhance local character and distinctiveness.</p> <p>The site is located within the Camden Road/Parkhurst Road Priority Employment Location where competing demands for land have to be carefully balanced, and employment uses are prioritised. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs.</p> <p>The site is located within the Camden Road/Parkhurst Road Priority Employment Location. Given this context and the existing employment uses on the site, a residential led development is likely to have a negative effect on employment floorspace or job creation.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
Reasonable Alternative 2: Business-led development	++	+	0	0	0	+	0	++	0	0	0	0	0	0
Reasonable Alternative 2: Residential-led development	The intensification of use of the site for business-led development would have a positive effect in terms of optimising use of previously developed land and buildings and will enhance local character and distinctiveness.													

	<p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for NH5 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that in this case a mixed-use allocation allowing more flexibility over the balance of residential and business uses to be provided is appropriate in helping to balance competing demands for land.</p>

**Table 1.94: Site Assessment NH6: 11-13 Benwell Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH6: 11-13 Benwell Road	0	+	0	0	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH6 is allocated for retention and re-provision of business floorspace. An element of residential use may be acceptable. Intensification of the former warehouse for office use will have a positive effect in optimising the use of previously developed land and buildings, and on economic growth, through increasing density of business floorspace on the site. Residential development on the site could contribute towards meeting housing need in the borough. Given the small scale of the site it is unlikely the allocation will affect other objectives. The site has constrained access from Benwell Road.</p>													
Reasonable Alternative 1: Residential-led development	0	+	0	0	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Intensification of the site will have a positive effect in optimising the use of previously developed land and buildings. Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

	Given the existing employment uses on the site, a residential led development is likely to have a negative effect on employment floorspace/job creation and therefore economic growth.													
Reasonable Alternative 2: Business-led development	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Reasonable Alternative 2: business-led development	<p>The intensification of use of the site for business-led development would have a positive effect in terms of optimising use of previously developed land and buildings and will enhance local character and distinctiveness.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for NH6 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that in this case a mixed-use allocation allowing more flexibility over the balance of residential and business uses to be provided is appropriate													

**Table 1.95: Site Assessment NH7: Holloway Prison**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH7: Holloway Prison, Parkhurst Road, N7 0NU	++	++	0	++	++	++	+	+	0	+	0	+	+	0
Commentary on assessment of likely significant	<p>NH7 is allocated for residential-led development with community uses (including a women's centre building), open space and an energy centre.</p> <p>The allocation will have a significant positive effect in optimising the use of previously developed land and buildings, providing a significant amount of residential and community uses in an appropriate location. A significant amount of affordable housing will be required as part of any</p>													

<b>effects of site allocations</b>	residential development to help meet need in the borough. Depending on the final design, development of this currently closed site will enhance local character and distinctiveness. Protected views cross the site, but impact on these can be avoided through careful design of the scheme, hence the impact will be neutral. The allocation promotes liveable neighbourhoods by requiring the provision of new facilities and amenities including publicly accessible open space, and development will open connections through the site for residents which will have wider health benefits. The allocation requires that consideration is given to the heritage of the site, formerly a women's prison, through the provision of community facilities including a women's centre. The scheme will also have significant environmental benefits by reducing resource use and reducing the borough's contribution to climate change with A new energy centre.
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. Supplementary planning guidance produced for this site supports a significant residential development with complementary community and business uses, which is reflected in the draft allocation. The site has been bought by a housing association committed to the residential development of the site, and has received financial support from the GLA to facilitate housing delivery and particularly the delivery of genuinely affordable housing. This is a key strategic site for the borough, with the potential to deliver approximately 880 new homes, therefore alternative uses are not considered reasonable in this case.

**Table 1.96: Site Assessment NH8: 457-463 Holloway Road**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH8: 457-463 Holloway Road, N7 6LJ	+	+	++	0	+	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH8 is allocated for retention and sensitive refurbishment of this locally listed building to provide employment and residential uses.</p> <p>The allocation is for redevelopment of existing offices and sensitive refurbishment of a locally listed building. The allocation will have a positive effect on optimising use of previously developed land and buildings and will enhance local character and distinctiveness, depending on final scheme – the development considerations highlight the various inappropriate and unsympathetic additions/actions which affect and detract from the existing buildings' contribution to the conservation area so there would be a significant positive effect if sympathetic development were implemented. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses. The site would provide affordable housing as part of any residential element. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location and could help to address issues surrounding social exclusion and health and wellbeing problems relating to poor quality housing.</p>													

<b>Reasonable Alternative 1: Residential-led development</b>	+	-	++	0	++	+	+	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy NH8 remain unchanged, for example the retention and sensitive refurbishment of the locally listed building, which could also have a positive effect on local character and distinctiveness.</p> <p>The site is located within a Priority Employment Location where competing demands for land have to be carefully balanced, and employment uses are prioritised. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs.</p> <p>The site is located within a Priority Employment Location. Given this context and the existing employment use on the site, a residential led development is likely to have a negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion and health and wellbeing by enabling some people to move out of poor quality and/or inappropriate housing.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	+	+	++	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy NH8 remain unchanged, for example the retention and sensitive refurbishment of the locally listed building, which could also have a positive effect on local character and distinctiveness. The is considered to have a positive effect on optimising use of previously development land</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough and contribute to the Priority Employment Location in which the site sits. This would help create employment opportunities that would support the council's social inclusion objectives.</p>													

<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for NH8 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that in this case a mixed-use allocation allowing more flexibility over the balance of residential and business uses to be provided is appropriate.
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**Table 1.97: Site Assessment NH9: Islington Arts Factory**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH9: Islington Arts Factory, 2 and 2a Parkhurst Road, N7	+	+	+	++	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	NH9 is allocated for provision of replacement community floorspace, residential use and an element of office floorspace. The allocation is for redevelopment of community space and storage. The allocation will have a positive effect on optimising use of previously developed land and buildings, providing a significant new mix of land uses. The allocation should also enhance local character and the distinctiveness of the conservation area. The re-provision of the Islington Arts Factory community facility will have a significant positive effect on liveable neighbourhoods, as well as benefits for social inclusion. The provision of employment floorspace will have a positive effect on economic growth providing some new employment floorspace where there was none previously. The site would provide affordable housing as part of any residential element, delivery of quality housing which addresses the challenging environment would be an important consideration in this location.													
Reasonable Alternative 1: Residential-led development	+	+	0	-	++	0	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	The allocation for residential-led could help to optimise use of the land and buildings on the site and enhance the local character of the area. However a residential-led development is likely to lead to the loss of community floorspace on the site which would have a negative impact on liveable neighbourhoods and social inclusion.  The site is located within the Camden Road/Parkhurst Road Priority Employment Location. Given this context and the existing employment uses on the site, a residential led development is likely to have a negative effect on economic growth.													

	Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion. However given the effect of the loss of the community use this is likely to result in a neutral score for social inclusion overall.													
Reasonable Alternative 2: Business-led development	+	+	0	-	0	0	0	0	++	0	0	0	0	0
Reasonable Alternative 2: Residential-led development	<p>The allocation for residential-led could help to optimise use of the land and buildings on the site and enhance the local character of the area. This would help create employment opportunities that would support the council's social inclusion objectives. However a business-led development is likely to lead to the loss of community floorspace on the site which would have a negative impact on liveable neighbourhoods and social inclusion leading to a neutral effect overall for the latter.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough and contribute to the Priority Employment Location in which the site sits. This would help create employment opportunities that would support the council's social inclusion objectives. However given the effect of the loss of the community use this is likely to result in a neutral score for social inclusion overall.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for NH9 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including community, residential and office uses is appropriate for this site.													

**Table 1.98: Site Assessment NH10: 45 Hornsey Road and 252 Holloway Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH10: 45 Hornsey Road and 252 Holloway Road	+	++	0	+	0	0	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH10 is allocated for redevelopment for conventional housing, however, given its location adjacent to London Metropolitan University, 45 Hornsey Road may also be considered as a site suitable for student accommodation. Commercial uses, particularly light industrial uses, should be maintained under the railway arches. The north eastern corner portion of the site is considered appropriate to develop a local landmark building of up to 12 storeys.</p> <p>The allocation will have a significant positive effect on optimising use of previously developed land and buildings and is currently used for storage and warehousing so would represent an intensification of the site, although it would have a negative effect on the delivery of affordable housing if student accommodation was delivered. Conversely if the site is delivered for conventional housing there will be a positive effect on the delivery of housing to meet the borough's significant identified need. Given this uncertainty, the effect on objective 5 is considered to be neutral. There would be a minor positive effect to liveable neighbourhoods. Reference to impact on the local viewing corridor is identified in the development considerations. Maintaining the commercial industrial uses under the railway arches will help contribute to the boroughs economy.</p>
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The draft allocation is flexible and supports a mix of uses, suggesting the site could be suitable for conventional housing or student accommodation with the retention of commercial uses under the railway arches. Given this flexibility it is considered there would be limited benefit in assessing alternative uses.</p>

**Table 1.99: Site Assessment NH11: Mamma Roma, 377 Holloway Road**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH11: Mamma Roma, 377 Holloway Road, N7 0RN	0	+	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH11 is allocated for the intensification of business use with replacement warehouse space and other business use above.</p> <p>The allocation is for redevelopment of an existing single storey warehouse and will have a minor positive effect on optimising use of previously developed land and buildings, and economic growth, through increasing density of business floorspace on the site. Given the small scale of the site it is unlikely the allocation will affect other objectives. The site has constrained access from Holloway Road and adjacent site allocation NH12 identifies the possibility of improving this access as part of comprehensive development which could potentially lead to a positive impact on improving neighbourhood connectivity depending on both sites being delivery as part of a comprehensive proposal. The development considerations highlight the adjacent conservation area designation.</p>													



<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	0	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	0	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Redevelopment of an existing single storey warehouse will have a minor positive effect on optimising use of previously developed land. However, this could also have a negative effect as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Nag's Head Town Centre. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Nag's Head Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives</p>													

<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for NH11 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its existing use and limited scope for expansion, alongside the borough's need for a significant amount of additional employment floorspace.
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**Table 1.100: Site Assessment NH12: 379-391 Camden Road and 341-345 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH12: 379-391 Camden Road and 341-345 Holloway Road	++	+	0	++	+	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>NH12 is allocated for re-provision and intensification of commercial and residential uses including no net loss of retail floorspace with some intensification of business floorspace. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 12 storeys.</p> <p>The allocation is an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment and increase the supply of residential floorspace, all of which result in positive effects. The corner location is prominent and offers a design opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. The development considerations highlight the adjacent conservation area designation. The site would provide affordable housing as part of any residential element, delivery of quality housing which addresses the challenging environment would be an important consideration in this location and could help to address issues surrounding social exclusion.</p>													
Reasonable Alternative 1: Residential-led development	++	-	0	-	++	+	0	-	0	0	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy NH12 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>The site is located within Nag’s Head Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion and health and wellbeing by enabling some people to move out of poor quality and/or inappropriate housing.</p>													
<p><b>Reasonable Alternative 2: business-led development</b></p>	++	+	0	-	0	+	0	++	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy NH12 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council’s social inclusion objectives. If other town centre uses are not provided such as retail, this could have a negative effect on liveable neighbourhoods which seeks to improve access for all residents to essential services.</p>													
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the mixed-use allocation for NH12 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate for this site.</p>													

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**Table 1.101: Site Assessment NH13: 166-220 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH13: 166-220 Holloway Road	+	++	0	++	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH13 is allocated for improvements to the internal layout of the London Metropolitan University site with existing education uses to be consolidated and improved. Student accommodation is not considered to be an acceptable use. The allocation also identifies that the site offers the opportunity to increase the height of the LMU tower by approximately 20m to create a district landmark building.</p> <p>The allocation will have a positive effect in optimising the use of previously developed land and buildings. The site will have a significant positive effect by creating more liveable sustainable neighbourhoods which are inclusive and safer and help attract students into the borough through the improvement of the university campus buildings and public realm. There may also be benefits to residents through further training and education opportunities increasing skills levels. In addition there may be positive benefits to wider economic growth in London and Islington.</p>													
<b>Reasonable Alternative 1: Education use including student accommodation</b>	+	0	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this sites for education use including student accommodation could make efficient use of previously developed land and buildings, but it could be challenging to effectively balance competing demands between land uses to provide for the borough’s full range of development needs. These sites were part of a larger London Metropolitan University site allocation in the 2013 Site Allocations DPD, which was partially developed as student accommodation. The remaining undeveloped sites, NH13 and NH14, are considered necessary for meeting the borough’s need for education floorspace and allowing additional student accommodation could make this less achievable. As such alternative 1 has been assessed as having a neutral effect on the efficient use of land.</p> <p>Alternative 1 would have similarities to the preferred approach in terms of promoting an inclusive and safe built environment as it would still require improvements to the layout of the site. There would also be the opportunity to increase the height of the LMU tower by approximately 20m to create a district landmark building. The alternative should also promote liveable neighbourhoods by improving access for residents to education facilities, although as some of the sites would be given over to student accommodation this has been assessed as a minor positive effect. The alternative may also have a limited positive effect with regards to the social inclusion objective by providing access to training and education opportunities which could increase skills levels and reduce barriers to employment.</p>													

	The alternative could have a limited positive effect on economic growth as it would bring new students and residents to the site who would spend money in the local area.
<b>Conclusion</b>	One reasonable alternative to the proposed allocation for NH13 (consolidation and improvement of existing education uses) was identified: education use including student accommodation. Whilst the alternative provides some positives in relation to economic growth social inclusion and liveable neighbourhoods, the provision of additional student accommodation would lead to potential less efficient provision of education floorspace, and in addition this is not considered a priority need given the borough's previous high delivery of student. On balance the allocation for education use is appropriate on this site.

**Table 1.102: Site Assessment NH14: 236-250 Holloway Road and 29 Hornsey Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH14: 236-250 Holloway Road and 29 Hornsey Road	+	+	0	++	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH14 is allocated for improvements to the internal layout of the London Metropolitan University site with existing education uses to be consolidated and improved. Student accommodation is not considered to be an acceptable use.</p> <p>The allocation will have a positive effect in optimising the use of previously developed land and buildings. The most significant positive effects will be the benefit to liveable neighbourhoods and attracting students into the borough through the improvement of the university campus buildings and public realm, and benefits to inclusivity for residents through further training and education opportunities increasing skills levels. In addition there may be positive benefits to wider economic growth for London and the borough. The development considerations highlight the potential impact on the local viewing corridor.</p>													
<b>Reasonable Alternative 1: Education use including student accommodation</b>	+	0	0	+	0	+	0	+	0	0	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>Allocating this site for education use including student accommodation could make efficient use of previously developed land and buildings, but it could be challenging to effectively balance competing demands between land uses to provide for the borough's full range of development needs. These sites were part of a larger London Metropolitan University site allocation in the 2013 Site Allocations DPD, which was partially developed as student accommodation. The remaining undeveloped sites, NH13 and NH14, are considered necessary for meeting the borough's need for education floorspace and allowing additional student accommodation could make this less achievable. As such alternative 1 has been assessed as having a neutral effect on the efficient use of land.</p> <p>Alternative 1 would have similarities to the preferred approach in terms of promoting an inclusive and safe built environment as it would still require improvements to the layout of the site. There would also be the opportunity to increase the height of the LMU tower by approximately 20m to create a district landmark building. The alternative should also promote liveable neighbourhoods by improving access for residents to education facilities, although as some of the sites would be given over to student accommodation this has been assessed as a minor positive effect. The alternative may also have a limited positive effect with regards to the social inclusion objective by providing access to training and education opportunities which could increase skills levels and reduce barriers to employment.</p> <p>The alternative could have a limited positive effect on economic growth as it would bring new students and residents to the site who would spend money in the local area.</p>
<p><b>Conclusion</b></p>	<p>One reasonable alternative to the proposed allocation for NH14 (consolidation and improvement of existing education uses) was identified: education use including student accommodation. Whilst the alternative provides some positives in relation to economic growth social inclusion and liveable neighbourhoods, the provision of additional student accommodation would lead to potential less efficient provision of education floorspace, and in addition this is not considered a priority need given the borough's previous high delivery of student. On balance the allocation for education use is appropriate on this site.</p>

**Finsbury Park**

**Table 1.103: Site Assessment FP1: City North Islington Trading Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP1: City North Islington Trading Estate, Fonthill	+	++	0	+	+	+	+	++	+	0	0	+	0	+

<b>Road and 8-10 Goodwin Street</b>	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site allocation for FP1 aligns with the extant planning permission for two 21-storey towers and 3 and 10 storey buildings containing 355 residential dwellings, offices, restaurant and café floorspace and flexible (A1-A4/D2/B1 use) floorspace. A new western entrance to Finsbury Park station will be created along with step-free access to the platforms. Should the site be subject to further amendments or new applications suitable uses should be provided aligning with the adjacent Fonthill Road Specialist Shopping Area and Finsbury Park Spatial Strategy and should seek to protect and enhance the public realm.</p> <p>The allocation is an opportunity to increase retail and business floorspace and add residential floorspace in a central and highly accessible location in the town centre. This should help meet resident's needs, improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. As well as providing B1 floorspace which is a main driver of economic growth, modern retail floor space will create a new attraction to Finsbury Park. The modernised public realm should also benefit the Specialist Shopping Area of Fonthill Road, further boosting economic growth. The site will provide affordable housing as part of the residential element. Permeability improvements and the provision of step-free access to the station promote more sustainable neighbourhoods which are more inclusive and safer and improve residents' connection to facilities and amenities. An enhanced public realm will make this part of Finsbury Park less dominated by the transport interchange, which should have minor positive effects in terms of efforts to reduce the borough's contribution to climate change and improve air quality.</p>
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation, and has reached an advanced stage of development.

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**Table 1.104: Site Assessment FP2: Morris Place/Wells Terrace**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP2: Morris Place/Wells Terrace (including Clifton House)	++	++	0	+	+	+	0	++	0	0	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>FP2 is allocated for mixed-use development to include retail floorspace at ground floor level and residential uses and business floorspace, including affordable workspace and SME space, on upper floors. The allocation identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation provides an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment as well as increase the supply of residential floorspace, all of which result in positive effects. The site would provide affordable housing as part of any residential element. Permeability improvements at the site would promote more sustainable neighbourhoods which are more inclusive and safer and improve residents connection to facilities and amenities. A tall building here would be appropriate as it would form part of the Finsbury Park tall building cluster and ensures efficient use of land by creating a high density mixed use building. The public realm is in need of improvement and comprehensive development of the whole site could address this and make this central location more inclusive and inviting.</p>													
<p><b>Reasonable Alternative 1: Residential-led Development</b></p>	++	-	0	-	++	+	0	-	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP2 remain unchanged, for example the opportunity for a landmark tall building of up to 15 storeys.</p> <p>The site is located in Finsbury Park Town Centre and a Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													



Reasonable Alternative 2: Business-led development	++	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy FP2 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in the borough within Finsbury Park Town Centre. This would help create employment opportunities that would support the council's social inclusion objectives. The focus on business-led development could however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for FP2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate for this well-located site close to Finsbury Park Station.													

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**Table 1.105: Site Assessment FP3: Finsbury Park Station and Island**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP3: Finsbury Park Station and	++	+	0	+	0	0	0	+	++	0	0	0	0	0

<b>Island, Seven Sisters Road</b>														
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP3 is allocated for improvements to the existing underground and railway station and related infrastructure and public realm improvements. Provision of a high quality public space adjacent to the station is required. Retention and potential expansion of ground floor retail. Retention of units in retail use on the Island part of the site, with a mix of commercial and residential uses provided above ground floor.</p> <p>The allocation provides an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet residents' needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment, as well as increasing the supply of residential floorspace, all of which result in positive effects. Permeability improvements at the site would promote liveable neighbourhoods by improving residents connection to facilities and amenities. Development of the site would improve the public realm making the relationship between pedestrian, bus, taxi and cyclist movements safer. Improvements to the station including access improvements will make the transport hub more inclusive and have a significant positive effect in relation to the need to travel and the creation of accessible, safe and sustainable transport connections. The permeability and transport improvements could help to promote walking, cycling and sustainable transport. The development would optimise the use of previously developed land.</p> <p>Development above the railway station is a long term ambition. If overstation development comes forward, the council would expect a mixed use, commercial led scheme with significant amounts of office floorspace, and the possibility of some residential floorspace. The allocation identifies that the site offers the opportunity for the development of a district landmark building of up to 25 storeys.</p> <p>The allocation is primarily concerned with public realm improvements and limited commercial expansion and has been scored as such. If comprehensive over-station development came forward, there would likely be significant positive effects for a number of objectives, namely economic growth, efficient use of land and affordable housing, although there would be potential negative impacts on health and housing quality due to the close proximity to the rail line, which would need to be managed through design. Given the need to weigh the benefits of housing delivery against the constraints and potential negative effects presented by this location, a neutral effect has been identified in relation to housing quality.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	-	++	+	0	-	++	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP3 remain unchanged, for example improvements to the existing underground and railway station and related infrastructure and public realm improvements.</p> <p>The site is located in Finsbury Park Town Centre and a Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Ddevelopment of this site for housing could have a negative effect with regards to the efficient use of land as</p>													

	<p>it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. There are a range of town centre uses currently on the site. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	++	+	0	-	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy FP3 remain unchanged, for example improvements to the existing underground and railway station and related infrastructure and public realm improvements.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in a town centre location. This would help create employment opportunities that would support the council's social inclusion objectives. The focus on business-led development could however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for FP2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate for this well-located site close to Finsbury Park Station.</p>													

**Table 1.106: Site Assessment FP4: 129-131 & 133 Fonthill Road and 13 Goodwin Street**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>FP4: 129-131 &amp; 133 Fonthill Road and 13 Goodwin Street</b>	+	+	0	+	0	+	0	++	0	0	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>Site FP4 is allocated for retail-led mixed use development to complement the specialist shopping function of Fonthill Road (as a fashion corridor) and contribute to the vitality of Finsbury Park Town Centre. Active retail should be provided on the ground floor. Upper floors should provide office floorspace and, where appropriate, workshop space related to ground floor specialist retail functions including appropriate well designed SME workspace.</p> <p>The allocation is an opportunity to increase retail floorspace and add business floorspace, including workshop space related to ground floor specialist retail functions including SME workspace, in a central location in the town centre. This should help meet residents' needs by improving access to town centre uses, and foster economic growth and social inclusion through providing additional opportunities for employment. The allocation requires improvements to the public realm and transport and pedestrian links which promotes more sustainable neighbourhoods by improving residents connection to facilities and amenities. Improvements to the public realm would act to make the connection between Fonthill Road and Goodwin Street leading to City North more harmonious. Improvements to the public realm and transport and pedestrian could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral. The allocation seeks to focus development of retail, office, workshop and SME workspace in the most appropriate location because Fonthill Road is a fashion hub and specialist shopping area (SSA). Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p>														
<p><b>Reasonable Alternative 1: Residential-led development</b></p>	+	-	0	-	++	+	0	-	0	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP4 remain unchanged, for example improvements to the public realm and transport and pedestrian links.</p> <p>The site is located in Finsbury Park Town Centre, a Primary Shopping Area and the Fonthill Road Specialist Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. There are town centre uses currently on the site. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>														

Reasonable Alternative 2: Business-led development	+	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy FP3 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council’s social inclusion objectives. The focus on business-led development could however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods and the efficient use of land has therefore been identified.</p>													
Conclusion	<p>Two reasonable alternatives to the mixed-use allocation for FP4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation providing retail and office floorspace including workshop space designed to support the specialist retail functions on the ground floor of the site is appropriate given its location within the designated Fonthill Road Specialist Shopping Area.</p>													

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**Table 1.107: Site Assessment FP5: Conservative Club, 1 Prah Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP5: Conservative Club, 1 Prah Road	++	+	0	0	0	+	0	++	0	0	0	0	0	0
-Commentary on assessment of likely significant	FP5 is allocated for business floorspace, particularly workspace suitable for SMEs													

<b>effects of site allocations</b>	The allocation provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels. The development of SME workspace takes advantage of the site's well connected location and provides floor space for an expanding business function of Finsbury Park. Development of the site will bring land back into use that can be utilised for uses that will benefit the town centre and support potentially local SME businesses. It could also help to promote social inclusion through providing additional opportunities for employment. Delivery of employment space in this town centre location is would help to meet wider needs for employment growth in the borough. More affordable workspaces can support SMEs and its close proximity to City and Islington College has potential for this link to be positively exploited.													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	++	+	0	+	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>A mixed-use commercial and residential development of the site provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. However, given the current use of the site it is likely that some commercial use as part of a mixed use development would have a minor positive effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	++	+	0	+	++	+	0	0/-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>														

<p>effects of Alternative 2</p>	<p>The residential-led development of the site provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels.</p> <p>The site is located within Finsbury Park Town Centre. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it could have a negative effect on economic growth, albeit this is reduced because the site was not previously in employment use. On balance this is considered to have a neutral/negative effect.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Finsbury Park Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<p>Conclusion</p>	<p>Two reasonable alternatives to the business-led allocation for FP5 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>

**Table 1.108: Site Assessment FP6: Cyma Service Station, 201A Seven Sisters Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>FP6: Cyma Service Station, 201A Seven Sisters Road</b>	++	++	0	0	0	+	0	++	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP6 site is allocated for redevelopment to provide office floor space across the whole site.</p> <p>This allocation will have positive effects on economic development by providing employment (office) floorspace in the town centre, and will make more efficient use of the site than the former petrol station use. Bringing this vacant site back into use will also have a positive effect on promoting a high quality built environment, providing surveillance to make the environment safer as well as enhancing the local character of the area. The site is of no heritage significance however its setting is, with the Grade II* listed Rainbow Theatre in close proximity which the development would need to respect and enhance the setting of it. Prioritising delivery of employment space in this town centre location is considered appropriate and helps meet wider needs for employment growth in the borough, reducing barriers to employment in accordance with the social inclusion objective.</p>														
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	++	++	0	+	+	0	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use and commercial development and will make more efficient use of the site than the former petrol station use. Bringing this vacant site back into use will also have a positive effect on promoting a high quality built environment, providing surveillance to make the environment safer as well as enhancing the local character of the area.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on site. However, it is likely that the provision of some commercial floorspace as part of the mix of uses will have a minor positive effect in relation to economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>														



Reasonable Alternative 2: Residential-led development	++	-	0	+	++	+	0	-	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development of the site. Bringing this vacant site back into use will also have a positive effect on promoting a high quality built environment, providing surveillance to make the environment safer as well as enhancing the local character of the area.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site of this vacant site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs – on balance a neutral effect has therefore been identified in relation to the efficient use of land. There are town centre uses currently on the site. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Finsbury Park Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>														
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP6 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace.</p>														

**Table 1.109: Site Assessment FP7: Holloway Police Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP7: Holloway Police Station, 284 Hornsey Road</b>	++	+	0	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP7 is allocated for redevelopment of the police station (subject to justifying the loss of social infrastructure) for residential-led mixed use development, with office/workspace uses on the ground floor.</p> <p>A mixed use scheme involving residential and office/workspace is appropriate given the location is outside the town centre. The wide pavements bordering the site present an opportunity for enhancements to the public realm with the potential for urban greening. The development will be residential led and provide affordable housing. This could have positive effects in helping to address issues surrounding social exclusion. Ground floor office and workspace will contribute to the economy and provide more affordable rents for business as well as creating a more active frontage than currently exists. The redevelopment of the site would help to optimise use of previously development land and can help to enhance the local character of the area and promote a high quality built environment.</p>													
<b>Reasonable Alternative 1: Business-led mixed use development</b>	0	-	0	+	+	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Alternative 1: The Holloway Police Station site is outside of the town centre and therefore is not considered to be the most appropriate location for business-led mixed use redevelopment. As this option allows for a mix of uses it would still provide an opportunity to deliver some housing, which would have positive effects in relation to affordable housing, social inclusion and potentially the health and wellbeing of future residents. A mix of uses on the site could also be beneficial for Islington's economic growth, particularly if affordable workspace is offered. The co-location of commercial and residential uses could help to promote liveable neighbourhoods and reduce the need to travel. It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Retention of social and community infrastructure</b>	0	0	0	+	0	+	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of Alternative 2</b>	Alternative 2: An allocation requiring retention of social and community infrastructure on site could help to secure uses that find it difficult to compete against more financially viable land uses in Islington, therefore making efficient use of the site and the borough's limited resources. Social and community infrastructure supports liveable neighbourhoods by providing access to essential services, although in this case the Police Station has closed and is sitting vacant. If an alternative social and community infrastructure use could be found for the site it could promote social inclusion, and potentially economic growth by improving opportunities for learning and skills development. However, if there is no demand for an alternative social and community infrastructure use the allocation could prove detrimental by restricting other uses and failing to make efficient use of land. It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for FP7 were identified: business-led mixed use development and the retention of social and community infrastructure at the site. Whilst both these alternatives have their merits it is considered that as the site is outside of the town centre it is not in the most appropriate location for a business-led mixed use redevelopment, whilst a failure to secure an alternative social and community infrastructure use for the site would not make the most efficient use of the land. Subject to justifying the loss of social and community infrastructure at the site, a residential-led development would contribute towards meeting the borough's significant housing need.

**Table 1.110: Site Assessment FP8: 113-119 Fonthill Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP8: 113-119 Fonthill Road</b>	++	++	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP8 is allocated for retention of retail floorspace and provision of a significant amount of business floorspace on upper floors. The allocation also identifies that the site offers an opportunity for the development of a local landmark building of up to 12 storeys. The site is identified as having potential for a tall building which would help to visually mediate between the City North development and lower surrounding context heights as well as helping to optimise use of the site and make the most efficient use of land.</p> <p>Retention of retail on the ground floor will help support the town centre's vibrancy and provide good quality trading space for many of the local businesses on Fonthill Road. Significant amounts of business floor space will be provided, supporting the approach set out in policy SP6 which identifies the positive contribution to employment growth and the economy Finsbury Park can make, given its potential to develop as a satellite location for B use classes. Retention of retail on the ground floor will support Fonthill Road's retail character, securing services for residents and space for business use. There will be no effects on heritage from redeveloping the site but the design should be sympathetic to the adjoining locally listed Edwardian former postal sorting office. The redevelopment of the site would help to optimise use of previously development land and can help to enhance the local character of the area and promote a high quality built environment.</p>													

<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	++	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for mixed use commercial and residential development. The other provisions of policy FP8 remain unchanged, for example the opportunity for a tall building which would help to visually mediate between the City North development and lower surrounding context heights.</p> <p>Whilst allocating this site for mixed-use commercial and residential development could have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace within Finsbury Park Town Centre. Given the current employment use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	++	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP8 remain unchanged, for example the opportunity for a tall building which would help to visually mediate between the City North development and lower surrounding context heights.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more</p>													

	<p>efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Finsbury Park Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace.</p>

**Table 1.111: Site Assessment FP9: 221-233 Seven Sisters Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP9: 221-233 Seven Sisters Road	++	++	0	++	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP9 is allocated for the re-provision of community use, intensification of main town centre uses with a significant amount of business floorspace and an element of residential use. The allocation identifies the site as offering an opportunity for the development of a local landmark building of up to 15 storeys.</p> <p>Increased density in the form of a tall building is appropriate in this location as it is highly accessible and would form part of a Finsbury Park tall buildings cluster. Development could also provide an enhanced active frontage and accessibility improvements through a new potential pedestrian link. The site could provide a wide mix of town centre uses which will have a positive effect on provision of services. Significant amounts of business floor space will be provided, supporting employment growth in the borough. The site does not contain any heritage assets</p>													

	<p>however, the development would need to respect and enhance the adjacent locally listed building at 141-149 Fonthill Road and the Grade II* listed Rainbow Theatre. The development promotes liveable neighbourhoods and social inclusion by re-providing upgraded community space that will interact more positively with the street scene. A small element of residential use is allocated for the site which will make a small contribution to housing supply and affordable housing in a mixed use development. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location. The redevelopment of the site would help to optimise use of previously development land and can help to enhance the local character of the area and promote a high quality built environment.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	-	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP9 remain unchanged, for example the development of a local landmark building of up to 15 storeys.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The alternative could have a minor negative effect on the promotion of liveable neighbourhoods, including through the loss of existing community uses on the site – this objective seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion and health and wellbeing by enabling some people to move out of poor quality and/or inappropriate housing.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	++	++	0	-	0	+	0	++	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy FP9 remain unchanged, for example for example the re-provision of community opportunity for the development of a local landmark building of up to 15 storeys.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough within Finsbury Park Town Centre. This would help create employment opportunities that would support the council's social inclusion objectives. The alternative could have a minor negative effect on the promotion of liveable neighbourhoods, including through the loss of existing community uses on the site – this objective seeks improved access for all residents to essential services.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for FP9 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation providing main town centre uses with business floorspace and an element of residential use, alongside the re-provision of community uses is appropriate for this site considering its existing uses and central location within Finsbury Park Town Centre.</p>

**Table 1.112: Site Assessment FP10: Former George Robey Public House, 240 Seven Sisters Road**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP10: Former George Robey Public House, 240 Seven Sisters Road	+	++	0	+	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP10 is allocated for hotel use with some business floorspace including affordable workspace.</p> <p>Development of the site will bring a centrally located site back into use. A new building would complete the street frontage and have a positive effect on the local environment. Planning permission for application P2017/3429/FUL has been approved and will see improvements to the public realm which can take advantage of a relatively large amount of pavement space here. The redevelopment and re-provision of the retail units on Seven Sisters Road will improve the quality of the A1 and A3 units. The previous building on the site has been demolished and the site is not in a conservation area although development will have to be sympathetic to the adjacent Grade II* listed Rainbow Theatre. A centrally located hotel in Finsbury Park is likely to support visitors to London rather than business users providing greater support to London's economy and may help</p>													

	support the borough's heritage and culture. Apart from the redeveloped retail units the majority of the site will not provide access to services and facilities for local residents.
	As development of this site was completed in late 2019 it is proposed to remove the allocation from the Site Allocations DPD.
<b>Reasonable alternative summary</b>	No reasonable alternative was identified.

**Table 1.113: Site Assessment FP11: 139-149 Fonthill Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP11: 139-149 Fonthill Road	++	+	+	+	+	0	0	++	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP11 is allocated for commercial-led mixed use development to include retail and office floorspace with an element of residential.</p> <p>A mix of retail, office and residential development could contribute to the vitality and viability of the specialist shopping area on Fonthill Road. Development should protect and enhance the locally listed building within the site at 141-149 Fonthill Road. The development will promote sustainable neighbourhoods by providing replacement retail space and office space that can potentially be used by local businesses and those involved with the fashion industry on Fonthill Road. An element of residential use will make a small contribution to the housing supply and affordable housing supply in a highly accessible location. Redeveloped business floor space will benefit the economy and contribute to the significant amount of new business floor space around the station, encouraging travel by public transport. This in turn should help with the borough's objectives of reducing contributions to climate change and improving air quality. The redeveloped retail space will also provide improved retailing units for the large amount of local businesses on Fonthill Road, contributing to the vibrancy and viability of this important commercial centre of Finsbury Park.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.114: Site Assessment FP12: 179-199 Hornsey Road**



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP12: 179-199 Hornsey Road	+	++	++	+	+	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP12 is allocated for mixed use development with the retention of some D1 floorspace where necessary and has planning permission for residential use with the provision of D1/D2 floorspace.</p> <p>The allocation seeks to optimise the use of the listed building. The retention of some D1 community use floor space should allow the creation of space that is better able to adapt to changing needs. D1 community use will complement any residential use and provide social infrastructure for an increasing residential population. The site has significant heritage considerations and development should protect and enhance the locally listed building on site and the Grade II listed building opposite the site at 254, 256 and 260 Hornsey Road. Re-provision of community uses will sustain and improve the area as a liveable neighbourhood. The site would provide affordable housing as part of any residential element.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.115: Site Assessment FP13: Tesco, 103-115 Stroud Green Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP13: Tesco, 103-115 Stroud Green Road	+	++	0	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP13 is allocated for the re-provision of retail floorspace and D1 uses with scope for residential development at upper levels.</p> <p>The allocation is an opportunity to re-provide retail floorspace and add residential floorspace in Finsbury Park town centre. The re-provision of retail floorspace is important in serving the needs of local residents. Intensification to provide housing is appropriate, taking advantage of the residential and retail context of the street and its good transport links. The site would provide affordable housing as part of any residential element. The development would contribute positively to promoting liveable neighbourhoods and provide modernised A1 floorspace. This would</p>													

	also create more sustainable and attractive retail space that will have economic benefits for the Finsbury Park town centre and maintain local services for residents. The intensification of the site will need to be well designed so as to complement the adjacent conservation area and the locally listed building at 119 Stroud Green Road, and provide adequate amenity and privacy to surrounding residential properties.													
<b>Reasonable Alternative 1: Residential-led development</b>	0	-	0	-	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The alternative could also have a minor negative effect on the promotion of liveable neighbourhoods which this objective seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	0	+	0	-	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for business-led use. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led development could however may not help to balance other competing demands for</p>													

	uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for FP13 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring the re-provision of retail and community uses along with some scope for residential use is appropriate for the site considering its existing uses and location within Finsbury Park Town Centre.

**Table 1.116: Site Assessment FP14: Andover Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP14: Andover Estate</b>	++	++	0	++	++	+	+	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP14 is allocated for residential development with retail, business and community floorspace including affordable workspace and public realm improvements.</p> <p>Development will intensify the residential density of the estate and will improve the public realm, increasing connections and permeability and therefore increasing inclusivity. Improved connectivity should also have a minor positive effect with regards to reducing the need to travel, which in turn will help with the borough's aims of reducing contributions to climate change and improving air quality. Intensification of residential will provide affordable housing and commercial uses will create economic benefits and employment opportunities. Infill development seeks to make the most efficient use of previously developed land and the affordable workspace located in converted former garages will provide flexible spaces to adapt to different businesses needs. Development will promote the estate as a more liveable neighbourhood, providing new retail and commercial space and a significant amount of affordable workspace that will potentially enable local people to secure business space.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.													

**Table 1.117: Site Assessment FP15: 216-220 Seven Sisters Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP15: 216-220 Seven Sisters Road	++	++	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP15 is allocated for office/business-led development with retail at ground floor level.</p> <p>Retail and office uses are well placed on this site taking advantage of its excellent transport links. The allocation would optimise and make more efficient use of a town centre site previously used for B8 storage by developing a mix of uses that contribute to the commercial offer of the town centre. The intensification of office space supports the approach set out in SP6 which identifies the positive contribution to employment growth and the wider economy that Finsbury Park could make, given its potential to develop as a satellite location for B use classes. New development has potential to improve the street scene, but will need to respect and enhance the adjacent Grade II* listed Rainbow Theatre. More retail space will have a positive effect on promoting a liveable neighbourhood, providing main town centre uses and services for residents.</p>													
Reasonable Alternative 1: Mixed-use commercial and residential development	++	+	0	+	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Alternative 1 is for mixed use commercial and residential development. New development would also help to improve the street scene, contributing to a better quality environment and the wider character of the area.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on site, thereby impacting on potential employment growth and Finsbury Park's potential to develop as a satellite location for B use classes. However, a mixed use development would contribute towards an intensification of some commercial use on the site and therefore on balance the effect in relation to economic growth is considered to be a minor positive.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>													

	<p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	++	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Alternative 2 is for residential-led development. New development would also help to improve the street scene, contributing to a better quality environment and the wider character of the area, but will need to respect and enhance the adjacent Grade II* listed Rainbow Theatre</p> <p>Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP15 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development with retail floorspace at ground floor level was most appropriate for this site given its location within a Primary Shopping Area and the borough's need for additional employment floorspace.</p>													

**Table 1.118 Site Assessment ARCH1: Vorley Road/Archway Bus Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH1: Vorley Road/Archway Bus Station, N19</b>	++	++	0	+	++	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH1 is allocated for residential-led development with an element of business floorspace including affordable workspace and space suitable for SMEs. The allocation identifies that the northern part of the site presents an opportunity for the development of a local landmark building of up to 15 storeys, forming part of an Archway cluster of tall buildings.</p> <p>The allocation is an opportunity to develop residential and business floorspace in a central and highly accessible location in the town centre and optimise the use of previously developed land and buildings. This should improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element. Permeability improvements at the site, would promote liveable neighbourhoods by improving residents connection to facilities and amenities.</p>													
<b>Reasonable Alternative 1: Mixed-use development</b>	++	++	0	+	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for mixed-use development (including residential and commercial uses). The other provisions of policy ARCH1 remain unchanged, for example for example the opportunity for the development of a local landmark building of up to 15 storeys and permeability improvements.</p> <p>ARCH1 is located within a Town Centre but is owned by LB Islington who are committed to delivering a residential-led scheme in this location. Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5, but allocating the site for mixed-use rather than residential-led development would likely lead to a reduction in the overall number of new homes secured.</p> <p>Mixed-use development may have limited positive effects on liveable neighbourhoods and economic growth, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors.</p>													

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<b>Reasonable Alternative 2: Business-led development</b>	++	++	0	-	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for business-led development. The other provisions of policy ARCH1 remain unchanged, for example for example the opportunity for the development of a local landmark building of up to 15 storeys and permeability improvements.</p> <p>Business led development would have a positive effect on economic growth and contribute towards the wider economy of Archway Town Centre. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led development could however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the residential-led allocation for ARCH1 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver a significant amount of new housing to contribute towards meeting the borough's identified need in an accessible town centre location.</p>													

**Table 1.119 Site Assessment ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station)**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ</b>	+	+	0	+	0	+	0	++	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH2 is allocated for intensification of business use with retail on the ground floor.</p> <p>The allocation will contribute positively to the vitality and viability of the town centre, optimising the use of previously developed land and contributing to the economic growth of the borough. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. The site is in a highly accessible location, adjacent to Archway Station. An improved shopfront design which takes advantage of adjacent public space would help to enhance the quality of the environment and enhance local character.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Alternative 1 is for mixed use commercial and residential development.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. However, a mixed use development could contribute towards an intensification of some commercial use on the site and therefore on balance the effect on economic growth is considered to be minor positive.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>The site is located within Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus</p>													



<p><b>effects of Alternative 2</b></p>	<p>development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the business-led allocation for ARCH2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development with retail floorspace at ground floor level was most appropriate for this site given its location within a Primary Shopping Area and the borough's need for additional employment floorspace.</p>

**Table 1.120 Site Assessment ARCH3: Archway Central Methodist Hall, Archway Close**

<p>IA Objective / Site</p>	<p>1. HIGH QUALITY ENVIRON</p>	<p>2. EFFICIENT USE OF LAND</p>	<p>3. HERITAGE</p>	<p>4. LIVEABLE NEIGHBOURHOODS</p>	<p>5. HOUSING QUALITY</p>	<p>6. SOCIAL INCLUSION</p>	<p>7. HEALTH AND WELLBEING</p>	<p>8. ECONOMIC GROWTH</p>	<p>9. NEED TO TRAVEL</p>	<p>10. OPEN SPACE</p>	<p>11. BIODIVERSITY</p>	<p>12. CLIMATE CHANGE</p>	<p>13. RESOURCE EFFICIENCY</p>	<p>14. NATURAL RESOURCES</p>
<p>ARCH3: Archway Central Methodist Hall, Archway Close, N19 3TD</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>ARCH3 is allocated for refurbishment/redevelopment to create a cultural hub in Archway Town Centre. Retail use might be acceptable on the ground floor.</p> <p>Arts and culture help boost local economies by attracting visitors, creating jobs, boosting businesses, revitalising places, and developing talent. Therefore, the allocation has a positive impact on economic growth, neighbourhood liveability and the vitality of Archway town centre. The allocation recognises the historical merits of the building and suggests refurbishment as a way to bring the building back into use, which would have a positive effect with regards to resource efficiency. Bringing the building back into use would also contribute towards the character of the area, whilst cultural use would contribute towards the wider Archway Cultural Quarter. There is limited capacity for intensification at the site.</p>													

<b>Reasonable Alternative 1: Mixed-use development</b>	0	+	-/0	-	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	Allocating the site for a mix of commercial and residential uses is considered to be a reasonable alternative given the site sites town centre location. Mixed-use could make more efficient use of a currently underused site, but could have a negative impact on the significance of the locally listed building and the surrounding conservation area if the design is not carefully considered and executed. A mixed-use development could have a positive effect in terms of economic growth, and for social inclusion if it creates jobs that help residents' access employment. In addition, it could have a positive effect on the delivery of affordable housing if housing were to be delivered as part of a mixed-use development. However, given the need to balance competing demands for land in the borough, it is considered a mixed-use allocation would result in the loss of some of Islington's limited supply of social and community infrastructure floorspace. This have a minor negative effect in relation to liveable neighbourhoods and conflict with aims for the Archway Cultural Quarter.													
<b>Conclusion</b>	One reasonable alternative to the proposed allocation for ARCH3 was identified: mixed-use development. Although a mixed-use scheme could have positive effects in terms of supporting a range of uses to meet the borough's development needs, it would also result in the loss of some of Islington's limited supply of social and community infrastructure floorspace to the detriment of aims for the Archway Cultural Quarter. On balance it is considered the refurbishment/redevelopment for a cultural hub is appropriate.													

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**Table 1.121 Site Assessment ARCH4: Whittington Hospital Ancillary Buildings**

<b>Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>ARCH4: Whittington Hospital Ancillary Buildings, N19</b>	0	0	+	++	+	+	++	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH4 is allocated for the provision of health uses with an element of residential development. The allocation has a cumulative impact on the provision of social infrastructure in the borough. The relocation of St Pancras Mental Health Hospital is a significant positive benefit in terms of creating liveable neighbourhoods by providing essential social services and supporting the economy by providing employment opportunities. It will also have significant positive health impacts. There is also a provision of residential units which has a positive contribution to the overall housing target. Part of the site is listed, therefore any development must consider and respond to this.													

<b>Reasonable Alternative 1: Residential-led development</b>	0	0	0	--	++	+	--	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. This would lead to the loss of social infrastructure and health care provision on the site which would have significant negative effect on health and liveable neighbourhoods. Given the employment generating use on the site it would also have a negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	0	0	0	--	0	+	--	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. The economic benefits overall are likely to be a minor positive given the employment generating use on the site currently. In addition the loss of social infrastructure and health care provision on the site which would have significant negative effect on health and liveable neighbourhoods.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for ARCH4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring the provision of health uses along and retaining some potential for residential development is appropriate for the site considering its existing uses and location.</p>													

Table 1.122 Site Assessment ARCH5: Archway Campus, Highgate Hill

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH5: Archway Campus, Highgate Hill, N19</b>	+	++	+	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH5 is allocated for residential-led mixed use development with community and social infrastructure uses.</p> <p>The allocation of this site will substantially contribute to housing provision in the borough, including the provision of affordable housing, to help meet need. It also makes efficient use of land located in a highly accessible area which has been vacant for some time, and development should seek to improve linkages to Archway Town Centre, promoting a more liveable neighbourhood. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p>													
<b>Reasonable Alternative 1: Mixed-use development</b>	+	++	0	+	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for mixed-use development (including residential and commercial uses). The other provisions of policy ARCH5 remain unchanged, for example for example that development proposals should contribute towards and improved public realm and linkages to Archway town centre.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5, but allocating the site for mixed-use rather than residential-led development would likely lead to a reduction in the overall number of new homes secured.</p> <p>Mixed-use development may have limited positive effects on liveable neighbourhoods, economic growth and the need to travel, through the co-location of different uses improving access to a variety of facilities for residents, workers and visitors.</p>													

Reasonable Alternative 2: Business-led development	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is where this the allocation is for business-led development. The other provisions of policy ARCH5 remain unchanged, for example for example that development proposals should contribute towards and improved public realm and linkages to Archway town centre.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.</p>													
Conclusion	<p>Two reasonable alternatives to the residential-led allocation for ARCH5 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver a significant amount of new housing to contribute towards meeting the borough's identified need in an accessible location.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

Table 1.123 Site Assessment ARCH6: Job Centre, 1 Elthorne Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH6: Job Centre, 1 Elthorne Road , N19 4AL	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant	<p>ARCH6 is allocated for business led mixed-use development, including provision of SME workspace, with an element of residential use. The allocation is an opportunity to increase business floorspace, including SME space, and add residential use in a central location in the town centre. This should improve access to town centre uses and increase diversity and vibrancy in the centre; foster economic growth through providing additional opportunity for a range of employment types and increase the supply of residential floorspace, all of which result in positive</p>													

<b>effects of site allocations</b>	effects. The allocation will optimise the use of previously developed land and provide affordable housing as part of any residential element. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													
<b>Reasonable Alternative 1: Residential-led development</b>	0	-	0	0	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The site is located in Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The development of this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy, supporting a range of jobs or contribute towards future economic growth.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	This alternative is where this site would be amended so that the allocation is for business-led use. The intensification of the site would help to optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives.													
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for ARCH6 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring business uses with SME workspace as well as some residential use is appropriate for the site considering its existing uses and location within Archway Town Centre.													

Table 1.124 Site Assessment ARCH7: 207A Junction Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH7: 207A Junction Road, N19 5QA	+	++	0	+	+	0	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH7 is allocated for residential development with potential to re-provide the existing D2 use.</p> <p>The allocation optimises the use of previously developed land, and contributes to the provision of housing in the borough. The site would provide affordable housing as part of any residential element, but careful consideration must be given to the close proximity of railway infrastructure and the need to mitigate noise and vibration to ensure future residential amenity is not negatively affected. The allocation also suggests the existing D2 use of the site may be re-provided, which could positively contribute to the vitality of the area and increase cultural provision. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p>													
<b>Reasonable Alternative 1: Mixed-use development</b>	+	+	0	0	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for mixed-use development (including residential and commercial uses). Development of the site can help to enhance the local character of the area and promote a high quality built environment and help to make efficient use of the site. Mixed use development would have a positive effect in terms of the efficient use of land and buildings</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. This would help create employment opportunities that would support social inclusion objectives.</p>													

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<b>Reasonable Alternative 2: Business-led development</b>	+	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	The intensification of the site would help to optimise use of the site for employment use. This alternative is where this the allocation is for business-led development. Development of the site can help to enhance the local character of the area and promote a high quality built environment. Business led development would have a positive effect on economic growth. This would help create employment opportunities that would support social inclusion objectives.													
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for ARCH7 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location.													

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**Table 1.125 Site Assessment ARCH8: Brookstone House, 4-6 Elthorne Road**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>ARCH8: Brookstone House, 4-6 Elthorne Road, N19 4AJ</b>	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH8 is allocated for the provision of co-working space through the re-configuration of existing buildings and/or the construction of new buildings/extensions to accommodate additional business floorspace. The allocation will have a positive effect in optimising the use of previously developed land and buildings and increasing the density of business floorspace which is a main driver of economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. The site contains a car park which, if re-developed into other priority uses as strongly encouraged in the													



	allocation, will improve the quality of the environment by reducing car use in line with objective 9. In turn this should have a minor positive effect with regards to the borough's objectives to reduce contributions to climate change and improve air quality. Part of the site is locally listed.													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Alternative 1 is for mixed use commercial and residential development.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the existing business use on the site, a mixed use proposal could lead to the loss of some existing employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	+	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centre. Whilst residential-led development on this site could bring more residents into Archway town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The site is currently fully in employment use, a</p>													

	<p>residential-led development would lead to the loss of employment floorspace and not contribute towards future economic growth. As such this alternative has been assessed as having a significant negative effect in relation to economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for ARCH8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that the intensification of business uses including the provision of co-working space was most appropriate for this site given its existing uses and the borough's projected need for a significant amount of additional employment floorspace.

Table 1.126 Site Assessment ARCH9: 724 Holloway Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH9: 724 Holloway Road, N19 3JD	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH9 is allocated for office led development with main town centre uses at ground floor level. The allocation aims to achieve a limited increase in business floorspace which will contribute to the overall provision of business floorspace in the borough, which is a main driver of economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.127 Site Assessment ARCH10: Elthorne Estate, Archway**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH10: Elthorne Estate, Archway, N19 4AG	+	+	0	+	++	+	+	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH10 is allocated for residential development with associated public realm improvements. The allocation aims to optimise the use of land and positively contribute to the provision of residential floorspace in the borough. Affordable housing will be provided as part of the development, which is likely to have positive effects on social inclusion and health and wellbeing by improving access to good quality housing. In addition, the associated public realm improvements should improve the quality of the local environment making the neighbourhood more liveable and reducing the need to travel. This in turn should have minor positive effects in relation to the borough's objectives of reducing contributions to climate change and improving air quality.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.													

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**Table 1.128 Site Assessment ARCH11: Dwell House, 619-639 Holloway Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH11: Dwell House, 619-639 Holloway Road, N19 5SS	+	++	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of</b>	ARCH11 is allocated for mixed-use residential/business/retail development.													

likely significant effects of site allocations	The allocation is an opportunity to increase retail and residential floorspace, add business floorspace in a central location in the town centre and increase diversity and vibrancy in the centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. The allocation aims to optimise the use of land and positively contribute to the provision of quality housing in the borough. Affordable housing will be provided as part of any residential element. Business and retail provision will positively contribute to the vitality and viability of the Archway Town centre. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													
Reasonable Alternative 1: Residential-led development	+	-	0	-	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The site is located in Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The development of this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy, supporting a range of jobs or contribute towards future economic growth. This alternative has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, and in relation to economic growth.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
Reasonable Alternative 2: Business-led development	0	+	0	-	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	This alternative is where this site would be amended so that the allocation is for business-led use. The intensification of the site would help to optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led													

	development could however have a minor negative effect for liveable neighbourhoods through no longer providing accessible services such as retail.
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for ARCH11 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring retail, residential and business uses is appropriate for the site considering its existing uses and location within Archway Town Centre.

**Table 1.129 Site Assessment ARCH12: 798-804 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH12: 798-804 Holloway Road, N19 3JH	+	+	0	+	+	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH12 is allocated for mixed-use development. Retail uses should be provided at ground floor. Business uses are considered suitable on upper floors alongside an element of residential use.</p> <p>The allocation is an opportunity to increase retail and residential floorspace, add business floorspace in a central location in the town centre and increase diversity and vibrancy in the centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. The allocation aims to optimise the use of land and positively contribute to the provision of quality housing in the borough. Affordable housing will be provided as part of any residential element. Business and retail provision will positively contribute to the vitality and viability of the Archway Town centre. The allocation will positively contribute to the vitality and viability of the town centre by providing a mix of town centre uses and maintaining active retail frontages at the ground floor.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 1.130 Site Assessment HC1: 12, 16-18, 20-22 and 24 Highbury Corner

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC1: 12, 16-18, 20-22 and 24 Highbury Corner	+	+	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>HC1 is allocated for commercial-led development with re-provision of a music venue; the re-provided venue should be operational before the existing venue ceases occupation on the current site. Possible new ticket hall with fully step-free access to Victoria Line. The site allocation identifies that comprehensive development could give greater scope to deliver against Local Plan objectives and which could help to optimise the use of the land. Associated public realm improvements alongside development could contribute towards an attractive public realm and high quality architecture.</p> <p>The allocation will contribute positively to the viability and vitality of the Lower Holloway Local Shopping Area and the economic growth of the borough in general, having a positive effect on optimising use of previously developed land and buildings. The site has potential to provide step-free access to the Victoria Line which will make the station more inclusive and the neighbourhood more liveable, as well as improving connectivity both within the borough and to other parts of London. Improved connectivity could have a positive effect with regards to reducing the need to travel however the specific effects are uncertain and so have been assessed as neutral. Maintaining the music venue will have a positive effect on liveable neighbourhoods by maintaining a cultural venue and potentially enhancing it which helps contribute to creating a vibrant social environment which helps to attract visitors and residents alike.</p>													
Reasonable Alternative 1: Residential-led development	+	+	0	-	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is where the allocation is for residential-led use. The other provisions of policy HC1 remain unchanged, for example for example the possible new ticket hall, step free access, public realm improvements and potential for comprehensive development.</p> <p>The site is within the Lower Holloway Local Shopping Area where smaller-scale retail development to meet the needs of residents is encouraged. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. The loss of the music venue would also have a negative effect in relation to liveable neighbourhoods.</p>													

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	Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.													
Reasonable Alternative 2: Business-led development	+	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is where the allocation is for business-led use. The other provisions of policy HC1 remain unchanged, for example for example the possible new ticket hall, step free access, public realm improvements and potential for comprehensive development.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. The site is within the Lower Holloway Local Shopping Area where smaller-scale retail development to meet the needs of residents is encouraged. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. The loss of the music venue would also have a negative effect in relation to liveable neighbourhoods.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for HC1 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that the mixed-use allocation requiring a mixture of business and retail use and re-provision of the existing music venue is appropriate for this specific site.													

Table 1.131 Site Assessment HC2: Spring House, 6-38 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC2: Spring House, 6-38 Holloway Road	0	+	0	+	0	+	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC2 is allocated for intensification for commercial/higher education uses.</p> <p>The allocation is an opportunity to increase commercial or higher education use in a Priority Employment Location and will have a positive effect on optimising use of previously developed land and buildings. Both uses support economic growth and provide opportunities for residents to develop skills and access employment in the borough, which accords with the social inclusion objective. The site is located in close proximity to Highbury and Islington Station. This good level of connectivity should have a positive effect with regards to reducing the need to travel by non-sustainable modes of transport, which in turn should help with the borough's aims of reducing contributions to climate change and improving air quality.</p>													
<b>Reasonable Alternative 1: Mixed-use development</b>	0	+	0	-/0	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The alternative is a mix of commercial and residential uses. This could have a positive effect in terms of optimising use of previously developed land and buildings. The site is already in education use, and is located within a designated Priority Employment Location. The loss of education use could have a negative effect on social infrastructure provision and therefore liveable neighbourhoods and social inclusion objectives. Conversely, development of a mix of uses could promote liveable neighbourhoods, providing residents with access to a range of services and facilities. Employment opportunities created at the site could contribute towards meeting the borough's social inclusion and economic growth objectives, although this might not outweigh the loss of education floorspace at the site.</p> <p>The provision of housing would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>Overall, given the loss of education use, the alternative is considered to have a neutral effect on social inclusion.</p>													
<b>Conclusion</b>	<p>One reasonable alternative to the proposed allocation for HC2 was identified: mixed-use development. Although positive effects could be realised through mixed-use development it is considered that as the site is already in education use and located within a PEL, an allocation that didn't secure business or education uses might not be the most appropriate use of land.</p>													

**Table 1.132 Site Assessment HC3: Highbury and Islington Station, Holloway Road**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
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<b>HC3: Highbury and Islington Station, Holloway Road</b>	++	++	0	++	0	0	0	++	0	+	0	0	0	0	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC3 is allocated for redevelopment of existing buildings, with potential to deck over the existing railway lines and build above the tracks. There should be a significant element of open space, public realm and station forecourt improvements. The station will be retained. Mixed use development is appropriate with active ground floor retail, leisure and cultural uses encouraged on those parts of the site fronting on to the station forecourt, Highbury Corner and Holloway Road. Office uses (B1a) should be prioritised above the station.</p> <p>The allocation will positively contribute to the economic growth of the borough within a Priority Employment Location and improve the viability and vitality of the Lower Holloway Shopping Area through provision of office and commercial uses. The most significant impact is expected to be on the quality of the built environment and the liveability of the neighbourhood. It is considered that the site represents a good opportunity for further public realm improvements and significant open space provision.</p>														
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	0/+	++	+	0	-	0	+	0	0	0	0	
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy HC3 remain unchanged, for example a significant element of open space, public realm and station forecourt improvements with the station retained.</p> <p>The site is partially within the Highbury Corner Priority Employment Location (PEL) and Lower Holloway Local Shopping Area and where non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and where employment provision is prioritised. The alternative could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The alternative could have a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, balanced against the wider public realm improvements this is likely to lead to a neutral/minor positive score overall. A minor negative has been identified in relation to economic growth because a residential-led scheme would not contribute towards the wider employment function of the PEL.</p> <p>Allocating this sites for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>														
<b>Reasonable Alternative 2: Business-led development</b>	++	++	0	0/+	0	+	0	++	0	+	0	0	0	0	

<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy HC3 remain unchanged, for example a significant element of open space, public realm and station forecourt improvements with the station retained.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development could result in a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, balanced against the wider public realm improvements this is likely to lead to a neutral/minor positive score overall.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for HC3 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation for retail, leisure, culture and business uses alongside public realm and open space improvements is appropriate for this site considering its excellent transport connections, existing uses and location within a PEL and LSA.</p>

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Table 1.133 Site Assessment HC4: Dixon Clark Court, Canonbury Road

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC4: Dixon Clark Court, Canonbury Road	+	++	0	+	++	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC4 is allocated for additional housing, community space and public realm improvements.</p> <p>The allocation aims to optimise the use of the site by providing additional housing units. Affordable housing would be provided as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. It also provides an opportunity for community space and public realm improvements that enhance the quality and liveability of the area.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.</p>													

**Table 1.134 Site Assessment HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London	+	+	+	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC5 is allocated for mixed use commercial and residential redevelopment.</p> <p>The allocation will have a positive effect in optimising the use of previously developed land and buildings, providing commercial and residential uses in an appropriate location. The allocation will positively contribute to the viability and vitality of the Lower Holloway Local Shopping Area, creating a continuous active frontage along Holloway Road and contributing to local economic growth. Affordable housing would be provided as part of any residential element, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. In addition, the development considerations specify that any proposals must be sensitively designed with regards to the adjacent Grade II listed building.</p>													
Reasonable Alternative 1: Residential-led development	+	-	+	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy HC5 remain unchanged, for example in relation the potential for intensification of the site, and the need for proposals to be sensitively designed with regards to the adjacent Grade II listed building,</p> <p>The site is within the Highbury Corner Priority Employment Location (PEL) and partially within Lower Holloway Local Shopping Area and where non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and where employment provision is prioritised. This could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. This alternative has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. A minor negative has been identified in relation to economic growth because a residential-led scheme would not contribute towards the wider employment function of the PEL.</p>													

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	Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.													
Reasonable Alternative 2: Business-led development	+	+	+	-	--	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for business-led development. The other provisions of policy HC5 remain unchanged, for example in relation the potential for intensification of the site, and the need for proposals to be sensitively designed with regards to the adjacent Grade II listed building,</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development could result in a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. Given the existing residential use on the site a business-led development could see a loss of housing which would have a significant negative effect in relation to objective 4.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for HC5 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation for commercial and residential uses retaining the retail frontage onto Holloway Road is appropriate for this site considering its existing uses and location within a PEL and LSA.													

Table 1.135 Site Assessment HC6: Land adjacent to 40-44 Holloway Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC6: Land adjacent to 40-44 Holloway Road	+	++	0	0	0	+	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC6 is allocated for business-led development in line with its Priority Employment Location designation.</p> <p>The allocation provides an opportunity to optimise the use of vacant land and develop business space that will contribute to the overall provision of business floorspace needed for the borough's economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. Development should have a positive effect on the quality of the built environment given the site is currently a vacant plot, making the area a safer and more inclusive place to visit.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	0	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Alternative 1 is for mixed use commercial and residential development. This would continue to have a positive effect on the quality of the built environment given the site is currently a vacant plot, making the area a safer and more inclusive place to visit.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. However, given the currently vacant nature of the site, a mixed use development would provide some intensification of employment use. A minor positive has therefore been identified in relation to economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	+	+	0	0	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of</b>	<p>Alternative 1 is for residential-led development. This would continue to have a positive effect on the quality of the built environment and had a positive effect on optimising the use of land given the site is currently a vacant plot</p>													

<b>likely significant effects of Alternative 2</b>	<p>It is considered that the alternative is likely to have a minor negative effect on economic growth if the site is developed for residential use given it falls within the Highbury Corner Priority Employment Location where the delivery of business floorspace is a priority.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for HC6 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its PEL designation and the borough's projected need for a significant amount of additional employment floorspace.</p>

**Other Important Sites**

**Table 1.136 Site Assessment OIS1: Leroy House, 436 Essex Road**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS1: Leroy House, 436 Essex Road, N1 3QP</b>	+	+	0	0	0	+	0	++	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS1 is allocated for refurbishment of employment space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises.</p> <p>The allocation will help support economic growth in a designated Priority Employment Location and provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land. Encouraging pedestrian and public realm improvements as well as providing a more active frontage will have a positive effect on creating a safer and more inclusive environment and more sustainable neighbourhood. This improved connectivity should reduce the need to travel, which in turn may have positive effects with regards to the borough's objectives to reduce contributions to climate change and improve air quality.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 1.137 Site Assessment OIS2: The Ivories, 6-8 Northampton Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS2: The Ivories, 6-8 Northampton Street, N1 2HY	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>OIS2 is allocated for refurbishment of business space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises.</p> <p>The allocation will help support economic growth and in particular the cultural and third sectors in a designated Priority Employment Location, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land.</p>													
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

<b>Reasonable Alternative 2: Residential-led development</b>	0	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could lead negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is within the Northampton Street PEL where employment uses are prioritised. The site is also in existing employment use. A residential-led allocations in these locations may not adequately balance the competing demands for land in the borough and provide for the full range of development needs. A minor negative has therefore been identified in relation to the efficient use of land.</p> <p>It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given it falls within a Priority Employment Location where the delivery of business floorspace is a priority and given the employment use of the site.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use, PEL designation and the borough's projected need for a significant amount of additional employment floorspace.</p>													

**Table 1.138 Site Assessment OIS3: Belgravia Workshops, 157-163 Marlborough Road**



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS3: Belgravia Workshops, 157-163 Marlborough Road, N19 4NF	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS3 is allocated for refurbishment of business space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises. The allocation will help support economic growth and in particular the cultural and third sectors in a designated Priority Employment Location, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land.													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

<b>Reasonable Alternative 2: Residential-led development</b>	0	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is within the Hornsey Road/Marlborough Road Priority Employment Location where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocation in this location may not adequately balance the competing demands for land in the borough and provide for the full range of development needs.</p> <p>It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given it falls within a Priority Employment Location where the delivery of business floorspace is a priority and given the employment use of the site.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS3 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use, PEL designation and the borough's projected need for a significant amount of additional employment floorspace.</p>													

**Table 1.139 Site Assessment OIS4: The BT Telephone Exchange, Kingsland Green**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS4: The BT Telephone Exchange, Kingsland Green</b>	+	+	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS4 is allocated for mixed use commercial and residential development, which maximises the provision of office use at the ground floor and lower levels. Development which improves the quality and quantity of existing employment provision is encouraged.</p> <p>The allocation is an opportunity to increase business floorspace in a Priority Employment Location. The allocation will have a positive effect on optimising use of previously developed land and buildings. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses and promoting additional use of a partially vacant site. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation promotes liveable neighbourhoods by requiring improvements to permeability between the site and the neighbouring Burder Close Estate.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	+	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy OIS4 remain unchanged, for example improving permeability.</p> <p>The site is within the Balls Pond Road East PEL where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocation in this locations may not adequately balance the competing demands for land in the borough and provide for the full range of development needs. A minor negative effect in relation to the efficient use of land has therefore been identified. A minor negative has been identified in relation to economic growth because a residential-led scheme would not contribute towards the wider employment function of the PEL.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

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Reasonable Alternative 2: Business-led development	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for business-led development. The other provisions of policy OIS4 remain unchanged, for example improving permeability. Given a large part of the telephone exchange is vacant and the scope for comprehensive redevelopment is identified a business-led development within the PEL could have a minor positive effect in relation to the efficient use of the land.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.</p>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for OIS4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation for commercial and residential uses is appropriate for this site considering its location within a PEL and close proximity to Dalston Town Centre.													

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Table 1.140 Site Assessment OIS5: Bush Industrial Estate, Station Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS5: Bush Industrial Estate, Station Road, N19 5UN	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant	<p>OIS5 is allocated for the retention and intensification for industrial uses (light industrial, B2 and B8 uses). Office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation is an opportunity to increase industrial floorspace in a Locally Significant Industrial Site and will have a positive effect in optimising use of previously developed land and buildings. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses and providing new employment opportunities for residents, in line with the social inclusion objective. Although the</p>													

<b>effects of site allocations</b>	allocation supports the intensification of industrial uses, which may have a negative impact on traffic congestion and air quality, this would be counteracted by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.													
<b>Reasonable Alternative 1: Housing co-location</b>	0	-	0	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating the Bush Industrial Estate for the co-location of housing with industrial uses would bring some benefits in relation to the delivery of much needed additional housing.</p> <p>It is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions. The co-location of industrial floorspace with housing is likely to lead to the exclusion of some traditional industrial uses in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p> <p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral. This is because the quality of development, in terms of both residential standards and any necessary mitigation relating to the presence of nearby industrial uses, would determine if equality, diversity and community cohesion was promoted or poorly served by this alternative.</p> <p>Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area.</p>													

	<p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
<p>Reasonable Alternative 2 Office co-location</p>	0	+	0	0	0	+	0	0	-	0	0	-	0	-
<p>Commentary on assessment of likely significant effects of Alternative 2</p>	<p>This alternative is for the co-location of industrial uses with office uses.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs of the area. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. If new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices given the higher values of this use in the borough. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities from this area (on economy and transport routes into London) given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For Alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this</p>													

location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective.

Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

The effects of alternative 2 on the other IIA objectives are considered to be neutral.

**Reasonable  
Alternative 3  
Office and housing  
co-location**

0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
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**Commentary on  
assessment of  
directly significant  
effects of  
Alternative 3**

This alternative is for the co-location of industrial uses with office uses on the allocated sites.

Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.

The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.

The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.

Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS. Considering these effects, alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

#### Conclusion

Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site OIS5: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth - it is considered that this is outweighed by the borough's need to protect its limited supply of industrial floorspace and support the industrial function of the Bush Industrial Estate LSIS.

**Table 1.141 Site Assessment OIS6: 100 Hornsey Road, N7 7NG**



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS6: 100 Hornsey Road, N7 7NG	+	+	0	+	+	+	0	0	0	+	0/+	+	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS6 is allocated for residential redevelopment with the provision of of nursery open space, and public realm improvements. The allocation will optimise use of previously developed land, providing residential use in an appropriate location. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The allocation promotes liveable neighbourhoods by requiring enhancements to the Hornsey Road streetscene. Open space improvements are required as part of the allocation, which could also have a positive effect on biodiversity.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 1.142 Site Assessment OIS7: Highbury Delivery Office, 2 Hamilton Lane

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS7: Highbury Delivery Office, 2 Hamilton Lane, N5 1SW	0	+	0	0	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS7 is allocated for: retention and re-provision of business floorspace, an element of residential use may be acceptable. The re-provision of business floorspace will have a positive impact on economic growth. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation seeks to optimise the use of the site, whilst respecting the constraints placed on development by its backland location.													

<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorspace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	+	0	+	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could help to optimise use of the land whilst respecting the constraints placed on development by its backland location.</p> <p>Given the employment use of the site a residential-led development would lead to minor negative effect on economic growth.</p>													

	<p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS7 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p>

**Table 1.143 Site Assessment OIS8: Legard Works, 17a Legard Road**

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS8: Legard Works, 17a Legard Road	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS8 is allocated for retention and re-provision of business floorspace, and potential for limited intensification of business use. This will positively contribute to the borough's economic growth, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective.													
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	0	+	0	0	+	0	+

<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace, however commercial use as part of a mix of uses could also provide employment use and so a neutral effect has been identified in relation to economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<p><b>Reasonable Alternative 2: Residential-led development</b></p>	0	+	0	+	++	+	0	-	+	0	0	+	0	+
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>Allocating the site for residential-led development could help to optimise use of the land as there may be some scope for limited intensification. Given the employment use of the site however a residential-led development would lead to minor negative effect on economic growth.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													

<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for OIS8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.
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**Table 1.144 Site Assessment OIS9: Ladbroke House, 62-66 Highbury Grove**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS9: Ladbroke House, 62-66 Highbury Grove	0	0	0	+	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	OIS9 is allocated for retention of education use. This would have a positive impact on the liveability of the neighbourhood by providing an essential social infrastructure use for local residents as well as employment opportunities. The use of the site is already optimised and no extra floorspace is expected.													
Reasonable alternative summary	No reasonable alternative was identified. As development of this site was completed in late 2019 it is proposed to remove the allocation from the Site Allocations DPD.													

**Table 1.145 Site Assessment OIS10: Hornsey Road and Grenville Works, 2A Grenville Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>OIS10: Hornsey Road and Grenville Works, 2A Grenville Road</b>	+	+	0	0	0	+	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS10 is allocated for business-led redevelopment with re-provision and intensification for business use (particularly B1c). Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The allocation optimises the use of previously developed land and the provision of business floorspace would have a positive impact on local economic growth in a Priority Employment Location, providing opportunities for residents to access employment in the borough in line with the social inclusion objective.</p>														
<b>Reasonable Alternative 1: Mixed- use commercial and residential development</b>	+	+	0	+	+	0	0	-	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy OIS10 remain unchanged. Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and given there is some scope for intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>														

Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	--	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2  Page 739	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy OIS10 remain unchanged</p> <p>Allocating the site for residential-led development may not focus development in the most appropriate locations. The site is within the Hornsey Road/Marlborough Road Priority Employment Location where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocations in these locations may not adequately balance the competing demands for land in the borough and provide for the full range of development needs. A negative effect on the efficient use of land has been identified.</p> <p>It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given it falls within a Priority Employment Location where the delivery of business floorspace is a priority and given the employment use of the.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
Conclusion	<p>Two reasonable alternatives to the business-led allocation for OIS10 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

Table 1.146 Site Assessment OIS11: Park View Estate, Collins Road

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IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS11: Park View Estate, Collins Road</b>	+	+	0	0	+	+	+	0	+	+	+	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for residential development including the provision/improvement of residential amenity space, community floorspace; and public realm improvements, and has planning permission.</p> <p>The allocation aims to optimise the use of land located in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The allocation requires public realm improvements which will improve the quality of the built environment, creating a safer and more inclusive environment. This improved connectivity should reduce the need to travel, which in turn may have positive effects with regards to the borough's objectives to reduce contributions to climate change and improve air quality. Improvements to estate amenity space could have minor positive effects in relation to open space and biodiversity.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.</p>													

**Table 1.147 Site Assessment OIS12: 202-210 Fairbridge Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS12: 202-210 Fairbridge Road</b>	0	+	0	0	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of</b>	<p>The site has planning permission for a mixed use business (B1 and B8) and residential scheme. Should the site be subject to further amendments or new applications, proposals should prioritise intensification of business floorspace.</p>													



<b>likely significant effects of site allocations</b>	The allocation optimises the use of previously developed land and the provision of business floorspace would have a positive impact on local economic growth in a Priority Employment Location, providing opportunities for residents to access employment in the borough in line with the social inclusion objective.													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	0	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use business and residential development reflective of the planning consent for the site.</p> <p>The alternative would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could lead to the loss of existing business floorpace. A minor negative effect in relation to economic growth has been identified.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	One reasonable alternative to the business-intensification for OIS5 was identified: mixed-use residential and business development, reflective of the planning permission for the site. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business intensification is appropriate for this site given its existing use, it's location within a PEL and the borough's projected need for a significant amount of additional employment floorspace.													

**Table 1.148 Site Assessment OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS13:</b> Highbury Roundhouse Community Centre, 71 Ronald's Road	0	+	0	++	+	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS13 is allocated for re-provision of the community centre. Residential development may be acceptable on the Ronalds Road frontage of the site.</p> <p>The most significant positive effect of the allocation is retention of the community centre, which provides a variety of services for residents including childcare, lunch and social clubs for older people, and health and fitness activities for all ages. In addition there will be a positive effect from any residential development at the site which would provide affordable housing and contribute towards meeting Islington's housing need. The allocation will also make more efficient use of the site.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has planning permission for the construction of a community centre that is close to completion, and the introduction of uses other than residential is not considered feasible in this primarily residential location.</p>													

**Table 1.149 Site Assessment OIS14: 17-23 Beaumont Rise**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS14:</b> 17-23 Beaumont Rise	+	+	0	+	++	+	+	0	0	0	+	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>OIS14 is allocated for new housing including supported living accommodation, with provision of staff facilities, private and communal amenity space and communal rooms. The site has planning permission (P2017/2330/FUL) for 10 flats and 17 supported living units.</p>													

<b>effects of site allocations</b>	The most significant positive effect of the allocation is the provision of housing, including supported living accommodation, to meet need in the borough. The allocation optimises use of previously developed land, and contributes to a high quality environment by requiring enhancements to the ecological value of the site. The allocation has no effect on heritage or economic growth objectives.
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.

**Table 1.150 Site Assessment OIS15: Athenaeum Court, 94 Highbury New Park**

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS15: Athenaeum Court, 94 Highbury New Park</b>	+	+	0	0	+	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS15 is allocated for infill residential development. The allocation optimises the use of land through infill residential development and positively contributes to the quality of housing provision in the borough. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.													

**Table 1.151 Site Assessment OIS16: Harvist Estate Car Park**

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>OIS16: Harvist Estate Car Park</b>	+	+	0	+	+	+	+	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS16 is allocated for residential development with associated amenity space and improvements to the public realm. This is considered to have a positive impact on housing provision, optimising the use of land previously used as a car park and improving the quality of the environment. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The reduction in car parking could help to reduce dependence on cars, reducing the need to travel, which may also have minor positive effects in relation to the borough's objectives to reduce contributions to climate change and improve air quality.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.													

**Table 1.152 Site Assessment OIS17: Hathersage and Besant Courts, Newington Green**

<b>A Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS17: Hathersage and Besant Courts, Newington Green</b>	+	+	0	++	++	+	+	0	+	+	+	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS17 is allocated for new housing, play space, open space and improvements to communal facilities and landscaping. The allocation aims to optimise the use of land located in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The allocation requires improvements to the permeability of the site which will improve the quality of the built environment, creating a safer and more inclusive environment. This improved connectivity should reduce the need to travel, which in turn may have positive effects with regards to the borough's objectives to reduce contributions to climate change and improve air quality. Improvements to open space and landscaping should have minor positive effects in relation to objectives 10 (open space) and 11 (biodiversity).													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.													

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**Table 1.153 Site Assessment OIS18: Wedmore Estate Car Park**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS18: Wedmore Estate Car Park	+	+	0	+	+	+	+	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS18 is allocated for residential development.</p> <p>The allocation aims to optimise the use of land located in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The landscape and public realm improvements required by the allocation will improve the quality of the environment creating a safer and more inclusive environment which includes re-provision of the playground. This improved connectivity should reduce the need to travel, which in turn may have positive effects with regards to the borough’s objectives to reduce contributions to climate change and improve air quality.</p>													
<b>Reasonable Alternative Summary</b>	<p>No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council’s objectives for the estate, or its housing estates in general.</p>													

**Table 1.154 Site Assessment OIS19: 25-27 Horsell Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS19: 25-27 Horsell Road	0	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>OIS19 has planning permission for mixed use development including residential uses and reconfigured office use. Should the site be subject to further amendments or new applications, intensification of business floorspace should be prioritised. The allocation aims to protect business floorspace with limited intensification which is positive for economic growth. The allocation will also make more efficient use of the site.</p>													

<b>effects of site allocations</b>														
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2: Residential-led development</b>	0	+	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could help to optimise use of the land as there may be some scope for intensification.</p> <p>It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given the employment use of the site.</p>													

	<p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS19 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p>

**Table 1.155 Site Assessment OIS20: Vernon Square, Penton Rise**

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS20: Vernon Square, Penton Rise	0	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS20 is allocated for refurbishment/redevelopment for business-led development, subject to justifying the loss of social infrastructure. The allocation aims to provide business floorspace within the CAZ which will have a positive impact on the economic growth of the borough. The allocation will also make more efficient use of the site. The building was used previously as a higher education facility. Social infrastructure loss will not be permitted unless it can be robustly demonstrated that it will not have a negative impact on the borough and its residents, hence there is considered to be no effect in relation to objective 4.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	0	-	0	0	+	+	0	-	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The site is within the CAZ, which requires additional employment floorspace to support Islington’s projected economic growth and employment uses are prioritised. By promoting residential rather than business use in a location prioritised for employment uses, the alternative would have a negative effect on the borough’s approach to fostering sustainable economic growth and increasing employment opportunities. This may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs and therefore a minor negative in relation to the efficient use of land is identified.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Reasonable Alternative 2 Office co-location</b>	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The site is in temporary educational use, but is expected to be vacant again in 2023/24 when the current occupier moves to new premises. An allocation requiring retention of social and community infrastructure on site could help to balance competing demands between land uses, and therefore make efficient use of the site. However, the site is within the CAZ and would also be appropriate for employment use.</p> <p>Social infrastructure supports liveable neighbourhoods by providing access to essential services, and can promote social inclusion and economic growth by improving opportunities for learning and skills development which reduces barriers to employment.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS20 were identified: residential-led development and retention of social infrastructure. Whilst it was felt that residential-led development could have positive effects in terms of the delivery of good-quality housing and the retention of social infrastructure could have a positive effect by providing learning and skills development, on balance it was considered that business use was most appropriate for this site given its PEL designation, location within the CAZ and the borough’s projected need for a significant amount of additional employment floorspace.</p>													

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Table 1.156 Site Assessment OIS21: Former railway sidings adjacent to Caledonian Road Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS21: Former railway sidings adjacent to Caledonian Road Station</b>	+	++	-	0	+	+	+	+	0	0	-/0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS21 is allocated for residential-led, mixed use development including the introduction of retail uses at ground floor level. The station must be retained and protected. The allocation also identifies that the site offers the opportunity for the development of a special local landmark building up to a height of 12 storeys.</p> <p>The allocation optimises the use of a previously developed building and the adjacent vacant land. It will contribute positively to the provision of quality housing in the borough and help to meet housing and affordable housing need. The allocation should improve the safety and inclusivity of the area by introducing some active retail frontages. The development may have a negative impact on the Caledonian Road Station which is a grade II listed building. The design of any proposal would be sensitive to the specific location, reflecting the need to preserve the heritage asset and ensure amenity impacts from the rail line are mitigated. Similarly impacts on the Holloway Road to Caledonian Road Railsides SINC will need to be carefully addressed or there is the potential for development to have negative effects on green infrastructure and biodiversity.</p>													
<b>Reasonable Alternative 1: Mixed-use development</b>	+	++	-	+	+	+	0	+	0	0	-/0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy OIS21 remain unchanged for example, the opportunity for the development of a special local landmark building up to a height of 12 storeys and the optimisation of the use of a previously developed building and the adjacent vacant land.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both uses would contribute towards social inclusion objectives.</p>													

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	Mixed-use development may have limited positive effects on liveable neighbourhoods, economic growth and the need to travel, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors.													
<b>Reasonable Alternative 2: Business-led development</b>	+	++	-	0	0	+	0	+	0	0	-/0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy OIS21 remain unchanged for example, the opportunity for the development of a special local landmark building up to a height of 12 storeys and the optimisation of the use of a previously developed building and the adjacent vacant land.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Business led development would have a positive effect on economic growth.</p>													
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for OIS21 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.													

**Table 1.157 Site Assessment OIS22: 114 Balls Pond Road and 1 King Henry's Walk**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS22: 114 Balls Pond Road and 1 King Henry's Walk</b>	0	++	0	0	++	+	0	0	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS22 is allocated for residential development. The site will optimise the use of a previously developed building and the adjacent vacant land. The allocation will contribute positively to the provision of quality housing in the borough and help to meet housing need. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.</p>													
<b>Reasonable Alternative 1: Mixed-use development</b>	0	++	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. A mixed use development would help to optimise the use of a previously developed building and adjacent vacant land.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both of these uses would also have positive effects in relation to social inclusion.</p> <p>Mixed-use development may have limited positive effects on liveable neighbourhoods, economic growth and the need to travel, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors. This in turn could have minor positive effects on the council's objectives to reduce contributions to climate change and improve air quality.</p>													
<b>Reasonable Alternative 2: Business-led development</b>	0	++	0	0	-	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. This alternative would help to optimise the use of a previously developed building and adjacent vacant land.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Business led development would have a significant positive effect on economic growth.</p> <p>A business led development would have a positive effect on economic growth.</p>													

<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for OIS22 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.
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**Table 1.158 Site Assessment OIS23: 1 Lowther Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS23: Lowther Road	0	+	0	+	0	+	++	0	0	0	0	0	0	0
Commentary on Assessment of likely significant effects of site allocations	<p>The site allocation for OIS23 protects the existing healthcare use of the site and encourages intensification/consolidation of healthcare and social and community infrastructure uses.</p> <p>The allocation will have a positive impact on the liveability of the neighbourhood by securing an important health service for the local community, and presenting an opportunity for other social and community infrastructure uses to locate at the site. It will contribute to social inclusion and health and wellbeing by providing services supporting people with protected characteristics.</p>													
Reasonable alternative summary	No reasonable alternative was identified. The allocation supports the existing healthcare use of the site with the intention of securing and protecting a social and community infrastructure use that benefits the borough.													

**Table 1.159 Site Assessment OIS24: Pentonville Prison, Caledonian Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>OIS24: Pentonville Prison, Caledonian Road</b>	++	++	++	+	++	+	0	0/+	0	+	0	0	0	0	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS24 is allocated for a heritage-led, predominantly residential scheme including appropriate provision of community uses, open space and an element of business use may be acceptable. Any development at the site is subject to the loss of social infrastructure being justified.</p> <p>The allocation will have a significant positive effect in optimising the use of previously developed land and buildings, providing residential, community and possibly business uses in an appropriate location. A significant amount of affordable housing will be required as part of any residential development to help meet need in the borough, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The site has been assessed as having no effect or a minor positive effect in relation to objective 8, as although business use is likely to have a positive effect on economic growth, its delivery on the site is uncertain. Depending on the final design, development of this currently closed site will enhance local character and distinctiveness. The allocation promotes liveable and inclusive neighbourhoods by requiring the provision of new community facilities and open space. The allocation can also positively contribute to the creation of a high quality environment by integrating the isolated site with the surrounding urban context as well as improving permeability through the site. Conserving the heritage of the site is a major aim of the allocation; opening up the site will provide greater visibility of heritage assets.</p>														
<b>Reasonable Alternative 1: Mixed-use Development</b>	++	++	++	+	+	+	0	+	+	+	0	0	0	0	
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for business-led development. The other provisions of policy OIS21 remain unchanged for example, a heritage-led development with the provision of active frontages, permeability and open space.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both of these uses would also have positive effects in relation to social inclusion.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>														

<b>Reasonable Alternative 2: Business-led development</b>	++	++	++	0	0	+	0	++	0	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	This alternative is for business-led development. The other provisions of policy OIS21 remain unchanged for example, a heritage-led development with the provision of active frontages, permeability and open space. A business led development in this location is likely to have a significant positive effect on economic growth given the size of the site as well as a positive effect in relation to social inclusion. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough.													
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for OIS22 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.													

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**Table 1.160 Site Assessment OIS25: Charles Simmons House, 3 Margery Street**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS25: Charles Simmons House, 3 Margery Street</b>	+	+	0	+	+	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS25 is allocated for residential development with some community floorspace and retail use.  The allocation will optimise the use of land and positively contribute to the provision of housing in the borough. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The provision of community floorspace and retail uses will contribute to a more liveable neighbourhood, and may also have a minor positive effect on economic growth by providing some employment opportunities. The allocation may improve the immediate environment with landscaping.													

<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate, or its housing estates in general.
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**Table 1.161 Site Assessment OIS26: Amwell Street Water Pumping Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS26: Amwell Street Water Pumping Station</b>	0	+	++	0	0/+	0	0	0/+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS26 is allocated for conservation of heritage assets and sensitive re-use of existing buildings for residential or office use. The allocation aims to preserve a Grade II listed site which will positively contribute to the historical character of the borough. The allocation will also make more efficient use of the site. It is likely that only either residential or office uses can be realised, hence the allocation may have no effect or a minor positive effect relating to objectives 5 and 8.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The allocation for the conservation of heritage assets and re-use of buildings for residential or office uses is flexible in its current form. Given the limited scope for development at the site no capacity assumptions have been made for the site in relation to either housing numbers or office floorspace.													

## Assessment of Bunhill and Clerkenwell Site Allocations

**Table 1.162 Site Assessment BC1: City Barbican Thistle Hotel, Central Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>BC1: City Barbican Thistle Hotel, Central Street, EC1V 8DS</b>	+	0	0	0	0	+	0	++ / +	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC1 is allocated for refurbishment or redevelopment of the existing buildings for office-led mixed use development. Re-provision of a hotel may be suitable given the existing hotel use on site.</p> <p>The allocation aims to provide business floorspace within the CAZ which will have a significant positive effect on the economic growth of the borough. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Retaining the hotel will have a minor positive effect on economic development. Redevelopment of these buildings offers an opportunity to improve the local environment as both buildings are of unremarkable design and merit and contribute little to the street or townscape. Provision of active frontages will help create a safer and more inclusive local environment.</p>														
<b>CA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>	
<b>Reasonable alternative: mixed use</b>	+	-	0	0	+	+	0	-	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site would be amended so that the allocation allows more housing to be developed, allowing up to 50% of the uplift to be provided as housing. The other provisions of policy BC1 remain unchanged, for example exclusions to this policy remain, including for publicly funded uses.</p> <p>As with the preferred approach this alternative will have positive effects on the local environment by redeveloping buildings of unremarkable design merit.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>														



	<p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Employment Land Study identifies the arc between Shoreditch and King's Cross including along City Road the focus of priority for site assembly and for provision of Grade A office space, to maintain and enhance the area's role in supporting London's strategic business role. This site lies broadly within this corridor.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>

**Table 1.163: BC2: City Forum, 250 City Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC2: City Forum, 250 City Road, EC1V 2PU	+	++	0	+	++	+	0	++	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is under construction with a planning permission for the development of four blocks ranging in height from 7 to 42 storeys to provide up to 995 residential units, 7,600sqm of B1 floorspace and a mix of other uses.</p> <p>The allocations states that should the site be subject to further amendments or new applications, the council will seek to maximise provision of affordable housing and affordable workspace.</p> <p>The scheme under construction will have positive effects on a number of criteria, but in particular there will be significant effects on housing and economic growth by providing a large number of new homes including affordable homes and a significant quantum of office floorspace. The affordable housing will have positive effects on social inclusion. The scheme will have significant positive effects on the efficient use of land by optimising development on previously developed land in a highly accessible location. In addition, the allocation will have a minor positive effect on creating a high quality environment through creating a safer and more inclusive public realm with through-site pedestrian links, particularly north-south, as part of a clearly defined public realm. The new links through the site and the improved public realm will have a minor positive effects on the transport objective by improving connectivity and encouraging walking and cycling.</p>													

<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.
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**Table 1.164 BC3: Islington Boat Club, 16-34 Graham Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC3: Islington Boat Club, 16-34 Graham Street, N1 8JX</b>	+	+	0	+	+	+	0	0	+	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC3 is allocated for refurbishment of boat club facilities and provision of residential units.</p> <p>Refurbishment of the boat club will have minor positive effects on liveable neighbourhoods by retaining the leisure use on site which enables community use of the open water in the basin. The redevelopment of the site will include provision of new homes which will have positive effects on housing provision and affordable housing delivery. The affordable housing will have positive effects on social inclusion. The allocation represents a more efficient use of land by providing new housing on the site which at present only has the boat club. The allocation will have minor positive effects on the transport, open space, and high quality environment objectives by requiring the redevelopment improve public access between Graham Street and the canal basin, improving conditions for walking and cycling and improving access to the open space.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation. This allocations maximises the amount of residential development reasonably possible on site, while retaining and improving the boat club, which is a valued social infrastructure use.</p> <p>This allocation is for refurbishment of boat club facilities and provision of residential units. The Islington Boat Club is a valued social infrastructure use and must be retained on site. In addition a small number of homes may be developed on the site. Residential was selected for this site because of the surrounding context. The surrounding uses are predominantly residential, including across City Road Basin. The area has high amenity for residential uses for a central London location with low levels of traffic noise and pollution, and the site adjoins Graham Street Gardens, and benefits from views across the City Road Basin. The Bunhill and Clerkenwell AAP directs commercial uses to busier, more accessible locations including along City Road and around the Old Street roundabout and surrounding area.</p>													

**Table 1.165: BC4: Finsbury Leisure Centre**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC4: Finsbury Leisure Centre, EC1V 3PU	+	++	0	++	++	+	+	0	+	0	0	+	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The Council plans to redevelop the Finsbury Leisure Centre into a new civic development which will include new indoor leisure facilities and outdoor sports pitches, new council and private homes, a GP surgery, a nursery, and the Bunhill Energy Centre. The development will also provide an enhanced public realm, including improvements to the surrounding streets and spaces particularly for pedestrian and cycling connections.</p> <p>The proposal will have significant positive effects on housing by providing new homes and affordable homes, and make more efficient use of the land by providing additional floorspace across a number of uses on site. The affordable housing will have positive effects on social inclusion. The scheme will have minor positive effects on the reducing climate change objective by development of a new energy centre. There will be minor positive effects on the high quality environment objective with an improved public realm and minor positive effects on the health and wellbeing objective with the provision of improved sports facilities. Improved permeability across the site and public realm improvements will improve conditions for walking and cycling with minor positive effects against the transport objective.</p>													
Reasonable alternative summary	<p>No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site, while re-providing and improving the leisure centre, as well as providing a new nursery and energy centre on site.</p> <p>The allocation for this site is demanding as redevelopment must meet a number of needs in a relatively small area. The allocation is for redevelopment to provide new high quality leisure facilities and meet increased demand, as well as a nursery, energy centre, housing (including a significant amount of genuinely affordable housing) and public open space. Permeability must also be improved across the site.</p> <p>Surrounding the site are predominantly residential buildings and development in this location should preserve amenity for local residents. The Bunhill and Clerkenwell AAP directs commercial uses to areas with higher accessibility and a busier more commercial context, including along City Road and around the Old Street Roundabout.</p> <p>The Council has developed detailed designs for the site, which have been evolved over a number of years, have been subject to extensive consultation, and have been revised and improved based on local feedback. The plans are at an advanced stage of development. For the above reasons no alternative allocations were considered reasonable for this site.</p>													

Table 1.166: BC5: London College of Fashion Golden Lane Campus

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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BC5: London College of Fashion Golden Lane Campus	0	++	+	0	0	+	0	++	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC5 is allocated for refurbishment of the existing building for office use, subject to justifying the loss of social infrastructure in line with relevant Local Plan policies. There may be potential for further intensification of office space through sensitive infill development on the undeveloped part of the site.</p> <p>This allocation will have significant positive effects on economic development by providing employment (office) floorspace in an appropriate location in the CAZ. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have minor positive effects on the efficient use of land objective by optimising the use of previously developed buildings as well as some vacant land. The loss of social infrastructure at the site will only be permitted if it can be robustly demonstrated that such loss will not have a negative effect on meeting Islington's resident's needs and will therefore have no effect on the liveable neighbourhoods objective. The allocation details designations relevant to the site which must be considered carefully in development proposals, including its locally listed status and location within the St. Luke's conservation area.</p>														
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES	
Reasonable alternative: mixed use	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow an element of housing to be provided on site.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>														

	<p>As with the preferred approach the alternative would have minor positive impacts on heritage as the allocation details designations relevant to the site which much be considered carefully in development proposals, including locally listed status and location within the St. Luke's conservation area.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>

**Table 1.167 : BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street, EC1V 9NH	+	+	0	+	++	+	0	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC6 is allocated for residential development.</p> <p>The site has planning permission for the construction of 55 new homes, a community centre, two flexible A1/A2 use units and the provision of a new amenity space. There will be significant positive effects on the housing objective by providing 55 additional homes, 70% of which will be affordable. The development optimises density on a previously developed site and will therefore have minor positive effects on the efficient use of land objective. The development will have minor positive effects on the liveable neighbourhoods objective and the high quality environment objective by improvements to the public realm, access, and passive surveillance. There will be minor positive effects on the social inclusion</p>													

	objective by provision of the community centre. Planning permission P2015/0709/FUL involves a significant reduction in car parking on site. This will help shift trips to more sustainable form of transport with minor positive effects on the objectives for transport, climate change, and natural resources (air quality).
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.

**Table 1.168: BC7: 198-208 Old Street (petrol station)**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC7: 198-208 Old Street (petrol station), EC1V 9FR	+	++	+	+	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC7 is allocated for redevelopment of the petrol station to provide a new building comprising retail/leisure uses at ground floor level with business uses above.</p> <p>This allocation will remove the petrol station use which provides a poor quality urban environment with large areas of hard standing and large areas of advertising signage and lighting. This change will have significant positive effects on the efficient use of land objective, and minor positive effects on the objectives for a high quality environment, heritage, and liveable neighbourhoods.</p> <p>The allocation will have significant positive effects on economic development by providing business / employment uses which will benefit economic growth. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

<b>Reasonable alternative: mixed use</b>	+	+	+	+	+	+	0	--	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would allow either an office led or a housing led mixed use development, with a retail or leisure at the ground floor and housing above.</p> <p>As with the preferred approach this allocation will remove the petrol station use which provides a poor quality urban environment with large areas of hard standing and large areas of advertising signage and lighting. This change will have minor positive effects on the efficient use of land objective, and minor positive effects on the objectives for a high quality environment, heritage, and liveable neighbourhoods.</p> <p>The alternative makes less efficient use of land compared to the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion by.</p> <p>The alternative could have significant negative effects on economic growth. Additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is located within the City Fringe Opportunity Area, fronting the busy Old Street and only 50m from the Old Street roundabout (the approximate centre for East London Tech City) and next to the landmark White Collar Factory office development. The site has very close access to the Old Street Station and close access to the shops, cafes, and restaurants of the area including within the Old Street Local Shopping Area, along Old Street, and at the Bower development across the road. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace, but also for space for SMEs, tech city-looking businesses and business service uses, which may be more appropriate due to the size of this site. This highly prominent address is valuable for an office use and would provide good access and local services for its staff. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>Residential uses may have challenges in providing protection from the noise and air pollution in this location (although air quality problems will decrease following public realm improvements in this area). It may also be challenging to provide an adequate outlook for homes toward the south and west of the site due to the blank walls of abutting buildings. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.</p>														
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>														

**Table 1.169 BC8: Old Street roundabout area,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC8: Old Street roundabout area, EC1V 9NR	++	+	0	++	0	0	0	0	+	+	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC8 is allocated for removal of the gyratory alongside public realm improvements, new public open space with potential for some small-scale commercial use, improvements to station access and facilities including enhanced retail provision.</p> <p>The allocation will have significant positive effects on the high quality environment objective and minor positive effects on the transport and climate change objectives by improving the area for walking and cycling and making it easier to enter and exit the station including providing step free access. The allocation will reduce the impacts of traffic including noise and air pollution which will have minor positive effects on the natural resources (air quality) objective. The allocation will transform carriageway space for pedestrianised public space with minor positive effects on the open space objective.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation as the site is allocated predominantly as a public realm improvement scheme with related small scale commercial uses. The Old Street Roundabout is a TfL led and predominantly a scheme which improves the public realm with a small amount of related supporting retail. There are no larger buildings proposed which could be allocated for the development of housing. This site is already at an advanced stage of construction.</p>													

**Table 1.170: BC9: Inmarsat, 99 City Road (east of roundabout),**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC9: Inmarsat, 99 City Road (east of roundabout), EC1Y 1BJ	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>BC9 is allocated for refurbishment of the existing building for commercial offices, with an element of retail/leisure, or other appropriate uses which provide active frontages at ground floor. Redevelopment of the building may be acceptable if it can be demonstrated that the existing building is no longer fit for the purposes for which it was designed. The allocation will have minor positive effects on the high quality environment objective as the refurbishment or redevelopment presents an opportunity to improve the quality of the local environment and public realm.</p>													



<b>effects of site allocations</b>	<p>Islington's Tall Building Study suggests there is potential to redevelop Inmarsat House as a district landmark building of up to 26 office storeys (106m). A larger building here as part of the planned cluster would have significant positive effects on the efficient use of land.</p> <p>This allocation will have significant positive effects on economic growth by providing employment (office) floorspace with floorspace for smaller businesses encouraged. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable Alternative: mixed use</b>	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use, in addition to retail and leisure use on the ground floor.</p> <p>As with the preferred approach the alternative will have minor positive effects on the high quality environment objective as the refurbishment or redevelopment presents an opportunity to improve the quality of the local environment and public realm, and will make more efficient use of land by developing a larger building. The alternative makes less efficient use of land than the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion by.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is particularly suitable for office development. The site is located within the City Fringe Opportunity Area, directly fronting the Old Street roundabout. This is a landmark building which has been in a long standing tech sector office use and along with the White Collar Factory is associated with being at the heart of the East London Tech City. The site has very close access to the Old Street Station and to the office workforce focussed shops, cafes, and restaurants of the area. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace. This highly prominent address is valuable for an office use. Retaining this large prominent site in office use will anchor and support the tech cluster and providing space for a large scale and high profile business. The additional</p>													

	<p>office floorspace would have positive effects on social inclusion through provision of a range of job opportunities, but less than an all office scheme.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>While there are residential uses fronting Old Street, the area suffers from high levels of noise and pollution which make providing an adequate level of amenity problematic, although these issues will decrease following public realm improvements in this area. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a constrained location for residential development.</p>
<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

Table 1.171: BC11: Longbow House, 14-20 Chiswell Street

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC11: Longbow House, 14-20 Chiswell Street, EC1Y 4TW	0	+	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC11 is allocated for redevelopment of the site to provide a new, high quality building incorporating commercial office uses. This allocation will have a significant positive effect on economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central</p>													

	<p>London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will result in minor positive effects on the efficient use of land objective as it will optimise development on previously developed land in a highly accessible location. The allocation requires development to consider the impacts on the surrounding heritage assets including the Grade II* headquarters at Armoury House and the Honourable Artillery Company's training grounds and will therefore have minor positive effects on the heritage objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	+	+	0	+	+	0	--	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>As with the preferred approach the alternative requires development to consider the impacts on the surrounding heritage assets including the Grade II* headquarters at Armoury House and the Honourable Artillery Company's training grounds and will therefore have minor positive effects on the heritage objective.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>Longbow House is located in the City Fringe Opportunity Area and close to the cluster of large scale office developments at Moorgate, including Citypoint, the Heron, and Ropemaker Place. The location has close access to the City of London and its agglomeration of business uses. With the commercial in use and has a high density and high site coverage built form. These characteristics make it an ideal location for development of offices where businesses can take advantage of the agglomeration benefits of the area and its role and a world city centre of business.</p>													

	While residential uses could be feasible in this location there would be challenges in providing adequate amenity, outdoor space, and outlook due to the density, site coverage, and built form. Good design may overcome these limitations to provide a good standard of residential accommodation, which is why the assessment shows likely positive effects against the objective for housing, however this will be a constrained site for residential development.
<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

**Table 1.172: BC12: Cass Business School, 106 Bunhill Row,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC12: Cass Business School, 106 Bunhill Row, EC1Y 8TZ	0	0	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC12 is allocated for limited intensification of education floorspace. This allocation will improving access to educational services which will have minor positive effects on the economic growth objective, liveable neighbourhoods, and social inclusion objectives. The allocation will likely have no other significant effects as the site already has full site coverage and is not a site allocated for a tall building so any development could only be a small upward extension.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for expansion of the social infrastructure (education) use. The Cass Business School has full site coverage and accommodating residential uses on site would be difficult with regard to space, access, and conflict between the homes and the education use.													

**Table 1.173: BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage, EC1Y 8TE	+	++	0	0	0	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC13 allocated site has planning permission for the development of a 61 bedroom hotel, 35 residential units, 1,954sqm of office, 80sqm of retail, 1,536sqm of restaurant use, and 263sqm of leisure floorspace..The allocation states that should the site be subject to further amendments or new applications, the council will seek redevelopment to provide an office development including affordable workspace and small scale business uses.</p> <p>The allocation will have minor positive effects on economic growth through the development of employment floorspace,. The additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities. The site is currently a ground level car park and the allocation will have significant positive effects on the efficient use of land by bringing this into use and removing the car parking. The removal of car parking will have sustainability benefits and contribute to wider strategic aims to encourage more sustainable forms for transport, resulting in minor positive effects on the objectives for climate change, transport, and natural resources (improved air quality). The scheme will also create a safer and more inclusive environment by introducing active frontages and activity to this currently largely empty site, resulting in minor positive effects on the high quality environment objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: Mixed use development with office and hotel use	+	+	0	0	+	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>This alternative is for an allocation for a mixed use development including office and hotel use. This reflects the scheme permitted on this site (P2016/0488/FUL) for the development of a 61 bedroom hotel, 35 residential units, 1,954sqm of office, 80sqm of retail, 1,536sqm of restaurant use, and 263sqm of leisure floorspace.</p> <p>The alternative will have mostly the same effects as the preferred approach. The removal of car parking will encourage more sustainable forms for transport resulting in minor positive effects on the objectives for climate change, transport, and natural resources (improved air quality). The</p>													

scheme will also create a safer and more inclusive environment by introducing active frontages and activity to this currently largely empty site, resulting in minor positive effects on the high quality environment objective. The allocation will have minor positive effects on the housing objective by providing homes and affordable homes on site. The additional affordable housing is likely to have positive effects on social inclusion. The effects differ against the objectives for the efficient use of land and economic development. The alternative will still have minor positive effects on economic growth through the development of employment floorspace, and other commercial uses including retail, restaurant and a hotel. However these effects are less than if the scheme provided a greater amount of office floorspace, which is a higher priority land use for this location, and would support the growth of business and employment in the borough. The alternative will have minor positive effects on the efficient use of land by converting a ground level car park into more valuable uses, however it will not have the significant positive effects of an allocation which maximises office floorspace due to the high demand for and high value of offices in this location and their role in boosting Islington's economy and employment. As with the preferred approach the additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities.

**This allocation is subject to a modification which has been assessed separately in part 2.**

**Table 1.174: BC14: Peabody Whitecross Estate, Roscoe Street,**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC14: Peabody Whitecross Estate, Roscoe Street, EC1Y 8SX	+	+	0	+	+	+	+	0	0	+	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC14 is allocated for improved public open space and design measures to improve the definition between public and private space, alongside some new housing.</p> <p>The allocation will have minor positive effects on the housing objective by providing new homes (4 family homes is feasible). The additional housing will have positive effects on social inclusion by reducing overcrowding. The allocation will create a safer and more inclusive neighbourhood and public realm by improving the open space and providing areas for sports and play with minor positive effects on the high quality environment, open space, liveable neighbourhoods, and health and wellbeing objectives. The allocation will make more efficient use of land by improving amenity spaces into multi-function open spaces, resulting in minor positive effects on the efficient use of land objective.</p>													
Reasonable alternative summary	<p>No reasonable alternative was identified for this allocation as the site is allocated primarily as a public realm scheme with a small amount of housing, introducing other uses on this site would not be appropriate.</p> <p>This allocation is for improved public open space and design measures to improve the definition between public and private space, alongside some new housing. The owners, Peabody, have ambitions to improve the public realm across the estate to improve amenity, biodiversity,</p>													

security, accessibility, and provide more opportunities for enjoyment and recreation. The allocation is primarily a public realm improvement scheme, with potential to develop a small number of homes in one identified location on the estate.

**Table 1.175: BC15: Richard Cloudesley School, 99 Golden Lane**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC15: Richard Cloudesley School, 99 Golden Lane, EC1Y 0TZ	+	+	0	++	++	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The allocation is for redevelopment of the former Richard Cloudesley school building to provide a new school, residential development, play and sports facilities.</p> <p>The scheme will have significant positive effects on affordable housing delivery by providing 66 social rented homes, and on liveable neighbourhoods through provision of a new school. It will have minor positive effects on economic growth by providing a small amount of affordable workspace. The education use will have minor positive effects social inclusion by providing opportunities for learning. The additional affordable housing is likely to have positive effects on social inclusion. The scheme makes efficient use of land by providing all of this along with additional school floorspace on site. The residential building is a taller building (10 storeys on a 4 storey podium). There will be minor positive effects on the health and wellbeing objective by provision of sport facilities (a MUGA), which will also be available to residents outside of school hours.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.176: BC16: 36-43 Great Sutton Street (Berry Street),**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC16: 36-43 Great Sutton Street	0	+	0	0	0	+	0	+	0	0	0	0	0	0

<b>(Berry Street), EC1V 0AB</b>															
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC16 is allocated for refurbishment or extension of the existing building to provide office development.</p> <p>There is likely to be positive effects on economic development by providing additional employment floorspace, and on the efficient use of land through the optimisation of development on site through potential extensions. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>														
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>	
<b>Reasonable alternative: mixed use</b>	0	+	0	0	+	+	0	-	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is surrounded by a mix of uses, including offices, pubs, galleries, showrooms, and some residential – however the context is primarily that of a commercial uses. It is an area highly valued by the tech and creative sectors and SMEs for this blend of uses, proximity to linked businesses and services, and also</p>														

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	<p>leisure uses which are appealing to this workforce. The introduction of a significant proportion of residential uses will likely contribute to negative impacts on economic development by reducing the supply of office floorspace in this area suited to these sectors.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

**Table 1.177: BC17: Caxton House, 2 Farringdon Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC17: Caxton House, 2 Farringdon Road, EC1M 3HN</b>	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>Formerly in office and retail use, buildings were demolished to facilitate Elizabeth Line (Crossrail) construction works.</p> <p>The site has planning permission for the development of 27,100sqm commercial/retail floorspace. BC17 allocation reflects the consent and is for office development with ground floor active retail/leisure floorspace.</p> <p>The allocation will have a significant positive effect on economic growth and minor positive effects on the efficient use of land by providing additional better quality office and retail floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation will also have minor positive effects on the high quality environment objective and liveable neighbourhoods objective by replacing an unremarkable 9 storey tower including two storey podium with an 8 storey office building with a more contextual and appropriate design for the historic perimeter block development pattern typical of Farringdon.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.178: BC18: Cardinal Tower, 2A, 4-12 Farringdon Road and 48-50 Cowcross Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC18: Cardinal Tower, 2A, 4-12 Farringdon Road and 48-50 Cowcross Street, EC1M 3HP	+	+	0	+	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC18 is allocated for office development with ground floor active retail/leisure floorspace. The site has planning permission for the development of a seven storey building providing 17,466sqm of office floorspace and 1,050sqm of ground floor retail floorspace. The site is being redeveloped as part of the Elizabeth Line (Crossrail) project.</p> <p>The allocation will have significant positive effects on economic growth and minor positive effects on the efficient use of land by providing additional quality office floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation will also have positive effects on the local environment, liveable neighbourhoods, and heritage by replacing a 13 storey modernist tower with two storey podium with a 7 storey office building on a smaller footprint which is more contextual to the historic perimeter block development pattern and nearby listed buildings and also provides a more generous and improved public realm.</p>													
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 1.179: BC19: Farringdon Place, 20 Farringdon Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC19: Farringdon Place, 20 Farringdon Road, EC1M 3NH	+	+	0	0	0	+	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC19 is allocated for intensification of business use and improved pedestrian connections to Turnmill Street and Farringdon Station. Only a smaller upward extension is likely, as such the effect of this allocation is minor positive effects on economic growth by providing additional employment floorspace and an improved and more inclusive public realm. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have a minor positive effects on the efficient use of land and objective by providing additional floorspace on site in a highly accessible central London location.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable alternative: mixed use</b>	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>This alternative will have a positive effect on the local environment through improved public realm and pedestrian connections as with the preferred approach.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. Both this site and BC20 (50 Farringdon Road) are located in the strip of land between the railway cutting for the London Underground and Farringdon Road. They are both</p>													

	<p>very close to Farringdon Station. Farringdon Road has a significant number of large scale offices along it, and is a busy main road. The Employment Land Study states that intensification of office use around Farringdon Station should be accepted and that this area should be nurtured in office market terms. These characteristics make it an ideal location for office development as commercial tenants will be attracted by the prominent location and proximity to Farringdon Station (including connection to the Elizabeth Line).</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>The noise from the railway line and Farringdon Road (and air pollution from the road) will serve as disbenefits for locating residential development, where it may be difficult to design in adequate levels of amenity. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a constrained location for residential development.</p>
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>

Table 1.180: BC20: Lincoln Place, 50 Farringdon Road,

IA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC20: Lincoln Place, 50 Farringdon Road, EC1M 3NH	+	+	0	0	0	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC20 is allocated for intensification of business use with improved pedestrian connections to Turnmill Street and Farringdon Station. The intensification of the site will have a minor positive effect on the efficient use of land.</p> <p>There is a minor positive effect on economic growth by providing improved standard office accommodation. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central</p>													

	<p>London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Should the site be redeveloped there may be positive effects on creating a high quality public realm and also on the transport objective by improving connections to the station and to Turnmill Street.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. Both this site and BC19 (Farringdon Place, 20 Farringdon Road) are located in the strip of land between the railway cutting for the London Underground and Farringdon Road. They are both very close to Farringdon Station. Farringdon Road has a significant number of large scale offices along it, and is a busy main road. The Employment Land Study states that intensification of office use around Farringdon Station should be accepted and that this area should be nurtured in office market terms. These characteristics make it an ideal location for office development as commercial tenants will be attracted by the prominent location and proximity to Farringdon Station (including connect to the Elizabeth Line).</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>The noise from the railway line and Farringdon Road (and air pollution from the road) will serve as disbenefits for locating residential development, where it may be difficult to design in adequate levels of amenity. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a constrained location for residential development.</p>													

<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.
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**Table 1.181: BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street, Islington, London EC1M 5PQ	+	++	0	0	0	+	0	++	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC21 is allocated for office-led redevelopment with retail and leisure uses at ground floor fronting Clerkenwell Road and Goswell Road. Development should provide units suitable for SMEs.</p> <p>The allocation will likely have minor positive effects on the local environment and significant positive effects on the efficient use of land by developing a ground level car park into a quality contextual building with active uses on the ground floor. The removal of car parking will have minor positive effects against the transport, climate change, and natural resources (air quality) objectives by encouraging more sustainable forms of travel. The allocation will also have significant positive effects on economic growth by providing a large amount of office floorspace as well as retail and leisure floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.182: BC22: Vine Street Bridge**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>BC22: Vine Street Bridge, EC1R 3AU</b>	++	+	+	+	0	0	+	0	+	++	+	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC22 is allocated for conversion of the bridge from carriageway space to public open space. This will have significant positive effects on the high quality environment and open space objectives by providing much needed green open space in the area. The improved public realm and green infrastructure will also have minor positive effects on the liveable neighbourhoods, health and wellbeing, and biodiversity objectives. This allocation will have minor positive effects by against the efficient use of land objective as the open space would provide a higher value than the carriageway space, which is largely redundant. The allocation will also protect views to St Paul's Cathedral which will have minor positive effects against the heritage objective. The replacement space will be safer and more pleasant for walking and cycling and have minor positive effects on the transport objective.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation because it is allocated for public realm and the development on this site of a building is not appropriate on this site. Vine Street Bridge is conversion of carriageway to open space with no buildings proposed. The Council does not consider it appropriate to develop this site for a building due to the harm this would cause to the character, amenity, views, and permeability of the area.													

**Table 1.183: BC23: Sycamore House, 5 Sycamore Street**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>BC23: Sycamore House, 5 Sycamore Street, EC1Y 0SR</b>	+	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC23 is allocated for the intensification of office use, which will provide significant positive effects on economic growth by providing more employment floorspace as well as help to make efficient use of land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The consented scheme will also have a positive effects on the local environment by replacing a building with a poor appearance with a high quality design.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission. The planning permission (P2016/4807/FUL) is for demolition of the existing office and replacement with a new office building, in accordance with the allocation.													

**Table 1.184: BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue, EC1R 4RN	+	++	++	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	BC24 is allocated for residential led development and to include some re-provision of social infrastructure/ community use. This would have significant positive effects on housing quality by providing additional good quality homes. Affordable housing would be provided as part of the development of the site. The additional affordable housing is likely to have positive effects on social inclusion. The allocation would have significant positive effects on the historic environment and the efficient use of land, by ensuring a listed building is protected by being brought back into economic use. The heritage led design will have positive effects in terms of the local environment by retaining this building which adds to local character and identity. The re-provision of services for residents will have a positive effect on the objective for providing liveable neighbourhoods.													
Reasonable alternative summary	No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site, while also re-providing social infrastructure. This allocation is for residential-led development to include some re-provision of social infrastructure or community use. Development on the site will need to be heritage led, as it must preserve the Grade II listed Clerkenwell Fire Station in the centre of the site. Development is also possible in the yard at the rear of the site, along with some open space. Development must take consideration of the Planning Brief for Clerkenwell Fire Station (November 2014). The planning brief states that the site should be developed for social infrastructure, homes, and open space. The brief states that homes may be developed (dependent on heritage impacts) on the upper floors on the Fire Station Building and in a new building in the yard. There are also a number of surrounding residential buildings, and the amenity of these homes must be protected. Furthermore the listed fire station and the yard space would not allow development of large floorplate open plan offices. For the above reasons the Council did not consider it reasonable to assess for commercial uses on this site.													

Table 1.185: BC25: Mount Pleasant Post Office, 45 Rosebery Avenue,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC25: Mount Pleasant Post Office, 45	+	++	0	+	++	+	0	+	+	0	0	0	0	0



<b>Rosebery Avenue, EC1R 4TN</b>	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The Mount Pleasant Sorting Office has an implemented planning permission for comprehensive redevelopment of the site to provide over 300 homes (on Islington's part of the site) with office, retail and community floorspace. Royal Mail operations are retained at the site, part of which is screened behind an acoustic deck to separate the operation from new homes. The allocation states that should the planning permission be subject to amendment, or new applications submitted, a mixed use development with priority given to the provision of affordable housing and affordable workspace will be required.</p> <p>The development will have significant positive effects on the housing and the efficient use of land objectives, by providing a significant number of new homes including affordable housing, as well as minor positive effects on economic growth objective with provision of office and retail floorspace. The additional affordable housing is likely to have positive effects on social inclusion. The additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities. The development will have minor positive effects on the liveable neighbourhoods objective by providing community floorspace, and will have minor positive effects on the built environment objective and the transport objective by improving connectivity and walkability with public routes through the site.</p>
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission which is currently under construction.

**Table 1.186: BC26: 68-86 Farringdon Road (NCP carpark),**

A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC26: 68-86 Farringdon Road (NCP carpark), EC1R 0BD</b>	+	++	0	0	0	0	0	+	0	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site has planning permission for the demolition of the existing building and redevelopment to provide 4,242sqm of office floorspace, a hotel with up to 171 bedrooms and 527sqm retail floorspace. BC26 allocation states that should the site be subject to further amendments or new applications, the council will seek a mixed use redevelopment of the site with priority for housing and office development, alongside a substantial amount of public open space. Affordable housing and affordable workspace will be a particular priority. The Council will also seek removal of car parking from the site to provide a car free scheme as part of redevelopment.</p> <p>The redevelopment will have positive effects on economic growth by providing new office floorspace and potentially other uses including hotel and retail. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It also replaces</p>													

	a multi storey car park which is housed in an unattractive building resulting in positive effects on the built environment (through replacement with a quality building with active frontages), and on transport, air quality (the natural resources objective) and climate change objectives by removing car parking and therefore reducing private car use.
<b>Commentary on assessment of likely significant effects of alternative</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.

**Table 1.187: BC27: Finsbury Health Centre and Pine Street Day**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC27: Finsbury Health Centre and Pine Street Day Centre, EC1R 0LP	+	0	++	++	0	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC27 is allocated for the refurbishment of the Finsbury Health Centre for healthcare. The Michael Palin Centre for Stammering may be suitable for redevelopment for community/social infrastructure uses. The allocation also requires retention of the listed building.</p> <p>The retention and refurbishment of the Grade I listed building will have significant positive effects on the heritage objective and minor positive effects on the high quality environment objective, as it retains the building which is described as both a brilliant piece of planning and as the prototype on a national level for modern construction and communal architecture such as NHS clinics, and health and treatment centres. Retention of the medical use in this location will have significant positive effects on the liveable neighbourhoods objective and minor positive effects on the health and wellbeing objective.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation as the site is allocated for retention of the social infrastructure use and other uses cannot be practically accommodated on site. Significant additional floorspace could not be added without unacceptable harm to the listed building and its setting. The building is not suitable for conversion to residential use due to the need to retain the health use, and the importance of the health use to the special historic interest of the listed building.</p>													

**Table 1.188: BC28: Angel Gate, Goswell Road,**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC28: Angel Gate, Goswell Road, EC1V 2PT	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC28 is allocated for redevelopment of the site to provide office-led development, with a significant intensification of office floorspace alongside active frontages for commercial uses fronting Goswell Road.</p> <p>Redevelopment will have minor positive effects on the environment as the current building is a dated office development and its replacement offers an opportunity for better urban design and architecture. Redevelopment will have significant positive effects on the efficient use of land because the current layout with large areas of ground level road circulation space is inefficient.</p> <p>Redevelopment on this site will have significant positive effects on economic growth as it will provide large amounts of quality employment floorspace in an appropriate location in the CAZ. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Heritage impacts are neutral, as development would need to prevent impacts on the listed buildings fronting City Road.</p>													
I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use, in addition to commercial uses fronting Goswell Road.</p>													

effects of alternative	<p>As with the preferred approach this alternative will have minor positive effects on the environment as the current building is a dated office development and its replacement offers an opportunity for better urban design and architecture.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as the current layout with large areas of ground level road circulation space is inefficient, as well as being a highly accessible location. However it will be less efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace. The scale of this site provides an opportunity for provision of a large high specification office. The site is well linked to the other central London office sub markets, located near the junction of Pentonville Road leading to King's Cross and the Knowledge Quarter, and City Road leading to Old Street, as well as being close to Angel Underground Station and the Northern Line.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>
Conclusion	

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**Table 1.189: BC29: Taylor House, 88 Rosebery Avenue**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC29: Taylor House, 88 Rosebery Avenue, EC1R 4QU	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant	BC29 is allocated for redevelopment for office use, subject to justifying the loss of social infrastructure. Mixed-use office/social or community use development may also be acceptable where retention of social infrastructure use is required on site.													

<b>effects of site allocations</b>	<p>This allocation will have minor positive effects on economic growth objective by providing employment floorspace in an appropriate location, if the loss of social infrastructure is justified. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation presents an opportunity to optimise the use of previously developed buildings with minor positive effects on the efficient use of land objective. The loss of social infrastructure at the site will only be permitted if it can be robustly demonstrated that such loss will not have a negative effect on Islington's residents, hence there is considered to be no effect in relation to the liveable neighbourhoods objective.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable alternative: mixed use</b>	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic</p>													

growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

**Table 1.190: BC30: Telfer House, 27 Lever Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC30: Telfer House, 27 Lever Street, EC1V 3QX	0	+	0	0	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	BC30 is allocated for residential development with landscaping and associated works. The site has planning permission for the construction of 38 homes. The allocation will have significant positive effects on housing provision by providing new homes, including affordable housing. The allocation would also make more efficient use of land compared to the current low rise and relatively inefficient layout. The additional affordable housing is likely to have positive effects on social inclusion.													
Reasonable alternative Summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

**Table 1.191: BC31: Travis Perkins, 7 Garrett Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC31: Travis Perkins, 7 Garrett Street, EC1Y 0TY	+	+	+	0	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	BC31 is allocated for intensification of business use, particularly industrial uses such as B1(c). Proposals should ensure at least no net loss of existing industrial use. The current use is a builder's merchant which is housed in a Grade II listed building. Extension and intensification of the business use will have positive effects on economic growth by providing additional employment floorspace and also make more efficient use of the land by extending													

	upwards on site. A carefully designed extension will preserve or enhance the special historic and architectural interest of the listed building which will have a positive impact on heritage, character and distinctiveness.
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission.

**Table 1.192: BC32: Monmouth House, 58-64 City Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC32: Monmouth House, 58-64 City Road, EC1Y 2AE</b>	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC32 is allocated for intensification of business uses. The site has planning permission for the demolition of the existing buildings and redevelopment to provide 13,393sqm of office space including affordable workspace and 404sqm of retail floorspace. This should have significant positive effects on economic growth by providing a significant amount of office floorspace as well as retail uses. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation would also make more efficient use of land.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission.													

**Table 1.193: BC33: Oliver House, 51-53 City Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC33: Oliver House, 51-53 City Road, EC1Y 1AU</b>	0	0	+	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of</b>	BC33 is allocated for refurbishment or intensification of office use. It will have minor positive effects on economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace													

likely significant effects of site allocations	<p>will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The development site is adjacent to the Wesley's Chapel complex, which contains both Grade I and II listed buildings. The allocation will have minor positive effects on the heritage objective by setting out that development on this site must be designed to conserve or enhance the setting of the listed buildings.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The location and surround context of Oliver House make it a valuable location for office development. It is within the City Fringe Opportunity Area, less than 200m from the Old Street roundabout, the centre of East London Tech City. The surrounding area has a strong commercial role and is home to a great many offices. The smaller site size is suitable for small and medium enterprises and the period building has potential for studio space and flexible and collaborative office space with revealed ceilings as valued by the digital and creative sectors.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													



<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.
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**Table 1.194: BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street, EC2Y 9AR	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	BC34 is allocated for office led mixed use development with a significant increase in office floorspace, provision of affordable workspace and active commercial uses at ground floor level. The site has planning permission for a large quantum for office floorspace and will have significant positive effects on economic growth. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. This allocation will have significant positive effects on the efficient use of land. Provision of commercial units at the ground floor will have minor positive effects on the high quality environment objective by creating a more vibrant and active environment that provides services to people living and working in the area.													
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.195: BC35: Finsbury Tower, 103-105 Bunhill Row,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC35: Finsbury Tower, 103-105	0	+	0	0	0	+	0	++	0	0	0	0	0	0

<b>Bunhill Row, EC1Y 8LZ</b>														
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC35 is allocated for intensification of office use. The allocation will result in significant positive effects on economic growth by providing additional employment floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation will have minor positive effects on the efficient use of land objective by increasing the floorspace on a previously developed site.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site is currently at an advanced stage of construction with planning permission P2016/3939/FUL, so no reasonable alternative has been assessed.													

**Table 1.196 BC36: London Metropolitan Archives and Finsbury Business Centre**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>BC36: London Metropolitan Archives and Finsbury Business Centre</b>	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC36 is allocated for intensification of business uses and expansion of the existing cultural uses linked to the operation of the London Metropolitan Archives. The allocation will have positive effects on economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation would also make more efficient use of land by adding floorspace to a previously developed site. The allocation will have minor positive effects on the liveable neighbourhoods objective as the allocation ensure that the ongoing operation of the London Metropolitan Archives must not be affected by any development on site, preserving this important cultural asset.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Finsbury Business Centre Site provides flexible workspace and collaboration space for small and medium enterprises, and development on this site offers an opportunity to expand this role. The site is allocated to allow for the expansion of the existing cultural uses linked to the operation of the London Metropolitan Archives also requires that any development does not affect the operation of the London Metropolitan Archives. A larger scale residential use will not support the expansion of cultural uses on site or the expansion of provision for SMEs.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
Conclusion	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>													

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**Table 1.197 BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street, EC1</b>	+	+	0	0	++	+	0	0	0	0	0	0	0	0	
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC37 is allocated for residential development and reprovision of retail floorspace. The extension and improvement of the Triangle Estate has planning permission and implementation will result in significant positive effects on housing by providing 54 new dwellings including 27 social rented units. The additional affordable housing is likely to have positive effects on social inclusion. Redevelopment will also have minor positive effects on the efficient use of land by infilling on an existing housing estate, and minor positive effects through associated improvements to access and common areas on the estate contributing to a safer and more inclusive environment.														
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission.														

**Table 1.198: BC38: Moorfields Eye Hospital, City Road**

<b>Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>	
<b>BC38: Moorfields Eye Hospital, City Road, EC1V 2PD</b>	++	+	+	+	0	+	0	++	+	+	0	0	0	0	
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC38 is allocated to deliver a very substantial quantum of office floorspace, a large proportion of which is expected to be Grade A office space. A range of unit types and sizes, including a significant proportion of small units, particularly for SMEs, must be provided and a substantial amount of affordable workspace at peppercorn rent will be delivered as part of the office floorspace. An element of social infrastructure will also be required, potentially consisting of two elements: Eye hospital/Institute of Ophthalmology “legacy” eye clinic facility and a GP/community health hub. Active shops, cafes, and restaurants, or drinking establishment uses on the ground floor will be sought as part of any future development proposal and a proportion will be affordable retail units.</p> <p>The redevelopment of the Moorfields Eye Hospital site will result in significant positive effects on economic growth by providing large scale high quality office floorspace in the City Fringe Opportunity Area. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London’s West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King’s Cross and the Knowledge Quarter. The Local Plan prioritises</p>														

	<p>employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation recognises the unique opportunity presented by this site which will make a significant contribution to both London and the national economy. It will also have positive economic effects by requiring SME space and affordable workspace which broadens the range of space for local businesses potentially providing more opportunity for local people tackling worklessness. The retail space also provides opportunities for employment. The hospital use is relocating within central London to a modern purpose built building so this clinical provision will not be lost maintaining a sub-regional service provision for residents.</p> <p>Redevelopment must retain key historic buildings fronting City Road therefore the allocation will have minor positive effects on the heritage objective. The increase in development on the site will have minor positive effects on the efficient use of land objective. There will be minor positive effects on the objectives for open space and transport by provision of a public open space, new links, and a quality public realm which will improve permeability and create a safer conditions for walking and cycling. Increased retail and leisure floorspace, social infrastructure uses, and the health hub will help provide more services for residents and create a more socially vibrant environment for visitors to the borough with minor positive effects on liveable neighbourhoods.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	++	-	+	+	+	+	0	-	-	0	0	0	0	0
Reasonable alternative summary	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of housing to be provided, in addition to the very substantial quantum of office floorspace, as well as social infrastructure uses (legacy eye clinic, GP surgery, community health hub), and retail and leisure uses on the ground floor.</p> <p>The alternative will have the same positive effects on the local environment, heritage, and liveable neighbourhoods as set out in the preferred approach above as these aspects will not be changed in this alternative.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Moorfields Eye Hospital</p>													

	<p>site is an important location in the Bunhill and Clerkenwell area for provision of office floorspace to anchor a large scale employer in the area, to support the East London Tech City, and to build a critical mass of employment uses in close proximity to the Old Street Roundabout. The Employment Land Study identifies the arc between Shoreditch and King's Cross including along City Road the focus of priority for site assembly and for provision of Grade A office space, to maintain and enhance the area's role in supporting London's strategic business role. The site occupies a key location with frontage to the commercial corridor of City Road and is located close to the Old Street Roundabout, the central identifiable point for the East London Tech City. This is one of the largest development sites in the AAP area and it is important to secure a large high quality office, which facilitate a large scale employer a prominent central London address in the area. The site is also within the City Fringe Opportunity Area. A new high quality large scale office development in this area will act as a catalyst, building confidence in the area and attracting smaller businesses and supporting service businesses.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

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**Table 1.199: BC39: Laser House, 132-140 Goswell Road,**

EA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC39: Laser House, 132-140 Goswell Road, EC1V 7DY</b>	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC39 is allocated for intensification of business use. This allocation will have positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.200: BC40: The Pentagon, 48 Chiswell Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC40: The Pentagon, 48 Chiswell Street, EC1Y 4XX	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC40 is allocated for intensification of office floorspace. This allocation will have positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p>													

	<p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is located in the City Fringe Opportunity Area and close to the cluster of large scale office developments at Moorgate, including Citypoint, the Heron, and Ropemaker Place. The location is also close to the border with the City of London, and can benefit from this agglomeration of business uses. These characteristics make it an ideal location for development of offices where businesses can take advantage of the agglomeration benefits of the area and its role as a world city centre of business.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>In addition, while the surrounding area is mixed use (including significant residential and the Barbican and the Whitbread Estate) the site is less suited to residential use due the high density and a high site coverage built form of the site and surrounding context, which will present challenges for providing adequate amenity, outdoor space, and outlook for homes. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.</p>
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>

**Table 1.201: BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 [Shoreditch County Court] & 21-23 Leonard Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 [Shoreditch County Court] & 21-23 Leonard Street, EC2	0	+	0	+	0	+	+	++	0	0	0	0	0	0



<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC41 is allocated for improved education and sports facilities with the provision of office floorspace. The site has planning permission for the construction of a 4-storey building for science teaching, development of a partially sunken sports hall in the courtyard and the erection of an 8-storey office building.</p> <p>The proposed development will have significant positive effects on economic growth by enhancing the quality of education offered and facilitating the increased student numbers, and by providing employment floorspace (an 8 storey office building) on site. These elements will also make more efficient use of the land by adding uses on site and have a positive effect on provision of services for residents. The education use will have minor positive effects social inclusion by providing opportunities for learning. The provision of sports facilities in line with the allocation will have minor positive effects on health and wellbeing.</p>
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is has planning permission which is under construction.

**Table 1.202: BC42: Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC42: Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road, EC1	0	++	0	+	0	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC42 is allocated for office use with retail at ground floor level.</p> <p>The current use is predominantly a ground level car park with an electricity substation on a corner of the site. The allocation will have significant positive effects on the efficient use of land by bringing this site into a better use. It will have positive effects on economic development by providing employment (office) floorspace and minor positive effects on liveable neighbourhoods by providing an active frontage and retail space increasing provision of services for residents. The additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities, but less than an all office scheme. The removal of car parking will have benefits in moving more trips to sustainable forms of transport which will have minor positive effects against the objectives for transport, climate change, and natural resources (air quality).</p>													

Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.
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**Table 1.203: BC43: Easy Hotel, 80-86 Old Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC43: Easy Hotel, 80-86 Old Street, EC1V 9AZ	0	0	0	0	0	0/+	0	+	0	0	0	0	0	0
Commentary on Assessment of likely significant effects of site allocations	<p>BC43 is allocated for refurbishment of the existing hotel and existing office floorspace, with potential for some intensification of office floorspace. Any full scale redevelopment should be office led but may include reprovion of existing quantum of hotel floorspace</p> <p>Whether development is for additional hotel use or for office use (if the site is redeveloped) there will likely be positive effects on economic growth by providing either hotel use which supports the economic functions of the area or office use by directly providing employment floorspace. Provision of business floorspace would have a positive effect as it would meet the identified need set out in the Employment Study. If office is provided it will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

**Table 1.204 BC44: Crown House 108 Aldersgate Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC44: Crown House 108 Aldersgate Street, EC1A 4JN	0	+	0	0	0	0	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC44 is allocated for intensification of office floorspace. This allocation will have positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable alternative: mixed use</b>	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site would be amended so that the allocation would allow for either office development or for residential development. Due to the small site size and inefficiencies in providing mixed use this allocation would allow an entirely residential redevelopment. The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This prominent location on the busy Goswell Road would be a valuable location for office use due to the high exposure, excellent public transport accessibility, and close proximity to the City of London.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particular on economic development.</p>													

**Table 1.205: BC45: 27 Goswell Road,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC45: 27 Goswell Road, EC1M 7AJ	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC45 is allocated for refurbishment and intensification of office floorspace. This allocation will have positive effects on economic development by providing employment (office) floorspace and also by potentially refurbishing and bringing the existing employment floorspace up to a higher standard. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The increased floorspace provided on site will have minor positive effects against the objective of efficient use of the land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace. The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.													

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	<p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is a valuable location for office development with a prominent address on Goswell Road, high accessibility for public transport, in close proximity to the Clerkenwell Road, a corridor with strong commercial role.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

**Table 1.206: BC46: City, University of London, 10 Northampton Square,**

Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC46: City, University of London, 10 Northampton Square, EC1V 0HB	+	+	0	+	0	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC46 is allocated for refurbishment and redevelopment of buildings to provide improved education floorspace, teaching facilities and uses ancillary to teaching. Increased teaching facilities may be suitable where they can be accommodated in line with other Local Plan policies.</p> <p>Improvements to the site will allow the University to continue to function on site while accommodating increasing student numbers, supporting economic growth, and providing enhanced services for residents. Expansion of the University on its existing highly accessible central London Campus will have minor positive effects on the objective for making efficient use of land. The education use will have minor positive effects social inclusion by providing opportunities for learning.</p> <p>The improvements will also improve the public realm on site and in the area and the appearance of the campus contributing to a safer and more inclusive environment. The allocation will have minor positive effects against the objective for transport through the local improvements to the public realm and permeability which will encourage walking and cycling, and also by allowing development to take place in the in the highly accessible central London location rather than necessitating that students travel elsewhere.</p>													

<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for improvement of the social infrastructure use and other uses cannot be practically accommodated on site. The priority for this site to retain and improve the university use and help meet the needs of growing student numbers within the limited space. There are no opportunities to provide other uses on site without comprising the function of the university. Development must have consideration of The City University London Northampton Square Campus Planning Brief (September 2009) which sets out how the university plans to extend and improve the campus. All development set out in the planning brief is university use and does not require enabling development.
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**Table 1.207: BC47: Braithwaite House and Quaker Court, Bunhill Row,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC47: Braithwaite House and Quaker Court, Bunhill Row, EC1Y 8NE</b>	+	+	0	0	++	+	0	0	0	0	+0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC47 is allocated for residential development. LB Islington's Housing Service are proposing to provide 38 new homes at the estate by demolishing and redeveloping the Braithwaite House podium and garages, adding two storeys to Quaker Court and constructing a new block adjacent to Braithwaite House. Possible landscaping improvements to Quaker Gardens which may include benefit to biodiversity.</p> <p>The allocation will have significant positive effects on housing by providing new homes including affordable housing. It will also ensure efficient use of land and improve the public realm. The additional affordable housing is likely to have positive effects on social inclusion.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site.</p> <p>This site is a Council housing estate and has been allocated to provide new homes at the estate through redevelopment, upwards extensions, and a new block. It was not considered reasonable to develop this site for other uses as development in the estate needs to preserve amenity for the existing residents and should complement the existing residential character and function of the estate. Furthermore development in this estate and the associated disruption caused by construction is justified by the additional housing and affordable housing that can be provided as well as improvements for existing residents. The Council will only make these sites available for additional residential development as schemes involving other uses would not align with the Council's objectives for these estates, or its housing estates in general.</p>													

**Table 1.208: BC48: Castle House, 37-45 Paul Street and Fitzroy House, 13-17 Epworth Street and 1-15 Clere Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC48: Castle House, 37-45 Paul Street, EC2A 4JU and Fitzroy House, 13-17 Epworth Street, EC2A 4DL and 1-15 Clere Street, EC2A 4UY	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC48 is allocated for intensification of office use. This allocation will have significant positive effects on economic development by providing employment (office) floorspace with potential for additional floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>It will also have significant positive effects on the efficient use of land. In addition, introducing active frontages will help to contribute to creating a safer and more inclusive environment with minor positive effects on the high quality environment objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Reasonable alternative summary</b>	This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.													

	<p>As with the preferred approach the alternative will have positive effects on the high quality environment objective through introducing active frontages.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is valuable for offices as the surrounding context is predominantly commercial uses, with a relatively small number of mixed use and residential buildings nearby. The site is also within the City Fringe Opportunity Area. The site forms part of a dense network of employment uses, including tech, creative, and SME uses and links into the priority corridor for offices stretching from King's Cross to Shoreditch as identified in the Employment Land Review. While there are many homes mixed into this area which add life and character, this site is needed to meet Local Plan objectives of providing jobs as a commercial location.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
Conclusion	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>

**Table 1.209: BC49: Building adjacent to railway lines and opposite 18-20 Farringdon Lane**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC49: Building adjacent to railway lines and opposite 18-20 Farringdon Lane, EC1R	+	+	0	0	0	0	0	+	0	0	0	0	0	0



<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC49 is allocated for intensification of business use particularly light industrial uses. The building is a former escalator workshop and has an industrial appearance with no external windows. Redevelopment could have positive effects on the local environment by providing a building with more active frontages and an improved relationship with the street and area.</p> <p>This allocation will have positive effects on economic growth by providing employment floorspace, and on the efficient use of land.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable alternative: mixed use</b>	+	+	0	0	+	+	0	--	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office or light industrial use.</p> <p>As with the preferred approach the alternative will have positive effects on the local environment by redevelopment providing a building with more active frontages and an improved relationship with the street and area.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office or light industrial floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is valuable for office or light industrial development due to its prominent location near the junction of Farringdon Road and Clerkenwell Road, both roads which are home to a large number of commercial uses along these corridors. In addition Farringdon Lane is predominantly commercial uses.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>There are also some characteristics of this prominent location which may make residential uses less suitable. Traffic noise and air pollution from Farringdon Road and Clerkenwell Road will have some impacts on this site. Immediately adjoining the site to the west is a railway cutting for London Underground lines. Furthermore there is a night time economy role of this area and there are three pubs in close vicinity. It may be challenging to mitigate the noise impacts for residential schemes on this relatively small site. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been</p>													

	maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.
<b>Conclusion</b>	The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices or light industrial in a priority location. The alternative allows more housing in this location in place of commercial uses which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.

**Table 1.210: BC50: Queen Mary University, Charterhouse Square Campus**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC50: Queen Mary University, Charterhouse Square Campus, EC1M 6BQ</b>	+	+	+	+	0	+	0	+	+	0	0	0	0	0
<b>Commentary on Assessment of likely significant effects of site allocations</b>	<p>BC50 is allocated for higher education and medical and research uses, alongside improvements to increase permeability through the site. Development on the site may include some office space and research space linked to overarching higher education, medical, and/or research uses.</p> <p>The allocation seeks to optimise the use of the site to accommodate uses which are beneficial to the health of the borough's residents and the wider population. The uses also support economic growth in the borough. Further development on the existing campus will have minor positive effects against the objective for making efficient use of land. The allocation is clear that the capacity to intensify the use of the site is constrained by the historic nature of the buildings and their surroundings. The allocation promotes a high quality environment and a safer and more inclusive neighbourhood by encouraging permeability improvements at the site and explicitly stating that the development of a new pedestrian route through the site from Charterhouse Buildings to Rutland Place should be a priority of development. The increased permeability created by this route will have minor positive effects against the objective for transport, by providing more direct routes for walking and potentially cycling. The education use will have minor positive effects social inclusion by providing opportunities for learning.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for expansion of the social infrastructure use and other uses cannot be practically accommodated on site. The priority for the site is to retain and improve the university. There are no opportunities to provide other uses on site without comprising the function of these university.													

**Table 1.211: BC51: Italia Conti School, 23 Goswell Road,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC51: Italia Conti School, 23 Goswell Road, EC1M 7AJ	0	0	0	0/+	0	0/+	0	0/+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC51 is allocated for retention of social or community use unless the loss of social or community use can be robustly justified, in which case office development may be suitable in this location. Therefore the allocation could have a positive effect on economic growth if it provides offices. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. If developed the additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have a neutral impact on the objective for liveable neighbourhoods if the loss of social infrastructure is justified or a positive effect on liveable neighbourhoods through provision of social infrastructure.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	0/+	0/+	0	0/-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>If the loss of social infrastructure is justified, the alternative will have the following effects:</p> <p>It would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office</p>													

	<p>markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is a valuable location for office development as it has a prominent address on Goswell Road, high accessibility for public transport, is in close proximity to the Clerkenwell Road, a corridor with strong commercial role.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusions</b>	<p>The preferred approach will support economic development, make the most efficient use of land, and reduce transport impacts by locating offices in the optimum location, or by retaining a social infrastructure use, if required. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives, in particularly on economic development.</p>

# Part 1: Review of Cumulative Effects

The approach taken in the interim IIA was to present the cumulative and synergistic effects at the end of each of the Local Plan sections in Section 4 of the report. This was done in a pragmatic way and to reflect an implicit consideration that individual policy and site assessments will have a variety of potential effects; therefore, while these were not all explicitly noted in individual assessments, there had been a detailed consideration of the effects undertaken. As part of the examination process the Inspectors requested further clarity on the assessment of cumulative effects raising concern in particular that a combination of minor effects could result in a significant cumulative effect. The review of cumulative effects in the addendum has drawn the consideration of cumulative effects together into one place and presented them more transparently with a fuller assessment of effects.

The approach has been clarified to consider that cumulative effects can arise when two or more impacts occur simultaneously, or have a significant effect when on its own may combine with another to produce a cumulative effect that is more significant.

There are two areas where cumulative effects will be considered; draft Local plan effects that could result from policies in the Plan working in combination; and inter-plan effects – synergistic effects, where effects of other strategies, plans or programmes act in combination with the draft Local Plan.

In order to provide a process to this updated cumulative assessment the Council has used a summary table of the updated assessment of plan policies and added a new row to provide an overall cumulative score. The overall score is a judgement based on the framework score, using the predominant score. Each section in the plan has been taken in turn and is presented below. The narrative from section 4 in the Regulation 19 interim IIA has been updated and expanded on and should be read as replacement text.

## Consideration of cumulative and other effects for Local Plan objectives

Table 1.212: Consideration of cumulative and other effects for Local Plan objectives

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
Objective 1: Homes - Delivering decent and genuinely affordable homes for all	0	++	0	0	++	++	++	0	0	0	0	++	0	0
Objective 2: Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living	0	++	0	0	0	++	++	++	+	0	0	+	0	0
Objective 3: Safety - Creating a safe and cohesive borough for all	++	0	0	++	0	++	++	0	++	+	0	+	0	0
Objective 4: Children and Young People - Making Islington the best place for all young people to grow up	++	0	0	++	+	++	++	0	+	++	0	0	0	0
Objective 5: Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all	++	++	++	++	0	++	++	+	+	++	++	++	+	+
Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives	+	0	0	++	++	0	++	0	++	++	+	+	0	0
Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources	0	0	0	+	0	+	+	0	0	0	++	++	+	+
<b>CUMULATIVE</b>	++	+	0	++	+	++	++	0	+	++	+	+	0	0

The Plan's objectives will have significant positive cumulative impacts. In particular against the Sustainability Framework objectives for Built Environment, Liveable Neighbourhoods, Inclusion and Equality, Health and Wellbeing and Open Space.

In relation to both the Built Environment and Liveable Neighbourhood sustainability framework objectives the Local Plan objectives for safety, place and environment and health combine with particular focus on making the built environment, including open spaces, feel safer. This helps encourage people to use more sustainable modes of transport, have more healthy lifestyles and better enables access to local facilities and services. This will have a positive effect on reducing emissions both for air quality and contribution to climate change. This combines well with Objective 2: Jobs and Money which seeks to create more jobs locally which will have cumulative positive impacts against the Sustainability Framework objective for need to travel helping people into employment locally.

With regards Inclusion and Equality the delivery of genuinely affordable housing is a key aspect of the Local Plan under objective 1: Homes, which in combination with objective 2: Jobs and Money, aims to create an inclusive economy which will help improve opportunity for Islington residents. These will bring long term positive effects to borough residents with positive impacts on peoples' health and wellbeing through the Local Plan creating better employment opportunities and helping meet housing need through addressing the priorities for the competing demands for the use of the limited land resource in the borough.

There will also be cumulative benefits to Sustainability Framework objectives for Health and Wellbeing of residents arising from the effect of various objectives combining; Objective 3: Safety, Objective 4: Children and Young People, Objective 5: Place and environment and Objective 6: Health and independence which will all provide a healthier living environment for residents. This will work with the health benefits created by delivering high quality housing under objective 1: homes. For example having a safer environment (objective 3) will assist with making the borough the best place for children to grow up (objective 4) which will be supported by a welcoming and attractive environment (objective 5) which is inclusive. In addition ensuring residents lead healthy and independent (objective 6) lives with good access to services and opportunities for play and outdoor leisure will help children grow up fit and active.

### **Synergistic effects**

There is a clear link with the Islington Corporate Plan 2018 – 2022 which shares the same seven objectives with the Local Plan. The Corporate Plan sets how the Council will deliver on these objectives from the service point of view setting various targets and aims for the objectives, some of which relate directly to policy in the Local Plan. For example under the Place and Environment objective there is a commitment to work with TfL to remodel gyratories at Highbury Corner, Nags Head, Old Street and King's Cross. Apart from King's Cross three of these are set out in policy in the Local Plan. The emerging Islington Transport Strategy and other policies in the plan such as the car-free policy approach set out in T3: Car-free development, also helps with objective 5: Place and environment as it will help people make more sustainable transport choices in particular when combined with the various public realm improvements. Finally, the Council published the Islington Zero Carbon strategy in 2020 and the Local Plan will help to achieve the ambitious carbon reductions set out in Strategy.

## Consideration of cumulative and other effects for PLAN1

Policy PLAN1 has a number of cross-cutting elements which will help to deliver synergistic and positive effects across objectives. For example:

- the contextual principle helps to deliver benefits in relation to the built environment, heritage and use of land ensuring that development is high quality and makes a positive contribution to local character, legibility and distinctiveness of an area, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. This would include reflecting heritage assets.
- the connected principle has benefits in terms of liveable neighbourhoods, need to travel and health. The policy states that development must improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings; and should sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan.
- the inclusive principle assists with achieving objectives on liveable neighbourhoods, affordable housing and housing, inclusion and health through sustaining and reinforcing a variety and mix of uses in line with relevant land use priorities of the Local Plan.
- the sustainable principle has benefits in terms of use of land, health, climate change, resource efficiency and natural resources requiring development to respond to the principle which underpins the whole planning system.

The overarching nature of PLAN1 means that it can deliver cumulative impacts when considered alongside other policies in the plan.

The **contextual principle** aligns closely with the design and heritage policies within the plan and will complement their delivery, however it will also assist with delivering high quality housing, delivery of new employment and retail floorspace, the delivery of green infrastructure and sustainable design. The approach works together with other policies in the plan which deal with amenity and noise including Policy H4 which sets out detail on housing quality including noise impacts and Policy DH5 which deals with noise and vibration but also the agent of change aspect of policy. In addition retail policies make clear the need for residential or other uses to ensure the vitality and retail function of town centres and local centres is not impacted which helps contribute to economic growth and liveable neighbourhoods.

The **connected principle** will help with achieving access to services and facilities and through encouraging permeability and movement through areas which links well with other policies in the including H1, H7, H9, SC1 and R1. This will not only assist with helping to achieve social infrastructure and economic growth objectives in terms of delivering development in accessible locations, it will also assist with delivery of the transport policies. The clear connection with Policy T1 and T4 in terms of a developments connection with public realm reinforces the approach expected through PLAN1, adding detail on methodology and tools which could be used by designers. In addition, it will help development respond to site specific issues such as safety, crime and fear of crime.

The **inclusive principle** is crosscutting and supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. A mix of uses can respond to economic as well as social needs and is represented by policies in the Thriving Communities and Inclusive Economy sections of the plan. The inclusive approach supports development which is adaptable and meets changing and needs of the population which works with policy H4 and B2 which both seek flexibility of new housing and employment floorspace. Other aspects of inclusive require a policy response from development in terms of a developments function and requirements such as landscape design set out in Policy G4 will respond to safety and useability.

Finally the **sustainable principle** assists with balancing social, economic and environmental objectives and is therefore relevant to policies across the plan as well as the sustainability policies. Policies through the plan contribute to this principle, not just those which respond to climate change but those which encourage re-use and renovation of buildings. Consideration of infrastructure provision is also part of the process of developing and designing a proposal which addresses this and other development principles.



More detailed considerations of PLAN 1 are set out under the site appraisal criteria – some of these criteria will specifically help with delivering specific policies in the plan (for example surface water flows) where as others will help with delivering cumulative benefits across policies (for example design quality).

## Consideration of cumulative and other effects for Area Spatial Strategies Section

Table 1.213: Consideration of cumulative and other effects for Area Spatial Strategies Section

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
Policy SP1: Bunhill and Clerkenwell	0	+	0	0	0	0	0	+	0	0	0	0	0	0
Policy SP2: King's Cross and Pentonville Road	+	+	+	+	+	0	0	+	+	+	+	0	0	+
Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	+	+	+	+	0	0	0	+	+	0	0	0	0	0
Policy SP4: Angel and Upper Street	+	+	+	+	0	0	0	+	+	0	0	0	0	0
Policy SP5: Nag's Head and Holloway	+	+	+	+	+	0	0	+	+	0	0	0	0	0
Policy SP6: Finsbury Park	+	+	+	+	+	0	+	+	+	0	0	0	0	0
Policy SP7: Archway	+	+	0	+	+	0	+	+	+	0	0	0	0	0
Policy SP8: Highbury Corner and Lower Holloway	++	+	+	+	0	0	0	+	++	+	0	0	0	0
<b>CUMULATIVE</b>	++	++	+	++	0	0	0	+	++	0	0	0	0	0

Consideration of the potential for cumulative effects associated with the area spatial strategies for the Local Plan and Bunhill and Clerkenwell AAP. Taken together these will have considerable benefits in delivering growth in terms of business floorspace, retail and leisure space with clear positive effects which work together from all the Area Spatial Strategies to contribute to the objective for economic growth. Similarly the Area Spatial Strategies will all have positive effects on the objective for use of land with policy for business floorspace which reinforces the policy position set out in policy B2. This is not surprising given these areas are identified for growth, are accessible in either CAZ or town centre locations and contain a concentration of different uses.

The Area Strategies help focus development in the most appropriate locations by recognising the various areas range of commercial uses including retail, leisure, service, and office uses. Some of the area strategies also recognise the rich variety of community uses and cultural spaces that are available. Having policy which promotes these diverse, vibrant and economically thriving spatial areas helps these locations serve the needs and wellbeing of the population. It also helps to better protect and enhance the uses in these locations. Area spatial strategy SP3 unique area with a focus on the protection of the industrial function of the area and protecting this helps contribute to meeting economic growth and compliments the function of the CAZ for example by providing space for industries which service the businesses in that area.

Policy in the area spatial strategies supports high quality improved public realm with more functional spaces that improves permeability and connectivity. This repeated emphasis on improving public realm throughout the spatial strategies creates a strong positive effect on making the built environment safer and more inclusive. Combined, these improvements will contribute to enhancing local character and create a high quality built environment. They also help contribute to a positive cumulative effect against the objective to reduce the need to travel by identifying improvements which help encourage increases in walking and cycling. These have positive effect on health and wellbeing benefits too. In addition a number of the spatial strategies in Nags head and Highbury Corner identify the benefits of open space either improving access to it or adding additional open space which will have wider health benefits.

Most of the spatial strategies identify specific heritage assets and local landmarks, highlighting them helps enhance the borough's heritage and culture. Most of the areas identify relevant social and community infrastructure which helps maintain residents access to facilities contributing to the objective liveable neighbourhoods across the borough, which also helps maintain facilities for the benefit of those both inside and outside the borough helping to serve wider needs across the borough.

### **Synergistic effects**

Key public realm and transport proposals in spatial policy areas align to and complement objectives of Islington's Transport strategy. The Infrastructure Delivery Plan contains an up date assessment of the infrastructure needed to support planned new development in Islington including transport. Spatial policies complement existing plans that are in place in some areas – for example the Finsbury Park SPD.

## Consideration of cumulative and other effects for Thriving Communities section

The Thriving Communities section contains the housing policies and social and community policies.

**Table 1.214: Consideration of cumulative and other effects for Thriving Communities section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
H1: Thriving Communities	++	++	+	+	++	++	+	0	0	0	0	+	+	0
H2: New and existing conventional housing	++	++	0	+	++	+	+	+	0	0	0	0	0	0
H3: Genuinely affordable housing	0	+	0	+	++	++	+	+	+	0	0	+	0	0
H4: Delivering high quality housing	++	++	0	0	++	++	++	0	0	0	0	+	++	0
H5: Private outdoor space	+	+	0	0	+	+	+	0	0	+	+	+	0	0
H6: Purpose-built Student Accommodation	0	-	0	+	-	+	-	+	0	0	0	0	-	0
H7: Meeting the needs of vulnerable older people	0	-	0	+	0	0	+	0	+	0	0	0	0	0
H8: Self-build and Custom Housebuilding	+	+	0	0	+	0	0	0	0	0	0	0	0	0
H9: Supported Housing	0	0	0	+	+	++	++	0	+	0	0	0	0	0
H10: Houses in Multiple Occupation (HMOs)	0	-	0	+	-	0	-	0	0	0	0	0	-	0
H11: Purpose Built Private Rented Sector Development	-	-	0	0	-	0	+	0	0	0	0	0	0	0
H12: Gypsy and Traveller Accommodation	0	0	0	0	+	+	0	0	0	0	0	0	0	0
SC1: Social and Community Infrastructure	++	++	0	++	0	+	++	+	+	0	0	0	0	0
SC2: Play space	+	+	0	++	0	+	++	0	0	+	0	0	0	0
SC3: Health Impact Assessment	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SC4: Promoting Social Value	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>CUMULATIVE</b>	++	0	0	++	++	++	++	0	0	0	0	0	0	0

Policies in the Thriving Communities section are focused on the societal objectives contained in the Sustainability Framework. When the policies within the section are considered together, they will have a particularly positive cumulative effect on the objectives including affordable housing, inclusion and equality, health and wellbeing, liveable neighbourhoods and the built environment.

Policies which address the health and wellbeing objective, in particular Policy H4, which determines housing quality within a development will combine well with other policies in the section: H2 considers the impact of development on social infrastructure, H3 contributes affordable housing which will help reduce poverty, H5 helps improve access to outdoor space which helps encourage health benefits. Other policies in the section link back to Policy H4 requiring the consideration of housing quality for older peoples accommodation, large scale HMO and purpose built private rented sector accommodation. High quality housing also helps encourage people into more active travel with access to cycle parking and encourages recycling with effective recycling facilities which helps resource efficiency. Policies SC1 and SC2 contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Policy SC2 provides play space as part of development which contributes to both the health and wellbeing objective and also the built environment objective. This combination of these positive policy effects contributes to overall improvements in health and wellbeing of residents. In addition there is a policy check for development in Policy SC4 that requires Health Impact Assessment.

There is an overall positive effect against the built environment objective with housing policies supporting housing development at optimal densities which combines with H4 which includes minimum space standards that ensures quality is maintained whilst density is optimised. Quality also helps support adaptability and the efficient use of land. Housing mix priority is considered in policy H2 which combines with both H1 in terms of a priority for family units and meeting affordable housing needs. This makes the best use of the scarce land resource in the borough and balance competing demands for land use across the borough. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. There is a tension however with policies for large scale HMO accommodation and student accommodation, which are restrictive policies but can still permit these forms of development which detracts from meeting the overwhelming need for housing which does have a negative impact on the efficient use of land. Further detail on meeting needs is set out below under 'consideration of cumulative effects of the Site Allocations' section.

The combined effect of the Thriving Community policies against the objective for promoting social inclusion and equality is significantly positive. The policies aim to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy H1 optimise housing density and also restricts gated development. Policy H2 ensures the broadest range of needs possible are met to reduce inequality and provide more opportunity and potentially addressing overcrowding issues. Policy H3 increases the quantum of affordable housing reducing the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and policy H4 ensures housing is tenure blind, promoting social cohesion which combines with requirements for accessible housing which also promotes social cohesion. In addition accessible homes can support older people to stay in their homes longer which contributes to meeting their needs, which is important given the perceived tension with Policy H7 and meeting wider housing needs and the restriction of market extra care accommodation. Finally Policy H9 helps improve peoples' opportunity for independence in particular for those more disadvantaged by protecting existing supported housing and supporting provision of new supported housing. Policies SC1 and SC2 contribute to social inclusion by improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately which will help to ensure peoples needs are considered and access for people to the same opportunities are available.

The affordable housing objective has clear positive effects on it from the delivery of affordable housing which improves fairness and integration and tackles social exclusion with the delivery of mixed and balanced communities. Policies H1 to H4 combine to achieve this providing affordable housing, a housing mix with size priorities for different affordable tenures and high quality housing at an optimal density. This helps meet the broadest range of need possible. In addition this combines with the policies in the Sustainable Design section to create energy efficient homes which are more affordable to heat and also cooler in summer. This helps tackle inequality for those on lower incomes. There is also a link though to economic growth where affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment which when combined with Policy B4 and particularly Policy B5 helps to improve residents skills and employment opportunities.

The Thriving Communities set of policies has a positive effect on the objective for liveable neighbourhoods with social and community facility policies which link with Policy H2 that supports existing facilities to ensure that the appropriate level of infrastructure is available for the local population. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality. It would include consideration of access to services. H1 in particular will support the provision of necessary social infrastructure to support residents, workers and visitors helping meet needs and improve access to essential services in the right locations which is supported by ST1 and the Islington Community Infrastructure Charging Levy. Policy SC1 also contribute to liveable neighbourhoods by improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately as well as supporting new or extended social infrastructure.

### **Synergistic effects**

Some of the new housing, in particular social housing that will be developed will be undertaken by Islington Council as part of the ongoing programme of development on Council housing estates. This is one of the key aims of the Councils Housing Strategy which seeks to increase the supply of affordable homes and increase choice. All Council development will be completed in accordance with the housing policies of the Local Plan.

There is a link with regards social infrastructure and other infrastructure and the Islington Community Infrastructure Levy with a charge adopted in 2014. The update to the Infrastructure Delivery Plan provides an up to date assessment of the infrastructure needed to support planned new development in Islington.

## Consideration of cumulative and other effects for Inclusive Economy section

The Inclusive Economy section contains the policies for business floorspace, retail, leisure and services, culture and visitor accommodation

**Table 1.215: Consideration of cumulative and other effects for Inclusive Economy section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
B1: Delivering business floorspace	+	++	0	+	0	++	+	++	++	0	0	+	0	+
B2: New business floorspace	+	++	0	+	0	+	+	++	++	0	0	+	0	+
B3: Existing business floorspace	0	+	0	+	0	+	+	++	+	0	0	+	0	+
B4: Affordable workspace	+	+	0	+	0	++	+	++	+	0	0	+	0	+
B5: Jobs and training opportunities	0	0	0	0	0	++	+	++	+	0	0	+	0	+
R1: Retail, leisure and services,	+	++	0	++	0	+	0	++	+	0	0	0	0	0
R2: Primary Shopping Areas	+	++	0	++	0	0	0	++	+	0	0	0	0	0
R3: Islington's Town Centres	++	++	0	++	0	0	0	++	+	0	0	0	0	0
R4: Local Shopping Areas	+	+	0	++	0	0	0	+	+	0	0	0	0	0
R5: Dispersed retail and leisure uses	+	+	0	++	0	0	0	+	+	0	0	0	0	0
R6: Maintaining and enhancing Islington's unique retail character	++	+	+	++	0	0	0	+	0	0	0	0	0	0
R7: Markets and SSAs	0	+	0	+	0	0	0	+	0	0	0	0	0	0
R8: Location and concentration of uses	+	0	0	++	0	0	+	0	0	0	0	0	0	0
R9: Meanwhile/ temporary uses	++	++	0	+	0	0	0	+	0	0	0	0	0	0
R10: Culture and NTE	+	++	0	++	0	0	0	++	+	0	0	0	0	0
R11: Public Houses	0	+	++	+	0	+	+	++	0	0	0	0	0	0
R12: Visitor accommodation	-	0	0	0	0	0	0	+	0	0	0	-	-	-

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
CUMULATIVE	++	++	0	++	0	+	+	++	+	0	0	+	0	0

Policies in the Inclusive Economy section are focused on economic aspects with the Local Plan objective to deliver an inclusive economy which the policy does through supporting creation of a variety of new business floorspace, protecting existing floorspace, in particular industrial land through new LSIS designations and securing affordable workspace and jobs/training opportunities from development. Cumulatively, as identified in the Thriving Communities section this has positive effects against the objective for inclusion and inequality when combined with policies for meeting affordable housing need. There are other cumulative effects, for example, the benefit of protecting the industrial function helps to reduce the need for goods and services to travel, reducing congestion and air pollution which is positive against the climate change objective when combined with policies in the Transport and Public Realm section to manage delivery and servicing (T2 and T5). Policy B2 focuses and maximises the delivery of offices in the most accessible parts of the borough, hence it also combines to reduce transport emissions. This also has a positive cumulative impact on the climate change and natural resources objective in relation to air quality.

Retail policies within the section will have cumulative positive effects against the objective to meet the needs and wellbeing of local residents through enabling town centres and LSAs to continue to serve the local residents across different retail catchment areas by striking the right balance of retail, leisure, culture and business uses to enable response to changing retail patterns. The policies combine seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. Enabling town centres to thrive also contributes to addressing inequality and inclusion objective through employment opportunities that retail, culture and the night time economies provide. This combines with the business floorspace policies to provide opportunities for economic growth. In addition, policies in this section have cumulative benefits against the objective to create liveable neighbourhoods when considered with policies in the Design and Heritage section which ensure that residential amenity is protected through suitable noise assessment and application of the agent of change principle.

Taken together the retail policies provide a framework to support facilities which can meet the needs of communities and this can provide health and , recreation and leisure benefits that are positive for both physical and mental health. The policies also provide a framework for taking into account cumulative impacts to provide against the proliferation of activities which can have/or have the potential to have negative health impacts. Maintaining and supporting retail centres is also positive for promoting an inclusive and equal society as they can act as informal spaces for communities to meet and strengthen local connections which can foster better community cohesion.

### Synergistic effects



Policy B4 is supported by Islington's Affordable Workspace Strategy; the council's Inclusive Economy team commission affordable workspace providers to deliver affordable workspace after it has been secured through planning permission. The Bunhill and Clerkenwell Area Action Plan and the City Fringe Opportunity Area also support policies B1 – B5 to prioritise employment and more specifically office use.

Policies B1, B2, B3, B4 and B5 are supported by the Council's 2020 Transport Strategy and Low Traffic Neighbourhoods programme which will enable people to reach a diverse range of employment types using active travel modes.

Policies R1 – R12 in conjunction with policies B1-B4 align with the objectives in the Finsbury Park Town Centre SPD which seek to strengthen the retail offer whilst promoting mixed use development especially around Finsbury Park station to provide office uses that benefit the viability and vibrancy of the retail and cultural environment. The Bunhill and Clerkenwell AAP also supports the aims of retail policies by providing for location specific criteria for retail, leisure and cultural development in the CAZ.

### Consideration of cumulative and other effects for Green Infrastructure section

The following section deals with policies dealing with green infrastructure and open space

**Table 1.216: Consideration of cumulative and other effects for Green Infrastructure section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIBILITY	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
G1: Green Infrastructure	++	+	0	++	0	0	++	0	0	++	++	++	0	+
G2 Protecting open space	++	+	+	++	0	0	++	0	0	++	++	++	0	+
G3 New public open space	+	0	0	++	-	0	++	0	0	++	++	+	0	+
G4: Biodiversity, landscape design and trees	++	0	0	+	0	0	0	+	0	++	++	+	0	0
G5: Green roofs and vertical greening	0	++	0	0	0	0	0	+	0	0	++	+	0	0
<b>CUMULATIVE</b>	++	+	0/+	++	0/-	0	++	0	0	++	++	++	0	0

Cumulative effects are considered within this section in relation to the strategic approach to green infrastructure and for biodiversity and wildlife habitat with requirements for developers to incorporate as much biodiversity habitat into development as is reasonably possible. This will have a cumulative effect, along with policies in the Thriving Communities section on the high quality built environment objective and the health and wellbeing objective. By ensuring that open spaces are preserved and increasing the amount of green open space, plants, trees, green walls and roofs in the urban environment this can help tackle air quality issues and encourage people to participate in more active travel, sport and recreation in the borough as well as help to mitigate the impacts of climate change (e.g. urban heat island and flood risk) therefore having cumulative benefits when considered with the policies in sections for Transport and Public realm and Sustainable Design.

#### Synergistic effects

The Local Plan policies related to Green Infrastructure are necessary to implement a large number of the actions set out in the Islington Biodiversity Action Plan 2020-2025, and its actions plans for the Built Environment, Parks and Urban Green Spaces, Designated Sites, and Access to Nature. The approach to protecting and enhancing green infrastructure also complements the Islington 2020 Zero Carbon Strategy which seeks to integrate he

management of the natural environment as part of efforts to achieve net zero and mitigate the risks from the loss of biodiversity and the impacts that this can have for environmental, social and economic objectives. Finally, the approach to green infrastructure will assist with creating and enhancing opportunities for cycling and walking in the borough which aligns with the Local Implementation Plan and Transport Strategy.

## Consideration of cumulative and other effects for Sustainable Design section

The following section deals with policies dealing with sustainability, flood risk, air quality and circular economy.

**Table 1.217: Consideration of cumulative and other effects for Sustainable Design section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
S1: Delivering Sustainable Design	++	+	0	+	++	+	++	+	0	0	0	++	++	+
S2: Sustainable Design and Construction	+	+	0	+	++	+	++	0	0	++	++	++	++	+
S3: Sustainable Design Standards	0	0	0	+	++	+	++	0	0	0	+	++	+	+
S4: Minimising greenhouse gas emissions	0	0	0	0	++	+	++	+	0	0	0	++	+	0
S5: Energy infrastructure	0	+	0	0	++	+	++	+	0	0	0	++	+	0
S6: Managing heat risk	+	0	0	0	+	0	++	0	0	0	0	++	0	0
S7: Improving Air Quality	+	0	0	+	0	0	++	0	+	0	+	0	0	++
S8: Flood Risk Management	+	0	0	0	0	0	0	0	0	0	0	++	0	0
S9: Integrated Water Management and Sustainable Drainage	+	0	0	0	0	0	+	0	0	+	+	++	0	++
S10: Circular Economy and Adaptive Design	+	+	0	0	+	0	0	+	0	0	0	++	++	0
<b>CUMULATIVE</b>	+	0	0	+	+	+	++	+	0	0	0	++	++	+

Cumulatively the Sustainable Design policies set out the council's strategic approach to delivering sustainable design with the aim to minimise the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. set out in policy S1, alongside the requirement for all development proposals to maximise energy efficiency in accordance with the energy hierarchy, reducing energy demand through fabric energy efficiency, followed by supplying energy efficiently and cleanly, works with the requirements set out in policies S2, S3, S4 and S5 and will have a significant positive effect against the framework objectives to reduce the contribution to climate change and promote

resource efficiency. The sustainable design policies will also individually and cumulatively contribute to reducing fuel poverty in the borough contributing to reducing inequalities and improving wellbeing.

Cumulatively policies S6, S8 and S9 will have a significant positive effect against objectives to mitigate and adapt to the effects of climate change which also contributes positively to both health objectives and affordable housing. In addition, Policy S7 has significant positive cumulative effects on health and wellbeing alongside Policy S5 which promotes the adoption of an integrated approach to energy supply to maximise both air quality and climate change benefits and ensures heating systems do not have a significant impact on local air quality.

When considered together, the requirement in Policy S2 for developments to submit a Landscape Design Strategy, alongside Policy S9 and the Green Infrastructure policies (particularly policy G4), all have a significant positive cumulative effect on objectives relating to climate change and open space. These policies all require the incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design as part of an integrated approach which maximises biodiversity, water quality and other benefits. Green Infrastructure Policy G4 and Policy S6 have cumulative benefits as the use of green roofs will help to minimise internal heat gain and the impacts of the 'urban heat island effect'.

Policies S4 and S10 have positive cumulative effects on objectives relating to reducing carbon emissions and promoting a circular economy approach by requiring the adoption of a whole life-cycle assessment methodology for the selection of heat sources and the use of building materials.

### **Synergistic effects**

These policies will help achieve the carbon reductions set out in the Islington 2020 Zero Carbon Strategy - the target is for all buildings in Islington to be net zero carbon by 2050. Improvements to building efficiency secured under Policies S1, S2 and S3 will help achieve the targets in the Government's 2020 Energy White Paper.

There will be synergies between these policies and the Islington Transport Strategy and co-ordinated cross boundary working with neighbouring boroughs on projects such as Old Street roundabout which provide inclusive redesign of the public realm.

These policies will help ensure new connections to Islington's planned future heat networks which are identified on Islington's CIL Regulation 123 Infrastructure List (CIL 123 List).

These policies (in particular Policy S7) will also help achieve Islington's Air Quality Strategy, which outlines the proposed actions in Islington to reduce air pollution and lower exposure to the main pollutants between 2019 and 2023.

Policy S9 works with the Thames River Basin Management Plan (TRBMP) by ensuring that all development proposals located adjacent to the New River or Regent's Canal are required to protect the water environment to help maintain good ecological status for the waterways. Policies S8/S9

combine to ensure that flood risk in the borough is considered and addressed helping address areas of flood risk identified in the Local Flood Risk Management Strategy.

Policy S10 is required to implement the Islington's Code of Practice for Construction Sites.

## Consideration of cumulative and other effects for the Public Realm and Transport section

The following section deals with policies dealing with public realm, sustainable transport, car-free development and delivery and servicing.

**Table 1.218: Consideration of cumulative and other effects for the Public Realm and Transport section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
T1: Enhancing the public realm and sustainable transport	++	+	0	++	0	+	++	0	++	0	0	++	+	++
T2: Sustainable Transport Choices	++	+	0	++	0	+	++	0	++	0	0	++	+	++
T3: Car free development	++	++	0	+	0	+	+	0	+	0	0	++	+	++
T4: Public realm	++	0	0	++	0	+	++	0	++	+	0	++	0	++
T5: Delivery, servicing & construction	+	+	0	+	0	0	0	+	+	0	0	+	+	+
<b>CUMULATIVE</b>	++	+	0	++	0	+	++	0	++	0	0	++	+	++

As previously identified in Thriving Communities and Sustainable Design sections the Public Realm and Transport policies when considered together will have significant positive cumulative effects against objectives for built environment, liveable neighbourhoods, health inequality and climate change by prioritising more active travel and use of more sustainable transport modes which will help promote a healthier lifestyle and which will have positive impacts against health inequality objective for residents and reducing carbon emissions objective.

The policies also have a positive impact on inclusion as they aim to improve transport for those with no access to private motor vehicles whilst providing wheelchair accessible parking for disabled people. As previously identified this is linked to the reduction in emissions and fuel consumption from land-use benefits of focusing and maximising development in the most accessible locations in the borough enabling more sustainable travel. There are also cumulative impacts with policies B2 and SP3 in reducing the negative impacts of transport relating to freight, servicing, delivery and construction. The transport policies (T1 and T4) also work in concert with spatial policies in helping to promote sustainable transport and deliver development in locations and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality.

There is a positive effect against the built environment objective with Public realm and transport policy T1 prioritising practical, safe and convenient access to the public realm which will help to create a sustainable public realm , which combines with Policy T2 which seeks the same factors for provision of sustainable transport infrastructure. This helps ensure the built environment is sufficiently flexible and adaptable to accommodate evolving social and economic needs. This also contributes to making neighbourhoods more liveable. Both T2 and T4 in combination ensure neighbourhoods are more liveable neighbourhoods with more permeable and legible public realm which helps people access existing facilities and services by walking and cycling in particular. In addition these policies can be considered to contribute to economic growth through reducing congestion, which improves freight deliveries and an improved built environment which is more accessible and attractive to visit, particularly town centres.

### **Synergistic effects**

The public realm and transport policies have positive synergistic effects with Islington's 2020 Transport Strategy which aims at increasing the number of trips made by walking, cycling and public transport, whilst reducing the number of car trips. The promotion of Low Traffic Neighbourhoods is also a key component of the Transport Strategy, which is also supported by the Local Plan. In addition, the Council has published its 2020 Zero Carbon Strategy, which identifies transport as a key priority to minimise emissions and reach carbon neutrality. There are also synergistic effects with the London Plan, the Mayor's 2018 Transport Strategy's Healthy Streets, and TfL's Action plans. For instance, the ambition of T2 and T5 to de-motorise and optimise freight, delivery and service movements reflect TfL's 2019 Freight Action Plan. The transport policies also work in combination with the Mayor's Ultra Low Emission Zone (ULEZ), which will be extended in October 2021. Finally, the Government's 2020 Energy White Paper identifies the shift towards active travel and public transport as a key strategic priority for the decarbonisation of transport.



## Consideration of cumulative and other effects for the Design and Heritage section

The following section deals with policies dealing with design and heritage, building heights, basements, noise and advertisements

**Table 1.219: Consideration of cumulative and other effects for the Design and Heritage section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCES	NATURAL RESOURCES
DH1: Fostering innovation and conserving and enhancing the historic environment	++	++	+	+	+	+	+	+	0	0	0	+	0	0
DH2: Heritage assets	++	++	++	0	0	0	0	0	0	0	+	0	0	0
DH3: Building heights	++	++	++	0	0	0	0	-	+	0	+	+	+	+
DH4: Basement development	+	-	+	0	0	0	+	0	0	++	++	+	+	+
DH5: Agent of change, noise and vibration	+	0	0	++	++	0	++	+	0	0	0	0	0	0
DH6: Advertisements	0	0	+	0	0	0	+	0	0	0	0	0	0	0
DH7: Shopfronts	++	0	++	0	0	+	0	0	0	0	0	0	0	0
DH8: Public art	+	+	+	0	0	+	+	0	0	0	0	0	0	0
<b>CUMULATIVE</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>0</b>

Cumulatively, the Design and Heritage policies have a significant positive effect against the framework objectives for the built environment and use of land, in particular ensuring use of a site is fully optimised which helps make the best use of the scarce land resource in the borough helping meet and prioritise the various development needs in the borough in particular housing need and employment. Combined with the spatial policies and relevant site allocations and Bunhill and Clerkenwell AAP this combines to focus development in more accessible locations, although the policy notes that high density development can be accommodated throughout the borough.

Clearly there is a positive effect on the heritage objective with NH2 and other policies having a positive effect including those that deal with basements, shopfronts, advertisements and public art which all expect to consider the effect on heritage. Basement policy also has positive effects on private open spaces – gardens, by helping to protect the amount of land that can be developed and heritage policy protects historic open spaces, which combines with DH3 building heights which ensures tall buildings consider their setting. These also have positive effects on biodiversity too.

The approach to tall buildings directs tall buildings to where they are most appropriate based on a robust and comprehensive evidence base while protecting local character, this includes taking into account other considerations which has cumulative benefits with other policies for example, taking into account heritage assets and impact on wider built environment as well as public transport accessibility. This combines with requirements set out in Policy H2 which supports housing development at optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels.

The agent of change policy will also have a positive effect for health and wellbeing as it ensures that change does not adversely effect existing uses through noise and vibration impacts. This is cross referenced in the Inclusive Economy section and Policy H4 which has positive effects on health and wellbeing.

### **Synergistic effects**

Policies DH1, DH2, and DH3 will help achieve the objectives of the Conservation Area Design Guides for each conservation area, help in removing assets from Historic England’s Heritage at Risk Register, and ensure that views in the London View Management Framework are protected (Mayor of London).

## Consideration of cumulative and other effects for the Strategic Infrastructure section

The following section deals with policies dealing with infrastructure, waste, telecommunications and water infrastructure

**Table 1.220: Consideration of cumulative and other effects for the the Strategic Infrastructure section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIBILITY	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
ST1: Infrastructure Planning and Smarter City Approach	0	++	0	++	0	++	++	0	++	++	0	++	0	0
ST2: Waste	++	++	0	0	0	0	0	0	0	0	0	0	0	++
ST3: Telecommunications, communications and utilities equipment	+	0	++	0	0	0	0	0	0	0	0	0	0	0
ST4: Water and Wastewater infrastructure	0	++	0	0	0	0	0	0	0	0	0	0	++	0
<b>CUMULATIVE</b>	0	++	0	0	0	0	0	0	0	0	0	0	0	0

The Strategic Infrastructure section will have a positive cumulative effect against objectives for liveable neighbourhoods and efficient use of land as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This will work cumulatively with policy in the Thriving Communities section which aims to protect community facilities where justified helping ensure residents have access to the various essential services, facilities and amenities necessary and enhance these facilities. Policy ST3 will work with PLAN1 and design and heritage policies ensuring visual impact of telecoms promotes sensitive design contributing to the built environment objective. Policy ST4 combines with ST1 and where relevant the site allocations will have a positive effect against the framework objective for natural resources as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments which will balance development needs in the borough which is positive cumulative effect for the use of land objective. This combines with the Sustainable Design Policies which require environmental accreditation for development and specific water conservation targets. In addition Green Infrastructure policies helps reduce run-off which help contribute to demand on the sewer system.

### Synergistic effects

Policy ST1 is linked to the Infrastructure Delivery Plan (updated 2019) which provides a benchmark of infrastructure and future infrastructure requirements. CIL payments secured through development will help build infrastructure set out in the delivery plan.

Policy ST2 links to the North London Waste Plan by ensuring safeguarding of the Hornsey Street Re-use and Recycling Centre, and also set out that the policies in the North London Waste Plan will be used to consider proposals for waste management facilities across the seven North London boroughs, including Islington.

Policy ST3 requires development to adhere to the Code of Best Practice on Mobile Network Development in England.

Policy ST4 requires that applicants engage with Thames Water with regard to water and wastewater requirements of development. This policy ensures that development takes place where there is sufficient water and wastewater capacity exist, helping to achieve Policy S8 and related plans.

## Consideration of cumulative and other effects for the Bunhill and Clerkenwell AAP

The following section deals with policies in Bunhill and Clerkenwell AAP including those that prioritise office use and spatial policies

**Table 1.221: Consideration of cumulative and other effects for the Bunhill and Clerkenwell AAP**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
BC1 Prioritising office use	0	++	0	0	-	+	0	++	+	0	0	0	0	0
Alternative to Policy BC1: Prioritising office use	0	-	0	+	0	-	0	-	0	0	0	0	0	0
BC2: Culture, retail and leisure uses	0	+	0	+	0	0	+	++	+	0	0	0	0	0
Policy BC3: City Fringe Opportunity Area	+	+	+	+	0	0	+	++	+	+	+	0	0	0
Policy BC4: City Road	+	+	+	+	+	0	+	+	+	+	+	+	0	+
Policy BC5: Farringdon	+	+	+	0	0	0	+	+	+	0	+	0	0	0
Policy BC6: Mount Pleasant and Exmouth Market	+	+	+	+	+	0	+	+	+	+	+	0	0	0
Policy BC7: Central Finsbury	+	+	+	+	+	0	+	+	+	+	+	0	0	0
Policy BC8: Historic Clerkenwell	+	+	++	0	0	0	+	+	+	+	+	0	0	0
<b>CUMULATIVE</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>0</b>

As identified elsewhere, policy BC1 in combination with policy in the Area Spatial Strategies, the Thriving Economy section and the Area Spatial Strategies in the AAP will likely to have a significant positive cumulative impact against the framework objective for the efficient use of land. The approach will focus development of employment uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport which will have cumulative benefits against reducing the boroughs contribution to climate change. The approach delivers maximisation of employment floorspace in the CAZ which the Islington Employment Study states is the location with the most demand for Grade A office space and over the long term will have a significant positive effect, including promoting the tech cluster and its supporting uses. This will likely

also have a cumulative positive effect for health and wellbeing through providing increased opportunities for employment with particular positive benefits for those who may be on low incomes.

The Bunhill and Clerkenwell Area Action Plan Spatial Strategies (BC3 to BC8) work in combination with the area wide policies of the BCAAP and the Strategic and Development Management Policies to likely positive effects against a number of objectives – built environment, use of land, liveable neighbourhoods, health, economic growth, transport, open space and biodiversity. These policies work by adding much more detailed site specific policy helping implement the broader strategy, for example by protecting an individual use or space, or by designating a particular opportunity for development such as a new open space or route.

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the built environment objectives include:

- An improved public realm along and new pedestrian crossings around City Road (Policy BC4)
- Development around Farringdon Station should contribute to an enhanced public realm that prioritises pedestrian circulation and provides good access between the station and other modes (Policy BC5)
- Improved links to Clerkenwell Green (Policy BC5)
- New development in Historic Clerkenwell should reflect long established building lines, street frontages and plot widths (Policy BC8)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the liveable neighbourhood objectives include:

- Focus of retail and leisure activities at the Old Street Local Shopping Area (Policy BC3)
- The Council will preserve and enhance Exmouth Market Local Shopping Area as a destination for food, drink, retail and entertainment uses (Policy BC6)
- Focus retail at Whitecross Street Local Shopping Area (Policy BC7)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the economic development objectives include:

- Allocation of a significant amount of office floorspace at the Moorfields Eye Hospital site to create a new business quarter (Policy BC3)
- Encouraging Grade A office development at the southern end of City Road (Policy BC4)
- Sites adjacent to Farringdon station must be predominantly offices and associated business uses (Policy BC5)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the transport objectives include:

- Removal of the gyratory at the Old Street Roundabout, new development around the roundabout to explore providing access to the station (Policy BC3)
- Support for change of use of the underground car park at Finsbury Square to other uses (Policy BC3)
- Proposals to promote a single station environment around Farringdon station, as well as cycling parking, docking stations, and pedestrian signage (Policy BC5)
- Public realm improvements at Exmouth Market should further improve pedestrian priority of the street (Policy BC6)

- Public realm improvements across Central Finsbury should facilitate easy pedestrian and cyclist access through and within the area, in line with pedestrian and cycle desire lines (Policy BC7)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the open space and biodiversity objectives include:

- Enhancement of the public open space at Finsbury Square (Policy BC3)
- Protection of the environmental and amenity value of the City Road Basin and new links to the space (Policy BC4)
- Development near Spa Fields should support role of the space and improve links (Policy BC6)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the reducing climate change policies include:

- Support for Bunhill Phase 2 at the City Road/Central Street junction, and a potential new energy centre powered by a water source heat pump Bunhill Phase 3 - at the City Road Basin (Policy BC4)
- Safeguarding the City Road substation and National Grid 400kV network (Policy BC4)

### **Synergistic effects**

Policies BC1 and BC2 support the City Fringe Opportunity Area Planning Framework, in particular the objectives to ensuring there is the space for continued business growth in City Fringe, and to balance between residential and commercial development. In addition the BCAAP spatial strategies (BC3 to BC8), supporting City Fringe Opportunity Area Planning Framework objectives of protecting the mix of uses that makes City Fringe special, identifying the key strategic development sites (along with the site allocations BC1 to BC51), and Connecting the City Fringe.

Policy BC2 and the Spatial Strategy Policies for Historic Clerkenwell and Farringdon will help achieve objectives set out in the City of London Plan with respect to the Culture Mile.

## Consideration of cumulative and other effects for the Site Allocations

Table 1.222: Consideration of cumulative and other effects for Site Allocations

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVER SITY	CLIMATE CHANGE	RESOURC ES	NATURAL RESOURC ES
Site Allocations (this includes the Site Allocations document and sites allocated within the BCAAP)	+	++	0	+	+	+/0	+/0	+	+/0	0	0	0	0	0

Consideration has also been given to the potential for cumulative effects associated with the site allocations. Taken together the sites will have considerable benefits in delivering growth in terms of both housing and business floorspace. The cumulative quantitative contribution of sites to identified development needs is summarised in both the Site Allocations DPD Bunhill and Clerkenwell Area Action Plan in tables 1.2 and 4.2 respectively. This sets out the quantity of homes and office floorspace that will be delivered across the Area Spatial Strategies identified in the Local Plan. The sites, together will make a significant contribution towards delivering housing and business floorspace. In addition they will also help to meet retail needs with significant retail allocations identified. In terms of delivery the more important sites are identified as strategic sites in the Local Plan.

Site Allocations will also have a positive cumulative effect in relation to sustainability assessment objectives as sites will help deliver improvements to the public realm and wider built environment, provide high quality housing and affordable housing, deliver services and infrastructure needed to serve wider needs across the borough, and contribute to economic growth both within and outside the borough and make more efficient use of land in the borough.

Design considerations/criteria for site allocations can assist with helping to deliver development on sites which responds to the character and context of each site, alongside other spatial and strategic policies within the plan, which can cumulatively enhance the built environment across different parts of the borough and combines positively with policy set out in Area Spatial Strategies. A number of site allocations help to support and promote sustainable transport outcomes – either through identifying opportunities for public realm enhancements for example, or by promoting development in accessible locations.



Several sites also help to deliver social and community infrastructure which alongside other policies in the plan, such as SC1 and relevant spatial policies, can help to contribute towards liveable and inclusive neighbourhoods as well as deliver against health objectives.

Several sites identify improvements to green infrastructure, or access improvements to open spaces and whilst this is not reflected in the overall scoring, these sites alongside landscaping improvements in Green Infrastructure policies in the plan can together help to contribute positively towards the boroughs green infrastructure, including open space and biodiversity provision.

Finally, whilst sites don't specify sustainable design and transport measures, the delivery of these cumulative will play a key role in helping to deliver these policies and can therefore positively contribute towards climate change and transport objectives.

### **Synergistic effects**

- The Site Allocations are complementary to the delivery of the Council's Transport Strategy with a number of site allocations helping to support and promote sustainable transport outcomes.
- Several sites recognise the important of landscape and green infrastructure improvements and the context of nearby open spaces/SINCs. Delivery of development on these sites can help with the achievement of objectives in the Council's Biodiversity Action Plan.

## **Consideration of cumulative effects for the Local Plan**

The following section brings together the overall cumulative effects of the plan against the sustainability framework objectives, drawing out positive effects between policy areas but also potential tensions.

### **Objective 1 - Promote a high quality, inclusive, safe and sustainable built environment**

The effect of the Local Plan on the Built Environment objective is positive with housing policies supporting development at optimal densities which combines with other policies – PLAN1 and DH1 to fully optimise density levels. and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality. The policy in DH1 supports innovative approaches to design as a means to increasing development capacity whilst recognising that the scale of development is dependent on design and character. PLAN1, T1, T4 and G4 also help a proposal fully integrate within, and relate positively to, their immediate locality which combined with the Area Spatial Strategies, which promote public realm improvements helps to create buildings and places that are both high quality and safer and more inclusive.

### **Objective 2 - Ensure efficient use of land, buildings and infrastructure**

The Local Plan makes the best use of the scarce land resource in the borough and balances the competing demands for land use across the borough. There is an overall positive effect against the built environment objective with housing policies supporting housing development at optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels. This efficient use of land and infrastructure can also have wider environmental benefits in terms of helping protect green spaces from development and reducing carbon emissions. There is a tension between optimising density and the historic environment with the potential impacts on heritage value potentially increased by higher density. Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk. The Inclusive Economy policies B1/B2 and R1 work in concert with the Area Spatial Strategy policies to focus development in the right locations in the borough which combines with the approach in Policy T1 which recognises that land use should take account of accessibility and ensure proposals promote connectivity. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. The development of visitor accommodation is also restricted by Policy R12 for the same reason. Infrastructure needs are addressed both through policy and Site Allocations where relevant.

### **Objective 3 - Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment**

The approach to heritage ensures that heritage assets will be strongly protected while recognising the need to accommodate new development. Where relevant Area Spatial Strategies in the Local Plan reference heritage assets highlighting their importance, alongside local views and landmarks. Site allocations also make reference where there are relevant heritage development considerations. Growth could impact heritage value but it is considered that this is mitigated by the relevant policies and will help new development to add to the borough's character and distinctiveness - Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk of adverse heritage impacts. Policy also considers cultural value in the borough recognising the inherent sensitivity these uses can have to the introduction of new uses. Area Spatial Strategies identify where culture is a priority and the identification of cultural quarters will help support and enhance the uses in these locations.

### **Objective 4 - Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles**

The Local Plan policies seek to ensure that the appropriate level of infrastructure is available for the local population with policies in the Thriving Communities section protecting social and community facilities and policy ST1 supporting new strategic infrastructure where needed. In addition policy seeks to respond to where facilities already exist with a link in Policy H2 to supporting existing facilities. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality and policies SC1 and SC2 which contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. The Area Spatial strategies identify relevant social and community infrastructure which helps maintain residents access to facilities. The retail policies seek to strike the right balance of retail, leisure, culture and business uses which will help maintain the access to these services close to peoples homes. Policy recognise the need to protect residential amenity eg through suitable noise assessment and application of the agent of change principle which is covered by housing, retail and design policies. PLAN1 draws this all together with the connected and inclusive principles which helps development to encourage permeability and movement and maintain and support access to services and facilities.

#### **Objective 5 - Ensure that all residents have access to good quality, well-located, affordable housing**

The objective has clear positive effects resulting from policy which seeks delivery of affordable housing from all development and responds to the number one objective of the Local Plan to maximise the delivery of genuinely affordable housing. This improves fairness and integration, addressing inequality and tackling social exclusion with the delivery of mixed and balanced communities. As identified in Thriving Communities section above the policies in the Sustainability Appraisal section have significant positive cumulative effects by helping ensure all residents have access to good quality housing through ensuring all housing meets high standards of energy efficiency and relevant sustainable design standards; which helps to reduce fuel poverty and contributes to reducing inequality. This also contributes health benefits with residents benefiting from warmer homes and more affordable homes to heat. There is a significant tension between balancing housing with other needs in the plan, primarily employment needs. The tension with other forms of housing has already been identified – large scale HMO accommodation and student accommodation. Ensuring that employment needs are met is a key consideration of the Local Plan. Striking the right balance with a focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Site Allocations play a key role in the borough in demonstrating that both employment and housing needs will be met with significant levels of growth identified.

#### **Objective 6 - Promote social inclusion, equality, diversity and community cohesion**

The same positive effect from the Local Plan approach to maximise the delivery of genuinely affordable housing results on this objective too. Other policies in the Thriving Communities section also aim to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy PLAN1 and the inclusive principle supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. The Inclusive Economy section supports the economy through supporting creation of a variety of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development which helps promote equity, provide opportunity and remove barriers to employment.

#### **Objective 7 - Improve the health and wellbeing of the population and reduce health inequalities**

Policies throughout the plan help address the health and wellbeing objective, in particular housing policies which determine housing quality which combine with other policies in the plan to help a proposal fully integrate within, and relate positively to, their immediate locality. The Area Spatial

Strategy policies promote specific public realm improvements which combined with high quality housing helps encourage people into more active travel through a healthier public and built environment supported by car free transport policies and adequate cycle parking. The Social and Community policies contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Public Realm and Transport policies will have significant positive cumulative effects against objectives relating to health and climate change as they seek to reduce pollutants and improve air quality. This work with policy for Green Infrastructure which preserve open spaces and increases the amount of green open space, plants, trees, green walls and roofs in the urban environment which will also contribute to improving air quality and encouraging people to participate in more active travel, sport and recreation in the borough. The sustainable design policies also contribute health benefits with residents benefiting from warmer homes and more affordable homes to heat and housing design policies that highlight the importance of designing the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health.

### **Objective 8: Foster sustainable economic growth and increase employment opportunities**

Policies B1 to B4 recognises the importance of supporting the economy through the creation of a variety of new business floorspace, protecting existing floorspace - in particular industrial land through new LSIS designations. Meeting employment needs is a clear priority for the Local Plan with other uses restricted to ensure that these needs are adequately met – the Site Allocations which prioritise employment space help to contribute to this meeting this need as will the Area Spatial Strategies which provides further policy support for employment growth in key areas such as the knowledge economy in Kings Cross and Tech City in the Bunhill and Clerkenwell AAP. As mentioned under the affordable housing objective striking the right balance between meeting housing and employment needs is a tension that the Local Plan has to deal with . The focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Retail policies also contribute to economic growth and London’s wider economy by seeking the right balance of retail, leisure, culture and business uses to meet residents, business and visitor needs through seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. The requirement to secure affordable workspace and jobs/training opportunities from development helps to widen opportunities for residents and tackle barriers to employment. The Sustainable Design policies support the delivery of an inclusive economy by helping to contribute to a green economy with commercial buildings that have high environmental standards and can be designed to be flexible and adaptable.

### **Objective 9: Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking**

The locational benefits of the Local Plan are also considered with cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough through policy in the Thriving Economy section; the AAP area, CAZ, town centres and CAZ fringe. These locational benefits are reinforced by policy in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses and policies for public realm and design/ PLAN 1 which support improvements in the built environment. The policy approach in the Bunhill and Clerkenwell AAP in particular aims to maximise floorspace with a percentage requirement which will help achieve most floorspace in the most accessible location in the borough. This combined with Transport, Public Realm policies and PLAN1 encourages more sustainable and accessible transport and cycle parking requirements will all help people transition to more sustainable modes of travel. There cumulative benefit of protecting the

industrial function also helps to reduce the need for goods and services to travel too which also reduces congestion and air pollution. The Area Spatial Strategies through promoting public realm improvements also help to create places that are both high quality and safer and therefore more inclusive.

**Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional**

The approach ensures that open spaces are preserved and seeks to increase the amount of green open space. Area Spatial Strategies will help to create a high quality built environment with public realm improvements and also identify improvements to access existing green open spaces or add additional open space. This will have wider health benefits when combined with Urban Greening policies and enhancement of green infrastructure. Combined with other policies in the Local Plan this helps to promote physical and mental health, health benefits associated with access to nature, responds to impacts of climate change (flood risk and urban heat island) as well as improving air quality.

**Objective 11: Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity**

Cumulative positive benefits for biodiversity are created through a strategic approach to green infrastructure, biodiversity and wildlife habitat with requirement for developers to maximise green infrastructure and biodiversity provision consistent with G1. Several Site Allocations identify landscape and green infrastructure improvements as do Area Spatial Strategies which respond to the context of nearby open spaces/SINCs and the Regent's Canal. Delivery of development on these sites can also help with the achievement of objectives in the Council's Biodiversity Action Plan. Policy approach to biodiverse green roofs, green walls and soft landscaping through PLAN1 will also contribute to enhancing biodiversity. The Green Infrastructure policies will also combine with the Sustainable Design policies and the integrated approach to flood risk management and sustainable drainage to have cumulative benefits together which reduce the risk of flooding and helping to manage water sustainably and ensure wider benefits such as biodiversity and a drainage hierarchy that promotes green features over grey.

**Objective 12: Reduce contribution to climate change and enhance community resilience to climate change impacts**

Cumulatively the Sustainable Design policies set out the council's strategic approach to delivering sustainable design with the aim to minimise the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs. The Sustainable Design policies go some way to addressing this tension through energy efficiency measures for example and also introduces new policy approach – Policy S10 circular economy and adaptive design which will help mitigate the effect of resource use of development. The locational benefits of the Local Plan are also considered to have cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough. There is also a benefit of protecting the industrial function in LSIS and Area Spatial Strategies which also helps to reduce the need for goods and services to travel too which also reduces emissions from this source. Islington's car-free policy in Policy T3 and Policy T5 which seeks to minimise air pollution from the construction process as well as reducing deliveries will also help reduce transport emissions. The Sustainable Design policies in setting out the approach to flood risk management and sustainable drainage have cumulative benefits together to reduce the risk of flooding and help to manage water sustainably. These policies working alongside green infrastructure policies which also play a role in helping to reduce surface water run-off and reduce flood risk. Sustainability is identified in PLAN1 as one of the four key design principles for development in the borough.

**Objective 13: Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste**

The policies in the Sustainable Design section set out requirements for development proposals to promote resource efficiency through application of an approach to the Circular Economy. Policy in the Thriving Economy section supports the intensification, renewal and modernisation of business floorspace. The approach to circular economy and adaptive design has cumulative benefits when considered alongside other policies in the plan, this include PLAN 1 which required development to be durable and adaptable, policies ST2, H4 and B2 which seek to maximise re-use and recycling as well as Sustainable Design policies by reducing the environmental impacts, including embodied carbon emissions, that new development can have. Policy for high quality housing provides seeks well designed facilities for the management of recycling for residents and Strategic Infrastructure ensures that the waste management facility in the borough is protected. The borough is also working jointly with neighbouring boroughs on the North London Waste Plan, that will plan for waste management needs for the borough.

**Objective 14: Maximise protection and enhancement of natural resources including water, land and air**

Air quality is a cross cutting issue addressed by a number of policies that cumulatively will help to tackle air quality issues in the borough, this includes design policies, locational policies set out in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses which seek to locate uses in the most appropriate locations, green infrastructure and public realm and transport policies which all have a role in helping to improve air quality and minimise exposure. The policies in the Sustainable Design section set out requirements for conserving water resources and managing flood risk and dealing with contaminated land.

# Part 2: Appraisal of pre hearing modifications

## Introduction

Part 2 of the examination IIA considers and assesses where necessary changes made to the plan for the policies and allocated sites. The changes to the draft Local Plan are defined as modifications to the plan. The main drivers for the modifications made are:

- the issues raised by the Inspectors in their initial letters
- the representations made at Regulation 19 stage of consultation
- wider changes in the planning system.

The modifications made in response to **issues raised by the Inspectors** relate to housing supply and matters associated with the Sustainability Appraisal. These have resulted in additional site allocations. The changes proposed to the Site Allocations document include 9 additional sites for housing, this includes:

- Six London Borough Islington sites (Drakeley and Aubert Court, Bemerton Estate South, Kerridge Court, New Orleans Estate, Cluse Court, and Hillside); and three other sites (Barnsbury Estate, York Way Estate and Highbury Quadrant Congregational Church).

Changes are also proposed to a small number of existing site allocations to provide additional housing – this includes:

- AUS8: 161-169 Essex Road, N1 2SN, The proposed modification changes part of the allocation to incorporate residential use on the car park to the rear of the site, rather than prioritising business floorspace.
- Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6A (site reference NH1): changed from retail-led mixed use to mixed-use development with a greater proportion of housing.
- 1 Prah Road, N4 2RA (site reference FP5): changed from business use to residential use
- 161-169 Essex Road, N1 2SN (site reference AUS8): changed to include residential use on the car park to the rear of the site rather than prioritising business use.
- 500- 502 Hornsey Road and Grenville Works, 2A Grenville Road (site references OIS10: changed from business-led redevelopment to mixed use office and residential development. This reflects the recent grant of planning permission for the site on appeal.
- ARCH1: Vorley Road/Archway Bus Station, N19; the introduction of a social and community uses alongside residential and business floorspace

- ARCH5: Archway Campus, Highgate Hill, N19, the introduction of student accommodation to increase flexibility
- BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage. The proposed modification amends the allocation to introduce a mixed use development where additional residential may be acceptable, in addition to a significant amount of office floorspace

The **representations made at Regulation 19** stage of consultation have resulted in a number of changes which were considered necessary to ensure a sound plan or helpful in terms of improving clarity of the plan.

The **Modifications made** in response to wider changes in the planning system are significant changes in response to the UCO Class E changes and the publication of the London Plan. The Use Class changes are the only area of modifications where alternatives were considered and span three areas of policy covering business floorspace, retail and social infrastructure. The changes made in response to the publication of the London Plan are in response to removal of the definition of the gypsies and travellers.

### **Use Class changes**

On 1 September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force changing aspects of the Town and Country Planning (Use Classes) Order 1987. The Regulations amend and seek to simplify the system of Use Classes. The Inspectors wrote to the Council requesting the Council's view on the potential soundness implications that the changes to the Use Classes will have on the Plan's policies and allocations and the Council responded to confirm that policy changes are necessary to address these and that the IIA will consider them holistically.

The changes of use within Class E are not classed as development so do not require planning permission, meaning that the Council no longer has the ability to resist the loss of existing the various uses that fall within Class E. The following tables sets these uses out.



Table 2.1 Use Class Order changes

Use Class before 31 August 2020	Use Class after 31 August 2020	Note
A1 – shops up to 280sqm selling essential goods, and no other such use within 1 km	Class F.2	Not likely in Islington and most of London
A1 - shops	Class E	Can change to any of the activities with new Class E use. NOT DEVELOPMENT and hence no permission needed.
A2 – financial services eg. bank, estate agents	Class E	
A3 – cafes and restaurants	Class E	
B1a - offices	Class E	
B1b – research and development	Class E	
B1c – light industrial	Class E	
D1 – clinics, health centres, crèches, day nurseries	Class E	
D2- gyms, indoor recreation	Class E	
A4 – drinking establishments	Sui Generis	
A5 – hot food takeaways	Sui Generis	

<b>D1 – education provider, art gallery, museum, public library or reading room, public hall or exhibition hall, public worship or religious instruction, law court</b>	<b>F.1 – learning and non-residential institutions</b>
<b>D1 – hall or meeting place for the principal use of the local community</b>	<b>F.2 – local community</b>
<b>D2 – swimming bath, skating rink, area for outdoor sports or recreation (not involving motorised vehicles or firearms)</b>	<b>F.2 – local community</b>

The justification from the Government for the scale of these changes was the need to provide the flexibility for businesses to adapt and diversify to meet changing demands which was considered particularly important for town centres to seek to recover from the economic impact of Coronavirus. In terms of the impacts for the draft Local Plan it was recognised that certain policies which seek to manage uses which are now subsumed into the broader Class E are affected. For example:

- Retail policies (Town Centres and Local Shopping Areas) – can’t limit other uses within class E and preserve retail as per the submission draft policy.
- Employment policies – can’t specifically protect B1 as per the submission draft however we still need to plan for new employment floorspace
- Affordable workspace – parts specifically written in relation to B1 use will need to be updated

Whilst the exact impacts of class E are uncertain, it is likely that there will be losses within certain uses in certain locations where they were previously priorities. The Council has set out some high level analysis of potential scenarios of Class E in the evidence base section below. These consider the potential effect on business floorspace, retail and social and community infrastructure

## Modifications Screening

All the modifications made to the draft Local Plan have been screened to consider which changes need to be assessed and where alternatives need to be considered. The screening tables below describes the change and provides a screening assessment by chapter order. Both main and minor modifications were considered, but the focus is on the main modifications.

Prior to the Regulation 19 consultation two further changes were made to the draft Strategic and Development Management Policies document under delegated authority. Further changes were made to reflect updated evidence relating to Gypsy and Traveller accommodation need; and the Council declaration of an environment and climate emergency and the associated aim to achieve net zero carbon by 2030 ahead of the formal 2050 target set out in the draft Local Plan. Both changes are considered factual, the first corrected a mistake and the second was factual and did not change the target set out in the draft Local plan.

**Table 2.2: Screening of Area Spatial Strategies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO1		Minor changes	No assessment necessary
SDM-MO2	Policy SP2: King's Cross and Pentonville Road	Part B contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening has identified this policy change and related supporting text needs assessment alongside but this will be covered by assessment of Policy B2.
SDM-MO3 and SDM-MO4	Policy SP2: King's Cross and Pentonville Road	Proposed change in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings, including in relation to policy G2 on open space. The modifications proposed span three policies in the Local Plan (SP2, BC4 and G2) and provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (Policies BC4 and G2).
SDM-MO5		Minor changes	No assessment necessary

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO6 to SDM-MO11	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site,	Part A contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The modification takes into account specific implications of Class E by securing light industrial floorspace for this purpose to protect the industrial function of the area.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (Policy B1).
SDM-M12 to SDM-M13		Minor changes	No assessment necessary
SDM-M14	Policy SP4: Angel and Upper Street	Part I contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening has identified this policy change and related supporting text needs assessment alongside but this will be covered by assessment of Policy B2.
SDM-M015 to SDM-M016		Minor changes	No assessment necessary
SDM-MO17 and SDM-MO19	Policy SP5: Nag's Head and Holloway,	Part E contains a change to ensure consistency with modification to Site Allocation NH1. The modification recognises the potential of the site to deliver a significant amount of housing now as well as office floorspace alongside the retention and enhancement existing floorspace.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (site allocation NH1).
SDM-MO18 SDM-MO20		Minor changes	No assessment necessary
SDM-MO21	Policy SP6: Finsbury Park	Part D contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening has identified this policy change and related supporting text needs assessment alongside but this will be covered by assessment of Policy B2.
SDM-MO22	Policy SP6: Finsbury Park,	Part M is a main modification resulting from Statement of Common Ground with London Borough of Hackney which identifies the need to conserve or enhance heritage assets	The screening has identified this additional criteria to the policy <b>does not need assessment</b> , the change is considered descriptive adding a reference to heritage assets outside the borough.

Modification reference(s)	Policy	Description	Screening Assessment
		including those in neighbouring boroughs, where these are impacted by proposals.	
SDM-MO23 to 29		Minor changes	No assessment necessary

**Table 2.3 Screening of Thriving Communities policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO30 to 34		Minor changes	No assessment necessary
SDM-MO35	Policy H7: Meeting the needs of vulnerable older people	Part F contains a proposed change which is identified as a main modification however the change does not amend the application of the policy approach and is an improvement on policy drafting.	The screening has therefore identified that this policy change does not need assessment.
SDM-MO36 to SDM-MO37		Minor changes	No assessment necessary
SDM-MO38 and SDM-MO40)	Policy H12: Gypsy and Traveller Accommodation	Part A is a modification that reflects the changes to the Publication London Plan policy H14 in response to Directions from the Secretary of State which removed the draft London Plan definition of Gypsies and Travellers for the purposes of assessing needs. The change removes the reference to 10 pitches identified through the London Plan definition in the policy. However, the modification maintains in policy that identified need will be met and retains reference in the supporting text to the need identified by the	The screening has identified that this policy change does not need assessment as it will not change the minor effects already identified. The EQIA has also considered this change.

		draft London Plan definition and the Planning Policy for Traveller Sites.	
SDM-MO39	Policy H12: Gypsy and Traveller Accommodation	Minor changes	No assessment necessary
SDM-MO41	Policy H12: Gypsy and Traveller Accommodation. Para 3.150	Proposed change is identified as a main modification however the change does not amend the application of the policy approach and is an improvement on policy drafting.	No assessment necessary
(SDM-MO42 and SDM-MO43)	Policy SC1: Social and Community Infrastructure	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E to clarify that where a propose social infrastructure use/facility is necessary to mitigate the impacts of a development this use will be secured at planning stage.	The screening has identified this policy change and related supporting text needs assessment.

**Table 2.4 Screening of Inclusive Economy, business floorspace policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO44 to SDM-MO48)	<b>Policy B1: Delivering business floorspace</b>	Parts D and E, contains a proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The change clarifies industrial uses sought in LSISs in the context of Class E s. The changes in the supporting text makes clear the risk from increased flexibility on existing floorspace being converted to other non-business uses eroding the overall supply of business floorspace in the borough.	The screening has identified this policy change and related supporting text requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3, Policies R1 to R10 and BC1 and BC2)
SDM-MO49 To SDM-MO54	<b>Policy B2: New Business Floorspace</b>	Part A, contains a proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the	The screening has identified this policy change and related supporting text requires an assessment. There

		introduction of Class E. The change identifies that conditions will be used on future proposals to ensure that specific uses such as new office, research and development and light industrial floorspace are secured in these locations. The supporting text contains new paragraph explaining spatial importance of different locations across the borough.	are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SP2, SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC1 and BC2).
SDM-MO49 and SDM-MO52	<b>Policy B2: New Business Floorspace</b>	Part D contains a proposed change (SDM-MO49 and SDM-MO52) which clarifies the councils approach to air quality and sustainable transport with a modification to Part D that adds cross reference to policies S7, T2 and T5. The change identifies that proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts. There are related changes in policy T5 which have strengthened the approach. Part E contains a proposed modification which clarifies the specific business uses that are south within town centres within the context of Class E, with cross references to relevant retail policies added.	The screening has identified these policy changes and related supporting text require an assessment.
(SDM-MO55 and SDM-MO56)	<b>Policy B3: Existing business floorspace</b>	Proposed changes (SDM-MO54 and SDM-MO55) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes include clarification of the approach to marketing of existing business uses within the context of class E and how proposals that have been secured for a particular class E use should be marketed.	The screening has identified this policy change and related supporting text requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy B1 and Policy).
SDM-MO57 to SDM-MO59	<b>Policy B4: Affordable Workspace</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening considered these changes minor.

<p>SDM-MO62 and SDM-MO63</p> <p>SDM-MO65 to SDM-MO70</p>			
<p>SDM-MO60 and SDM-MO61 and SDM-MO64</p>	<p><b>Policy B4: Affordable Workspace</b></p>	<p>The supporting text contains a proposed changes (SDM-MO59, SDM-MO60 and SDM-MO63) to clarify flexibility around application of the affordable workspace policy requirements in response to various locations / types of proposal across the borough. There are three changes proposed:</p> <ul style="list-style-type: none"> <li>• Proposals which involve a small uplift of office floorspace relative to existing office use floorspace will be able to consider site specific viability evidence on a case by case basis.</li> <li>• Mixed use proposals which deliver on-site affordable housing, where in exceptional circumstances, the provision of affordable workspace will undermine the ability to the scheme to secure affordable housing, the provision of affordable housing will take priority.</li> <li>• Proposals in PELs and Town Centre Locations outside of the CAZ where wholly commercial schemes are proposed, site specific viability evidence for affordable workspace provision will be considered on a case by case basis.</li> </ul> <p>The changes require discussion as they introduce additional flexibility but in relatively specific circumstances. The impact of the changes are likely to be minimal and relate to policy application and do</p>	<p>The screening has identified that this policy change does not justify an assessment.</p>



		not change the general policy approach to affordable workspace and are not considered to have an effect. They are clarifying changes which introduce additional flexibility to the application of the policy approach in respect to viability and viability evidence.	
SDM-MO65 to SDM-MO70		Minor changes	No assessment necessary

**Table 2.5 Screening of Inclusive Economy, retail floorspace policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO71-SDM-MO72	<b>Policy R1: Retail, Leisure and Services</b>	Proposed change to clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The approach identifies that the Council is seeking a proportionate tiered approach to development involving Class E proposals where alongside recognising the flexibility provided Class E, impacts are appropriately considered using assessments in relation to the scale of a proposal and the location of a proposal. Reference is also introduced in to policy in relation to concentration of Class E uses. There are also changes in the supporting text in particular explaining the use of impact assessments as a tool to assess the harm that might arise from the range of uses within Class E. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10)	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO73 and	<b>Policy R1: Retail, Leisure and Services</b>	Minor	No assessment necessary

SDM-MO74			
SDM-MO75 and SMD-MO76	<b>Policy R2, Primary Shopping Areas</b>	Proposed change (SDM-MO75 and SDM-MO75) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. This includes clarifications to the role of the percentage targets for retail, the contribution of new development to the ground floor retail function and that it will be appropriately conditioned to maintain this with impacts assessed where it does not, and changes in relation to change of use/marketing periods and provision of an impact assessment. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10)	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO77	<b>Policy R3: Islington's Town Centres</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The change introduces a threshold for requiring an impact assessment of 350sqm. Reference to the CAZ and its primary business function is introduced. Changes in supporting text clarify the importance of active frontages. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10)	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO78 to SDM-MO80	<b>Policy R3: Islington's Town Centres</b>	Minor	No assessment necessary
SDM-MO81 and SDM-MO82	<b>Policy R4: Local Shopping Areas</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes introduce a threshold for requiring an impact assessment of 200sqm. A distance threshold of 300m for access to essential goods and services is also identified. Changes in supporting text clarify use	The screening has identified this policy change and related supporting text requires an assessment.

		of marketing for change of use to other non-Class E main town centre uses. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	
SDM-MO83	<b>Policy R5: Dispersed retail and leisure uses</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes introduce a requirement that where there is a particular need the Council will condition a unit to provide essential daily goods. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO84	<b>Policy R5: Dispersed retail and leisure uses</b>	Minor	No assessment necessary
SDM-MO85	<b>Policy R6: Maintaining and enhancing Islington's unique retail character</b>	Minor	No assessment necessary
SDM-MO86	<b>Policy R6: Maintaining and enhancing Islington's unique retail character</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. Introduces reference to active frontages and amends approach to encourage in para 4.114	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO87	<b>Policy R7: Markets and Specialist Shopping Areas</b>	Proposed change (SDM-MO85 to SDM-MO91) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes relate to clarifying the role of the percentage targets within the revised Use Classes Order and marketing for change of use. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO88 to SDM-MO91	<b>Policy R7: Markets and Specialist Shopping Areas</b>	Minor	No assessment necessary

SDM-MO92 to SDM-MO96	<b>Policy R8: Location and concentration of uses</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The proposed change introduces reference to overconcentration of Class E uses but is not considered to have sufficient effects to require an assessment. In addition it is noted that the concept of overconcentration of Class E uses is introduced in Policy R1 and forms part of the assessment.	The screening has identified this policy change and related supporting text requires an assessment.
SDM97 to SDM107	<b>R9</b>	Minor	No assessment necessary

Table 2.6 Screening of Green Infrastructure policies main modifications

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO108	<b>Policy G2: Green Infrastructure</b>	Proposed change (SDM-MO108) in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings,. The modification proposed spans three policies in the Local Plan (SP2, BC4 and G2) and provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.	The screening considers this policy change and related supporting text requires assessment alongside the related proposed changes elsewhere in the Local Plan (Policies BC3 and G2).
SDM-MO109	<b>Policy G2: Green Infrastructure</b>	minor	minor

SDM-MO110	<b>Figure 5.2: Sites of Importance to Nature Conservation (SINC) designation</b>	There is an update (SDM-MO110) to the SINC map to reflect amended boundary to the SINC at 351 Caledonian Road. This is a revision to correct an error and to improve accuracy of mapping. See Policies Map Changes for full explanation.	The screening identifies that the change is factual and does not require an assessment.
SDM-MO111	<b>Policy G5: Green Infrastructure</b>	Proposed change (SDM-MO109) to clarify that intensive and semi-intensive green roofs may be acceptable instead of extensive green roofs if they can demonstrate they can enhance biodiversity, sustainable drainage and cooling functions, this reflects policy G5, part E. Clarification is also provided in relation to accessible roofs for amenity purposes.	The screening does not consider the change has effects to require an assessment, the policy and supporting text continue to prioritise biodiversity-based extensive green roofs.

Table 2.7 Screening of Sustainable Design policies main modifications

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO112		Minor	No assessment necessary
SDM-MO113	<b>Policy S1: Delivering Sustainable Design, supporting text, Paragraph 6.9, 6.10, 6.11</b>	Proposed change (SDM-MO112) to clarify that the use of low-emission CHP systems will only be acceptable to support the expansion of area-wide heat networks as part of the planned transition to the use of secondary sources to power heat networks.	The screening has identified this policy change requires assessment alongside the related proposed changes elsewhere in the Local Plan (Policy S5).
SDM-MO114 to SDM-MO116	<b>Policy S5: Energy Infrastructure</b>	(SDM-MO14) Part A, contains a proposed change to recognise a different dataset for the calculations of carbon emissions which is considered to provide a better reflection of a development's future carbon emissions.	The screening has identified that this change is factual and does not require an assessment.
SDM-MO119			
SDM-MO121		(SDM-MO115) A change is proposed to part C to clarify the approach to larger minor new	The screening has identified this policy change which reduces the opportunity for

SDM-MO123		<p>developments, selecting heat sources in line with the heating hierarchy, with a new part D to clarify minor new-build developments should prioritise low carbon heating systems.</p> <p>A modification (SDM-MO119) is proposed which clarifies that feasibility assessments for connection to heat networks should use a whole life-cycle assessment methodology this will enable a fair comparison between carbon emissions with heat network connection and other heat source options.</p> <p>A modification (SDM-MO123) is proposed to provide a new paragraph which provides a link to the production of a Zero Carbon SPD to assist with the implementation of the council's sustainable design policies as part of the council's wider zero carbon strategy, including taking into account changes to this policy area over time.</p>	<p>minor development to use gas fuelled boilers requires assessment alongside the related proposed changes elsewhere in the Local Plan (Policy S1).</p> <p>The screening identified that this clarification does not require an assessment and will not change the effects already identified.</p> <p>The screening identified that the link to future guidance does not require an assessment.</p>
SDM-MO117 and SDM-MO118  SDM-MO120  SDM-MO122  SDM-MO124	<b>Policy S5: Energy Infrastructure</b>	Minor	Minor
SDM-MO125 to SDM-MO127	<b>Policy S9: Integrated Water Management and Sustainable Drainage</b>	minor	minor

SDM-MO128	<b>Policy S10: Circular Economy and Adaptive Design</b>	Minor	Minor
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**Table 2.8 Screening of Public Realm and Transport policies main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO129	<b>Policy T1: Enhancing the public realm and sustainable transport</b>	Proposed changes have been introduced to reference the adoption of the Councils Transport Strategy in November 2020.	The screening has identified that this change is factual and does not require an assessment.
SDM-MO130 and SDM-MO131	<b>Policy T2: Sustainable Transport Choices</b>	Minor	minor
SDM-MO132 to SDM-MO135	<b>Policy T5: Delivery, Servicing and construction</b>	Proposed changes (SDM-MO132, 133, 134, 135) that seeks to promote more sustainable freight movements including the use of non-motorised modes of transport for safe, clean and efficient deliveries and servicing, including for uses which generate deliveries to end customers as part of their operation. The clarification and update to linked to the recently adopted Islington Transport Strategy. The change introduces the need for development to demonstrate how it is maximising use of more sustainable modes of transport.	The screening has identified this change needs assessment.

**Table 2.9 Screening of Design and Heritage policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO136 to SDM-MO137	<b>Policy DH2: Heritage assets</b>	Minor	No assessment necessary
SDM-MO138	<b>Policy DH2: Heritage assets</b>	There is a change to supporting text which deletes reference to St John's Gate which has been de-scheduled (as a historic monument). It remains a grade I listed building.	The screening has identified that this change is factual and does not require an assessment.
SDM-MO141	<b>Policy DH3: Tall Buildings</b>	Part F is a change that revises the policy text to provide clarification.	The screening has identified this change needs assessment.

Table 2.10 Screening of Strategic Infrastructure policies main modifications

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO142	<b>Paragraph 9.4</b>	The modification to paragraph 9.4 is made in response to representations from the Department for Education and clarified that where it has been necessary to forward fund infrastructure projects developer contributions may be secured retrospectively.	The screening has identified that this clarification does not require an assessment and will not change the effects already identified.
SDM-MO144	<b>Paragraph 9.11</b>	Modification to paragraph 9.11 provides a clarification that the boroughs only safeguarded waste site will be identified on the policies map. This update is for consistency with the London Plan and North London Waste Plan.	The screening has identified that this clarification does not require an assessment and will not change the effects already identified.
SDM-MO143 SDM-MO145 and SDM-MO146	<b>Paragraph 9.6</b> <b>Policy ST3: Telecommunications, communications and utilities equipment</b>	Minor	Minor



Table 2.11 Screening of Monitoring policies main modifications

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO147	<b>Monitoring</b>	A modification is proposed to the monitoring section which sets some key indicators that will be used to help monitor the plan, providing further clarification on the approach to monitoring.	The screening has identified that this clarification does not require an assessment.

Table 2.12 Screening of Appendices main modifications

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO148	Appendix 1: Marketing and Vacancy Criteria	Provides a clarification of the approach to marketing and vacancy evidence in the context of changes to the Use Classes Order and the introduction of class E and is considered by other class E assessments for in particular for Policy B3.	
SDM-MO149	Appendix 2: Noise and vibration	Appendix 2 sets out how noise impacts should be considered has been updated to reflect changes to the Use Classes Order. A clarification has been added in relation to the examples where assessments of internal sound transfer should be considered (for example gyms and nurseries where there is residential above. There is also a clarification about how impact generating uses are considered where there are likely to be noise issues which could impact upon residential properties (below or above). This helps to provide further clarification in relation to policy DH5.	The screening has identified that this clarification does not change the effects already identified and does not require an assessment.

SDM-MO150 and SDM-MO151	Appendix 3: Transport Assessments and Travel Plans	Proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The requirement for a transport assessment is introduced for a premises larger than 750sqm where Class E use is unspecified to ensure transport impacts of the most intensive use are considered. The Cycle Parking Standards introduces a standard for general Class E use to ensure sufficient cycle parking is provided for unspecified Class E use.	The screening has identified that these changes require assessment.
SDM-MO152 and SDM-MO153	Appendix 3: Transport Assessments and Travel Plans	minor	Minor
SDM-MO154 and SDM-MO155	Appendix 4: Cycle parking standards	Proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The requirement for a transport assessment is introduced for a premises larger than 750sqm where Class E use is unspecified to ensure transport impacts of the most intensive use are considered. The Cycle Parking Standards introduces a standard for general Class E use to ensure sufficient cycle parking is provided for unspecified Class E use.	The screening has identified that these changes require assessment.
SDM-MO156 and SDM-MO157	Appendix 4: Cycle parking standards	Minor	No assessment necessary
SDM-MO158	Appendix 5: Social Value self-assessment	In response to Fossil Free Islington reference has been added to the Social Value requirements to includes referebnce to promoting low carbon behaviour	No assessment necessary

**Table 2.13 Screening of Glossary main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO173	<b>Appendix 9 Glossary: Low traffic neighbourhoods</b>	The Glossary for transport adds a definition of Low Traffic Neighbourhoods which is referenced in T1: 'Low Traffic Neighbourhoods: Low Traffic Neighbourhoods restrict through traffic to create more space for pedestrians and cyclists on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area. However, Low Traffic Neighbourhoods maintain access for local residents, their visitors, the emergency services, and local shops and businesses. A reduction in through traffic will improve air quality and allow more space for local people to travel safely around their local streets on foot and by bicycle'.	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment. The modifications to the glossary summarised above will assist with the implementation of policy that has been assessed for its effects.
SDM-MO176	<b>Appendix 9 Glossary: Non-motorised forms of transport</b>	The Glossary includes a new definition for non-motorised transport modes, which clarifies the new provision for policy T5. It is stated that it refers to active travel and human powered transportation, including walking and cycling, and variants such as small-wheeled transport (cycle rickshaws, cargo cycles, skateboards, push scooters and hand carts) and wheelchair travel. The Council consider electric cycles and mobility scooters also form part of that category.	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment. The modifications to the glossary summarised above will assist with the implementation of policy that has been assessed for its effects.
SDM-MO160 SDM-MO163 SDM-MO168 SDM-MO170	<b>Appendix 9 Glossary: business uses; retail use; shop; industrial floorspace; leisure</b>	The Glossary includes an update definition of business use (SDM-MO160), retail use (SDM-MO168), industrial floorspace (SDM-MO163), as well as a new definition of	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an

SDM-MO175		leisure use (SDM-MO170) to take into account the changes to the Use Classes Order. A new definition of shop (SDM-MO175) has also been added.	assessment. The modifications to the glossary summarised above will assist with the implementation of policy that has been assessed for its effects.
SDM-MO159, 161, 162, 164, 165, 166, 167, 169, 171, 172, 174	<b>Appendix 9: Glossary</b>	Minor	Minor

Table 2.14 Screening of Bunhill and Clerkenwell AAP main modifications

Modification reference(s)	Policy	Description	Screening Assessment
BC-MO2 and BC-MO3	Policy BC1: Prioritising office use	Parts D, contains a proposed change (BC-MO2 and BC-MO3) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The screening has identified this policy change and related supporting text requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2).	The screening has identified that these changes require assessment.
BC-MO5 and BC-MO6	Policy BC2: Culture, retail and leisure uses	parts A and B, contain a proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of	The screening has identified that these changes do not require assessment as they make a point of clarity and amend references to

		<p>Class E. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2).</p> <p>There are also changes made in B which clarify the application of the approach to location of cultural uses.</p>	uses in relation to the new use class order.
BC-MO8	Policy BC3: City Fringe Opportunity Area	The supporting text to BC3 contains a clarification to paragraph 3.11 which clarifies that the Moorfields site represents a unique opportunity for office space – this reflects the changes to the Use Classes Order.	The screening has identified that this change does not require assessment and does not change the effects identified for policy BC3.
BC-MO9	Policy BC4: City Road	Proposed change in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings, including in relation to policy G2 on open space. The modifications proposed span three policies in the Local Plan (SP2, BC4 and G2) and provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (Policies SP2 and G2).
BC-MO12	Policy AAP1 and supporting text	A modification is propose to AAP1 and supporting text (BC-M12) which updates the policy within the context of Use Classes Order changes, and clarify how specific uses identified in allocations should be provided. This is to ensure that development contributes to meeting	The screening identified that this change does not require an additional assessment.

		identified development needs. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2) where the effects have been assessed.	
BC-M20	Site Allocation BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage, Allocation and Justification	A modification is proposed which will amend the allocation from a wholly office led redevelopment to a mixed use development which includes a significant amount of office floorspace and where additional residential use may be acceptable.	The screening has identified that these changes require assessment.
BC-M52	Site Allocations monitoring	A modification is proposed to the monitoring section of the AAP (BC-M80) this is to clarify indicators that will be used to help monitor the Bunhill and Clerkenwell Area Action Plan.	The screening has identified that this clarification does not require an assessment.
BC-M53	Appendix 1: scheduled monuments	<b>Appendix 1</b> includes an update to the scheduled monuments identified to clarify that one monument was de-scheduled and update the name of another in responding to representations from Historic England. This is a factual update to correct and error and is not considered to require an additional assessment.	This is a factual update to correct and error and is not considered to require an additional assessment.
BC-MO54, 55, 58, 60	Glossary	The glossary includes several updated definitions including those to business use (BC-M54), entertainment use (BC-M55), industrial floorspace (BC-M58) and retail use (BC-M60) to take into account changes to the Use Classes Order. These modifications to the glossary will assist	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment

		with the implementation of policy that has been assessed for its effects. The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment	
BC-M1,4, 7, 10, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 56, 57, 59, 61	Site allocations  Glossary	minor	minor

**Table 2.15 Screening of Site Allocations main modifications**

The table below sets out the screening assessment for the modifications to the Site Allocations.

Modification reference(s)	Description	Screening Assessment
SA-MO1 to SA-MO9	New Site Allocations proposed for additional housing: <ul style="list-style-type: none"> <li>• KC8, Bemerton Estate South</li> <li>• OIS27: York Way Estate</li> <li>• OIS28: Barnsbury Estate</li> </ul>	Each new site allocation is subject to an assessment set out below in this section. The assessment includes consideration of reasonable alternatives.

Modification reference(s)	Description	Screening Assessment
	<ul style="list-style-type: none"> <li>• OIS29: Highbury Quadrant Congregational Church</li> <li>• OIS30: Cluse Court</li> <li>• OIS31: Hillside Estate</li> <li>• OIS32: New Orleans</li> <li>• OIS33: Drakeley Court and Aubert Court</li> <li>• OIS34: Kerridge Court</li> </ul>	
SA-MO10 to SA-MO11	Site Allocations proposed to be removed: <ul style="list-style-type: none"> <li>• FP10: Former George Robey Public House, 240 Seven Sisters Road</li> <li>• OIS9: Ladbroke House, 62-66 Highbury Grove</li> </ul>	Both of these allocations are proposed to be deleted because both of the sites have been subject to developments that have now been completed.
SA-MO12 to SA-MO15	Minor changes	No assessment necessary
SA-MO16 SA-MO17 SA-MO18 SA-MO19	Site Allocations modifications, policy SA1 and supporting text.	The proposed modification to policy SA1 seeks to clarify the council's approach to determining development proposals for allocations site in light of the changes to the Use Classes Order, including the potential impact of the boroughs ability to meet evidenced priority development needs. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2) where the effects have been assessed. The screening identified that this change does not require an additional assessment.
SA-MO20	Minor changes	No assessment necessary
SA-MO21	Table 1.2 amended to reflect changes made to capacity assumptions following the grant of	Assessment considered as part of cumulative effects section on overall capacity.



Modification reference(s)	Description	Screening Assessment
	planning permission for certain sites, as well as the addition of new site allocations and amendments to existing site allocations outlined in this schedule of modifications.	
SA-MO22 to SA-MO33	Minor changes	No assessment necessary
SA-MO34 to SA-MO35	VR1: Fayers Site, 202-228 York Way. The site allocation has been amended to acknowledge a planning permission whilst reflecting the need for future application to retain and intensify industrial floorspace	Reflects recent planning decision and doesn't change existing assessment. No assessment necessary
SA-MO36 to SA-MO46	Minor changes	No assessment necessary
SA-MO47 to SA-MO48	AUS2: Pride Court, 80-82 White Lion Street. The site allocation has been amended to acknowledge a planning permission whilst reflecting the need for future application to retain and intensify industrial floorspace	Reflects recent planning decision and doesn't change existing assessment. No assessment necessary
SA-MO49 to SA-MO50	Minor changes	No assessment necessary
SA-MO51	Site Allocations modifications, AUS8: 161-169 Essex Road, Allocation and justification	The proposed modification changes part of the allocation to incorporate residential use on the car park to the rear of the site, rather than priorities business floorspace.  An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO52 to SA-MO56	Minor changes	No assessment necessary

Modification reference(s)	Description	Screening Assessment
SA-MO57	Site Allocations modifications NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, Allocation and justification	The proposed modification changes to the focus of the allocation to recognise the increased potential for residential use, alongside the retention of and improvements to existing retail floorspace.  An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO58 to SA-MO72	Minor changes	No assessment necessary
SA-MO73	Site Allocations modifications FP5: 1 Prah Road, Allocation and justification	An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO74 to SA-MO97	Minor changes	No assessment necessary
SA-MO78	ARCH1: Vorley Road/Archway Bus Station. The proposed modification introduces social and community uses.	An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO84 to 85	ARCH5: Archway Campus, Highgate Hill. The proposed modification introduces an element of student accommodation on the proviso that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant.	An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO98	Site Allocations modifications OIS4: 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green	The proposed modification amends the site boundary to remove part of the site that was subject to a recent planning permission that has made comprehensive redevelopment of the wider site unlikely during the plan period. However the telephone exchange building which makes up the vast majority of the site continues to have development potential. Whilst the decrease in site size could be argued to reduce the quantum of development

Modification reference(s)	Description	Screening Assessment
		that will contribute towards the SA objectives, the modification does not impact on the uses proposed and is not considered to contribute to a change in the scoring of the assessment.
SA-MO99	Minor changes	No assessment necessary
SA-MO100 to SA-MO102	Site Allocations modifications OIS5: Bush Industrial Estate. The modifications provide additional information in relation to the site's development context and how this should be considered by future proposals, in particular the northeastern section of the site.	The modification adds additional site designations and constraints which add clarity and could have potential positive effects in relation to mitigating any effects of future proposals, however these effects are uncertain and would be expected to be addressed in line with other policies in the plan
SA-MO104	OIS6: Site of Harvist Under Fives, 100 Hornsey Road. Updated in response to advice from the Early Years' Service and the recent grant of planning permission for the site.	Removes the reference to nursery provision but assessment not necessary in light of recent planning consent.
SA-MO105 to SA-MO106	Updated in response to the recent grant of planning permission for the site on appeal.	Replaces allocation of business use only with mixed use office and residential in light of recent appeal decision. The screening identified that this clarification does not require an assessment and will not change the effects already identified.
SA-MO103 to SA-MO112	Minor changes	No assessment necessary
SA-MO113 SA-MO114	Site Allocations modifications OIS24: Pentonville Prison, Caledonian Road	The site boundary has been amended to reflect the full boundary of the prison estate. An assessment of the allocation has been undertaken in part 1. Whilst the increase in site size could be argued to help to contribute to some of the development objectives for the suite, the modification does not impact on the

Modification reference(s)	Description	Screening Assessment
		uses proposed and overall is not considered to contribute to a change in the scoring of the assessment.
SA-MO115, 118,119, and 122,123, 125, 126	Minor changes	No assessment necessary
SA-MO116	Main change to provide additional information on how the delivery of allocated sites will be monitored	The screening has identified that this clarification of the approach to monitoring does not require an assessment.
SA-MO117 SA-MO119 SA-MO120 SA-MO121 SA-MO124	Main changes which update references in the glossary to various use class E for business, industrial and leisure uses	These modifications to the glossary will assist with the implementation of policy that has been assessed for its effects. The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment

## Pre hearing modifications assessment

Proposed changes to SP2, BC4 and G2 re canal boat moorings are in response to the representation from the Canal and River Trust who are seeking seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings, including in relation to policy G2 on open space. The modifications proposed span three policies in the Local Plan (SP2, BC4 and G2) provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.

**Table 2.16 Policy SP2: King’s Cross and Pentonville Road, Policy BC4 and Policy G2: Green Infrastructure pre hearing modifications assessment**

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	This modification will have no negative effects on the built environment as the policy states that boater facilities will only be permitted where there is no detrimental impact on the character and amenity of the waterway corridor and its function as an open space, and any development must also meet the Local Plan policies for design, including PLAN1.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	+	This modification will have minor positive effects on the efficient use of space by allowing improved boater facilities and infrastructure to be built along the canal corridor, improving the function and amenity of those living on and using the canal.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	The modifications are likely to have no effects on conservation of the historic environment as the policy states that boater facilities will only be permitted where there is no detrimental impact on the character and amenity of the waterway corridor, and any development must also meet the Local Plan policies to protect heritage assets (DH1 and DH2).
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to minor positive effects on promoting liveable neighbourhoods as boater facilities could include waste and recycling infrastructure which would improve amenity, and electricity infrastructure that will reduce reliance on diesel generators and improve air quality. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a minor positive effects by improving the standard of accommodation for boaters. The modifications clarify the role of policies in relation to the open space policy but are not considered to have any additional effects in relation to the provision of moorings. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	0	No effects have been identified.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have positive effects on health and wellbeing by improving the air quality. This could be achieved by installation of power supply to more moorings reducing reliance on diesel generators. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	No effects have been identified.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	No effects have been identified.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal which is an open space. No effects have been identified as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal which is an open space. No significant effects on the biodiversity have been identified as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a have minor positive effect on reducing climate change by potentially introducing more electricity supply points shifting energy use of boats away from fossil fuels (diesel generators). On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.



IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a have minor positive effect on reducing waste by providing reuse and recycling facilities for boaters which will increase the proportion of household waste that is recycled and reduce the amount of waste going to landfill. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.
14. Maximise protection and enhancement of natural resources including water, land and air	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a a positive effect on protecting natural resources by improving air quality through supply of electricity to boats and shifting away from diesel generator use, and also on water by providing water and sewerage infrastructure is available to service boats. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.

## Summary

The assessment has identified the modifications to the policies do not result in negative effects on open space, the environment or biodiversity as the modifications do not change the criteria which ensures impacts are mitigated. Whilst the policy is clear in respect to detrimental impacts there is some uncertainty identified around potential improvements resulting from development of boater facilities.

## Assessment of alternatives to modifications to Policy SC1

The inclusion of former D1 uses such as health centres, nurseries and day centres within the new class E, means that they can change to another use within class E without planning permission and cannot be specifically protected for social and community infrastructure use. Social and community infrastructure uses not falling within Class E will now be classified as either F.1 (learning and non-residential institutions) or F.2 (local community) uses. The preferred approach and alternative are as follows:

**Table 2.17 Description of preferred and alternative approach to Policy SC1**

Reference	Description
Preferred approach	To seek to secure specific proposed social and community infrastructure uses that fall within class E (such as a GP surgery or nursery) through the planning process where this is necessary to mitigate the impacts of a development and/or meet the needs of the community. The approach also clarifies that applications involving social and community infrastructure uses within the F.1 and F.2 use classes will be fully assessed against the requirements of policy SC1 and other relevant Local Plan policies
Alternative	Considering the possible effects of allowing Class E without any policy intervention ie no policy change in relation to class E meaning there would be no policy to secure specific social and community infrastructure uses where they fall within class E.

**Table 2.18 Pre hearing assessment of preferred and alternative approach to Policy SC1**

IIA Objective	Policy SC1	Alternative 1 to Policy SC1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
1. Promote a high quality, inclusive, safe and sustainable built environment	+	--	<p>The preferred approach: Seeking to secure specific social and community infrastructure uses through policy SC1, rather than supporting unrestricted Class E use is likely to have a minor positive effect in terms of promoting a high quality, inclusive, safe and sustainable built environment. The policy will apply where social and community infrastructure uses falling within Class E, such as a health clinic, are deemed necessary to meet needs arising from new development and therefore places people at the heart of the process. The effect will be limited as the policy will not be able to prevent the loss of existing valued facilities falling within Class E where they are changing to another Class E use.</p> <p>Alternative 1: Policy SC1 seeks to protect Islington's existing social and community infrastructure and ensure that new social and community facilities are inclusive, accessible, flexible and sustainable. The introduction of the new Use Class E through the 2020 amendments to the Use Classes Order has curtailed the ability of the policy to safeguard existing social and community infrastructure facilities that fall within Class E, such as nurseries, day centres, medical and health services and indoor sports facilities. These facilities can play an important role for local communities, and are often location sensitive as people are unable to travel far to access healthcare or the kind of support services offered by day centres. Promoting a policy approach that does not seek to secure specific forms of social and community infrastructure from new development where this is necessary is likely to have a significant negative effect in terms of securing an inclusive, safe and sustainable built environment that places people at the heart of the design process and creates robust and adaptable buildings that respond to people's changing needs.</p>

2. Ensure efficient use of land, buildings and infrastructure	+	-	<p>The preferred approach offers more of an opportunity to balance competing demands for land, as it would secure social and community infrastructure from new development where it was considered necessary to meet development need. This would help to focus social and community infrastructure in appropriate locations, where it is accessible for future users. The approach would have a minor positive effect, given the likely loss of existing social and community facilities through the operation of Class E.</p> <p>Alternative 1: Class E provides flexibility and may help development to adapt to and accommodate evolving social and economic needs. However, it will limit the ability to focus development in the most appropriate locations and to balance competing demands between land uses to provide for the full range of development needs of the area. This is particularly the case as some social and community infrastructure uses, such as day centres or nurseries, serve an important social purpose but would not be able to compete for land with higher value uses such as offices or housing. It is considered this approach would have a minor negative effect.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the conservation and enhancement of heritage assets.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	<p>The preferred approach seeks to manage the provision of social and community infrastructure so that facilities are located in areas that are convenient for the communities they serve, and within buildings that are inclusive and accessible. Social and community infrastructure uses would be secured through condition so that they can serve the needs and wellbeing of the population in accordance with objective 4. The policy would have a positive effect in terms of supporting liveable neighbourhoods.</p> <p>Alternative 1 could result in improved access to essential services for residents, as there is potential for facilities such as health clinics and nurseries to open in former shops or offices under Class E. However, there is also potential for such services to be pushed out by other, more financially viable, uses such as offices. The approach limits the Council's ability to manage the diversity of uses in town and local centres, and could lead to social and community infrastructure being located in sub-optimal locations that does not promote accessible services and liveable neighbourhoods. Overall it is considered the approach would be neutral because of the uncertainty of the effects.</p>

5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the provision of affordable housing.
6. Promote social inclusion, equality, diversity and community cohesion	+	-	<p>The preferred approach offers some protection to new social and community infrastructure uses, but retains flexibility – if it can be demonstrated at some point in the future that a facility is no longer fit for purpose, or is no longer needed for social infrastructure uses, then a change of use can be approved. This approach is considered to have a minor positive effect in promoting social inclusion and community cohesion.</p> <p>Alternative 1 allows a broad range of uses under class E that could lead to the creation of a wider range of employment opportunities, potentially helping to remove some barriers to employment. There is nevertheless a concern that this could come at the expense of worsening social exclusion for others – for example if a day centre supporting older residents and helping them remain connected to their community changes use to a shop and is not replaced. Similarly, objective 6 refers to the importance of early years’ services in helping vulnerable children to have the best start in life. If there is nothing in policy securing the ongoing use of new early years’ facilities, the benefits they can bring could be lost through Class E. It is considered overall that alternative 1 would have a minor negative impact.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>The preferred approach aims to improve health and wellbeing by securing facilities necessary to meet the needs of the community in appropriate and accessible locations. The approach would have a minor positive effect, given the likely loss of existing social and community facilities through the operation of Class E.</p> <p>Alternative 1 could help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms, to secure premises. However there is also the potential for these uses to be lost to other Class E uses with negative consequences for health and wellbeing. Given this uncertainty it is considered that overall alternative 1 would have a neutral effect with regards to health and wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	Both alternative 1 and the preferred approach could have minor positive effects in terms of fostering economic growth. Alternative 1 supports the flexible use of premises and could lead to a range of employment types and job opportunities that would contribute to the borough’s economy. However, the preferred approach seeks to protect social and community infrastructure that supports residents to access the jobs market. For example, the policy would aim to safeguard new childcare facilities from changes of use that would create a barrier to employment for some parents, and protect healthcare facilities that help support people back into work.

9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	<p>The preferred approach aims to secure social and community uses in appropriate locations, which are accessible for the people who need them, so that the need to travel is minimised. A minor positive effect has therefore been identified.</p> <p>By supporting flexible uses across the borough, with the potential for retail and office uses to replace social and community infrastructure uses, alternative 1 could encourage increasing amounts of servicing and freight rather than minimising the need to travel. Not being able to secure some social and community infrastructure uses which are accessible to people who need them would also increase the need to travel. A minor negative effect has therefore been identified.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the protection and enhancement of open space.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the protection and enhancement of biodiversity.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>The preferred approach aims to secure social and community uses in appropriate locations, which are accessible for the people who need them, so that the need to travel, and resultant emissions, are minimised. A minor positive effect has therefore been identified.</p> <p>Alternative 1 has the potential to encourage increasing amounts of servicing and freight to service the flexible uses permitted under Class E, which will result in additional carbon emissions. People may also have to travel further to access social and community infrastructure facilities if existing premises change use under Class E, which may also effect emission levels. It is considered alternative 1 could have a minor negative effect with regards to efforts to reduce contributions to climate change.</p>

13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of promoting resource efficiency.
14. Maximise protection and enhancement of natural resources including water, land and air	+	0	<p>The preferred approach aims to secure social and community uses in appropriate locations, which are accessible for the people who need them, so that the need to travel and impacts on air quality are minimised. A minor positive effect has therefore been identified.</p> <p>Alternative 1 has the potential to encourage increasing amounts of servicing and freight to service the flexible uses permitted under Class E, which could have a negative impact on air quality. People may also have to travel further to access social and community infrastructure facilities if existing premises change use under Class E, which may also effect emission levels and air quality. However it is considered that the effect of Class E is uncertain with regards to efforts to protect natural resources including air quality and is considered neutral.</p>

### Summary

The assessments makes clear the uncertainty of Class E on social and community facilities, which could both help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase health inequalities by not protecting these facilities against change of use to higher value uses. The wider positives are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment. But the assessment, despite the uncertainty ultimately identifies the preferred approach as preferable as it seeks to secure social and community uses in appropriate locations, which are accessible for the people who need them.



## Inclusive Economy: Assessment of Class E Policy and policy alternative for Policies B1 to B5 and SP3

The new UCO changes introduced on 1 September 2020 identify office uses as part of class E. This means that an office can now be changed to other uses considered within class E without planning permission. This puts existing office floorspace in the borough at risk of being converted to other non-business uses. The introduction of class E poses some new challenges for the future of business floorspace, particularly for lower grade and smaller office stock, which is generally more affordable and located outside the CAZ. The additional flexibility introduced by class E could have significant impacts on the way that Islington's business floorspace is distributed, affecting the borough's well-established employment clusters.

**Table 2.19 Description of preferred and alternative approach to Policy B1, B2 and B4**

The following two alternatives described below; the preferred approach for Policy B1 and Policy B2 and Policy B4 and the alternative.

Reference	Description
Preferred approach	Taking a targeted approach to class E, recognising flexibility whilst restricting class E in some instances through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative	Considering the possible effects of allowing Class E without any policy intervention. This assessment considers the full range of uses that Class E could introduce, aside from business floorspace (e.g. office) and the effects that this alternative will have against the sustainability framework objectives, with a particular focus on the potential range of effects of Class E on existing business clusters.

**Table 2.20 Description of preferred and alternative approach to Policy B3, marketing and vacancy**

Marketing assessments are a standard approach for considering whether there is continued demand for an existing use and are judged against a set of criteria. The criteria used are set out in appendix 1 of the draft Local Plan. The possible effects of reducing the marketing requirement on applications to change the use of business floorspace to other uses are considered by the assessment of the following choices.

Reference	Description
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Preferred approach	Restricting class E through conditions and proposed policy approach (including 24 months of marketing evidence for offices whilst the unit is vacant).
Alternative	Reducing the marketing/vacancy evidence for offices to 12 months and allowing 12 months marketing vacancy of class E.

The criteria would apply to both uses which could take advantage of Class E (offices and light industrial) and uses which couldn't such as warehousing and industrial or sui generis uses. The assessment is principally considering the effect of an alternative Class E proposal that comes through the planning system rather than take advantage of the flexibility presented by Class E.

### Table 2.21 Description of preferred and alternative approach to Policy SP3 Vale Royal Brewery Road LSIS

Class E removes the ability to differentiate between light industrial office and research and development, and a broader range of uses such as restaurant/café, shops, gyms and medical facilities. The options for Policy SP3 (and parts of B1 and B2) are as follows:

Reference	Description
Preferred approach	Industrial consolidation and intensification as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS, taking a targeted approach to class E, recognising flexibility whilst restricting class E in some instances through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative	Class E co-location in the LSIS: the co-location of industrial and full class E office uses as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS

The alternative to SP3 reflects allowing the co-location of full class E with industrial uses, and it is in part interrelated with alternative set out in Part 1: Updated policy assessments, that considers office as co-locating alongside industrial intensification. Offices have traditionally attracted higher values and are highly sought in the borough due to its position within the CAZ. However, Islington's economic success relies on the diversity of its business clusters and the Vale Royal/Brewery Road LSIS is an example of a successful agglomeration of industrial businesses which benefit from their close proximity to the CAZ. The introduction of class E will inevitably lead to some loss of light industrial floorspace to other class E uses in the LSIS. Considering the recent pressures from office development proposals, it is likely that this activity will be the preferred one from class E accompanied by some restaurant/café and retail depending on future market trends. Therefore, the assessment of the alternative considers the broad range of class E uses but with the potential for more office Class E use.

**Table 22 Pre hearing assessment of the preferred and alternative approach to Policy B1 and Policy B2 and Policy B4**

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>No effect for alternative or proposed policy response.</p> <p>In the longer term there may be a detrimental effect on the existing economic function of an area if significant quantum of floorspace changes via flexible uses which over time could have an effect on the character of an area with incremental applications to change building facades and fascias which could erode positive aspects of an areas architecture coherence. However, overall the effect is considered to be neutral.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	-	<p>The Preferred approach policy response for B1/B2 and B4 will seek a Class E use conditioned to an appropriate use for either the Priority Employment Locations, town centres or LSIS to prioritise the delivery of employment floorspace needs. This will have a positive effect by encouraging development which primarily supports the existing economic function of an area which will reinforce the economic sustainability of an area, and may see design which compliments existing character of an area. For example, Grade A offices in the Central Activities Zone; co-working space in Priority Employment Locations. The policies require incorporation of inclusive design features and ensure safety and inclusivity as part of the design process. The conditioning of specific business uses will assist in making the most efficient use of land by encouraging maximisation of business floorspace space in locations which have already well-established employment hubs and suitable business clusters.</p> <p>The alternative approach of Class E may see landowners take advantage of the flexibility to change use to a more economically valuable use without seeking extensions to a building or redevelopment which would require planning permission. This may be beneficial to owners but won't maximise potential uplift in floorspace and won't ensure an efficient use of land. Class E could lead to a dispersed pattern of growth of business uses away from more sustainable locations such as town centres and the CAZ which offer excellent public transport connections established through the historic pattern of growth. Overall, the alternative is considered likely to have a significant negative effect on the efficient use of land over the medium to long term.</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for alternative or preferred approach policy response.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	<p>The preferred approach policy response for B1/B2 and B4 would seek in the CAZ, Priority Employment Locations and Town Centre locations, a range of units in terms of size and type expected which will help support diversity in town centres and should benefit existing services in these locations. This is likely to have a minor positive effect.</p> <p>The alternative allows a range of uses that could support the creation of liveable neighbourhoods. However, the lack of strategic control over the supply and location of this broad range of uses (including offices and light industrial space), could cause significant harm on prominent office floorspace locations such as the CAZ or more likely on more affordable peripheral locations. This would affect the mix and balance of uses. Alternative 1 could also lead to the overconcentration of uses that could have a negative impact on the vitality of town centre locations and amenity of residents. Whilst individually it may be positive and provide or maintain a wide range of services, facilities and amenities for residents close to home, at a cumulative level, Class E could have significant effects on the function of town centres, PELs and the CAZ. On balance, due to the potential harm identified on town centre locations and amenity, the benefits are considered minor positive effects.</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	There are no effects for both approaches. There is potential for a minor negative effect as both alternatives could stifle the supply of housing in certain locations across the borough, through prioritising commercial floorspace. However, on balance, because other policies will help to ensure housing targets are met both approaches are considered to have a neutral impact.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>Preferred approach policy response for B1/B2 and B4 in seeking to reduce the potential consequences of Class E through securing new business floorspace in adequate employment locations will strengthen the local economy and provide new jobs by encouraging development of office space which will meet demand and unlock potential economic growth. This approach will also have a positive effect on Policy B4 with regards to the provision of affordable workspace, creating more certainty around its implementation which could remove barriers to employment by increasing opportunities for residents.</p> <p>Alternative would lead to potentially different types of employment and commercial activity in various locations across the borough which will potentially broaden the access to different employment opportunities. However Class E may also result in a reduction in office floorspace for example in the CAZ at ground floor level which could result in lower levels of employment and constrain employment supply in this prominent business floorspace location. This could lead to a reduction of employment opportunities for residents and have negative effects on the borough and Central London economy. Therefore on balance the effect is considered neutral. In addition class E does not enable jobs and training and opportunities to be sought reducing the opportunity for social inclusion, equality, diversity and community cohesion as well as removing the opportunity to secure affordable workspace. The effect from the alternative on Policy B4 would be uncertain in terms of the Council's ability to secure affordable workspace. An increase of class E development and implementation of other commercial uses over office-led proposals could lead to a reduction in the supply of affordable workspace. This could have an impact on removing barriers to employment for people.</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for alternative or proposed policy response

8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	<p>The Preferred approach policy response for B1/B2 and B4 will seek to reduce the consequences of Class E through conditions to secure office and other business floorspace and will have a positive effect. The development and maximisation of new office floorspace sustains and improves Islington's economy and helps to meet defined needs. It will be required to provide a range of units, in terms of size and type, which can support a range of businesses. Space will be directed to certain areas including the Central Activities Zone and existing business clusters, this will allow agglomeration benefits to be felt and will allow businesses to grow and thrive. New office floorspace in the borough will contribute towards sustaining London's economic activity and the wider economy. However class E introduces significant uncertainty, with landlords likely to hold back land for intensification which will constrain supply and economic growth in the short term and maybe longer. Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps to reduce the need for goods and services to travel, reducing congestion and air pollution. These areas also offer a range of jobs providing greater employment opportunity. The preferred approach will also have a positive effect on Policy B4 and the provision of affordable workspace creating more certainty around its implementation which could increase employment opportunities.</p> <p>The alternative allows a broad range of uses under class E. The borough has an important role in supporting Central London's economy due to its strategic location within the CAZ. Considering the marked losses of office to residential in past years and the constrained supply, it is important that office floorspace is protected and maximised to ensure that there is a balanced supply to meet demand. Class E is a market-led approach and may only address short term need. This option could support economic growth to provide a range of diverse employment opportunities although there maybe a quality issue with some of those employment opportunities and they may not meet defined floorspace need. Over time the effect on supply will remain or worsen. The lack of control over the creation and the protection of business floorspace (former B1 use class), from which the Council also secures affordable workspace and jobs and training opportunities, would limit the viability of SMEs, and impact creative industries. In addition, economic growth would not be equal, with some groups not accommodated. The effect from the alternative on Policy B4 would be uncertain in terms of the Council's ability to secure affordable workspace which has only been tested in viability terms against office or research and development uses (or former B1 use class) and not other Class E uses. This could have an impact on employment opportunities more generally and the contribution to Islington's economic growth. In addition, the agglomeration benefits of existing business uses could undermine the long-term sustainability of existing business clusters, which support office employment types.</p>
9. Minimise the need to travel and create accessible,	++	-	Preferred approach policy response for B1/B2 and B4 would seek to support growth and direct business development to the most appropriate and accessible locations in the borough, encouraging the provision of appropriate and accessible infrastructure, therefore promoting economic centres such as the CAZ. This

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
safe and sustainable connections and networks by road, public transport, cycling and walking			<p>will help reducing the complexity of journey patterns from uneven growth encourage more sustainable transport choices.</p> <p>The alternative would allow a broad range of commercial uses but it would not ensure that these are strategically distributed to support efficient use of road connections, existing public transport and promote sustainable transport growth. Class E could result in dispersed growth depending on landowners which could over time increase the need to travel if office and light industrial uses disperse from existing specific locations and town centres. This could reduce the competitiveness of London's traditional economic centres like the CAZ which supports existing transport infrastructure and. In addition, the over concentration of activities of certain types outside designated areas could have impacts on air quality linked to traffic congestion and safety of pedestrians.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	There are no effects for alternatives
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	There are no effects for policies B1 to B5



IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>Preferred approach policy response for B1/B2 and B4 would direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.</p> <p>Alternative 1 would allow a broad range of commercial uses but would not ensure that these are strategically distributed and could increase the need to travel depending on landowners which as identified in objective 9. In addition the locations, being less accessible could increase the need to travel by car increasing emissions. The over concentration of activities of certain types such as retail, which is a high trip generating use, outside designated areas could have impacts on air quality.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	There are no effects for alternatives.

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative: allowing full class E	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	There are no effects for alternatives.

### Summary

The assessment recognises the detrimental longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. The detrimental effect is recognised in particular on the role of the CAZ in supporting Central London's economy. But harm through take up of Class E is also recognised as likely in more affordable peripheral locations. Uncertainty is recognised across both locations and it is too early to determine the take up of floorspace changes via Class E. The benefits of not attempting to manage the effect of Class E are recognised with Class E potentially supporting the opportunity for a range of economic growth opportunities across the borough. However despite this positive effect and the uncertainty surrounding take up of Class E, there are several negative effects as well. Therefore, the preferred approach is considered overall beneficial.

**Table 23: Pre hearing assessment of preferred and alternative approach to Policy B3**

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	No effect for the preferred approach and the alternative.

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	-	-	<p>The Preferred approach will have a minor negative effect in the short term. It protects new business floorspace secured as offices (or former B1 range of uses) through conditions from future changes through the flexibility of Class E, which will help maintain a balance of employment land across the borough meeting a range of business needs. However for the vast majority of existing floorspace the longer marketing period may discourage landowners from seeking alternative uses through the planning system in the short term and instead they may likely consider changing use within Class E and not intensifying the existing office use of a building which would represent a lost opportunity. However given that most commercial property is leased on a medium to long term basis may mean that this negative effect on the efficient use of land is not realised as much as it could be. In addition depending on the location and concentration of alternative Class E uses would affect landowners choices. Eg the quantum of potential class E space in locations such as the CAZ and a town centre is a very different opportunity compared to an isolated office in the north of the borough.</p> <p>The Alternative would encourage landowners to consider an approach through the planning system by reducing the length of time that offices need to be vacant to demonstrate that the building has no demand for continued office use. This may encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. However, this could also lead to the long term effects mentioned in the assessment of alternative for policy B1, B2 and B4 with more loss of office space. In the CAZ this will be particularly damaging to the borough's future economic growth. But in terms of this objective which is seeking to optimise the use of previously developed land the approach could be beneficial outside employment designations, where there is less specific demand of business floorspace. On balance because of the long term implications it is considered this approach would have a negative effect through the impact on the overall supply of office space.</p> <p>Overall both approaches are considered to have minor negative effects for different reasons.</p>

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	There are no effects for alternative or preferred policy approach.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	-	+	<p>The Preferred Approach will have a minor negative effect through seeking to protect new business floorspace with longer marketing requirements. A positive aspect of this approach is that it may help maintain diversity outside the CAZ and town centres and counter predominantly residential neighbourhoods, promoting economic activity in these locations. However, as identified in response to objective 2 this would depend on landowners and it could discourage them from seeking alternative uses through the planning system in the short term, and instead they may likely consider changing use within Class E. Therefore, on balance, this approach is considered to be neutral against the objective.</p> <p>The alternative would encourage landowners to engage with the planning system by reducing the length of time that offices need to be vacant and could encourage redevelopment by introducing a degree of flexibility that would diversify the range of services available in an area which may improve access to services, facilities and amenities near residents homes. The impacts of this will vary depending on location and on the quantum of existing floorspace that is considered class E. In the longer-term the effect of the changes maybe more uncertain and have a negative impact on vibrant and thriving town centres. The extent of flexibility and access is more limited in many parts of the borough given it already has a mixed-use nature and high levels of accessibility. However, on balance, it is considered that the alternative approach has minor positive effects on this objective as it could lead to increased access to services.</p>

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	There are no effects for alternative or preferred policy approach.
6. Promote social inclusion, equality, diversity and community cohesion	-	0	<p>The preferred approach is considered to have a minor negative effect as set out against objective 2.</p> <p>The alternative would encourage landowners to consider an approach through the planning system by reducing the length of time that offices need to be vacant and could encourage redevelopment by introducing a degree of flexibility that would diversify the economy and remove barriers to employment. Conversely this may also affect existing office jobs by reducing the protection of business floorspace lead to the displacement of businesses that are essential to the borough's economic growth and affect wider employment opportunities for residents. Overall these effects are considered to cancel each other out.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	There are no effects for alternative or preferred policy approach.

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	-	<p>The Preferred approach will have a minor negative effect in the short term. It protects new business floorspace secured as offices (or former B1 range of uses) through conditions from future changes through the flexibility of Class E, which will help maintain a balance of employment land across the borough meeting a range of business needs. However for the vast majority of existing floorspace the longer marketing period may discourage landowners from seeking alternative uses through the planning system in the short term and instead they may likely consider changing use within Class E and not intensifying the existing office use of a building which would represent a lost opportunity. However given that most commercial property is leased on a medium to long term basis may mean that this negative effect on economic growth is not realised as much as it could be. In addition depending on the location and concentration of alternative Class E uses would affect landowners choices. Eg the quantum of potential class E space in locations such as the CAZ and a town centre is a very different opportunity compared to an isolated office in the north of the borough. Therefore, considering both of the above negative and positive effects, it is considered that on balance the effects of this approach is neutral on this objective.</p> <p>The Alternative would encourage landowners to consider an approach through the planning system by reducing the length of time that offices need to be vacant to demonstrate that the building has no demand for continued office use. This may encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. However, this could also lead to the long term effects mentioned in the assessment of alternative for policy B1, B2 and B4 with more loss of office space. In the CAZ this will be particularly damaging to the borough's future economic growth which is fundamental to this objective. Class E is a market-led approach and may only address short term need. This option could support economic growth to provide a range of diverse employment opportunities although there maybe a quality issue with some of those employment opportunities and they may not meet defined floorspace need. On balance because of the long term implications it is considered this approach would have a negative effect through the impact on the overall supply of office space.</p>

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	-	+	<p>The preferred approach could have similar long term impacts identified against objective 2 which could encourage more Class E development because of the longer marketing period which results in less control over where new uses are located which could lead to traffic congestion. Although any predictions of where uses will be located are uncertain, this approach could have a minor negative impact in road networks and sustainable transport modes when there is an accumulation of uses that have loading and parking requirements or high numbers of journeys such as offices in industrial areas which do not have the public transport access.</p> <p>The alternative would have a similar effect to objective 2 and could encourage more flexible use of sites in the longer term rather than landowners seeking to use full class E flexibility which could lead to changes of use which don't best reflect the intensity of their transport impact. This may lead to development decisions which better reflect existing patterns of development and which relate to existing public transport infrastructure.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	There are no effects for alternative or preferred policy approach.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	There are no effects for alternative or preferred policy approach.



IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	There are no effects for alternative or preferred policy approach.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	There are no effects for alternative or preferred policy approach.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	There are no effects for alternative or preferred policy approach.

## Summary

Overall the assessment has to make assumptions about what land owners might do and teasing out the potential overall impact of the options is difficult and uncertain in respect to Class E. The Preferred approach has some minor negative effects, in particular in the short term as a longer marketing period may discourage landowners from seeking alternative uses through the planning system and instead they may likely consider changing use within Class E and not intensifying their sites and that would represent a lost opportunity. Conversely the alternative reduced marketing could encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. But there is uncertainty recognised depending on the location and concentration of alternative Class E uses which could affect landowners choices. Eg it is recognised that the quantum of potential class E space in locations such as the CAZ and a town centre is a very different opportunity compared to an isolated office in the north of the borough. Overall though the preferred approach is considered positive, and it's noted it applies to changes of use without Class E affecting a wider range of land uses.

**Table 24 Pre hearing assessment of preferred and alternative approach to Policy SP3 (and parts of B1 and B2) - protecting and promoting industrial uses in the LSIS**

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	--	<p>Policy SP3 would have a minor positive effect because the proposed policy aims to protect the primary economic function of the industrial cluster. The strategic policy protection assigned to this area will nurture the future sustainability of the industrial cluster and will ensure that new development supports the economic activity of the area. There is a minor positive effect for policy SP3. The policy provides specific guidance on building heights within the area, informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.</p> <p>The alternative would have significant negative effects on the economic function of the Vale royal and Brewery Road LSIS. The introduction of full class E, which involves a mix of light industrial, offices, restaurants, retail, medical and leisure uses, will attract a large volume of visitors. The area has very narrow street profiles and its roads are essential for industrial businesses to continue their operations and distributions activities. The additional volume of pedestrians and traffic that class E could generate would compromise both safety of the visitors and industrial operations of the LSIS.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	--	<p>There is a minor positive effect for Policy SP3 as it focuses development in the most appropriate areas by making specific reference to retaining and strengthening industrial floorspace to protect the economic activity in the Vale Royal and Brewery Road LSIS. Policy SP3 will have a minor positive effect in the LSIS as it supports the economic activity in this area. The proposed policy protects existing industrial activity and promotes the intensification of industrial activity in the area akin to B8, B2 and light industrial uses. It is noted that the rise of e-commerce and distribution activities has been significant in recent years. This has been more notable during the pandemic. Recent anecdotal evidence observed in Town Centres showed that a great portion of businesses have switched to online trading. Some retail businesses have recently expressed the need for larger facilities that can accommodate large storage and distribution operations.</p> <p>A recent analysis of premises and use classes carried on February 2020, in the Vale Royal and Brewery Road LSIS, showed that there are almost 10,000sqm of light industrial floorspace (former B1c), most of which is located along Brewery Road, Brandon Road and Blundell Street. There is a smaller cluster of light industrial</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			<p>premises located between Tileyard Road and Vale Royal. In addition, there are approximately 7,300sqm of storage (B8) floorspace that includes light industrial floorspace, located between Brandon Road and Tileyard Road. However, it is difficult to determine the proportion of light industrial floorspace combined with storage.</p> <p>The introduction of the new class E means that over 10,000sqm of light industrial floorspace in the LSIS is potentially at risk of being lost to other non-industrial use classes that attract higher values. The northern fringe along Brewery Road is the main transport route in the LSIS and many of the industrial businesses in the borough depend on this route to carry out their essential delivery and distribution activities. Most of the light industrial floorspace is concentrated along this road.</p> <p>Offices are also included within class E along the other uses permitted. In February 2020 we estimated that there are almost 11,000sqm of office floorspace in the LSIS, and a further 6,000sqm of general B1 floorspace which can include offices, research and development and light industrial activities. Based on this analysis, it is estimated that the Vale Royal and Brewery Road LSIS has a total of 107,409 sqm of business floorspace uses in the area (including industrial B2, B8, Sui Generis akin to industrial, offices and light industrial). If both existing office and light industrial floorspace are considered as part of this, the total floorspace that could potentially be lost to the other uses within class E is 27,000sqm or a 25% which is a significant amount considering the constrained supply of industrial land to meet demand in the borough and in Central London. Any expansion of class E could exacerbate this loss.</p> <p>The rise of e-commerce and distribution activities has been significant in recent years. This has been more notable during the pandemic. Recent anecdotal evidence observed in Town Centres showed that a great portion of businesses have switched to online trading. Some retail businesses have recently expressed the need for larger facilities that can accommodate large storage and distribution operations.</p>
3. Conserve and enhance the significance of	0	0	New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. Whilst the policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area the updated assessment considers that

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
heritage assets and their settings, and the wider historic and cultural environment.			<p>some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings. This would depend on the wider historic environment and on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</p> <p>The alternative is assumed to have a similar effect to the assessment for policy SP3. Depending on the extent to which intensification of full class E uses with industrial floorspace happens, it might have negative effects on the significant heritage assets and their settings, in terms of massing, scale and design as the mix of uses considered within class E. In addition, the range of uses considered within class E serve very different purposes and could introduce different design patterns which could divert significantly from the industrial function of the LSIS. However, the impact is considered to be neutral because it can be counterbalanced with general policies such as PLAN1 and design heritage DH1, DH2 and DH3.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	<p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</p> <p>The alternative would have a minor positive impact and lead to the creation of a more liveable neighbourhood, with the increase in accessible services for the community that class E could bring. However, the area is currently a functional industrial location. Therefore, an increase in pedestrians and vehicle congestion brought by the intensification of new class E activities could disrupt the economic activity of the industrial cluster and bring in conflicts between pedestrians and vehicles, which could compromise safety. The alternative is also assumed to have a similar effect to the assessment for policy SP3.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effective identified for the alternative or the preferred approach. It could be considered that there could be a minor negative impact on the supply of affordable housing. However, the LSIS is a functional industrial cluster, which includes some more traditional industrial uses that cannot coexist with housing. In addition other policies in the plan will help to meet housing needs in other more suitable locations.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for alternatives to policies SP3, B1 and B2.identified for alternative and preferred approach
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>The preferred approach would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Overall the preferred approach is considered to have a minor positive effect.</p> <p>No effect is identified for the alternative. There is no evidence to suggest that allowing more office uses instead of industrial uses, would have a pronounced effect on health and wellbeing.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	<p>The preferred approach would continue to protect existing businesses in the LSIS and would promote the intensification and renovation of old industrial sites. This would attract a wider range of different sized occupiers in need of industrial premises. The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in Islington's Employment Land Study (2016), this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses which are based primarily in industrial units and support Islington's wider creative sector. Proposed policy reflects the Council's commitment to support creative production industries where it is more needed in the borough.</p> <p>The alternative would have a minor to significant negative effect on the economic function of the LSIS. Whilst this approach introduces flexibility to the commercial market, it undermines the ability to protect light industrial floorspace from other non-industrial class E uses. This means that there will be further encroachment of class E uses in the LSIS. The advancement of class E in the LSIS could undermine the cluster's ability to grow and to continue delivering its primary industrial function. This makes a stronger argument to protect remaining general industrial, storage and distribution uses, as well as introducing conditions on new light industrial floorspace that is secured to limit class E. Any policy that could diminish this function could undermine economic growth. While office uses and other class E use could themselves have some economic benefit, further significant expansion of offices in the LSIS would be likely to undermine the overarching function and on balance would cause a negative effect.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and	+	-	<p>There is a minor positive effect for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Policy SP3 would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
networks by road, public transport, cycling and walking			<p>into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</p> <p>The alternative could lead to industrial uses being forced to locate outside of Islington, while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p> <p>Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Various other uses considered within class E could have a negative impact in the operation of industrial businesses, which could lead to traffic congestion and safety concerns due to the lack of loading and parking facilities for industrial uses.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative or preferred approach
11. Create, protect and enhance suitable wildlife	0	0	No effect for alternative or preferred approach



IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
habitats wherever possible and protect species and diversity.			
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>As noted in objective 9 the preferred approach will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. On balance the preferred approach is considered to have a minor positive impact.</p> <p>As noted in objective 9, the alternative could lead to the displacement of industrial activities of the LSIS. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular	0	0	No effect for alternative or preferred approach

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
economy that optimises resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	+	-	<p>As noted in objective 12 the preferred approach will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. On balance the preferred approach is considered to have a minor positive impact.</p> <p>As noted in objective 12, the alternative could lead to the displacement of industrial activities of the LSIS. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p>

## Summary

The assessment identifies the key risk from the advancement of class E in the LSIS; undermining the industrial cluster's ability to grow and to continue delivering its primary industrial function. An estimate is made which quantifies the floorspace at risk from Class E. The impacts from a wider mix of offices, restaurants, retail, medical and leisure uses attracting more visitors to the area are made clear as well as the potential

negative environmental impacts. The only positive identified of the alternative is the potential economic benefit that office uses and other class E use could have. Overall the preferred approach which seeks to resist Class E in Vale Royal is seen as overwhelmingly positive.

## **Inclusive Economy: Assessment of preferred approach and policy alternative for Policies R1 to R9**

Evidence demonstrates that there is strong demand for retail in the borough. This is evidenced through low vacancy rates compared to the national average as well as identified need for additional retail space over the plan period. The Regulation 19 draft Local Plan responds to the competing pressures for retail floorspace from some commercial and residential land uses resulting in a specific approach that seeks to protect retail space in the Primary Shopping Area and offer a more relaxed approach across the rest of town centre. This was intended to ensure a diverse range of uses across the borough. Outside town centres in LSAs a more relaxed approach was set out in the Regulation 19 draft Local Plan compared to the adopted Local Plan. Class E is likely to affect this with retail premises moving to non-retail class E uses without planning permission. This is going to have impacts on the borough's Town Centres and Local Shopping areas, potentially most significantly in the Primary Shopping Area.

Whilst the flexibility in some parts of a town centre may be desirable, in other parts that are particularly suitable for comparison retail floorspace this flexibility to change to other leisure or business uses has the potential to be damaging, not only in terms of its local impacts but to the wider coherence of the town centre. Angel town centre for instance may for see a hollowing out effect which impacts comparison good floorspace predominantly responding to wider sectoral factors – Angel town centre has the highest amount of comparison expenditure of all the borough's town centres. Any dilution of retail floorspace could have a knock-on effect on provision of other goods and services. Different town centres have differing retail floor space capacity forecasts over the plan period. Scenario testing explored adjusting the levels of protection and attempts to secure retail in different town centres, however, given the ability for Class E flexibility to significantly change the quantum's of retail floorspace, there is uncertainty as to the full impact of Class E on retail floorspace. The policies set a framework that seeks to continue to provide for retail needs and function in an appropriately cautionary approach where impacts of policies on individual town centres will be monitored.

### **Preferred approach Policies R1 to R9**

#### **Policy R1: Retail, leisure and services, culture and visitor accommodation**

Policy R1 sets a tiered approach to securing retail floorspace which utilises the existing retail hierarchy. In order to support Town Centres, the Council is seeking a proportionate tiered approach to development involving Class E proposals where alongside recognising the flexibility provided Class E, impacts are appropriately considered using assessments in relation to the scale of a proposal and the location of a proposal. Current development within the E use class seeking to change to another E use is beyond the scope of planning control and could result in a distortion of the retail hierarchy, at least in the short term. The tiered approach evolves the existing policies in the spirit of Class E and seeks to secure retail uses in some specific existing retail concentrations to retain their retail functions. Policies R2, R3 and R4 would see an impact

assessment required for Class E based on the locations ability to absorb the impacts of development and the scale of the proposal. The sequential test, although now diminished because of the changes that can occur within class E can still be applied to non-E use main town centre use development.

## **Policy R2: Primary Shopping Areas**

In particular Policy R2: for the Primary Shopping Area – retail use at ground floor will be conditioned where possible to remain in retail use. Maintaining the maximum possible protection is desirable because of the PSA agglomeration benefits for retail in order to continue to meet residents and other's needs. Percentage thresholds for the retail mix in each town centre have remained the same from the Reg19 submission, however, these have changed to be strategic targets as opposed to original development management criteria. Where retail uses are conditioned to maintain a Class E retail use and seek to change to another E use, a period of marketing will be required with 6 months identified.

Where specifically an E use proposed to change to a non-E main town centre use(s), the premises must be marketed for 12 months and vacant for at least 12 months. This helps to maintain and promote the retail core of town centres and recognising the flexibility that Class E brings through the introduction of other appropriate town centre uses such as professional/financial services and cafes/restaurants. Furthermore, the retention of an E use makes the ability for a premises to return to a retail use easy and efficient which is key to the PSAs role and function. A period of 12 months is considered to be appropriate to reflect the importance of publicly accessible E uses that contribute most significantly to town centres vibrancy, vitality and viability, whilst not making the change of use to other main town centre uses that can also contribute positively to town centres unduly onerous. This is demonstrated through a reduction in the marketing period from the Reg19 submission of 24 months to 12 months.

An Impact assessment is especially necessary given the wide range of uses within the E use class and therefore the wide range of impacts. An impact assessment will be required for any development seeking flexible E use, to explore the different impacts of the individual E uses and the cumulative impacts these could have on the retail function of the PSA and, depending on the scale of change, on the wider town centre. Regarding other main town centre use development, the Council may request an impact assessment depending on whether the scale and use is considered to have potential for significant adverse impacts.

## **Policy R3: Islington's Town Centres**

Rest of Town Centres (outside PSA) - in line with Reg 19 submission plan policy R3 introduces a more flexible approach outside the PSA. Applications for E uses would have to demonstrate a full Class E use impact assessment for development of above 350sqm gross. A threshold of 350sqm reflect development that is around double the size of the average town centre unit across Islington's four town centres. 350sqm is therefore considered the threshold at which a town centre location could reasonably be expected to absorb the impacts of Class E development effectively.

### **Policy R4: Local Shopping Areas**

Within LSAs, the flexibility of Class E uses is recognised with development creating over 200sqm required to provide an impact assessment. The 200sqm threshold has been determined through analysis of the average size of a small supermarket above which it is considered there could be an impact on retail viability of the LSA itself and neighbouring town centres. An impact assessment is also necessary given the wide range of uses within the E use class and therefore the wide range of impacts, an impact assessment will be required for any development seeking flexible E use over 200sqm to explore the different impacts of the individual E uses and the cumulative impacts these could have on neighbouring LSA/town centres viability and amenity. In regard to other commercial development the Council may request an impact assessment depending on whether the scale and use is considered to have potential significant adverse impacts.

### **Policy R5: Dispersed retail and leisure uses**

The preferred approach for dispersed locations is to allow flexible class E development in line with the tiered approach and retail hierarchy. However, where a new retail development comes forward in some circumstances where there is a particular local need, the council will seek to condition the unit in retail use to provide essential daily goods. Dispersed retail units can assist with work to mitigate the prevalence of food deserts in the borough, in line with the overarching plan objective on healthy environments. Food deserts are where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems. Accessible provision of essential goods has multiple benefits including a balanced diet, active travel, reduced transport congestion, and increased social contact.

### **Policy R7: Markets and Specialist Shopping Areas**

The preferred approach for SSAs seeks to retain the specialist shopping function of Camden Passage and Fonthill Road. Like Policy R2, the retail percentage mix threshold assumes a strategic aim as opposed to a development management criterion in light of the reduction in control of uses due to Class E. It was considered whether Policy R7 should be omitted but due to Islington's town centres still retaining retail viability and SSAs still contributing to the unique selling proposition of Angel and Finsbury Park, the efficacy of retaining the policy was considered to be beneficial.

### **Consideration of alternatives to Class E**

The IIA involves considering a preferred approach and an approach which does not react to the context of Class E; essentially the alternative would stay silent, removing redundant policy references, remove policy targets for shopping frontages where appropriate, remove references to sequential tests and not consider impacts. In summary the following alternative are considered:

**Table 2.25 Description of the preferred and alternative approach to Class E**

Reference	Description
Preferred approach	Where possible restricting class E through conditions, impact assessment and variable marketing assessments with the aim to maintain the town centre. Relevant policies: R1, R2, R3, R4, R5 and R7
Alternative	Removing redundant policy references to former use class and related redundant content. Relevant policies: R1, R2, R3, R4, R5 and R7

The preferred approach could have various permutations of the following policy issues:

- % retail mix threshold
- floorspace threshold for impact assessment
- Marketing period for change of use
- Impact assessment

Permutations of floorspace thresholds to trigger an impact assessment were explored. The floorspace thresholds need to allow flexible change of E uses whilst acknowledging the reasonable capacity different designations have to host a range of E uses. This provides a basis for impacts to be assessed and conditions applied to limit harmful uses. This approach however does see a slight change in the tiered approach in that the PSA and dispersed locations require an impact assessment because of the potential for certain uses in these locations to either diminish the retail core (PSA) or provide unsuitable uses to non-commercial settings or where a distinct need for retail access is identified.

The other alternatives considered but discounted looked at considering the effects of various different percentage levels of retail use protected in the PSA across each of the town centres which were different to the retail percentage thresholds set out in the Regulation 19 version of Policy R2; differences in marketing periods; and different applications of the requirement for impact assessments. Applying such varying permutations across the different town centres was considered to have too many variants to be able to define the effects and also to be a potentially inconsistent approach with little justification in evidence for the variations.

The potential alternatives to Policy R6; would be variations in the period for which the temporary use is considered. Variations were not considered possible to assess as the assessment would not be able to provide a meaningful comparison of the various effects and the

significance that different periods of time that a vacant unit could be used for flexible uses. There could be an alternative to the range of uses. It was not considered realistic to expand the range of uses further as the approach adopted was already permissive. A more limited range of uses was a possible alternative however this was considered unreasonable given the flexibility the policy is seeking to promote

**Table 2.26 Pre hearing assessment of preferred and alternative approaches to Policies R1, R2 and R7**

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
1. Promote a high quality, inclusive, safe and sustainable built environment	-	-	-	--	-	--	<p>The Policy alternative to Policy R1 could see the potential for adverse impacts on the public realm felt from changes in footfall if large amounts of floorspace were to change use. This could be experienced through a change to office, creating demands on the public realm from commuters, or from retail increasing demands on the public realm from increased numbers of shoppers. This could affect the local character and distinctiveness would be eroded. Additionally negative effects could be experienced from COU to café/restaurants which although would increase natural surveillance could increase anti-social behaviour if there is a new concentration of such uses in areas not always close to public transport, particularly some LSAs. High trip generating uses locating away high public transport access locations also does not make best use of existing public transport. There could be a demand for expansion of pavement seating. A minor positive could be in terms of adaptable buildings due to Class E encouraging buildings to be configured to support the wide range of commercial uses found in Class E but this would be outweighed by the inability of the alternative to provide specific uses in certain locations in order to protect and enhance the character.</p> <p>Policy R1 would introduce the principle of the requirement for impact assessments for Policies R2-R5 which will include consideration of the impact on the public realm and the relationship with the retail designation based on scale of development.</p>

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IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>Both R1 and the alternative will not be able to ensure that appropriate retail development is directed to the core of the town centres so both would result in a minor negative effect although the alternative is considered to have a stronger negative effect given the possibility that impacts cannot be addressed.</p> <p>Policy R2 alternative would result in Class E impeding the approach to protecting retail in highly concentrated, accessible core of town centres. Although negative effects may be seen in the short term,</p> <p>The preferred approach for Policy R2 seeks to secure retail development at ground floor through conditions, promoting location sensitive design, justified on the basis of impact.</p>
2. Ensure efficient use of land, buildings and infrastructure	-	--	-	--	-	--	<p>The alternative approach would have an overall significant negative impact on the efficient use of land and infrastructure. The alternative approach to policies R1, R2 and R7 will have a significant negative effect on optimising the use of developed land which focuses commercial, cultural and civic activity in town centres. Over time there is likely to be a dilution of retail development in the most appropriate locations in primary shopping areas. This would erode the function of the town centre and accelerate the shift to more leisure and experience based activities, which would be ineffective in balancing competing demands between land uses and affect the ability of the Local Plan to meet the development needs of the area through ensuring comparison and convenience retailing needs are provided for example. Town Centres have the necessary transport infrastructure and public realm to accommodate high footfall and accessibility from different parts of the borough and from elsewhere too. In addition, there will be a significant negative impact on the specialist shopping areas in the town centres of Angel and Finsbury Park in any case given Class E flexibility,</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>although this would be amplified under the alternative approach because no new retail development would be secured.</p> <p>The preferred approach for Policies R1 and R2 will have a minor positive effect in terms of directing appropriate new build E use retail development and other Sui Generis and F.2 main town centre uses to the core of the town centres, the primary shopping areas. However, COU of existing retail uses away from retail diminishes the efficacy of this strategic approach with the ability to secure retail floorspace through conditions not likely to be seen until cumulatively significant quantum of new development has come through the planning system. The sequential test can be applied where relevant to Class E and to non-class E development however Class E means that the focusing of specific uses in appropriate locations will be made harder to ensure. The heightened use of impact assessments where possible (from new build development or increases in E use floorspace) will however highlight the inappropriateness of some E uses in certain areas, allowing mitigation. The approach for R1 and R2 will go some way to encouraging development to focus in the most appropriate locations in town centres and their primary shopping areas, although it will not be able to fully mitigate the negative impact of Class so will still have a minor negative effect.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and	-	-	-	-	-	-	<p>There could be a minor negative impact from policies R1, R2 and R7 and alternatives on the setting of the historic and cultural environment. The negative effects are likely to be stronger for the alternative approach where impacts are not considered through an impact assessment. The preferred approach in Policy R3 also requires development in town centres to provide a frontage which engages positively with local character and the street scene, as</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
cultural environment.							<p>well as protecting historical shopfronts. This helps to mitigate the erosion of character in town centres albeit unlikely significantly enough to counter the potential changes to character brought about through Class E. The establishment of E uses that are not publicly accessible such as previously B1a, B1b, B1c uses at ground floor would cumulatively erode the character of Town Centres and LSAs and make these designations less appealing to visit by tourists. In particular harmful impacts could occur in Camden Passage, covered by the Angel conservation area, Chapel market part of the Chapel market/Penton Street conservation area within Angel town centre and St John's Grove conservation area in Archway town centre. Impacts may also be felt in conservation areas outside these locations.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	+	-	-	-	<p>The policy alternative for policies R1, R2 and R7 could have a negative impact on access for residents to essential services. The ability for retail premises to change to other E uses without planning permission combined with an approach that did not seek to secure retail development could see a cumulative change of use away from retail that could over the longer term severely impede access to a wide range of goods in town centres. This could see a negative impact especially on comparison retailing in PSAs and convenience retailing in other town centres.</p> <p>The preferred approach for policies R1, R2 and R7 are likely to have positive effects on enabling town centres PSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by seeking to maintain a balance of retail, leisure and business uses. Albeit this approach is unavoidably diminished by the introduction of Class E.</p> <p>However, Policy R7 will likely see negative effects in the specialist shopping areas through the preferred and alternative approach,</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>although the preferred approach would seek to mitigate this decline.</p> <p>The potential for E uses which do not form active frontages, such as offices at ground floor would cumulatively and in specific locations individually, have a significant negative impact on the diversity, vibrancy and economic prosperity of town centres, PSAs and to a lesser extent LSAs. With potential reduction in ground floor retail uses and an increase in previously B1a, B1b, B1c uses, centres may become less attractive for multi-use visitation, resulting in diminished vibrancy. Change within Use ClassE may have positive impacts on upper floors in town centres, and especially in less well performing LSAs that would benefit from an influx of workers on the upper floors.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	0	<p>No effect for the policy alternatives for R1, R2 and R7 or the preferred approach. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough and either approach would maintain the restriction residential at ground floors within town centres and LSAs. The assessment considers this to have no effect overall as other policies within the plan provide for housing outside the locations identified to meet targets. Further detail is set out in the Reg 19 IIA assessment tables.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	<p>No effect for policy alternatives to R1, R2 and R7 and preferred approach.</p> <p>There may be minor effects which may see increased employment opportunities from a wider range of uses in some parts of the borough however this can be balanced against</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							decreased employment opportunities for other areas depending on the viability of the various Class E uses.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	-	0	0	0	0	<p>No effect for policy alternatives to R1, R2 and R7 and preferred approach.</p> <p>The preferred approach would go some way to maintaining retail and café uses. Access to shops in particular is vital in bettering health and wellbeing. This is especially important for people with reduced mobility. Overall whilst potentially negative it is not clear that this would bear out as an effect.</p> <p>Class E represents potential for increased noise, odour, ingress/egress, anti-social behaviour and moped delivery impacts on residents in particular from cafes using former retail units and opening later than previous units would have which can affect nearby residents amenity. Impacts from extended opening times will not be managed through the planning system but through the licensing system where there is less scope and flexibility to mitigate such effects. This negative effect would apply to both preferred approach and to the alternative approach. Conversely the impact would be less in PSA where there is generally less residential accommodation so in that respect the alternative would have less negative amenity impact if more cafes were to establish in the PSA.</p> <p>For Class E, health facilities are unlikely to be able to compete from a viability point of view with other retail/leisure/office use in a town centre so this is unlikely to create a positive effect on people's ability to access health facilities. Theoretically, Class E</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							has the potential to provide a greater opportunity for some health facilities, especially in secondary space on upper floors but could also lead to their loss and therefore impacts within town centres are uncertain. Please see Social Infrastructure IIA assessment for Class E effects.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	-	+	-	+	-	The effect of the alternative to R1, R2 and R7 could see a proliferation of non-publicly accessible uses – in particular offices, in town centres at ground floor that cumulatively could have a negative effect by diluting the commercial, cultural and civic activity in town centres. It could reduce the commercial offer for residents and tourists; with stretches of frontages that do not engage well or provide use to visitors creating inactive frontages that creates the perception of decreasing quality of town centres resulting in less visitors and thus reduced viability of shops. This could lead to a reduction in economic growth within the retail sector and other related service and leisure sectors that are all interdependent on multi-purpose visitation to maintain a healthy town centre. Town centre locations for retail should achieve highest commercial value however with a distortion of retail and office uses caused by Class E this harmony could change in the short term and accelerate any longer term changes in commercial floorspace market. There will be a significant negative impact on economic growth and the town centres of Angel and Finsbury park if the specialist shopping areas change via Class E under the alternative approach with their function attracting people from further afield. Once a critical mass of antique shops for instance in Camden Passage SSA change away from retail use, the appeal of the designation to provide comparison needs is lost. However there could also be positive effects from the alternative R2 which could enable a range of uses that were previously prevented to locate in the PSA and are able to take advantage of the PSA

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>location which could help to maintain and support the town centre depending on the centre.</p> <p>The preferred approach set out in R2 seeks to encourage retail uses at ground floor and where possible seeks to retain the core function of town centres which will help maintain and support a range of local businesses, maintaining opportunities for residents to access employment through retail. There are theoretical economic benefits brought about by Class E flexibility, especially in areas where retail is struggling. However, such unfettered flexibility would actually be harmful to Islington's Town Centres that benefit from established agglomerations of retail and enjoy low vacancy rates. This more flexible approach, is supported by R1 which sets out the tiered approach and consideration of impact which will be assessed depending on the scale of the proposal and will enable more flexible Class E uses on other floors which will help manage this whilst also providing wider opportunity in line with the flexibility introduced by Class E. The preferred approach for R7 seeks to protect as far as possible the retail use of the specialist shopping areas which will support the wider economic function of the town centre and economic growth more generally.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport,	+	-	0	-	0	-	<p>The effect of the alternative to R1, R2 and R7 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R1, R2 and R7 may help mitigate some of the unintended consequences of Class E in town centres by</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
cycling and walking							seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	0	No effect for alternative to R1, R2 and R7 or the preferred approach.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	0	No effect for alternative to R1, R2 and R7 or the preferred approach.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	0	-	0	0	The effect of the alternative to R1, R2 and R7 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore carbon emissions associated with transport. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R1, R2 and R7 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function, active frontages and



IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							consider impacts which could support maintaining uses in accessible locations.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	0	No effect for alternative to R1, R2 and R7 or the preferred approach.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	0	The effect of the alternative to R1, R2 and R7 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore carbon emissions associated with transport. This in turn contributes to the high levels of air pollution in London. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R1, R2 and R7 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations.

## Summary

Overall the assessment has to make assumptions about what land owners might do, although there is more certainty given the wider weakness in the retail sector so considering the impact in respect to Class E is more robust for retail compared to office floorspace. The assessment suggest impacts including a potential distortion of the retail hierarchy which could have a range of effects including ability to meet retail needs, wider provision of services, increasing the need to travel and associated carbon emissions. In particular the potential dilution of retail development in the most appropriate locations is considered to be ineffective in balancing competing demands between land uses and ultimately an inefficient use of land. The impacts on economic growth, in particular for town centres are considered to be clearly negative with no positive effects identified for the alternative 'do nothing' alternative. However there could be positive effects from the alternative which could enable a range of uses that were previously prevented to locate in the PSA/town centres and are able to take advantage in particular of the PSA location which could help to maintain and support the town centre depending on the centre. However this is not enough to outweigh the overall negative impacts and despite the uncertainty over how landowners will utilise Class E the preferred approach is considered positive.

**Table 2.27 Pre hearing assessment of preferred approach and policy alternatives for policies R3, R4 and R5**

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	+	--	+	-	<p>The alternative approach to Policy R3, R4 and R5 could see the potential for adverse effects on the public realm depending on the location of the place in the retail hierarchy and the scale of the Class E use of the proposal. This may lead to a change in footfall if large amounts of floorspace were to change use. This could be experienced through a change to office, creating demands on the public realm from commuters, or from retail increasing demands on the public realm from increased numbers of shoppers. This would affect the design response and local character and distinctiveness would be eroded. Additionally negative impacts could be experienced from COU to café/restaurants which although would increase natural surveillance could increase anti-social behaviour if there is a new concentration of such uses in areas not always close to public transport, particularly some LSAs. This impact could be more keenly felt in LSAs and dispersed retail areas which don't have the scale of existing use to consider impacts. The sequential test - that seeks to promote 'main town centre uses' in the four town centres that are commercial hubs, benefiting from high PTAL ratings, agglomeration of retail and leisure uses, and commercial characters that can absorb negative impacts on amenity more so than other locations, would not be applied through alternative to policy R3. A minor positive could be in terms of adaptable buildings, due to Class E encouraging buildings to be configured to support the wide range of commercial uses found in Class E. However, the inability of the alternative to provide specific uses in certain locations in order to protect and enhance the character would have detrimental effects on sense of place.</p> <p>The Preferred approach to Policy R3 and R4 would set out a requirement for impact assessments for Policies R2-R5 which will include consideration of the impact on the public realm. Impact assessments will help illuminate impacts of noise, odour, ingress/egress, anti-social behaviour and moped delivery as well as scale, operating hours and impact on the function of the designation. This</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>approach seeks to put people at the heart of the process by ensuring amenity and economic growth needs are met although the loss of control with class E may not see this materialise as intended at least in the short term due to trends of perceived viable E uses.</p> <p>The preferred approach to Policy R3, R4, R5 and R6 will also have a positive effect focusing appropriately scaled development in line with the retail hierarchy but also ensuring high quality development of uses that benefit a wide demographic of people that includes residents and workers, ensuring accessibility, amenity and sustainability are considered.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	-	+	-	+	-	<p>The preferred approach for Policies R3, R4 and R5 will have a minor positive effect in terms of directing appropriate new build E use retail development and other Sui Generis and F.2 main town centre uses to town centres and LSAs. However, COU of existing retail uses away from retail diminishes the efficacy of this strategic approach with the ability to secure retail floorspace through conditions not likely to be seen until cumulatively significant quantum of new development has come through the planning system. The sequential test can be applied where relevant to Class E and to non-class E development however Class E means that the focusing of specific uses in appropriate locations will be made harder to ensure. The heightened use of impact assessments where possible (from new build development or increases in E use floorspace) will however help to highlight the inappropriateness of some E uses in certain areas as well as specific mitigation measures. The approach for R3, R4, R5 and R6 will go some way to encouraging development to focus in the most appropriate locations in town centres with greater flexibility outside PSAs which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. The requirement for impact assessments will help to focus appropriately scaled development in line with the retail hierarchy with Policy R3 having a higher threshold of 350sqm to reflect development that is around double the size of the average town centre unit and in Policy R4 LSA having a slightly lower threshold of 200sqm which will help to guide development to the most appropriate locations. The tiered approach aims to</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>encourage development to maintain the existing retail hierarchy as far as possible in order to help meet retail needs in the most sustainable locations.</p> <p>The alternative approach would have an overall minor negative impact on the efficient use of land and infrastructure. This is in light of acknowledgement that Class E has theoretical benefits in terms of efficient use of buildings in the short term as a flexible approach to Class E could help ensure land is brought back into use. However, the alternative approach to Policies R3, R4 and R5 will have a negative effect on optimising the use of developed land which focuses commercial, cultural and civic activity in town centres. Over time development would not be focused in the most appropriate locations in town centres, rest of town centre locations and LSAs and the concentration of retail uses would become weakened. This would erode the function of the town centre and accelerate the shift to more leisure and experience based activities, which would be ineffective in balancing competing demands between land uses and affect the ability of the Local Plan to meet the development needs of the area through ensuring comparison and convenience retailing needs are provided for example.</p> <p>Evidence demonstrates that there is strong demand for retail in the borough. This is evidenced through low vacancy rates compared to the national average as well as identified need for additional retail space over the plan period. Cumulatively increases in ground floor E uses (previously B1a, B1b, B1c uses) would reduce the retail and leisure uses that contribute to the spaces in which 'community' can prosper. There will inevitably be some dilution of retail floorspace due to the change of use allowed within developed Class E uses under the preferred and alternative approach. However, the preferred approach seeks to mitigate this negative effect of cumulative dilution of retail floor space so that sustainable use of buildings is realised. Any dilution of retail floorspace could have a knock on effect on the provision of other goods and services due to multi-trip visitation.</p> <p>Policy R4 could see a minor positive effect in LSAs by allowing a more flexible approach to Class E that may be beneficial in certain circumstances in LSAs</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>that will experience further decline as shopping destinations more so than town centres. However, across the majority of LSAs it is important to manage impacts of Class E proposals so that LSAs core functions as centres for essential daily goods and services is not damagingly eroded in favour of higher land value uses. LSAs often provide for localised needs of residents. With no attempt to assess impacts of Class E development above 200sqm this could distort the retail hierarchy and see retail development in LSAs shift footfall away from neighbouring town centres, further diminishing the character and functions of town centres. There may be a minor positive effect of E class development in that less well performing LSAs could evolve to offer a wider range of uses.</p> <p>Policy R5 alternative would see a minor negative impact in relation to dispersed shops especially those that provide essential daily goods for people with mobility issues. The COU from dispersed shops to 'office, research/development, light industrial' uses would see these spaces no longer serving a local community but rather workers from further afield. Although dispersed shops are still vulnerable to change of use within Class E in the preferred approach, there are opportunities to monitor these changes and in certain locations where it is appropriate to condition development to retail use to help meet local essential needs, the policy can help achieve this.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	-	0	-	0	-	<p>There could be a minor negative impact on Policies R3, R4, R5 and R6 on the setting of the historic and cultural environment. The negative effects are likely to be stronger for the alternative approach where impacts are not considered. The establishment of E uses that are not publicly accessible such as previously B1a, B1b, B1c uses at ground floor would cumulatively erode the character of Town Centres and LSAs and make these designations less appealing to visit by tourists. The preferred approach would enable assessment of the individual and cumulative impacts of development in relation to scale, waste and refuse, delivery and servicing, operating hours and access which all influence the setting of the historical and cultural environment.</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	+	-	+	-	+	-	<p>Policies R3, R4 and R5 will have positive effects on enabling town centres and LSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by seeking to maintain balance of retail, leisure and business uses. Albeit this approach is unavoidably diminished by the introduction of Class E.</p> <p>The potential for E uses which do not form active frontages, such as offices at ground floor could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. With potential reduction in ground floor retail uses and an increase in B1a, B1b, B1c uses, centres may become less attractive for multi-use visitation, resulting in diminished vibrancy. The alternative to Policies R3, R4, R5 and R6 would strengthen this negative effect.</p> <p>However, the increased ability for COU within the E use class may have positive impacts on upper floors in town centres, and especially in less well performing LSAs that would benefit from an influx of workers.</p> <p>Policy R4 will have a positive effect, through seeking to enable LSAs to continue to serve the needs of local residents across local retail catchment areas. The approach allows a flexibility in LSAs that responds to the decline of traditional retail whilst seeking to manage these changes whereby there is not a deficiency of access to essential goods because of short term market preference and/or a proliferation of E uses that could harm the primary function of LSAs as places to serve local retail and service needs.</p> <p>Policy R5 will have a positive effect through seeking to ensure that essential dispersed convenience and café services are protected. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly beneficial.</p> <p>The policy alternative for Policies R3, R4 and R5 would have a negative impact on access for residents to essential services. Although Class E allows for the</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							potential increase in access to some services from change of use to these services, the ability for retail premises to change to other E uses without planning permission and an approach that did not seek to secure retail development could over the longer term severely impede access to a wide range of goods in town centres. This could see a negative impact on convenience retailing in LSAs and dispersed shops. Ground floor retail and leisure uses across town centres, LSAs and dispersed locations encourage social environments and can often act as informal spaces for civic engagement, supporting cultural provision. The diminishment and complete lack of control over such uses could have a negative impact on the informal social and cultural provision.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	0	No effect for Policies R3, R4, R5 and R6 or the alternatives. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough and either approach would maintain the restriction against conversion to residential. However the assessment considers this to have no effect overall as other policies within the plan provide for housing is delivered outside the locations identified to meet housing targets. The policies set out circumstances where residential would be suitable in town centres and LSAs.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	No effect for Policies R3, R4 and R5 or the alternatives. There may be minor effects which may see increased employment opportunities from a wider range of uses in some parts of the borough however this can be balanced against decreased employment opportunities for other areas depending on the viability of the various Class E uses. Please see Social Infrastructure IIA assessment for Class E effects.
7. Improve the health and	0	-	0	-	0	-	No effect for policies R3 and R4. The preferred approach would go some way to maintaining retail. Access to shops in particular is vital in bettering health



IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
wellbeing of the population and reduce health inequalities							<p>and wellbeing. This is especially important for people with reduced mobility. Smaller LSAs would likely experience more pronounced effects of a reduction in retail which takes fewer changes of use to impact on overall viability or retail, resulting in the cessation of these LSAs to provide for localised need. Overall whilst there could potentially be negative effects due to the loss of retail to other class E uses, it is not clear that this would bear out as an effect.</p> <p>Policy R5 seeks to maintain local shops and cafes. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service that especially benefits access to goods and services by people with mobility issues is particularly relevant and considered to have a positive effect against this objective.</p> <p>A negative effect is created by the alternatives if access to shops is reduced through a lack of impact assessment or conditions are not used where possible to maintain shops which would affect health and wellbeing.</p> <p>Class E also represents potential for increased amenity impacts such as noise, odour, ingress/egress, anti-social behaviour and moped delivery impacts on residents in particular from cafes using former retail units and opening later than previous units would have, which can affect nearby residents amenity. These impacts will not be managed through the planning system but through the licensing system where there is less scope and flexibility to mitigate such effects. This negative effect would apply to both preferred approach and to the alternative approach. However, the preferred approach seeks to mitigate the negative impacts of Class E on town centres and LSAs where development of a significant scale could impact on the function and viability of these designations to provide for goods and services, which in turn benefits health through comprehensive access to these uses across the borough.</p>
8. Foster sustainable economic growth and increase	++	-	+	+	+	0	The preferred approach Policy R3 will have a positive effect as the approach aims to strike a balance between retail, leisure and businesses uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
employment opportunities across a range of sectors and business sizes							<p>centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development with the sequential test which can be applied where relevant to Class E and to non-class E development. However Class E means that the focusing of specific types of development in appropriate locations will be made harder to ensure. The heightened use of impact assessments where possible (from new build development or increases in E use floorspace) will however highlight the inappropriateness of some E uses in certain areas, and identify mitigation measures. The approach for R3, R4 and R5 will go some way to encouraging development to focus in the most appropriate locations in town centres with flexibility introduced outside PSAs which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. The requirement for impact assessments will help to focus appropriately scaled development in line with the retail hierarchy with Policy R3 having a higher threshold of 350sqm and in Policy R4 LSA having a slightly lower threshold of 200sqm which will help to guide development to the most appropriate locations. The tiered approach aims to encourage development to maintain the existing retail hierarchy as far as possible in order to help meet retail needs in the most sustainable locations. Town Centres provide the employment opportunities outside the CAZ and help provide job opportunities for local residents.</p> <p>In addition the effect of the alternative to R3 and wider town centres in particular could see a proliferation of non-publicly accessible uses – in particular offices, in town centres at ground floor that cumulatively could have a negative effect by diluting the commercial, cultural and civic activity in town centres. This could reduce the commercial offer for residents and tourists; with stretches of frontages that do not engage well or provide use to visitors creating inactive frontages that creates the perception of decreasing quality of town centres resulting in less visitors and thus reduced viability of shops. This will lead to a reduction in economic growth within the retail sector and other related service and leisure sectors that are all interdependent on multi-purpose</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>visitation to maintain a healthy town centre. Town centre locations for retail should achieve highest commercial value however with a distortion of retail and office uses caused by Class E this harmony could change in the short term and accelerate any longer term changes in commercial floorspace market. Negative economic effects on the retail sector are likely to be experienced by both the alternative and preferred policy approach in the short term at least from a number of impacts: market forces pushing a decline in the some retail uses from economic downturn caused by Covid-19 and Brexit; change of use away from retail within Class E, reducing viable retail floorspace; change of uses from retail to other non-publicly accessible E uses such as business uses could cumulatively diminish the vibrancy of town centres, impacting upon their appeal as leisure and retail destinations.</p> <p>Policy R4 and policy R5 will both have a minor positive impact as they are both aiming to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses.</p> <p>The alternative to Policy R4 would see a negative impact due to LSAs core functions as centres for essential daily goods and services eroded in favour of higher land value uses. LSAs often provide local employment for residents. With no attempt to assess impacts of Class E development above 200sqm this could distort the retail hierarchy and see retail development in LSAs shift footfall away from neighbouring town centres, further diminishing the character and functions of town centres. There may be a minor positive effect of E class development in certain locations, in that less well performing LSAs could evolve to offer a wider range of viable uses. This could aid the economic growth and viability of these centres, albeit in a move away from the core function of providing essential goods and services to surrounding residents. However, this positive effect is likely to only be of notable benefit in particular LSAs where retail has already diminished, whereas borough wide LSAs are considered to be viable, reflecting the review of LSAs in this Local Plan review.</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>Policy R5 could theoretically see land be used for more viable uses, more efficiently through Class E. The change from dispersed retail uses to other E uses of business activity may be a larger employer thus increasing overall economic growth, however, the alternative to Policy R5 will more likely see a negative impact in relation to dispersed shops especially those that provide essential daily goods for people with mobility issues. The COU from dispersed shops to 'office, research/development, light industrial' uses would see these spaces no longer serving a local community but rather workers from further afield, impacting on residents and workers easy access to goods made all the more pertinent through home working, who in themselves are contributors to the economy.</p> <p>The alternative to R4 could have a minor positive effect in the long term which may occur from the flexible E uses sustaining LSAs vitality. Over the plan period GLA projections show in 'other locations' which include LSA, -614sqm of convenience retail will be needed and -2160sqm of comparison retail will be demanded over the plan period. Flexibility in the LSA could enable a reduced amount of retail to remain viable from multiple other supporting uses able to establish quickly. However, contrasting with this scenario is a reduction of key retail units through loss via Class E uses that could see a premature deficiency in retail floorspace. There may be a negative impact on LSAs in the short term that may see the reduction in retail due to Class E changes stifle short term viability and local employment. This negative impact on retail viability could also be exacerbated when combined with the cumulative damaging impacts of the proliferation of uses such as cafes/restaurants.</p>
9. Minimise the need to travel and create accessible, safe and sustainable	+	-	+	-	+	-	The effect of the alternative to R3, R4 and R5 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus,

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
connections and networks by road, public transport, cycling and walking							tube and rail connections. The preferred approach set out in policy R3 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function and thus draw to town centres, active frontages and consider impacts which could support maintaining uses in accessible locations. Policies R4 and R5 concentrate on managing impacts so that uses that previously would unlikely be located in LSAs and dispersed locations of a significant scale are not putting unnecessary pressure on transport systems.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5
12. Reduce contribution to climate change and enhance community resilience to	0	-	0	-	0	0	The effect of the alternative to R3, R4 and R5 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore emissions associated with transport. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R3 and R4 may help

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
climate change impacts.							mitigate some of the unintended consequences of Class E in town centres and LSAs by seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations. This is less certain in dispersed locations due to their accessibility varying greatly, however to a hyper localised catchment this reduces the need for travel. This is considered to have a neutral effect overall.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5 The preferred approach to Policy R3 and R4 would contribute to better air quality than the alternative approach, from a reduced need to travel to access goods and services by retaining established functions of areas dispersed across the borough. However, this is considered to be of minimal impact to bettering air quality and has been classed as a neutral effect.

### Summary

Overall the assessment has to make assumptions about what land owners might do, and given the wider weakness in the retail sector some of the changes envisaged in the assessment maybe more certain than others such as those office floorspace. As with the assessment of policies

R1, R2 and R7 the assessment of the alternative 'do nothing' approach suggests similar negative effects including other non main town centre uses diluting the core function of town centres as locations for culture, civic and commercial activity alongside negative effects on local centres role in provision of essential daily goods and services. The negative effect of offices on retail frontages is noted and the creation of inactive frontages which creates a perception of decreasing town centre quality. This could have a wide range of effects including ability to meet retail needs, wider provision of services, increasing the need to travel and associated carbon emissions. Associated amenity impacts from different uses in unsuitable locations are also clearly identified in terms of noise and odours and anti-social behaviour. The impacts on economic growth, in particular for town centres are considered to be clearly negative with no positive effects identified for the alternative 'do nothing' alternative. The exception to this is to Policy R4 Local Centres where a minor positive effect of E class development in certain locations could help less well performing LSAs evolve to offer a wider range of viable uses. This could aid the economic growth and viability of these centres. However overall the impact on provision of local services is noted. However this is not enough to outweigh the overall negative impacts and taking into account the uncertainty over how landowners will utilise Class E the preferred approach is considered positive.

## Assessment of Bunhill and Clerkenwell AAP: Alternative to Policies BC1 and BC2

The new UCO changes introduced on 1 September 2020 identify office uses as part of class E. This means that an office can now be changed to other uses considered within class E without planning permission. This puts existing office floorspace in the borough at risk of being converted to other non-business uses. The introduction of class E poses some new challenges for the future of business floorspace. The additional flexibility introduced by class E could have significant impacts on the way that Islington's business floorspace is distributed, affecting the borough's well-established employment clusters such as the CAZ. In addition the possibility is raised around

### Policies BC1 and BC2

The following alternatives described below; the preferred approach for Policies BC1 and BC2 the alternative.

**Table 2.28 Description of preferred and alternative approaches to Policies BC1 and BC2**

Reference	Description
Preferred approach BC1	Taking a targeted approach to class E, recognising flexibility whilst restricting class E through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative BC1	Considering the possible effects of allowing Class E without any policy intervention. This assessment considers the full range of uses that Class E could introduce, aside from business floorspace (e.g. office) and the effects that this alternative will have against the sustainability framework objectives, with a particular focus on the potential range of effects of Class E on existing business clusters.
Preferred approach BC2	Taking a targeted approach to class E, recognising flexibility whilst restricting class E through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative BC2	Considering the possible effects of allowing Class E without any policy intervention. This assessment considers the full range of uses that Class E could introduce, aside from business floorspace (e.g. office) and the effects that this alternative will have against the sustainability framework objectives, with a particular focus on the potential range of effects of Class E on existing business clusters.



Table 2.29 Pre hearing assessment of preferred and alternative approaches to Policy BC1 and BC2

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	0	0	<p>The preferred approach to Policy BC1 will likely have a minor positive effect on promoting a high quality, inclusive, safe, and sustainable built environment. The area has a mixed-use character with specific concentrations of employment uses, particularly large floorplate and SME offices. The policy will promote business-led development consistent with this character.</p> <p>BC1 alternative: The alternative will likely have a minor negative effect on promoting a high quality, inclusive, safe, and sustainable built environment. The alternative will remove the ability for the Council to control the type and distribution of commercial, business and service uses on many sites in the Bunhill and Clerkenwell area, potentially harming the mix and balance of uses with impacts on their function and offer and also potentially creating conflict between commercial and residential uses, with impacts on amenity.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	--	+	-	<p>The preferred approach to Policy BC1 will likely have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. Development will be located in areas with excellent public transport accessibility including to the underground and the Elizabeth Line as well as walking and cycling. The Islington Employment Study states that the Central Activities Zone is the location with the most demand for Grade A office space and this will be the priority. Maximisation of business floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. Local evidence currently indicates that there is a significant</p>

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>shortfall in supply of employment land. This policy will maximise development of floorspace in this most appropriate location ensuring the efficient use of the land.</p> <p>BC1 alternative: The alternative to BC1 will have significant negative impacts on efficient use of land buildings and infrastructure, by allowing office uses to change to other commercial, business, and service uses within Class E without permission. It can be expected that alternative uses including shops, professional services, restaurants and cafes, and gyms will be developed taking the place of office floorspace. While these other uses are valued and play a role in the CAZ they would be developed at the cost of office floorspace. Consideration of what the most efficient use of land is for area should include agreed planning objectives and priorities, rather than deferring to the market alone which cannot meet all needs for all individuals. Office floorspace is the priority land use across the Bunhill and Clerkenwell AAP area. Local Plan evidence sets out that the Council has significant evidenced need to provide office floorspace to cater for projected jobs increases and secure inclusive economic growth, and the BCAAP area is the best location for these uses, with good access and agglomeration benefits with the other central London office markets and supporting service uses.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect on the efficient use of land, buildings, and infrastructure by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					BC2 alternative: without any policy intervention Class E would have a negative effect on the efficient use of land, buildings, and infrastructure by preventing the Council from ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.
3. Conserve and enhance the significance of <b>heritage assets</b> and their settings, and the wider historic and cultural environment.	0	0	0	0	BC1: No effect for the preferred approach or the alternative.  BC2: No effect for the preferred approach or the alternative.
4. Promote <b>liveable neighbourhoods</b> which support good quality accessible services and sustainable lifestyles	0	-	+	-	The preferred approach to Policy BC1 will have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, there are a number of sites allocated for other (non-office) uses. These factors combined with the existing mixed use character of the area means the mix of uses which support liveable neighbourhoods will not be affected.  BC1 alternative: The alternative will have a likely minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations due to their effect

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>on residential amenity such as noise, odours, and servicing impacts. It will also may have an impact on the vitality and viability of the Local Shopping Areas as the Council will have less control to direct and retain high street uses in these locations, potentially reducing the offer of these centres.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect on liveable neighbourhoods. It ensures that retail, cultural, entertainment and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping expand the cultural role of this area and of London as a whole.</p> <p>BC2 alternative: As with BC1, the alternative will have a likely minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations due to their effect on residential amenity such as noise, odours, and servicing impacts.</p>
5. Ensure that all residents have access to good quality, well-located, <b>affordable housing</b>	0	0	0	0	The preferred approach to BC1 and the BC1 alternative will not effect the provision of affordable housing.

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote <b>social inclusion, equality, diversity and community cohesion</b>	+	-	0	0	<p>The preferred approach to Policy BC1 will have minor positive effects, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. These policies will work alongside other policies in the plan whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>BC1 alternative: The alternative will lead to minor negative effects in terms of social inclusion, equality, diversity, and community cohesion in comparison to policy BC1 by reducing the amount of employment uses and associated employment and training opportunities. The alternative does not maximise the development of employment uses where it is in most demand and most suitable as set out in the Islington Employment Study.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>
7. Improve the <b>health and wellbeing</b> of the population and reduce health inequalities	0	0	+	-	<p>For Policy BC1 both the preferred approach and the policy alternative will not have significant effects on the health and wellbeing of the population.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect on the health and wellbeing of the population by directing uses with potential for negative effects on amenity to the most appropriate locations to minimise harmful effects. In particular, the policy ensures that retail, cultural, entertainment, and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour.</p> <p>BC2 alternative: This will have a minor negative effect as it will reduce the Council's ability to stop developments locating in areas where they may harm residential amenity which can impact on health outcomes.</p>
8. Foster sustainable <b>economic growth</b> and increase employment opportunities across a range of sectors and business sizes	++	--	+	-	<p>The preferred approach to Policy BC1 will have significant positive effects on economic growth and providing employment opportunities. The Council recognises that there is uncertainty around growth projections for the London office market due to Covid 19 and Brexit. The home working necessitated during the pandemic will have lasting effects on the office market, however evidence indicates that these effects should not be overstated, with the need for fewer desks often balanced against a need for higher quality spaces, and with population growth driving demand in the long term.</p> <p>The policy will provide much needed floorspace for employment uses, in particular office uses. There is high demand in Islington for office floorspace, which is projected to exceed supply, restricting economic growth and employment in the borough. The biggest threat to the supply of employment land is likely to be from restricted supply caused by a lack of sites as they are outbid by residential developments. In addition, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>BC1 alternative: This alternative will have significant negative effects as office accommodation may change under Class E to other uses, reducing the supply of office floorspace needed for businesses and economic growth</p>

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>in the borough. The existing permitted development rights will further reduce the supply of employment floorspace meaning that control of new build office floorspace over the longer term is important. The Council recognises Class E will allow the operators of commercial, business, and service uses a greater range of potential sites for use. The Council does not consider that this flexibility delivers on Local Plan objectives when compared to the proposed policy approach where uses are planned in a proactive way. In Islington's circumstances, there is high demand for office floorspace to take advantage of the central London office markets, but also high values for other uses which may outcompete office uses while not providing the same number and type of employment opportunities. These offices would provide the space for establishment and expansion of businesses in the tech and creative sectors and their supporting services, spaces for SMEs, affordable workspace for enterprises with social value, and training opportunities.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect. It will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate. However, the policy will have overall positive effects on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, improving the offer of these locations and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole. We recognise that Class E rights will lead to less defined Local Shopping Areas however the policy will reduce this effect.</p> <p>BC2 alternative: Full Class E is likely to have a minor negative effect on the economy. While some businesses including shops, cafes and restaurants will gain the advantage of being able to locate in a larger range of sites throughout the BCAAP area without planning permission, potentially leading to some economic activity, this will be outweighed by the disadvantages in</p>

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					not being able to maintain areas as clusters of uses to maintain an attractive and walkable offer, with a distinct character, which will sustain local businesses and support the wider economy.
9. <b>Minimise the need to travel</b> and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	+	-	<p>The preferred approach to policy BC1 will have a minor positive effect as it will promote development in areas with excellent public transport accessibility, including to the underground and the Elizabeth Line.</p> <p>BC1 alternative: Allowing change to Class E uses will have a minor negative effect as may replace offices which are a high trip generating use to other uses which are less trip generating, leading to a more dispersed and less sustainable trip generation pattern, and not maximising the relative accessibility of the AAP area compared to other parts of the borough.</p> <p>The preferred approach to policy BC2 will have minor positive effects as it will promote clustering of uses in the Local Shopping Areas to combine trips in accessible areas.</p> <p>BC2 alternative: This may have minor negative effects as it will likely result in a less coherent distribution of retail and high street uses in the BCAAP area, increasing trip generation.</p>
10. Protect and enhance <b>open spaces</b> that are high quality, networked, accessible and multi-functional	0	0	0	0	<p>BC1: No effect for the preferred approach or the alternative.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>



IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable <b>wildlife habitats</b> wherever possible and protect species and diversity.	0	0	0	0	<p>BC1 alternative: No effect for alternative. Both residential and commercial uses will be required to integrate green infrastructure where possible.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>
12. Reduce contribution to <b>climate change</b> and enhance community resilience to climate change impacts.	+	-	+	-	<p>BC1: The preferred approach to policy BC1 will have a minor positive effect as it will promote development with high trip generation (offices) in areas with excellent public transport accessibility, including to the underground and the Elizabeth Line, maximising use of low carbon transport.</p> <p>BC1 alternative: Allowing change to Class E uses will have a minor negative effect as may replace offices which are a high trip generating use to other uses which are less trip generating, leading to a more dispersed and less sustainable trip generation pattern, and not maximising the relative accessibility of the AAP area compared to other parts of the borough.</p> <p>The preferred approach to policy BC2 will have minor positive effects on reducing climate change as it will promote clustering of uses in the Local Shopping Areas to combine trips in accessible areas.</p> <p>BC2 alternative: This may have minor negative effects on climate change as it will likely result in a less coherent distribution of retail and high street uses in the BCAAP area, increasing trip generation for more carbon intensive forms of transport.</p>

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a <b>circular economy</b> that optimises resource use and minimises waste	0	0	0	0	BC1: No effect for the preferred approach or the alternative.  BC2: No effect for the preferred approach or the alternative.
14. Maximise protection and enhancement of <b>natural resources</b> including water, land and air	0	0	0	0	BC1: No effect for the preferred approach or the alternative.  BC2: No effect for the preferred approach or the alternative.

### Summary

The assessment recognises the potential harmful effect on the mix and balance of uses and efficient use of land in the CAZ which is considered to impact the wider economic function of the area. The potential for conflict between commercial and residential uses, with impacts on amenity is also recognised. Allowing office uses to change to other commercial, business, and service uses within Class E such as shops, professional services, restaurants and cafes, and gyms is recognised by the assessment as having a value and a role to play in the CAZ but the assessment makes clear that this will be at the cost of office floorspace. Therefore overall the assessment recognises the significant harm in economic terms of not restricting office floorspace by conditions where new office floorspace requires planning consent but there is also

uncertainty over how effective the overall approach to BC1 will be in terms of maximising office floorspace where changes to office floorspace can occur without requiring planning consent.

Whilst the preferred approach to BC2 will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate it is considered to have an overall positive effect on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, improving the offer of these locations and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole. The alternative more flexible approach is considered to lead to a more dispersed pattern of leisure and culture uses which given the CAZ location in principle is not unwelcome however this may be to the economic disadvantage of maintaining areas as clusters of uses, with a distinct character, which as an approach is considered will sustain more local businesses and support the wider economy so is the preferred choice.

**Low Carbon heating / ASHP change: Policy S1: Delivering Sustainable Design, supporting text, Paragraph 6.9, 6.10, 6.11**  
**Policy S5: Energy Infrastructure:**

**Policy S1: Delivering Sustainable Design, supporting text, Paragraph 6.9, 6.10, 6.11**, contains a proposed change to clarify that the use of low-emission CHP systems will only be acceptable to support the expansion of area-wide heat networks as part of the planned transition to the use of secondary sources to power heat networks.

**Policy S5: Energy Infrastructure, part D**, contains a proposed change (insert ref) to clarify that minor new-build developments with an individual heating system are required to prioritise low carbon heating systems over gas boilers, with the change to part C clarifying the larger minor new-build developments should select the heat source in accordance with the heating hierarchy in part A of the policy.

**Policy S5: Energy Infrastructure, supporting text, Paragraph 6.67** contains a proposed change to clarify that ultra-low NOx gas boilers as the heat source for the communal heating system of major and larger minor developments will only be acceptable as part of a hybrid system involving heat pumps, and where it can be demonstrated that heat network connection and zero-emission or local secondary heat sources are not feasible.

**Policy S5: Energy Infrastructure, supporting text, Paragraphs 6.69 and 6.70** contain proposed changes to clarify that the most appropriate low carbon heating systems for use in minor new-build developments with an individual heating system will be Air Source Heat Pumps (ASHPs), in preference to ultra low NOx gas boilers, due to the decarbonisation of the electricity grid. These paragraphs also contain proposed changes to clarify that minor development using ASHPs or direct electric heating as the heat source for an individual heating system will only be acceptable where the development will achieve minimal heat demands through building design with a very high standard of fabric energy efficiency (Passivhaus standards or similar).

**Table 2.30 Pre hearing assessment of proposed change to Policies S1 and S5**

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	The proposed changes to policies S1 and S5 will have a minor positive effect. These changes will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment.
2. Ensure efficient use of land, buildings and infrastructure	0	No effect has been identified.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	The proposed changes to policy S5 have the potential to impact upon heritage assets by prioritising the use of ASHPs over gas boilers for minor development with individual heating systems and requiring high standards of fabric energy efficiency. The effect of these requirements on building design will be considered and balanced alongside other policies in the plan, so the effect on the conservation and enhancement of heritage assets is considered to be neutral overall.

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	The proposed change to Policy S1 will ensure that gas CHP will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network. The proposed change to Policy S5 will limit the use of gas boilers in minor developments. As a result, both policy changes will have a positive effect on the promotion of liveable neighbourhoods by ensuring that new developments limit their contribution to air pollution through NOx.
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	The proposed change to Policy S5 requires minor developments using an ASHP or direct electric heating as the heat source for their individual heating system to achieve high standards of fabric energy efficiency in order to ensure they will achieve minimal heat demands to keep energy bills down.
6. Promote social inclusion, equality, diversity and community cohesion	+	The proposed change to Policy S5 in relation to requiring high standards of fabric energy efficiency will contribute to reducing fuel poverty in the borough, which has economic and health benefits for Islington residents.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	<p>The proposed change to Policy S5 in relation to requiring high standards of fabric energy efficiency will ensure that individual ASHP or direct electric heating systems will not lead to high energy bills and will help to reduce fuel poverty in the borough.</p> <p>The proposed changes to Policy S1 and S5 will limit the use of gas powered heating systems and will ensure that new developments limit their contribution to air pollution through NOx.</p>

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	The proposed change to policy S5 to prioritise ASHPs in minor developments with individual heating systems will help to support the development of green industries and a low-carbon economy.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	No effect.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect.

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	<p>The proposed change to policy S1 will have a significant positive effect on reducing the borough's contribution to climate change because it will reduce carbon emissions by ensuring that that gas CHP will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network as part of the transition to the use of secondary sources to power heat networks.</p> <p>The proposed change to policy S5 will have a significant positive effect on reducing the borough's contribution to climate change because it will reduce carbon emissions by prioritising low carbon heating systems, in particular ASHPs, over gas boilers as the power source for minor developments with an individual heating system. The policy change to require a high standard of fabric energy efficiency such developments will also contribute to reducing carbon emissions by reducing energy demand.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	The changes to policies S1 and S5 will help to minimise the use of non-renewable energy sources by limiting the use of gas CHP and gas boilers. The change to policy S5 will also promote the use of ASHPs which are a renewable sustainable energy source.



IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	+	The proposed changes to Policy S1 and S5 will limit the use of gas powered heating systems and will ensure that new developments limit their contribution to air pollution through NOx.

### Summary

These changes respond to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions. In addition to the health and environmental benefits these changes also have economic benefits and help in particular with residents in fuel poverty.

## Transport and Public Realm: Assessment of Policy alternative to Policy T1 & T2

The preferred approach proposes changes to Appendix 3, which relate to Policy T1 which sets out the requirements for cycle parking and Transport Assessments or Travel Plans. The changes proposed for Appendix 3 reflect the nominal changes made to use class orders; replacing the previous use class with the updated use class. To ensure that thresholds for Transport Assessments and Full Travel Plans reflect the size, transport needs and impacts of General Class E developments, a spatial threshold of 750sqm is proposed. This is the lowest threshold for a Class E development; Use Class E(b) Sui Generis Hot Food Takeaway. The purpose of this is to ensure that developers assess transport impacts and explore mitigation for all activities included in Class E. The preferred approach to T2 aligns the cycle parking standards to take into account the changes to the use class order, including the different uses that now fall within class E to ensure that appropriate cycle parking, is provided as well as the importance of designing flexibility to cater for different activities within the same use class. In addition a requirement is introduced for class E where a particular use is unspecified to ensure that a suitable minimum level of cycle parking is provided which can adapt to short stay/long stay requirements of different uses. In summary the option for assessment is:

**Table 2.31 Description of preferred and alternative approach to Policies T1, T2 and BC1**

Reference	Description
Preferred approach T1 and T2	To set a minimum threshold for Transport Assessments and Full Travel Plans to ensure the size, transport needs and impacts of General Class E developments, are considered and to set a suitable minimum general level of cycle parking provision for an unspecified Class E use
Alternative BC1	Considering the possible effects of allowing Class E without any policy intervention on transport impact and cycle parking

Table 2.32 Pre hearing assessment of preferred and alternative approach to Policies T1 and T2

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	-	<p>The assessment of the preferred approach identifies positive effects in terms of transport assessments because it will help to address safety and sustainability concerns over quantity of traffic for a proposal and with regards cycle parking because it proposes to provide sufficient cycle parking for visitors or residents/staff as part of development with a general Class E requirement.</p> <p>The alternative by not specifying Class E activity could result in minor loss of cycle parking, harming the promotion of sustainable built environment and potentially cause negative transport impacts if adequate transport assessment was not undertaken.</p>
2. Ensure efficient use of land, buildings and infrastructure	0	T1-	<p>Preferred approach to Policies T1 and T2 will have a minor positive effect as they encourage more sustainable modes of transport and will tailor the requirement to the use unless its general Class E. This will help to support a more optimal land use in relation to transport and the movement of people and goods. It could also lead to an inefficient use of land with additional cycle parking provided it was not required taking away land from other development needs so is considered overall neutral.</p> <p>The alternative, not specifying Class E activity in Appendix 4 could result in excess or lack of land attributed to cycle parking, an inefficient use of land. A minor negative impact has therefore been identified.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for alternative or Policy T2.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	-	<p>The preferred approach will have a significant positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which will help to reduce the impacts of pollution on the public realm, it will also help to ensure appropriate provision of cycle parking is provided on proposals and that this is sufficiently flexible to adapt - this will help to promote connections and ensure services are accessible via sustainable transport options.</p> <p>The alternative, not specifying cycle parking minimum requirements by activities in Appendix 4 could lead to inappropriate cycle parking provision. The flexibility of Class E means that the needs for long stay and short stay can change depending on the activity. Not having standards which take this into account could lead to inappropriate and insufficient provision which could negatively impact on sustainable transport and accessing services via sustainable means. In addition, not being able to appropriately assess transport impacts could lead to increased transport impacts which can in turn result in additional pollution on the public realm. A minor negative has therefore been identified.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for alternative or Policy T2.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for alternative or Policy T2.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	-	<p>The preferred approach will have a significant positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help to reduce the impacts of pollution on the public realm which can help to tackle pollution and air quality which can impact on health. Ensuring adequate cycle parking is provided will also help to promote active travel which can improve physical health and wellbeing.</p> <p>For the alternative a minor negative effect has been identified. Unrestricted class E in Appendix 3 and 4 could lead to adverse transport impacts and inadequate cycle parking provision, which would affect communities by increasing congestion, air pollution, road danger, as well as creating barriers to cycling.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	-	<p>For the preferred approach no effect has been identified.</p> <p>For the alternative a minor negative effect has been identified. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision, which could affect access to employment spaces by increasing congestion or lack of cycle parking.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	<p>The preferred approach will have a minor positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help to promote safe and sustainable connections by public transport, walking and cycling. Ensuring adequate cycle parking which takes into account the different potential impacts of Class E and provides flexibility for cycle parking to adapt will also help to achieve this objective.</p> <p>For the alternative a minor negative effect has been identified. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative or Policy T2.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for alternative or Policy T2.

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>The preferred approach will have a minor positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help to reduce the impacts of pollution and emissions. Ensuring adequate cycle parking is provided will also help to promote sustainable travel which can be beneficial in reducing vehicle trips and associated emissions.</p> <p>For the alternative a minor negative effect has been identified. Transport amounts for around 50% of emissions in Islington which contribute to air pollution. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision, which would increase emissions and hinder the Council's ambition to be carbon neutral by 2030.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for alternative or Policy T2.



IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	+	-	<p>The preferred approach will have a minor positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help with tackling air quality. Ensuring adequate cycle parking is provided will also help to promote sustainable travel which can be beneficial in reducing vehicle trips and associated emissions.</p> <p>For the alternative a minor negative effect has been identified Transport amounts for around 50% of emissions in Islington which contribute to air pollution. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision. These negative impacts could lead to increased use of motor vehicles, which can in turn impact air quality.</p>

### Summary

The assessment identifies that the flexibility of Class E means that the needs for cycle parking could potentially not be met which could negatively impact on sustainable transport and accessing services via sustainable means. In addition, not being able to appropriately assess transport impacts could lead to increased transport impacts which can in turn result in additional pollution on the public realm, having an effect on health. The preferred approach ensures that transport impacts can be appropriately assessed and mitigated which helps tackling air quality and promoting sustainable travel which can be beneficial in reducing vehicle trips although it could also lead to an inefficient use of land with additional cycle parking provided if developers sought a flexible Class E use which could take away land from other development needs. No positive benefits of the alternative were identified.

## Policy T5: Delivery, Servicing and construction

The policy contains proposed changes (SDM-MO132, 133, 134, 135) that seeks to promote more sustainable freight movements including the use of non-motorised modes of transport for safe, clean and efficient deliveries and servicing, including for uses which generate deliveries to end customers as part of their operation.. The changes to Policy B2: New Business Floorspace, part D contains a proposed change (SDM-MO49) which clarifies the councils approach to air quality and sustainable transport that adds cross reference to policies S7, T2 and T5. The change identifies that proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts. The changes to T5 clarify the need for development to demonstrate how it is maximising use of more sustainable modes of transport. The clarification and update is also linked to the recently adopted Islington Transport Strategy.

**Table 2.33 Pre hearing assessment of proposed change to Policy T5**

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	The modifications require developments to explore more efficient and sustainable freight, delivery and servicing movements, by using sustainable and 'clean' modes for servicing and delivery, including uses generating delivery trips to end customers such as restaurants or shops. This has the potential to reduce the safety and sustainability impacts that deliveries have on the built environment, in particular the public realm. A minor positive effect has therefore been identified.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	+	A minor positive effect has been identified as developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which could reduce the amount of space required on-site and off-site to accommodate these vehicular movements. The new provision relating to delivery to end customers (for instance for restaurants and shops) also contributes towards that positive effect. Optimised and efficient vehicular movements for freight, delivery, servicing can together lead to positive impacts in terms of improvement congestion on the road network.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	No effect has been identified.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	A minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which supports a reduction in vehicular movements, promotes non-motorised modes, which can support better access to services and sustainable lifestyles.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effect has been identified.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect has been identified.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	A minor positive effect has been identified as relevant developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which supports a reduction in vehicular movements, promotes non-motorised modes, which can support better access to services and sustainable lifestyles, and by extension reduce health inequalities. The policy can have a positive impact in improving air quality, reduce congestion and other negative consequences relating to traffic, improving health and wellbeing.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	No effect has been identified.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	A minor positive effect has been identified. The requirement to demonstrate how safe, clean and efficient delivery and servicing, which can lead to consolidating and reducing the number of operational vehicle trips. The promotion of non-motorised transport modes can also reduce the volume of motorised trips.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	A minor positive effect has been identified. The modifications require delivery and Servicing Plans to demonstrate how clean and efficient deliveries and servicing has been facilitated which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this. Requiring that industrial developments should facilitate sustainable freight movement , and investigate the use of non-motorised transport and 'clean' vehicles which minimise motorised vehicle trips, which could have a positive effect on reducing carbon emissions.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	A minor positive effect has been identified. The modifications can help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels.
14. Maximise protection and enhancement of natural resources including water, land and air	+	A minor positive effect has been identified. The modifications requirement for Delivery and Servicing Plans to demonstrate how clean and efficient deliveries and servicing has been facilitated which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged, could have a positive effect on air quality.

### Summary

The assessment identifies the positive benefits of making the changes which will have a help to improve air quality, reduce congestion and other negative consequences relating to traffic, thereby improving health and wellbeing for those living, working or visiting Islington.

# Part 2: New and amended Site Assessments

## **Introduction**

This section sets out the assessment of the new site allocations and amended existing site allocations proposed for pre-hearings consultation.

**Table 2.34 Pre hearing assessment of site KC8 Bemerton Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC8: Bemerton Estate	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>KC8 is allocated for infill residential development including the provision of additional genuinely affordable housing. Re-provision of community space and provision of new retail/commercial spaces along Caledonian Road is required, alongside improved landscaping, lighting, seating, play spaces and security measures across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements which will benefit the quality of the built environment, creating a safer and more inclusive environment as well as the re-provision of community and commercial space that will promote more liveable neighbourhoods.</p> <p>In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate, or its housing estates in general.</p>													

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**Table 2.34 Pre hearing assessment of site OIS27: York Way Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS27: York Way Estate	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The allocation suggests that additional genuinely affordable housing can be accommodated on new blocks within the estate, alongside improved play space provision, improvements to communal facilities and enhanced landscaping.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires improvements to play space and communal facilities which</p>													



will benefit the quality of the built environment, creating a safer and more inclusive environment and promoting a more liveable neighbourhood.

In terms of assessing potential reasonable alternatives to residential use of the site, it is appropriate to note that the site is a non-LBI owned housing estate. The draft allocation reflects the landowners' plans for the site and it is considered unlikely that the site would be made available for non-residential development.

**Table 2.35 Pre hearing assessment of site OIS28: Barnsbury Estate**

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS28: Barnsbury Estate	+	+	0	+	++	+	0	0	0	+	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The site is allocated for refurbishment of Old Barnsbury estate and redevelopment of New Barnsbury estate for residential use, including the provision of additional new homes and genuinely affordable housing. Improvements to existing estate open spaces including the creation of a park on Pultney Street, and the provision of a new park on Carnegie Street with a community centre, play and exercise equipment and ball court. Improvements to landscaping, planting, lighting and security measures, play spaces, seating and bin and cycle storage across the estate. The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires extensive improvements to communal facilities, including play spaces, a new community centre and improved routes through estate, which will benefit the quality of the built environment, create a safer and more inclusive environment and promote a more liveable neighbourhood. New publicly accessible open spaces should be provided, contributing towards the increasing need for open space in the borough.</p> <p>In terms of assessing potential alternatives to residential use of the site, it is appropriate to note that the site is a non-LBI owned housing estate. The draft allocation reflects the landowners' plans for the site and it is considered unlikely that the site would be made available for non-residential development.</p>													

**Table xx: New Site Assessment: OIS29: Highbury Quadrant Congregational Church:**

The draft Highbury Quadrant Congregational Church allocation reflects the landowner’s plans for the site, which involve the co-location of housing with a new church and community space. The reasonable alternative to the allocation assessed below is retention of the existing quantum of social and community floorspace.

**Table 2.36 Pre hearing assessment of site OIS29 Highbury Quadrant Congregational Church**

Site	IIA Objective															Commentary on assessment of likely significant effects of site allocations  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)	
		1. Built Environment	2. Efficient use of land	3. Heritage	4. Liveable	5. Housing	6. Social inclusion	7. Health	8. Economic growth	9. Need to travel	10. open space	11. Biodiversity	12. Climate change	13. Resource efficiency	14. Natural resources		
OIS29  Highbury Quadrant Congregational Church:	<b>Option 1: co-location of housing and church/community space</b>	+	++	0	+	+	+	+	0	0	0	0	0	0	0	0	<p><b>Preferred approach – Option 1:</b> The site is allocated for re-provision of the Church and community space alongside residential development, including affordable housing. Landscaping and public realm improvements should be provided. Improvements to pedestrian access to the site are also important given its ‘island’ location.</p> <p>The co-location of social and community infrastructure uses with housing at the site is considered to be an efficient use of the site. The existing buildings on site are currently in a state of disrepair and development should have a positive effect on the built environment. This option would</p>

<p><b>Reasonable Alternative 1: Retention of social and community infrastructure</b></p>	-	-	0	+	0	+	+	0	0	0	0	0	0	0	<p>support the delivery of much needed affordable housing on the site, and bring underused social and community infrastructure back into more productive use. This would have significant positive effects for local residents by encouraging social interaction and providing community and faith facilities, alongside the benefits brought by new good quality housing. This supports the liveable neighbourhoods, social inclusion and health objectives.</p> <p><b>Reasonable alternative 1:</b> In terms of potential alternative uses of the site, whilst the retention of social and community infrastructure is strongly supported by policy, in this case allocating the site solely for social and community infrastructure uses could have a negative impact on the built environment and the efficient use of land. The site has suffered fire damage and there are challenges associated with bringing parts of the site back into community use. This alternative could see the site fall into further disrepair, without some form of development to help with improvements to the worship and community meeting spaces. Nevertheless if sole use of the site for social and community infrastructure could be achieved, it would likely have a positive effect on liveable neighbourhoods, social inclusion and health and wellbeing.</p>
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**Table 2.37 Pre hearing assessment of site OIS30: Cluse Court**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS30: Cluse Court	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The site is allocated for residential development, including the provision of additional genuinely affordable housing. Improvements to play space, amenity space and landscaping across the estate are required.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment that will promote more liveable neighbourhoods.</p> <p>In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate, or its housing estates in general.</p>													

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**Table 2.38 Pre hearing assessment of site OIS31: Hillside Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS31: Hillside Estate	+	+	0	-/0	++	0/v	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>Subject to justifying any loss of social infrastructure, residential development including the provision of additional genuinely affordable housing. Improvements to play space, amenity space and landscaping across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements which will benefit the quality of the built environment, creating a safer and more inclusive environment. There is the potential for existing community facilities to be lost as a</p>													

result of development of this site. Unless this can be robustly justified in accordance with policy SC1, it could have a negative effect on liveable neighbourhoods and social inclusion by reducing residents' access to essential services and opportunities for people to connect with their community.

In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate, or its housing estates in general.

**Table 2.39 Pre hearing assessment of site OIS32: New Orleans Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS32: New Orleans Estate	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The site is allocated for residential development including the provision of additional genuinely affordable housing. Relocation and re-provision of the existing multi-use games area and community building is proposed, alongside improvements to play space, amenity space and landscaping across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment that will promote more liveable neighbourhoods.</p> <p>In terms of possible alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate, or its housing estates in general.</p>													

**Table 2.40 Pre hearing assessment of site OIS33: Drakeley Court and Aubert Court**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS33: Drakeley Court and Aubert Court	+	+	0	+	++	+	0	0	0	+	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The site is allocated for residential development including the provision of additional genuinely affordable housing. Relocation of Aubert Court community centre to improve visibility and accessibility is proposed, alongside improved landscaping - including the creation of a new green square - and improved lighting, seating, play space and security measures across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment and promoting more liveable neighbourhoods. The new green square will contribute towards the increasing need for open space in the borough.</p> <p>In terms of possible alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate, or its housing estates in general.</p>													

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**Table 2.41 Pre hearing assessment of site OIS34: Kerridge Court**

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS34: Kerridge Court	+	+	0	+	++	+	0	0	0	+	0	0	0	0

**Commentary on  
assessment of  
likely significant  
effects of site  
allocations**

The site is allocated for residential development including the provision of additional genuinely affordable housing. Re-provision of the existing multi-use games area within a new, centrally located public space and improvements to play space, amenity space and landscaping across the estate are expected.

The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment and promoting more liveable neighbourhoods. The new public space will contribute towards the increasing need for open space in the borough.

In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate, or its housing estates in general.

**Modified allocations:**

The following assessments reflect main modifications made to the allocations for sites AUS8: 161-169 Essex Road, N1 2SN; FP5: 1 Prah Road, N4 2RA; NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG; ARCH1: Vorley Road/Archway Bus Station, N19; OIS10: Hornsey Road and Grenville Works, 2A Grenville Road ; ARCH5: Archway Campus, Highgate Hill, N19

**Table 2.42 Pre hearing assessment of modifications made to site AUS8: 161-169 Essex Road, N1 2SN**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS8: 161-169 Essex Road, N1 2SN	+	+	++	++	+	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS8 is allocated for a mix of retail, culture and leisure uses. There is an opportunity to develop the car park to the rear of the site and it is considered residential use could be appropriate on this part of the site.</p> <p>The most significant positive effect of the allocation will be on liveable neighbourhoods. The allocation protects the existing cultural uses which will attract people to the area and help sustain a vibrant and viable town centre in Angel. The building is Grade II* listed and this is protected in the allocation; bringing the building back into appropriate use could have a significant positive heritage impact. The allocation also positively contributes to creating a high quality environment and optimising the use of land by supporting the development of the car park to meet need for additional housing in the area including affordable housing. Redevelopment of the car park also contributes to the council’s strategic objective to encourage active modes of transport and reduce dependency on cars. The provision of good quality affordable housing could have positive effects in relation to social inclusion.</p>													
<b>Commentary</b>	<p>The modification changes the focus of uses on the car park to the rear of the site, from business uses being priorities to recognising residential use could be appropriate. It is thought that an element of residential use could be incorporated onto the site through the redevelopment of the car park to the rear of the site. Whilst the change from business use to residential could have an effect in relation to economic growth, the site would still provide relevant town centre uses which would continue to provide for positive economic growth effects, whilst also providing a minor positive in the provision of housing.</p>													



Table 2.43 Pre hearing assessment of modifications made to site FP5: 1 Prah Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP5: 1 Prah Road	++	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>FP5 is allocated for residential development and public realm improvements.</p> <p>The allocation provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels. The site is within the town centre, providing future residents with good access to facilities and amenities in accordance with the liveable neighbourhoods objective,. The site would provide affordable housing as part of any residential element, which could also help to address issues surrounding social exclusion.</p>													
	<p>Although business use was previously identified on the site, the benefits of housing were recognised. As the site was not previously in business use (as a former Conservative club in Sui Generis use) and is located in a primarily residential area, albeit still within Finsbury Park Town Centre, residential use of this site would be appropriate, although it is recognised that this would not result in a positive contribution towards economic growth. The allocation has been amended accordingly.</p>													

Table 2.44 Pre hearing assessment of modifications made to site NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG	++	++	0	++	+	+	+	++	+	+	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>NH1 is allocated for mixed-use development, with a large quantum of residential use, retention of and improvements to existing retail floorspace and a significant amount of new office floorspace. Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and enhancement of the covered market will be supported. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation offers an opportunity to improve retail provision and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment as well as increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location. Permeability improvements at the site would promote liveable neighbourhoods by improving residents' connection to facilities and amenities. The potential delivery of new public open space would improve accessibility to public open space. The site represents an opportunity for a more efficient use of land, and if the amount of car parking is reduced development could help to meet objectives to reduce dependence on cars.</p>
<p><b>Commentary</b></p>	<p>The allocation has been amended to rebalance the mix of uses proposed – the retention and improvement of existing retail floorspace is considered to be sufficient to meet demand for retail floorspace in this location. Therefore, rather than requiring additional retail floorspace, the allocation now supports a more fully mixed-use scheme with a significant amount of residential and office floorspace on the upper floors. This does not affect the scoring overall – the site will still contribute towards the delivery of economic and housing needs.</p>

**Table 2.45 Pre hearing assessment of modifications made to site ARCH1: Vorley Road/Archway Bus Station, N19**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH1: Vorley Road/Archway Bus Station, N19	++	++	0	+	++	+	+	+0	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH1 is allocated for residential-led development with social and community infrastructure uses. There may be potential for an element of business floorspace including affordable workspace and space suitable for SMEs. The allocation identifies that the northern part of the site presents an opportunity for the development of a local landmark building of up to 15 storeys, forming part of an Archway cluster of tall buildings.</p> <p>The allocation is an opportunity to develop residential, social and community infrastructure and business uses in a central and highly accessible location in the town centre, optimising the use of previously developed land and buildings. The development of a landmark tall building will and assist with wayfinding and permeability and help to enhance local character. The allocation will foster economic growth by providing additional opportunities for employment and increase the supply of residential floorspace, resulting in positive effects. The site would provide affordable housing as part of any residential element, which will help people to move out of poor quality and/or inappropriate housing with positive effects for social inclusion and health and wellbeing. Permeability improvements at the site would promote liveable neighbourhoods by improving residents' connection to facilities and amenities.</p>
<b>Commentary</b>	<p>The modification continues to be allocated for residential development. The introduction of a social and community uses will have positive effects in relation to liveable neighbourhoods and potential social inclusion however does not change the scoring already identified. The change in emphasis that there may be an element of business floorspace is less certain and this has been reflected in the scoring, however give the benefits of social and community infrastructure uses in a town centre location and the continued opportunity to provide a significant amount of housing the modification allocation is considered appropriate and has a number of positive effects.</p>

**Table 2.46 Pre hearing assessment of modifications made to site OIS10: Hornsey Road and Grenville Works, 2A Grenville Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS10: Hornsey Road and Grenville Works, 2A Grenville Road</b>	+	+	0	+	+	+	0	-/0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The modification for OIS10 is allocated for mixed-use office and residential development.</p> <p>The allocation optimises the use of previously developed land. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could lead to the loss of existing business floorpace which could have a negative impact on economic growth, however the provision of some office development would still contribute towards employment objectives helping to mitigate the impacts of this to some extent leading to a neutral/minor negative effect in relation to economic development overall. and the provision of business floorspace would have a positive impact on local economic growth in a Priority Employment Location,</p>													

	providing opportunities for residents to access employment in the borough in line with the social inclusion objective. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.. The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.
<b>Commentary</b>	The allocation for mixed-use office and residential development reflects the extant planning permission for the site. Whilst this could have a minor negative effect in relation to economic growth given the previous employment use on the site, the provision of some office development would still contribute towards employment objectives helping to mitigate the impacts of this to some extent. The modified allocation would also have positive effects on the provision of housing. On balance it is considered that the modified allocation will help to contribute towards the boroughs housing needs as well as retaining some employment use on the site to contribute towards the provision of jobs and the wider function of the PEL.

**Table 2.47 Pre hearing assessment of modifications made to site ARCH5: Archway Campus, Highgate Hill, N19**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH5: Archway Campus, Highgate Hill, N19</b>	+	++	+	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH5 is allocated for residential-led development with some commercial and community and social infrastructure uses on the ground floor. It also allows for an element of student housing provided this does not weigh against the provision of priority conventional housing on the site.</p> <p>The allocation of this site will substantially contribute to housing provision in the borough, including the provision of affordable housing, to help meet need. It also makes efficient use of land located in a highly accessible area which has been vacant for some time, and development should seek to improve linkages to Archway Town Centre, promoting a more liveable neighbourhood. Development of the site can help to enhance the local character of the area and promote a high quality built environment. The introduction of some commercial use can have a minor positive effect in relation to economic growth, with both commercial uses and community and social infrastructure use could also contribute to liveable neighbourhoods by providing accessible services.</p> <p>The introduction of an element of student housing, has the potential to make less efficient use of the land for priority land uses, however the allocation text is clear that student accommodation is provided where this is not considered to impact negatively on the provision of priority conventional housing on-site.</p>													

**Commentary**

The modified allocation retains a strong focus on residential-led development. The strong positive benefits already identified in the original scoring in relation to housing and other objectives has not changed. As noted above, the provision of an element of student housing is provided on the basis that this does not negatively impact on conventional housing and affordable housing and so the scoring in relation to those objectives is unaffected. The only change in relation to the scoring is that an element of commercial use could have a new positive impact in relation to economic growth. On balance the modified allocation is considered appropriate.

**Table 2.48 Pre hearing assessment of modifications made to site BC13 Car park at 11 Shire House, Whitbread Centre, Lamb's Passage**

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURH	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC13 Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	+	++	0	0	+	+	0	+	+	0	0	+	0	+
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>The allocation is for redevelopment to provide a mixed use development which includes a significant amount of office floorspace including affordable workspace and small scale business uses with additional residential use may be acceptable.</p> <p>The allocation will have minor positive effects on housing and economic growth through the development of employment floorspace. The provision of significant office space, alongside affordable workspace and small scale business uses would have a positive effect in relation to economic growth and on social inclusion through provision of a range of job opportunities. The addition of housing will have a positive effect in relation to objective 5 which could also have positive effects on social inclusion.</p> <p>The site is currently a ground level car park and the allocation will have significant positive effects on the efficient use of land by bringing this into use and removing the car parking. The removal of car parking will have sustainability benefits and contribute to wider strategic aims to encourage more sustainable forms for transport, resulting in minor positive effects on the objectives for climate change, transport, and natural resources (improved air quality). The scheme will also create a safer and more inclusive environment by introducing active frontages and activity to this currently largely empty site, resulting in minor positive effects on the high quality environment objective.</p>													

**Commentary**

The modification changes the allocation to recognise that there should be a significant amount of office floorspace, whilst recognising additional residential use may be acceptable. This is will have mostly the same effects as the original allocation albeit there is an additional positive effect in relation to the provision of housing.

# Part 2: Monitoring the IIA

The SEA regulations set out that local planning authorities should monitor the significant environmental effects of implementing the Local Plan. The purpose of this is to identify any unforeseen adverse effects at an early stage so appropriate remedial actions can be taken. Monitoring of Islington’s Local Plan will be set out in the Authorities Monitoring Report and details of Islington’s monitoring indicators are set out in the modifications. These have been included below where they are a relevant alternative or complimentary to the proposed IIA indicator.

**Table 2.49 Pre hearing assessment of proposed IIA indicators and proposed Local Plan indicators**

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
BUILT ENV	1. Promote a high quality, inclusive, safe and sustainable built environment	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Secure high quality architecture and urban design that enhances local character and distinctiveness?</li> <li>Promote location sensitive density and design?</li> <li>Ensure consideration of the spaces between buildings to provide an attractive, functional and sustainable public realm?</li> <li>Create robust and adaptable buildings that can respond to change over their life?</li> <li>Make the built environment safer and more inclusive?</li> <li>Promote an approach to design that places people at the heart of the design process?</li> <li>Encourage measures to reduce crime and fear of crime including anti-social behaviour?</li> </ul>	<ul style="list-style-type: none"> <li>Rate of crime (per 1000 residents)</li> <li>Perceptions of anti-social behaviour</li> </ul>	<ul style="list-style-type: none"> <li>Visitor accommodation change (completions) in schemes and bed spaces in identified locations and outside of identified locations</li> </ul>
USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Optimise use of previously developed land, buildings and existing infrastructure?</li> <li>Optimise the use of previously developed sites and new builds to implement Green Infrastructure in unused areas such as footpath sides, blank walls and roof space?</li> <li>Focus development in the most appropriate locations?</li> <li>Balance competing demands between land uses to provide for the full range of development needs of the area?</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of floorspace consented in class E use vs proportion in conditioned class E use for office, shops, community infrastructure and light industrial.</li> </ul>	<ul style="list-style-type: none"> <li>Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)</li> <li>Business floorspace completed (and net change) in major developments within (i) CAZ and Bunhill and Clerkenwell AAP (ii) CAZ fringe Spatial Strategy areas – Angel and Upper</li> </ul>

		<ul style="list-style-type: none"> <li>• Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc?</li> <li>• Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs</li> </ul>		Street; and King's Cross and Pentonville Road (iii) Priority Employment Locations (PELs)
HERITAGE	3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	<p>Will the policy.....</p> <ul style="list-style-type: none"> <li>• Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Islington?</li> <li>• Enable the borough's heritage and culture to be understood, explored and appreciated as much as possible and by as wide a range of people as possible?</li> <li>• Protect views of historically important landmarks and buildings and valued local views?</li> <li>• Ensure Islington's historic environment contributes to social and cultural life in the borough?</li> <li>• Successfully balance access and energy efficiency requirements with the conservation and enhancement of heritage assets?</li> <li>• Encourage management plans to be actively prepared and implemented?</li> </ul>	<ul style="list-style-type: none"> <li>• Changes in the number of Heritage assets; listed Buildings, Conservation Areas</li> <li>• Change in number of heritage assets held on heritage at risk register</li> </ul>	<ul style="list-style-type: none"> <li>• Additions and removals from the Historic England Buildings at Risk Register</li> <li>• Tall buildings completed in identified locations and outside of identified locations</li> </ul>
LIVEABLE	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve access for all residents to all essential services, facilities and amenities near their home? Such as health facilities, schools, early years provision, council services, advice services, libraries, community and faith facilities, leisure centres, open space and play areas, food growing space, and neighbourhood shops.</li> <li>• Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?</li> <li>• Improve connections of neighbourhoods with facilities/amenities?</li> <li>• Encourage a vibrant social environment that attracts visitors to the borough while respecting the needs of residents?</li> <li>• Reduce the impacts of noise, vibration and pollution on the public realm?</li> <li>• Support the expansion and enhancement of cultural provision and maximise opportunities for the cultural life of the borough to flourish?</li> </ul>	<ul style="list-style-type: none"> <li>• Access to dispersed convenience store / supermarket</li> <li>• Level of vacancies in major and local centres</li> <li>• Access to services and facilities and amenities</li> <li>• Noise complaints registered with the council</li> <li>• Cultural provision outside cultural quarters</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of units within each Town Centre that are vacant</li> <li>• Proportion of units within each Local Shopping Area that: (i) are in class E use; (ii) are vacant; (iii) have changed to C3 use within the monitoring year.</li> <li>• Proportion of completed new hotel rooms that are wheelchair accessible</li> <li>• S106 contributions for accessible parking bays</li> </ul>



AFFORDABLE HOUSING	5. Ensure that all residents have access to good quality, well-located, affordable housing	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Ensure all housing is of a good standard, including for energy efficiency?</li> <li>• Increase the supply of affordable housing to meet identified need as far as possible?</li> <li>• Improve the diversity of housing sizes, types, prices and tenures?</li> <li>• Ensure tenures are fully integrated?</li> <li>• Encourage development at an appropriate density, standard, size and mix?</li> <li>• Provide for housing that meets the diverse and changing needs of the population?</li> </ul>	<ul style="list-style-type: none"> <li>• Income to average house price ratio</li> </ul>	<ul style="list-style-type: none"> <li>• Housing completions and net change</li> <li>• Mix of dwelling sizes in completed developments</li> <li>• Gross and net affordable housing completions for major developments</li> <li>• Affordable housing contributions secured for minor schemes (permitted)</li> </ul>
INCLUSION	6. Promote social inclusion, equality, diversity and community cohesion	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Reduce inequality and the negative consequences of relative poverty?</li> <li>• Reduce social exclusion and ensure that everyone has access to the same opportunities?</li> <li>• Promote fairness, social cohesion and integration?</li> <li>• Promote equity between population groups and those with protected characteristics?</li> <li>• Support active engagement of the wider community in decisions that affect their area?</li> <li>• Encourage active and connected, strong and cohesive community?</li> <li>• Support the delivery of integrated and accessible early years services necessary to ensure that vulnerable children have the best start in life?</li> <li>• Remove barriers to employment and increase the skills of residents?</li> <li>• Improve opportunities and facilities for formal, informal and vocational learning for all ages?</li> </ul>	<ul style="list-style-type: none"> <li>• Resident satisfaction with local services</li> <li>• % of people who believe people from different backgrounds get on well together in their local area</li> <li>• Proportion of resident pupils attending Islington schools achieving 5+ A-Cs including English and Maths</li> </ul>	<ul style="list-style-type: none"> <li>• Progress in meeting identified needs for Gypsy and Traveller Accommodation</li> </ul>
HEALTH	7. Improve the health and wellbeing of the population and reduce health inequalities	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve mental and physical health and wellbeing?</li> <li>• Increase use and ease of access to green spaces for all residents, particularly those with mental and physical health concerns?</li> <li>• Reduce health inequalities?</li> <li>• Reduce the proliferation of activities with negative health externalities?</li> </ul>	<ul style="list-style-type: none"> <li>• Health deprivation (IND)</li> <li>• Life expectancy</li> <li>• Rate of obesity in children</li> <li>• All-age all cause mortality rate</li> </ul>	<ul style="list-style-type: none"> <li>• Public houses gained and lost (completions)</li> <li>• Annual mean air pollution levels for nitrogen dioxide and PM10</li> </ul>

		<ul style="list-style-type: none"> <li>• Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents?</li> <li>• Ensure that the built and natural environments promote health and wellbeing, including by facilitating physical activity and active travel and encouraging social interaction?</li> <li>• Increase food growing opportunities?</li> <li>• Support fully inclusive health, recreation, leisure and sport facilities that meet the needs of the whole community?</li> <li>• Reduce fuel poverty?</li> <li>• Manage noise issues and their effect on individual health?</li> <li>• Improve air quality?</li> </ul>		
ECONOMIC GROWTH	8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Sustain and increase the borough's contribution to the London and national economy?</li> <li>• Support a range of local businesses of different types and sizes?</li> <li>• Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive?</li> <li>• Support the development of green industries and a low carbon economy?</li> <li>• Widen the opportunities for local residents to access employment, particularly those groups experiencing above average worklessness?</li> <li>• Provide a range of employment opportunities?</li> <li>• Tackle barriers to employment, such as affordable childcare and skill levels?</li> <li>• Provide training and job opportunities for local residents?</li> </ul>	<ul style="list-style-type: none"> <li>• Net gain in employment floorspace (by type and size)</li> <li>• Proportion of Islington residents with no qualifications</li> <li>• Income deprivation (IND)</li> </ul>	<ul style="list-style-type: none"> <li>• Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)</li> <li>• Business floorspace completed (and net change) in major developments within (i) CAZ and Bunhill and Clerkenwell AAP (ii) CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road (iii) Priority Employment Locations (PELs)</li> </ul>
NEED TO TRAVEL	9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve connectivity both within the borough and to neighbouring boroughs and wider London?</li> <li>• Encourage a shift to more sustainable forms of travel and away from private vehicle use?</li> <li>• Reduce the need to travel, especially by car?</li> <li>• Improve road safety for all, particularly pedestrians and cyclists?</li> <li>• Improve accessibility of the borough's transport network?</li> <li>• Provide facilities that will support sustainable transport options?</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of residents using sustainable modes of transport</li> <li>• Volume of transport in Islington</li> <li>• Number of people killed or seriously injured on Islington roads</li> </ul>	<ul style="list-style-type: none"> <li>• Change in mode share</li> </ul>

		<ul style="list-style-type: none"> <li>• Enhance capacity of the transport network?</li> <li>• Reduce harmful emissions from transport?</li> <li>• Reduce the negative impacts of servicing and freight?</li> </ul>		
OPEN SPACE / ACCESSIBILITY	10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Protect existing public and private open spaces?</li> <li>• Contribute to meeting the increasing need for open space?</li> <li>• Link existing open spaces?</li> <li>• Prioritise open space in areas of deficiency?</li> <li>• Improve the quality of open space?</li> <li>• Promote or improve public accessibility of open space now and in the future?</li> <li>• Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits?</li> <li>• Improve inclusive access to a range of open space types to meet local needs?</li> </ul>	<ul style="list-style-type: none"> <li>• Quantity of open space (ha)</li> <li>• Resident satisfaction with open space</li> </ul>	<ul style="list-style-type: none"> <li>• Designated public open space gains and losses (sqm) (completions)</li> </ul>
BIODIVERSITY	11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Increase protection and improve opportunities for biodiversity?</li> <li>• Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority?</li> <li>• Encourage development that implements strategic and connected green infrastructure?</li> <li>• Ensure development does not increase flood risk ?</li> <li>• Protect existing trees and increase tree planting?</li> <li>• Increase biodiverse green roofs, green walls and soft landscaping?</li> <li>• Protect the populations of priority species identified in Islington's BAP?</li> <li>• Maximise opportunities to enhance biodiversity?</li> <li>• Impact on access to nature?</li> <li>• Increase green infrastructure and improve connectivity?</li> <li>• Maximise opportunities for engagement with wildlife, including environmental education?</li> <li>• Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity?</li> <li>• Support biodiversity enhancement of The Regents Canal?</li> </ul>	<ul style="list-style-type: none"> <li>• Change in areas designated for conservation significance</li> <li>• Additional area of green roofs installed in new developments</li> </ul>	

CLIMATE CHANGE	12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve energy efficiency and carbon emissions associated with buildings and transport?</li> <li>• Promote the use of low and zero carbon technologies including decentralised energy networks?</li> <li>• Improve energy security?</li> <li>• Encourage buildings and places designed to respond to changing conditions?</li> <li>• Reduce the impact of climate change, including flooding and urban heat island effect?</li> <li>• Improve the microclimate?</li> <li>• Reduce greenhouse gas emissions?</li> <li>• Reduce fuel poverty?</li> <li>• Provide the necessary infrastructure to support development?</li> <li>• Steer development to the areas at lowest risk of flooding in the borough?</li> </ul>	<ul style="list-style-type: none"> <li>• Overall greenhouse gas emissions for Islington</li> <li>• Per capita reduction in CO2 emissions in the LA Area</li> <li>• EPC certificates</li> </ul>	<ul style="list-style-type: none"> <li>• On-site carbon reduction achieved for major development</li> <li>• Offsetting contributions from completed new developments</li> <li>• Major developments (completions) that have: 1. Connected to a heat network. 2. Where there is a Commitment to connect to a future network</li> </ul>
RESOURCE EFFICIENCY	13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Use local, sustainable materials and resources?</li> <li>• Promote the use of renewable sustainable energy sources?</li> <li>• Minimise the use of non-renewable resources?</li> <li>• Ensure design is appropriate for lifetime of development?</li> <li>• Support the circular economy?</li> <li>• Provide opportunities for businesses to benefit from the circular economy?</li> <li>• Minimise the volume of waste produced in Islington, including construction and deconstruction waste, food and household waste?</li> <li>• Support the 'Waste Hierarchy'?</li> <li>• Increase the proportion of waste recycled or composted?</li> <li>• Provide the right type of infrastructure to deal with residual waste in the most sustainable way?</li> </ul>	<ul style="list-style-type: none"> <li>• Water consumption per capita</li> <li>• Residual household waste per household</li> <li>• Percentage of household waste sent for reuse, recycling and composting</li> </ul>	<ul style="list-style-type: none"> <li>• Circular Economy Statements for referable applications (permissions)</li> </ul>
NATURAL RESOURCES	14. Maximise protection and enhancement of natural resources including water, land and air	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Minimise air, water, and soil pollution and their negative impacts on human health?</li> <li>• Improve air quality in line with national and international standards?</li> <li>• Protect surface and groundwater quality?</li> <li>• Promote the sustainable use of water resources?</li> </ul>		<ul style="list-style-type: none"> <li>• Annual mean air pollution levels for nitrogen dioxide and PM10</li> </ul>

		<ul style="list-style-type: none"><li>• Prevent soil pollution and restore contaminated land?</li><li>• Ensure sustainable use and protection of natural resources, including water?</li><li>• Ensure the necessary water and sewerage infrastructure to service development?</li></ul>		
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# Part 2: IIA Examination Conclusions

This section seeks to pull together part 1 and part 2 assessments using as a base the overall cumulative effects of the plan when considered against the sustainability framework objectives set out in part 1: cumulative effects. This has been presented below in table form with a column added which updates and adds any relevant effects identified in part 2. The section seeks to bring together the overall cumulative effects of the plan against the sustainability framework objectives, drawing out positive effects between policy areas but also potential tensions. It is intended to make clear that the effects identified in part 2 add to the those identified in Part 1 unless they do not replace effects identified in part 1 of the examination IIA.

**Table 2.50 IIA Examination Conclusions**

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment
<b>Objective 1 - Promote a high quality, inclusive, safe and sustainable built environment</b>	The effect of the Local Plan on the Built Environment objective is positive with housing policies supporting development at optimal densities which combines with other policies – PLAN1 and DH1 to fully optimise density levels. and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality. The policy in DH1 supports innovative approaches to design as a means to increasing development capacity whilst recognising that the scale of development is dependent on design and character. PLAN1, T1, T4 and G4 also help a proposal fully integrate within, and relate positively to, their immediate locality which combined with the Area Spatial Strategies, which promote public realm improvements helps to create buildings and places that are both high quality and safer and more inclusive.	The assessment of modifications recognises the potential harmful effect on social and community uses but also the wider mix and balance of uses across the CAZ and town centres from Class E which the modifications can only partly mitigate. There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive. Effects are considered limited as there is uncertainty over how effective the approach will be in securing an inclusive, safe and sustainable built environment that places people at the heart of the design process and creates robust and adaptable buildings that respond to people’s changing needs.
<b>Objective 2 - Ensure efficient</b>	The Local Plan makes the best use of the scarce land resource in the borough and balances the competing demands for land use across the	The assessment of modifications recognises the potential harmful effect on the mix and balance of

<p><b>use of land, buildings and infrastructure</b></p>	<p>borough. There is an overall positive effect against the built environment objective with housing policies supporting housing development at optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels. This efficient use of land and infrastructure can also have wider environmental benefits in terms of helping protect green spaces from development and reducing carbon emissions. There is a tension between optimising density and the historic environment with the potential impacts on heritage value potentially increased by higher density. Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk. The Inclusive Economy policies B1/B2 and R1 work in concert with the Area Spatial Strategy policies to focus development in the right locations in the borough which combines with the approach in Policy T1 which recognises that land use should take account of accessibility and ensure proposals promote connectivity. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. The development of visitor accommodation is also restricted by Policy R12 for the same reason. Infrastructure needs are addressed both through policy and Site Allocations where relevant.</p>	<p>uses and efficient use of land in the CAZ from Class E which is considered to impact the wider economic function of the area. There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive but uncertainty is identified over how effective the approach in policy BC1 will be in maximising office floorspace.</p> <p>The effect of Class E and the potential dilution of retail development in the most appropriate locations in town centres is a risk and an inefficient use of land which could be ineffective in balancing competing demands between land uses and will result in retail needs not being met. Whilst the preferred approach goes some way to mitigating this the advent of Class E is recognised as working against the policies assessed in the submission IIA which sought to balance the tensions between land uses and focus development in the right locations. Ultimately the introduction of Class E affects the ability of the Local Plan to meet the development needs of the area.</p>
<p><b>Objective 3 - Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment</b></p>	<p>The approach to heritage ensures that heritage assets will be strongly protected while recognising the need to accommodate new development. Where relevant Area Spatial Strategies in the Local Plan reference heritage assets highlighting their importance, alongside local views and landmarks. Site allocations also make reference where there are relevant heritage development considerations. Growth could impact heritage value but it is considered that this is mitigated by the relevant policies and will help new development to add to the borough's character and distinctiveness - Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk of adverse heritage impacts.</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>

	<p>Policy also considers cultural value in the borough recognising the inherent sensitivity these uses can have to the introduction of new uses. Area Spatial Strategies identify where culture is a priority and the identification of cultural quarters will help support and enhance the uses in these locations.</p>	
<p><b>Objective 4 - Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</b></p>	<p>The Local Plan policies seek to ensure that the appropriate level of infrastructure is available for the local population with policies in the Thriving Communities section protecting social and community facilities and policy ST1 supporting new strategic infrastructure where needed. In addition policy seeks to respond to where facilities already exist with a link in Policy H2 to supporting existing facilities. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality and policies SC1 and SC2 which contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. The Area Spatial strategies identify relevant social and community infrastructure which helps maintain residents access to facilities. The retail policies seek to strike the right balance of retail, leisure, culture and business uses which will help maintain the access to these services close to peoples homes. Policy recognise the need to protect residential amenity eg through suitable noise assessment and application of the agent of change principle which is covered by housing, retail and design policies. PLAN1 draws this all together with the connected and inclusive principles which helps development to encourage permeability and movement and maintain and support access to services and facilities.</p>	<p>The uncertainty around Class E is identified for social and community facilities, which could both help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase health inequalities by not protecting these facilities against change of use to higher value uses. The effect of Class will also likely have minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations and have negative impact due to their effect on residential amenity such as noise, odours, and servicing impacts. The wider impact on town centre vibrancy from the potential for Class E uses which do not form active frontages, such as offices at ground floor could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. Overall there is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive.</p>



		However, the increased ability for COU within the E use class may have positive impacts on upper floors in town centres, and especially in less well performing LSAs that would benefit from an influx of workers.
<b>Objective 5 - Ensure that all residents have access to good quality, well-located, affordable housing</b>	The objective has clear positive effects resulting from policy which seeks delivery of affordable housing from all development and responds to the number one objective of the Local Plan to maximise the delivery of genuinely affordable housing. This improves fairness and integration, addressing inequality and tackling social exclusion with the delivery of mixed and balanced communities. As identified in Thriving Communities section above the policies in the Sustainability Appraisal section have significant positive cumulative effects by helping ensure all residents have access to good quality housing through ensuring all housing meets high standards of energy efficiency and relevant sustainable design standards; which helps to reduce fuel poverty and contributes to reducing inequality. This also contributes health benefits with residents benefiting from warmer homes and more affordable homes to heat. There is a significant tension between balancing housing with other needs in the plan, primarily employment needs. The tension with other forms of housing has already been identified – large scale HMO accommodation and student accommodation. Ensuring that employment needs are met is a key consideration of the Local Plan. Striking the right balance with a focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Site Allocations play a key role in the borough in demonstrating that both employment and housing needs will be met with significant levels of growth identified.	The additional of site allocations specifically to address housing supply will make a significant contribution to affordable housing which will help to meet need in the borough.
<b>Objective 6 - Promote social inclusion,</b>	The same positive effect from the Local Plan approach to maximise the delivery of genuinely affordable housing results on this objective too. Other policies in the Thriving Communities section also aim to improve	There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are

<p><b>equality, diversity and community cohesion</b></p>	<p>fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy PLAN1 and the inclusive principle supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. The Inclusive Economy section supports the economy through supporting creation of a variety of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development which helps promote equity, provide opportunity and remove barriers to employment.</p>	<p>considered positive these effects are now minor where previously they were considered significant positive.</p>
<p><b>Objective 7 - Improve the health and wellbeing of the population and reduce health inequalities</b></p>	<p>Policies throughout the plan help address the health and wellbeing objective, in particular housing policies which determine housing quality which combine with other policies in the plan to help a proposal fully integrate within, and relate positively to, their immediate locality. The Area Spatial Strategy policies promote specific public realm improvements which combined with high quality housing helps encourage people into more active travel through a healthier public and built environment supported by car free transport policies and adequate cycle parking. The Social and Community policies contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Public Realm and Transport policies will have significant positive cumulative effects against objectives relating to health and climate change as they seek to reduce pollutants and improve air quality. This work with policy for Green Infrastructure which preserve open spaces and increases the amount of green open space, plants, trees, green walls and roofs in the urban environment which will also contribute to improving air quality and encouraging people to participate in more active travel, sport and recreation in the borough. The sustainable design policies also contribute health benefits with residents benefiting from warmer homes and more affordable homes to heat and housing design policies that highlight the importance of designing the home as a place of retreat</p>	<p>Policy R5 seeks to maintain local shops and cafes. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service that especially benefits access to goods and services by people with mobility issues is particularly relevant and considered to have a positive effect against this objective.</p> <p>Policy T1 and T2 changes in response to Class E will have a significant positive effect through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help to reduce the impacts of pollution on the public realm which can help to tackle pollution and air quality which can impact on health. Ensuring adequate cycle parking is provided will also help to promote active travel which can improve physical health and wellbeing. In addition the changes to Policy T5 are similarly positive in this respect.</p>

	which can contribute to wellbeing, improving both physical and mental health.	
<b>Objective 8: Foster sustainable economic growth and increase employment opportunities</b>	<p>Policies B1 to B4 recognises the importance of supporting the economy through the creation of a variety of new business floorspace, protecting existing floorspace - in particular industrial land through new LSIS designations. Meeting employment needs is a clear priority for the Local Plan with other uses restricted to ensure that these needs are adequately met – the Site Allocations which prioritise employment space help to contribute to this meeting this need as will the Area Spatial Strategies which provides further policy support for employment growth in key areas such as the knowledge economy in Kings Cross and Tech City in the Bunhill and Clerkenwell AAP. As mentioned under the affordable housing objective striking the right balance between meeting housing and employment needs is a tension that the Local Plan has to deal with . The focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Retail policies also contribute to economic growth and London’s wider economy by seeking the right balance of retail, leisure, culture and business uses to meet residents, business and visitor needs through seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. The requirement to secure affordable workspace and jobs/training opportunities from development helps to widen opportunities for residents and tackle barriers to employment. The Sustainable Design policies support the delivery of an inclusive economy by helping to contribute to a green economy with commercial buildings that have high environmental standards and can be designed to be flexible and adaptable.</p>	<p>The wider positives of Class E are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment across the borough with the increased flexibility around where uses can locate. However the assessment recognises the detrimental longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. The detrimental effect is recognised in particular on the role of the CAZ in supporting Central London’s economy but uncertainty is recognised in terms of all locations – including town centres and more peripheral locations. The tension Class E has introduced is particularly apparent with the assessment of marketing periods for the protection of existing uses with the assessment finely balanced over considering the options and the response of landowners with long term impacts considered to be overall negative.</p> <p>More generally in the longer term Class E is considered to have a negative effect on the overall supply of office space.</p>
<b>Objective 9: Minimise the need to travel and create</b>	<p>The locational benefits of the Local Plan are also considered with cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough through policy in the Thriving Economy section; the AAP area, CAZ, town</p>	<p>The transport impacts of class E are considered in Policy T1 and T2 changes and will have a significant positive effect that builds on the submission policy through helping to ensure that</p>

<p><b>accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</b></p>	<p>centres and CAZ fringe. These locational benefits are reinforced by policy in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses and policies for public realm and design/ PLAN 1 which support improvements in the built environment. The policy approach in the Bunhill and Clerkenwell AAP in particular aims to maximise floorspace with a percentage requirement which will help achieve most floorspace in the most accessible location in the borough. This combined with Transport, Public Realm policies and PLAN1 encourages more sustainable and accessible transport and cycle parking requirements will all help people transition to more sustainable modes of travel. There cumulative benefit of protecting the industrial function also helps to reduce the need for goods and services to travel too which also reduces congestion and air pollution. The Area Spatial Strategies through promoting public realm improvements also help to create places that are both high quality and safer and therefore more inclusive.</p>	<p>transport impacts of Class E can be appropriately assessed and mitigated which can help encourage a shift to more sustainable forms of travel.</p> <p>The uncertainty over predictions of where uses will be located from Class E could now have a minor negative impact on road networks and sustainable transport modes when there is an accumulation of uses that have loading and parking requirements or high numbers of journeys such as offices in industrial areas for example which do not have appropriate public transport access.</p>
<p><b>Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</b></p>	<p>The approach ensures that open spaces are preserved and seeks to increase the amount of green open space. Area Spatial Strategies will help to create a high quality built environment with public realm improvements and also identify improvements to access existing green open spaces or add additional open space. This will have wider health benefits when combined with Urban Greening policies and enhancement of green infrastructure. Combined with other policies in the Local Plan this helps to promote physical and mental health, health benefits associated with access to nature, responds to impacts of climate change (flood risk and urban heat island) as well as improving air quality.</p>	<p>The changes to Policy G2 that provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space identify no effects as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.</p>
<p><b>Objective 11: Create, protect and enhance suitable wildlife habitats wherever possible and protect species</b></p>	<p>Cumulative positive benefits for biodiversity are created through a strategic approach to green infrastructure, biodiversity and wildlife habitat with requirement for developers to maximise green infrastructure and biodiversity provision consistent with G1. Several Site Allocations identify landscape and green infrastructure improvements as do Area Spatial Strategies which respond to the context of nearby open spaces/SINCs and the Regent's Canal. Delivery of development on these sites can also help with the achievement of objectives in the Council's Biodiversity</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>

<p><b>and diversity</b></p>	<p>Action Plan. Policy approach to biodiverse green roofs, green walls and soft landscaping through PLAN1 will also contribute to enhancing biodiversity. The Green Infrastructure policies will also combine with the Sustainable Design policies and the integrated approach to flood risk management and sustainable drainage to have cumulative benefits together which reduce the risk of flooding and helping to manage water sustainably and ensure wider benefits such as biodiversity and a drainage hierarchy that promotes green features over grey.</p>	
<p><b>Objective 12: Reduce contribution to climate change and enhance community resilience to climate change impacts</b></p>	<p>Cumulatively the Sustainable Design policies set out the council's strategic approach to delivering sustainable design with the aim to minimise the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs. The Sustainable Design policies go some way to addressing this tension through energy efficiency measures for example and also introduces new policy approach – Policy S10 circular economy and adaptive design which will help mitigate the effect of resource use of development. The locational benefits of the Local Plan are also considered to have cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough. There is also a benefit of protecting the industrial function in LSIS and Area Spatial Strategies which also helps to reduce the need for goods and services to travel too which also reduces emissions from this source. Islington's car-free policy in Policy T3 and Policy T5 which seeks to minimise air pollution from the construction process as well as reducing deliveries will also help reduce transport emissions. The Sustainable Design policies in setting out the approach to flood risk management and sustainable drainage have cumulative benefits together to reduce the risk of flooding and help to manage water sustainably. These policies working alongside green infrastructure policies which also play a role in helping to reduce surface water run-off and reduce flood risk. Sustainability is</p>	<p>The policy changes add to the submission policies Sustainable Design policies by responding to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions.</p> <p>The displacement of industrial activities of the LSIS through Class E could see an increase in vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts.</p> <p>The transport impacts of class E are considered in the Policy T1 and T2 changes and will have a significant positive effect that builds on the submission policy through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help reduce the carbon emissions associated with transport. In addition the changes to Policy T5 are similarly positive in this respect.</p>

	identified in PLAN1 as one of the four key design principles for development in the borough.	
<b>Objective 13: Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</b>	The policies in the Sustainable Design section set out requirements for development proposals to promote resource efficiency through application of an approach to the Circular Economy. Policy in the Thriving Economy section supports the intensification, renewal and modernisation of business floorspace. The approach to circular economy and adaptive design has cumulative benefits when considered alongside other policies in the plan, this include PLAN 1 which required development to be durable and adaptable, policies ST2, H4 and B2 which seek to maximise re-use and recycling as well as Sustainable Design policies by reducing the environmental impacts, including embodied carbon emissions, that new development can have. Policy for high quality housing provides seeks well designed facilities for the management of recycling for residents and Strategic Infrastructure ensures that the waste management facility in the borough is protected. The borough is also working jointly with neighbouring boroughs on the North London Waste Plan, that will plan for waste management needs for the borough.	None of the modifications have significantly changed the assessments outcomes against this objective.
<b>Objective 14: Maximise protection and enhancement of natural resources including water, land and air</b>	Air quality is a cross cutting issue addressed by a number of policies that cumulatively will help to tackle air quality issues in the borough, this includes design policies, locational policies set out in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses which seek to locate uses in the most appropriate locations, green infrastructure and public realm and transport policies which all have a role in helping to improve air quality and minimise exposure. The policies in the Sustainable Design section set out requirements for conserving water resources and managing flood risk and dealing with contaminated land.	The potential negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore carbon emissions associated with transport. Similarly, the displacement of industrial activities of the LSIS through Class E could see an increase in vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts.  This in turn contributes to the high levels of air pollution in London. High trip generating E uses located outside of town centres could see these

		<p>uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections.</p> <p>Policy T1 and T2 changes in response to Class E will have a significant positive effect through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help to reduce the impacts of air pollution. In addition the changes to Policy T5 are similarly positive in this respect.</p>
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# Appendix 1: EqIA Local Plan Modifications

## Islington Local Plan modifications – Equalities Impact Assessment update

A full equalities impact assessment was undertaken as part of the Regulation 19 IIA. The following provides an update to this specifically looking at the equalities implications of proposed modifications to the plan.

**Table 1: Area Spatial Strategies, set out in Strategic and Development Management Policies, policies SP1 to SP8; and Bunhill and Clerkenwell Area Action Plan policies BC3 to BC8**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
Modifications likely to positively impact on groups with protected characteristics.	SP2 (SDM-MO3- SDM-MO4) and BC4 (BC-M09) provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of identified needs and the canal as an open space. The modifications have the potential to improve boat dwellers’ safety, convenience and quality of life by improving their access to water, electricity and waste collection. Boat dwellers may possess one or more protected characteristics; a 2016 survey of London boat dwellers conducted by the Canal and River Trust found 10% of respondents reported a disability and 11% were from non-white backgrounds. <sup>1</sup> Better boater facilities also contribute to creating a cleaner and better-quality environment for pedestrians and cyclists, therefore benefitting many protected groups who walk or cycle beside the canal. The policy does not require improvements however and so the extent of positive impacts will depend on implementation. This modification is cross-referenced by a modification in G2. The impacts of modifications of G2 for protected groups are considered in that section below.



In SP3 A (SDM-MO08), the approach to securing new light industrial floorspace through planning conditions, responding to the introduction of class E, will help retain a range of employment opportunities which can help to benefit local people.

Islington's 2016 Employment Study<sup>2</sup> highlights that land prices in the LSIS are much more affordable than in other parts of the borough, which provides a lower price threshold for enterprise space needed for new and emerging businesses. This can favour small to medium size businesses. The location of the LSIS in Inner London make it an accessible employment area for local people, who can also access it by public transport. This is likely to have a positive impact on those protected groups who may be on lower incomes; in particular BAME, disabled and pregnant women are less likely to have access to private motorised transport. It is worth noting that car ownership increases with household income, types of household and homes. People on lower incomes, lone parents and people who rent their properties are less likely to own a car<sup>3</sup>.

In spite of these identified positive impacts, existing light industrial floorspace can be converted into other uses within Class E, which could lead to a reduction of in the range of employment opportunities which could have negative impacts for local people, including those with protected characteristics identified above, albeit this is beyond the scope of the policy.

The proposed change to SP5 (SDM-MO17) and Site Allocation NH1 (SA-MO57) seeks to balance the retention and enhancement of retail and employment floorspace and emphasises the need to provide a significant amount of residential space on the upper floors. This will help to provide additional housing including affordable housing to support meet identified housing needs. All BAME groups (with the exception of Indian/Pakistani and White Other households) as well as young and older people and those with disabilities are more likely to be on lower incomes and to be housed in social

	<p>rented housing. Providing increased and improved housing opportunities for those on low incomes is likely to have a positive effect on these protected groups. The provision of accessible accommodation which will also have a positive effect on disabled and others with mobility needs.</p> <p>Other modifications were identified to have no specific impacts.</p>
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**Table 2: Thriving Communities, set out in Strategic and Development Management Policies, policies H1 to H12 and SC1 to SC4**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
<p>Modifications likely to positively impact on groups with protected characteristics.</p>	<p>H7- Meeting the needs of vulnerable older people, part F (SDM-MO35) is a clarification in relation to how the policy structured. It does not impact on the overall outcomes.</p> <p>(SDM-MO38 - SDM-MO40 )The changes to policy H12 and the supporting text responds to the deletion of the London Plan definition of Gypsies and Travellers. Islington has given consideration to how differing definitions of this protected ethnic group influence the identified accommodation need (Council's Gypsy and Traveller Accommodation Assessment (2019)). The proposed modifications retain the commitment to meeting identified need, and the Local Plan continues to recognise the different levels of need that applying the removed draft London Plan definition and government definition result in.</p> <p>Islington's evidence suggests the need is currently entirely from members of the Gypsy and Traveller community who live in permanent 'bricks and mortar' accommodation, including social housing in Islington. Depending on the preferences of Gypsies and Travellers living in 'bricks and mortar' this need may not translate into a need for pitches.</p>

The planning and delivery of new pitches may result in a reduction in social exclusion, and promote equality, fairness and respect for some Gypsies and Travellers. However, the positive benefits of this would be reduced the less the need is met. As the Local Plan recognises that the theoretical need identified may not translate into real need in practice, whilst the changes could be seen to reduce the pitch target the reality of the Islington context has not changed and whilst the change made at the London Plan level may have a negative effect from a strategic point of view the effect of the modifications at a local level remains positive. However, depending on the extent of need and if pitches are provided based on the government's definition, this could lead to the delivery of a lower number of pitches, thereby having the potential to reduce the overall positive impact. The Local Plan, whilst recognising the challenges in meeting identified need due to the circumstances of the borough, also highlights mitigations in place to meet identified need. Depending on the scale of accommodation that can be met through council sites(s), if there is a need for further sites to meet need, this could be met through a focused review of the Site Allocations document, and/or by working subregionally with other boroughs and the GLA.

(SMD-MO41) H12 Gypsy and Traveller Accommodation relating to windfall sites that come forward during the plan period, add additional clarification that proposed sites must provide a high quality of housing consistent with relevant aspects of policy H4 is added. The addition of this wording reiterates the requirement of high-quality housing for the protected group. Additions to paragraph 3.150 emphasise that amenity blocks must meet accessibility standards and a good level of privacy to be maintained. This detail will promote high accessibility standards for members of the Gypsy and Traveller community, especially for those who possess a disability.

SC1 new criterion C (SMD-MOD42) proposes to secure necessary social and community infrastructure at planning stage. Securing social and community infrastructure services and facilities is generally considered to have

a positive impact on all groups in terms of supporting physical and mental health and wellbeing and helping encourage community cohesion. As stated in the Regulation 19 Equality Impact Assessment for SC1, this infrastructure is likely to have a positive impact on disabled people and older people, particularly older women, who live longer but spend more later years living with a disability, as these groups rely more on health services. Positive impacts are also especially likely to be felt by certain BAME groups who are more likely to experience poor health. Community infrastructure also supports children, older people, and families and often offers support to people who possess protected characteristics relating to religion, race, gender reassignment, sex and sexual orientation. In spite of this positive impact, it is worth noting that class E has potential impacts in terms of loss of social infrastructure which the policy can no longer affect. The effect of Class E has curtailed the ability of the policy to safeguard existing social and community infrastructure facilities that fall within Class E, such as nurseries, day centres, medical and health services and indoor sports facilities. Whilst this could both help to reduce access to facilities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase access to facilities by not protecting these facilities against change of use to higher value uses. Therefore the impacts are considered uncertain at the moment.

Other modifications were identified as have no specific impacts.

**Table 3: Inclusive Economy, set out in Strategic and Development Management Policies, policies B1 to B5 and R1 to R12; and Bunhill and Clerkenwell Area Action Plan policies BC1 and BC2**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>There are likely to be various positive impacts on groups with protected characteristics.</p>	<p>The amendment to B1, part E (SDM-MOD44), clarifies the approach to Locally Significant Industrial Sites within the context of the changes to the use class order, their continued protection and encouragement for their renewal, modernisation and intensification. All of this will help to ensure a range of employment provision for Islington residents, including for groups with protected characteristics.</p> <p>B2 Part A (SDM-MOD49) and supporting text modifications relating to the use of planning conditions to secure employment activities in the right locations could have a positive impact on lower income communities who might suffer from unemployment or job insecurity. The change to part C (SDM-MOD49) and supporting text will help with securing a range of employment provision for Islington residents, including for groups with protected characteristics as BAME groups, for example, have greater proportion of people who have no qualifications and face barriers to employment<sup>4</sup>. Child poverty is closely linked to unemployment. Providing a range of employment in the borough can help to reduce unemployment and increase opportunities for all protected groups including disabled people who traditionally face greater barriers to employment.</p> <p>It should however be recognised that beyond the new policies, Class E, whilst providing flexibility, also limits the Council’s ability to protect employment space in the right locations. Existing business floorspace can be converted into other uses within Class E, which could lead to a reduction of business floorspace in the borough’s employment locations which could impact on employment opportunities and on protected groups.</p> <p>B2 Part D (SDM-MOD49) and associated supporting text require developments to mitigate air quality impacts in the LSIS. As stated in</p>

the Islington Air Quality Strategy (2019)<sup>5</sup> disabled people, children, older people and those on lower incomes are more likely to suffer from air pollution, the policy, alongside other policies in the plan which address air quality can therefore help to have a positive impact on these groups.

SDM-M063 – A new paragraph is proposed that clarifies that on mixed use proposals, where there are exceptional circumstances where the provision of affordable workspace will undermine the ability to secure affordable housing, affordable housing would take a precedent. This both has the potential to have negative and positive impacts where the situations arise, as affordable workspace provides opportunities for people in lower income groups – however the acute need for affordable housing is evidenced. The paragraph ensures that in limited cases affordable workspace would not prevent schemes that deliver policy compliant affordable housing from coming forward.

The modifications to R1 (SDM-MOD71) recognises the flexibility benefits of Class E whilst maintaining a retail and access to services that help meet the needs of residents to ensure shops and services are located in accessible places, most capable of accommodates those uses. Impact assessments aim at mitigating some of the negative impacts of uses which have the potential to have some equalities implications, for example in relation to the function and amenity of areas (which could impact on access to services).

The changes to policy R2 (SDM-MOD75) aim to maintain a retail core in Town Centres, ensuring shops and services are accessible and manage the impacts of uses. This has beneficial impacts on protected groups as having accessible shops helps to cater for the needs of older people, children and young people, disabled residents, pregnant women and parents with young children. Town Centres are a focal point for socialising and support social interaction, they also support employment and training offering flexible entry level jobs for young and old people. Older people will also generally place value on retail which is convenient as they generally make fewer journeys. The proximity and

accessibility to Town Centre also incentivises walking trip generation. This increases the amount of physical exercise people take with its accompanying health and social benefits of all groups of residents.

It should however be recognised that beyond the new policies, Class E, whilst providing flexibility, also limits the Council's ability to protect retail spaces in the right locations. Existing retail floorspace can be converted into other uses within Class E, which can lead to a reduction of retail floorspace in the borough's shopping areas.

R3 Footnote 30- states that some class E uses like clinics and nurseries will not be required to adhere to the Sequential Test in certain circumstances but may be conditioned to operate in that use. The clarification of not requiring the sequential test for planning application purposes is unlikely to have an impact on the provision of social infrastructure. The consideration of social infrastructure and how this will be secured is assessed above.

(SDM-MO81) The amendments to policy R4 in relation to Local Shopping Areas and supporting text whilst providing flexibility in relation to Class E also seek to manage potential impacts of this and in some circumstances secure through planning conditions retail for everyday essential goods where there is no such provision within 300m of a site. This modification has scope to benefit people with families, children, older people and people with physical, sensory and cognitive disabilities and related limited mobility. Access to very local services incentivises walking trip generation. This increases the amount of physical exercise people take with its accompanying health and social benefits of all groups of residents.

R4 (SDM-MO82) - The addition of an impact assessment for developments over 200sqm proposing class E use will result in the identification of potential individual and cumulative impacts of uses, including amenity impacts. The

potential for a loss of future amenity is likely to affect disabled and older people with limited mobility more acutely as they may struggle to travel further to access shops. This modification aims to assess and monitor for such risks so that any negative impacts can be managed.

R5 B (SDM-MO83). This modification enables the council to secure a retail unit outside of a designated Town Centre for the provision of essential daily goods where a need is identified. As with R4D- this policy will benefit those older people and disabled people who may have limited mobility. It will also improve convenience shopping for the wider population. However, it is recognised that there will be impacts associated with the introduction of class E which could result in the loss of existing retail which provide essential daily goods to other class E uses which do not, albeit this is not something that policy can affect.

BC1 and supporting text (BC-MO2 and BC-MO3) were amended to clarify the policy in the context of use classes order changes, this includes clarifying the use of conditions for new developments in Bunhill and Clerkenwell consistent with the modifications for policies B1 and B2. Ensuring that new development can provide for business space can help to secure positive benefits for people in lower incomes, BAME communities and disabled people who face employment barriers. This in part mitigates against the other impact of Class E which removes the Council's ability to prevent existing office stock from changing to other Class E uses.

BC2 (BC-MO5) was amended to clarify the locations where retail, leisure and cultural uses might be appropriate. This will help to ensure that these uses do not harm the amenity of the area, which can have a positive impact on the wellbeing and safety of residents. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping



	<p>expand the cultural role of this area and of London as a whole. This policy has potential positive impacts for protected groups – as people who suffer from poor health might be more exposed and suffer more from noise pollution. Deprived communities can also disproportionately be exposed and vulnerable to anti-social behaviour and crime. However it is recognised that there will be impacts associated with the introduction of class E which could result in the negative amenity impacts due to the location and concentration of specific uses, albeit this is not something that policy can affect.</p> <p>Other modifications were identified as have no specific impacts.</p>
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**Table 4: Green Infrastructure, set out in Strategic and Development Management Policies, policies G1 to G5**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
<p>This modification is likely to see mainly positive impact on groups with protected characteristics. Some minor negative impacts may also be felt by people with protected characteristics- mitigation of this is suggested.</p>	<p>G2- A (SDM-MOD108), alongside amendments to SP2 and BC4 provide clarification on how proposals for moorings should be approached in relation to the canal as an open space. As with SP2, this policy has potential to positively impact boat dwellers’ access to amenities and quality of life plus also improve the environment for pedestrian and cyclist users of the canals. There is potential for a minor negative impact on the amenity of open space enjoyed by pedestrians and cyclists with protected characteristics who use the canal depending on implementation. To mitigate this, any boater facilities must be designed to have no detrimental impact on the character and amenity of the waterway and its function as an open space.</p> <p>Other modifications were identified as have no specific impacts.</p>

**Table 5: Sustainable Design, set out in Strategic and Development Management Policies, policies S1 to S10**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
<p>No major additional impacts on protected groups have been identified as a result of the modifications</p>	<p>The modifications for policy S5 (SDM-MOD114 – 124) and supporting text aim to reduce carbon consumption through low / zero carbon heating sources which will make homes more energy efficient. These energy efficiencies can lead to cheaper energy bills, which can reduce fuel poverty and improve long term energy security, supporting those of lower incomes as well as groups more likely to live in poor housing accommodation such as children. The modifications to policy S5 and supporting text also include requirements for developments using air source heat pumps and direct electric heating to achieve a high specification of fabric energy efficiency. This will ensure that developments using these heating systems achieve minimal heat demands, and as a result, not lead to increased energy bills.</p> <p>Low and zero carbon heating sources, including low-carbon heat networks and secondary heat sources will have a positive impact on air quality. The modifications to policy S5 and supporting text seek to ensure that minor new-build developments with an individual heating system prioritise low carbon heating systems, such as air source heat pumps, and that ultra-low NOx gas boilers will only be acceptable in exceptional circumstances where other heating options are not feasible. This will ensure that the impact on air quality of heating systems used by minor developments is minimised and has benefits for all groups, and in particular for children, older and disabled people, as identified in the Islington 2020 Zero Carbon Strategy.</p> <p>Other modifications were identified as having no specific impacts.</p>

**Table 6: Public Realm and Transport, set out in Strategic and Development Management Policies, policies T1 to T5**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>Positive impacts have been identified for people with protected characteristics.</p>	<p>Policy T1 supporting text (SDM-M0129) - modifications relating to Low Traffic Neighbourhoods, Vision Zero and People Friendly Streets relate to the new Islington 2020 Transport Strategy – and they aim at improving the environment for walking and cycling through minimising through traffic and reducing speeds, therefore reducing road danger and air pollution. These benefits will be particularly felt by children and older adults who are disproportionately likely to be involved in collisions, killed or seriously injured by motor vehicles. Reducing through traffic also improves air quality which will especially people with disabilities relating to respiratory health. Whilst the policies referred above are not directly linked to the Local Plan, policy T1-T5 are complementary of its objectives and will help deliver the Transport Strategy.</p> <p>The new Part C of T5 (SDM-M0133) includes a requirement for uses which generate deliveries to end customers such as restaurants, retail and restaurants to prioritise non-motorised sustainable modes of transport. Given the rise of e-commerce and take-away activities, this requirement has the potential to reduce motorised vehicular movements linked to deliveries.</p> <p>Further to new part C, the new part E for policy T5 (SDM-M0134) requires developments in the LSIS to explore reducing freight movement through consolidation and increase the proportion of trips made by non-motorised modes.</p> <p>Together, Part C and Part E have the potential to reduce the number of motorised trips, which can improve air quality by reducing emissions, reduce road danger and community severance, which all have positive effects on people who disproportionately suffer from the negative impacts related to traffic, namely children, older people, disabled people and those on lower incomes.</p>

	<p>Appendix 3 and 4 modifications translate the former use class order into the new use class order, and create a general Class E requirement which aims at mitigating transport impacts via Transport assessments or provide appropriate cycle parking for Class E. The mitigation of transport impacts via Transport Assessments will have positive impacts on people on low incomes, disabled people, children and older people who all suffer disproportionately from traffic externalities. The provision of cycle parking at an appropriate level for general Class E will also support those who do not have access to a private car in providing more sustainable transport choice.</p> <p>Other modifications were identified as have no specific impacts.</p>
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**Table 7: Design and Heritage, set out in Strategic and Development Management Policies, policies D1 to D8**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
No major additional impacts on protected groups have been identified as a result of the modifications	Modifications were identified as having no impacts.

**Table 8: Strategic infrastructure, set out in Strategic and Development Management Policies, policies ST1 to ST4**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
	The supporting text for paragraph 9.4 sets out that developer contributions may be secured retrospectively to forward fund infrastructure projects, which can benefit all Islington residents and particularly those with protected

<p>Modifications likely to have minor positive impacts on groups with protected characteristics.</p>	<p>characteristics who might benefit from a more inclusive and sustainable environment delivered through infrastructure.</p> <p>The supporting text for paragraph 9.6 establishes that the Council might secure infrastructure costs for additional education infrastructure via CIL. The supply of that infrastructure has benefits for children and parents and more generally for the wider community.</p>
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**Table 9: Site Allocations, including sites within the Bunhill and Clerkenwell Area Action Plan**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>Various positive impacts are identified.</p>	<p>The modifications include additional site allocations for residential development, all of which will provide affordable housing. Low income groups are more likely to benefit from the provision of affordable housing and are likely to include groups with protected characteristics. Provision of residential schemes providing more than 10 units will benefit disabled and older people, as suitable accessible housing will be required for these schemes.</p> <p>Notwithstanding these positive impacts, it should be noted that increasing housing on a site might lead to a loss of amenity space for residents. This risk could impact all residents benefitting from playspace, outdoor or community space, particularly older residents, families and children. This risk is partly mitigated by the fact that the details of each proposal will be set out at planning stage, with site specific issues and local amenity need identified and addressed in line with other relevant policies. Allocations do not specify exactly where different uses need to be on site, and the Council would expect a design-led approach to respond to different strategic needs.</p>

The following allocations include reprovision, refurbishment and/or addition of community facilities which are considered to have a positive impact on all groups in terms of supporting physical and mental health and wellbeing and helping encourage community cohesion:

- KC8: Bemerton Estate South- includes the replacement of community space,
- OIS27: York Way Estate- enhancement of communal facilities, playspace and landscaping,
- OIS28: Barnsbury Estate provision of two new parks, a community centre, a play space and public realm improvements
- OIS29: Highbury Quadrant Congregational Church- reprovision of church and community space.
- OIS31: Hillside Estate- is added but on condition that the development does not result in loss of social infrastructure which would disproportionately affect groups who possess protected characteristics.

These facilities generally are considered to have a positive impact on all groups in terms of wellbeing and help encourage community cohesion. They have the more specific potential benefit older people and disabled people through improved access to services as well as children and young people, pregnant women/mothers of very young children as they can sometimes provide nursery or children activities.

The following allocations will see improvements in landscaping, community amenity areas, play space or games areas:

- OIS30: Cluse Court- playspace, amenity space and landscaping
- OIS32: New Orleans Estate- play space, landscaping and reprovision of multi-use games area,
- OIS33: Drakeley Court and Aubert Court-relocation of Aubert Court community centre to improve visibility and accessibility. Improved landscaping, including the creation of a new green square.

- OIS34: Kerridge Court- re-provision of the existing multi-use games area within a new, centrally located public space. Improvements to play space, amenity space and landscaping across the estate.

Other modifications were identified as have no specific impacts.

### **Conclusion**

Generally the modifications present either positive or no additional impacts. A potential minor negative impact is identified in respect of the amendment for boater facilities but this is considered mitigated by policy. The assessments notes the potential impact of Use Class E. Overall it is considered that the impacts where they can be managed through the policy modifications are managed as far as they can be and in that respect can be considered to have a positive effect on protected characteristic groups. The benefits identified deriving from the Social and Community, Retail and Employment policy modifications maybe affected by the wider effects of Class E. These wider effects cannot be mitigated by the Council because they cannot be managed by the planning system and these effects could have positive or negative effects on groups with protected characteristics.

## Appendix 2: HRA screening update

The effects of Islington's Local Plan policies and allocations on the identified European sites were assessed through a Screening Assessment, as part of the regulation 19 IIA and were not considered to be significant. The effect 'in combination' with other plans when combined with the Local Plan was also not considered to be significant. Therefore, it is concluded it was not necessary to carry out a full appropriate assessment (Stage 2 of the HRA process) as the Local Plan policies and allocations have been 'screened out'. The modifications to the Local Plan are not considered to effect the conclusions of the original screening.

An update to the Sustainability Appraisal has been carried out for the proposed modifications. As part of this, possible negative environmental impacts of the Local Plan have been assessed. In order to effectively manage any less than significant impacts attributed to the Local Plan policies and allocations, the Sustainability Appraisal of the Local Plan will continue to evaluate the impacts of any further changes to the document.



# Appendix 3: Flood Risk

Site name/address	Reference number	Site located in a SWMP Critical Drainage Area (CDA)	Site located in a SWMP Local Flood Risk Zone (LFRZ)	Site includes EA RoFSW High Risk Area - 1 in 30 year (3.3% annual probability)	Site includes EA RoFSW Medium Risk Area- 1 in 100 year (1% annual probability)	Site includes EA RoFSW Low Risk Area- 1 in 1000 year (0.1% annual probability)	Additional Notes	Opportunities for flood risk management/ mitigation where site includes EA RoFSW High Risk Areas	Is the level of flood risk acceptable?
Bemerton Estate South	KC8						Small area of the site includes EA RoFSW Medium Risk Area, with the majority of the site having no EA RoFSW flood risk. Eastern boundary adjacent to RoFSW High Risk Area and LFRZ.	N/A	Yes
York Way Estate	OIS27							N/A	Yes
Barnsbury Estate	OIS28						Some EA RoFSW High and Medium Risk Areas concentrated	Development to include open space and landscape improvements,	Yes

							in western quarter of site. Majority of site has no EA RoFSW flood risk. Western part of site is located in a LFRZ.	and to maximise urban greening.	
Highbury Quadrant Congregational Church	OIS29							N/A	Yes
Cluse Court	OIS30						Small area in the eastern part of the site includes EA RoFSW High Risk Area, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening.	Yes
Hillside Estate	OIS31						Small areas of the site include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening.	Yes
New Orleans Estate	OIS32						Small areas of the site include EA RoFSW High Risk Areas, with the majority of the site having no	Development to include landscape improvements and maximise urban greening.	Yes

							EA RoFSW flood risk.		
Drakeley Court and Aubert Court	OIS33						Small area of the site include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening, including creation of a new green square.	Yes
Kerridge Court	OIS34						Very small EA RoFSW Medium Risk Area on south eastern boundary of site, with the majority of the site having no EA RoFSW flood risk.	N/A	Yes

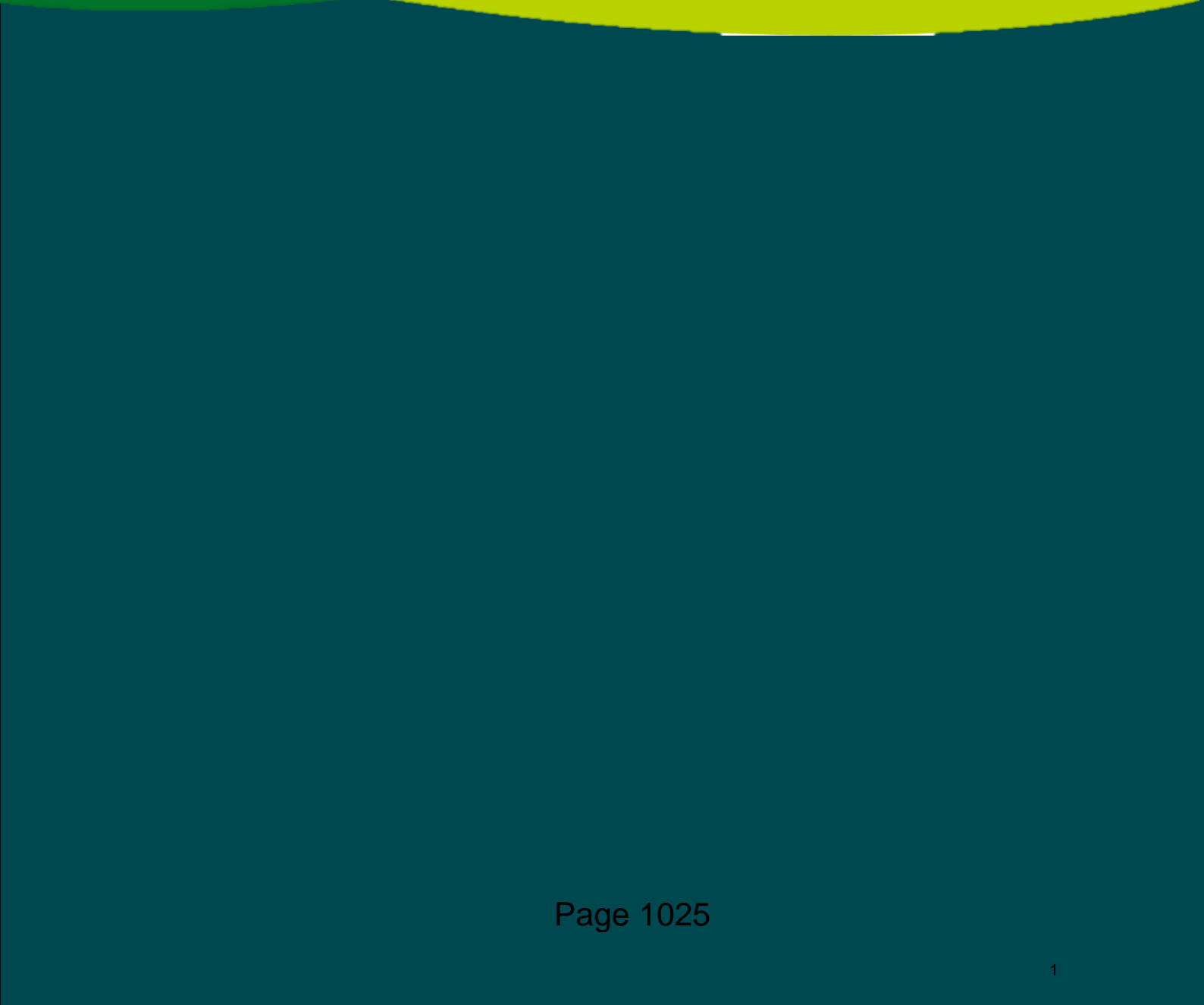
The above matrix demonstrates that the level of flood risk for each of the 9 new allocated sites is deemed to be acceptable following the application of the sequential test. 6 of the allocated sites are located within a CDA, but only 1 is located in a LFRZ. The location of a development within a CDA does not necessarily mean it is at higher risk from surface water flooding, but that it is within a catchment area which contributes to a flooding in a LFRZ. The assessment demonstrates that the majority of the 9 new sites include a EA RoFSW Low Risk Area, with 1 site including Low Risk Areas only (no Medium or High Risk Areas) and 1 site including no EA RoFSW identified risk of surface water flooding at all. 2 sites include a Medium Risk Area with no High Risk Areas and 5 sites include a High Risk Area. Where the new sites include areas of EA RoFSW, there are only some areas of flood risk with the majority of each of these sites having no EA RoFSW flood risk at all. For 4 of the 5 sites that include EA RoFSW High Risk Areas, the high risk area only covers a small area of the site. Barnsbury Estate is the only new site that includes a larger EA RoFSW High Risk Area when compared to the other sites and is also located in a LFRZ. The high risk area is, however, concentrated in one part of the site with the majority of the site having no EA RoFSW flood risk.

It is concluded that following the application of the sequential test to Islington's new site allocations, the council is satisfied that there are no alternative locations where the allocated sites can be located due to wider sustainable development objectives and constraints on development in the borough. The above matrix demonstrates that for all of the 9 new sites the flood risk to the majority of each site is low, and that where sites that do coincide with higher surface water flood risk, this risk only covers a small area and can be successfully managed using appropriate flood risk management and mitigation measures in accordance with the requirements set out in the Appendix 8 of the Draft Reg 19 IIA Interim Report, alongside the sequential approach to site layout. Further details explaining how the sequential test has been applied, and the use of appropriate flood risk management and mitigation measures, is set out in Appendix 8 of the Draft Reg 19 IIA Interim Report.

**Islington Local Plan**

# **Post submission Policies Map changes**

**January 2021**



1.	Introduction	3
2.	Amendment to Sites of Importance for Nature Conservation (SINCs)	4
3.	Site allocations	8
4.	Scheduled Monuments	17
5.	Waste site	20

# 1. Introduction

- 1.1 This document sets out the proposed changes to Policies Map designations that have arisen since the end of the Regulation 19 consultation. These map changes are set out in the Schedules of Modifications for the Local Plan where relevant, but are also set out in this document with additional detail. These map changes are in addition to those set out in following document:
- [Policies Map changes from adopted Local Plan, Proposed Submission \(Regulation 19\)](#) in the Examination Library (document reference PD6, September 2019)
- 1.2 The Council proposes that the changes set out in these documents will made to the Islington Local Plan Policies Map.
- 1.3 Further information on the new Local Plan can be found at the Council's website: [www.islington.gov.uk/localplan](http://www.islington.gov.uk/localplan)

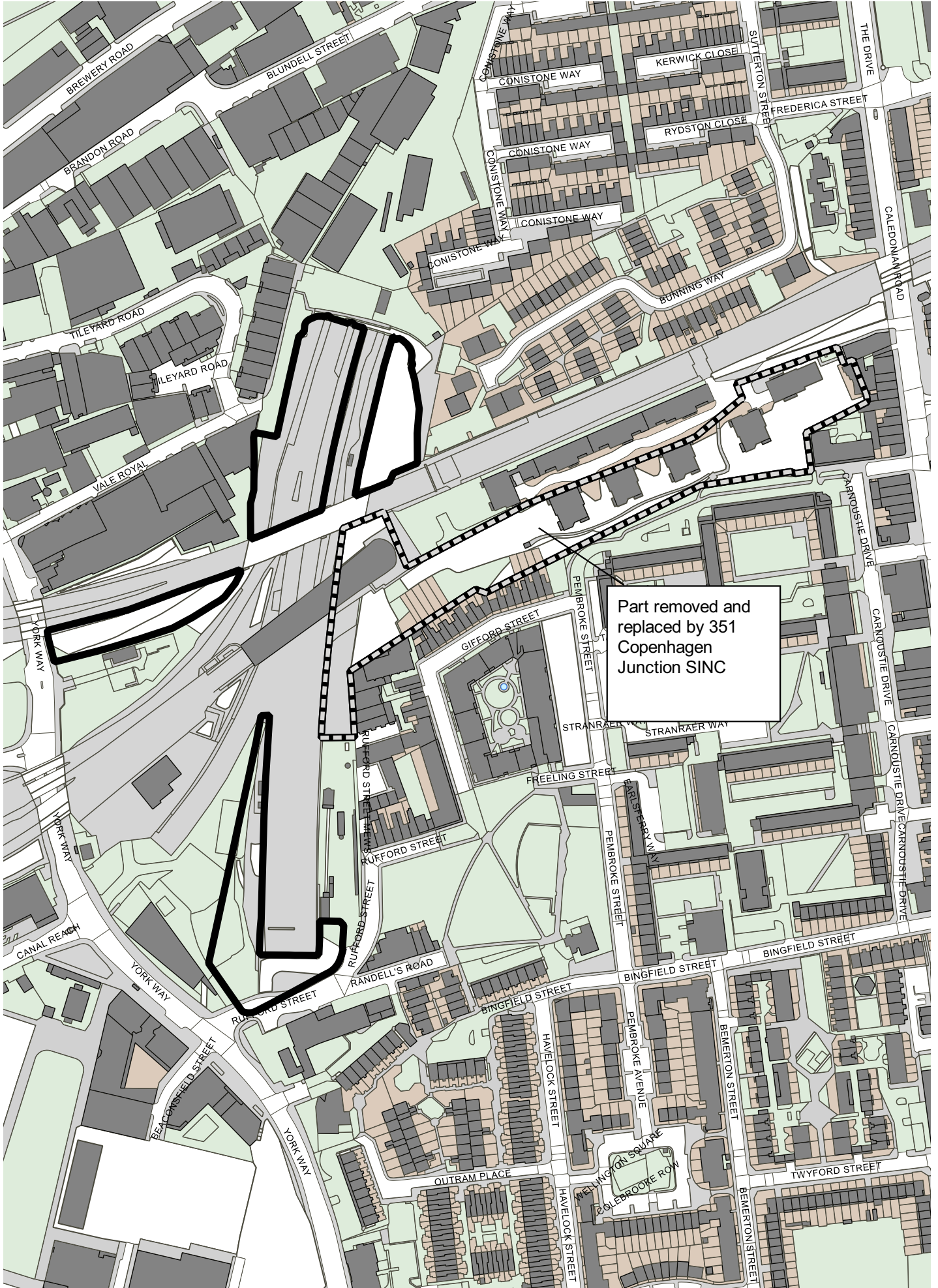
## 2. Amendment to Sites of Importance for Nature Conservation (SINCs)

### 351 Caledonian Road

- 2.1 The SINC boundary for 351 Caledonian Road has been amended for the following reasons:
- The residential gardens on Gifford Street have been retained as SINC (they are currently designed as SINC under the Copenhagen Junction designation). At Regulation 19 stage it was proposed to exclude these gardens due to the limitations on managing private residential gardens as SINC however these gardens benefit from a bespoke management agreement outlined in the s106 agreement for the development of 351 Caledonian Road (2014/0609/FUL) to use the gardens in a manner to promote their nature conservation and biodiversity value (the Gifford Street Agreements).
  - The boundary around the buildings on site and around the entrance to the site has been amended for improved accuracy. This has been possible due to updated Ordnance Survey Mastermap mapping which includes the development on site and receipt of a Habitat and Biodiverse Roof Plan. This revised boundary also includes a small curved parcel of SINC value land at the north east of the site near the entrance of the site.
  - The western boundary has been extended west to adjoin the railway line. This covers the SINC designation currently part of the Copenhagen Junction designation. This area was not included in the replacement 351 Caledonian Road designation in error and has therefore been reinstated.



# Copenhagen Junction Existing SINC Boundary



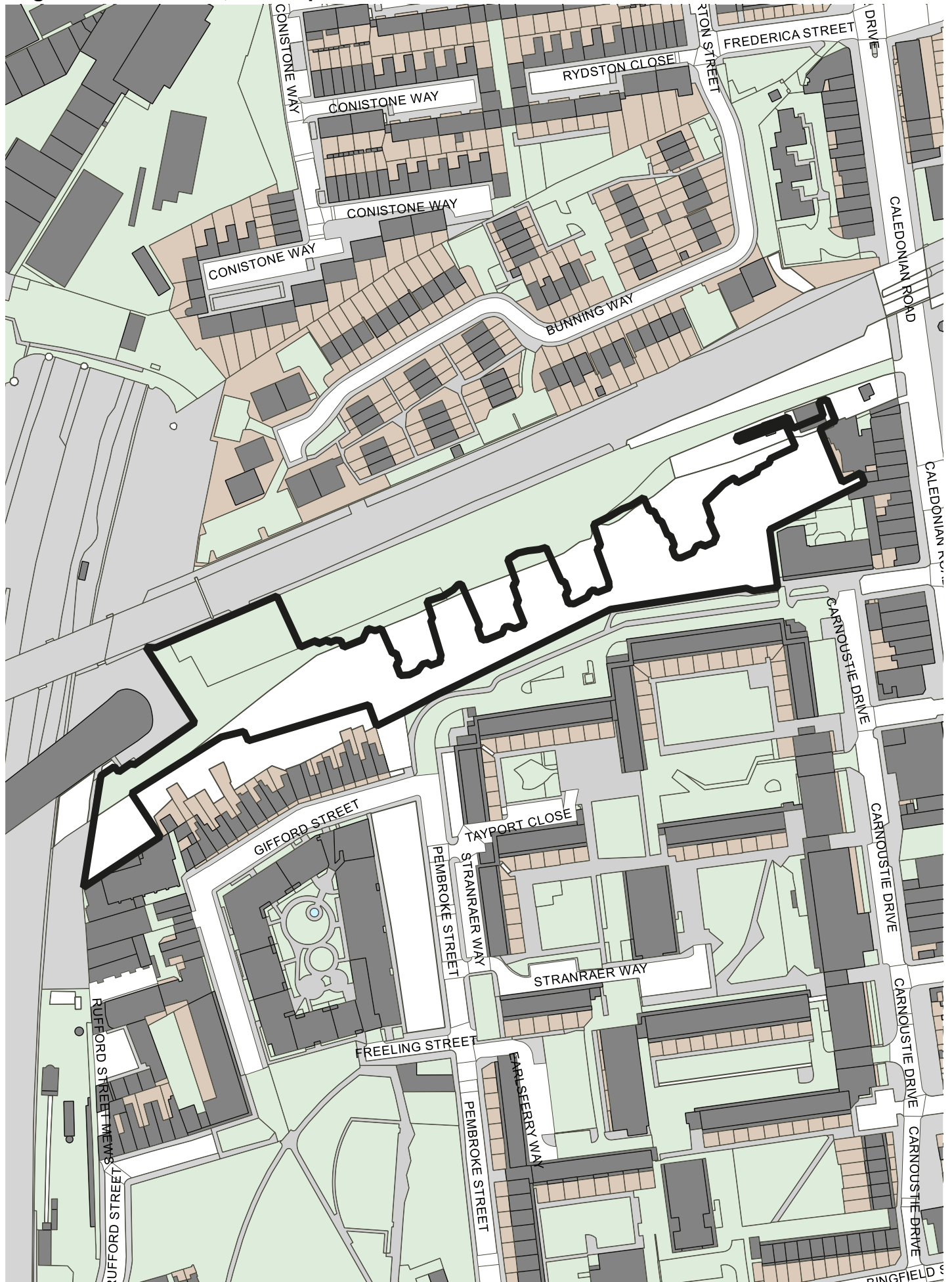
Part removed and replaced by 351 Copenhagen Junction SINC

20 0 20 40 60 80 100 m



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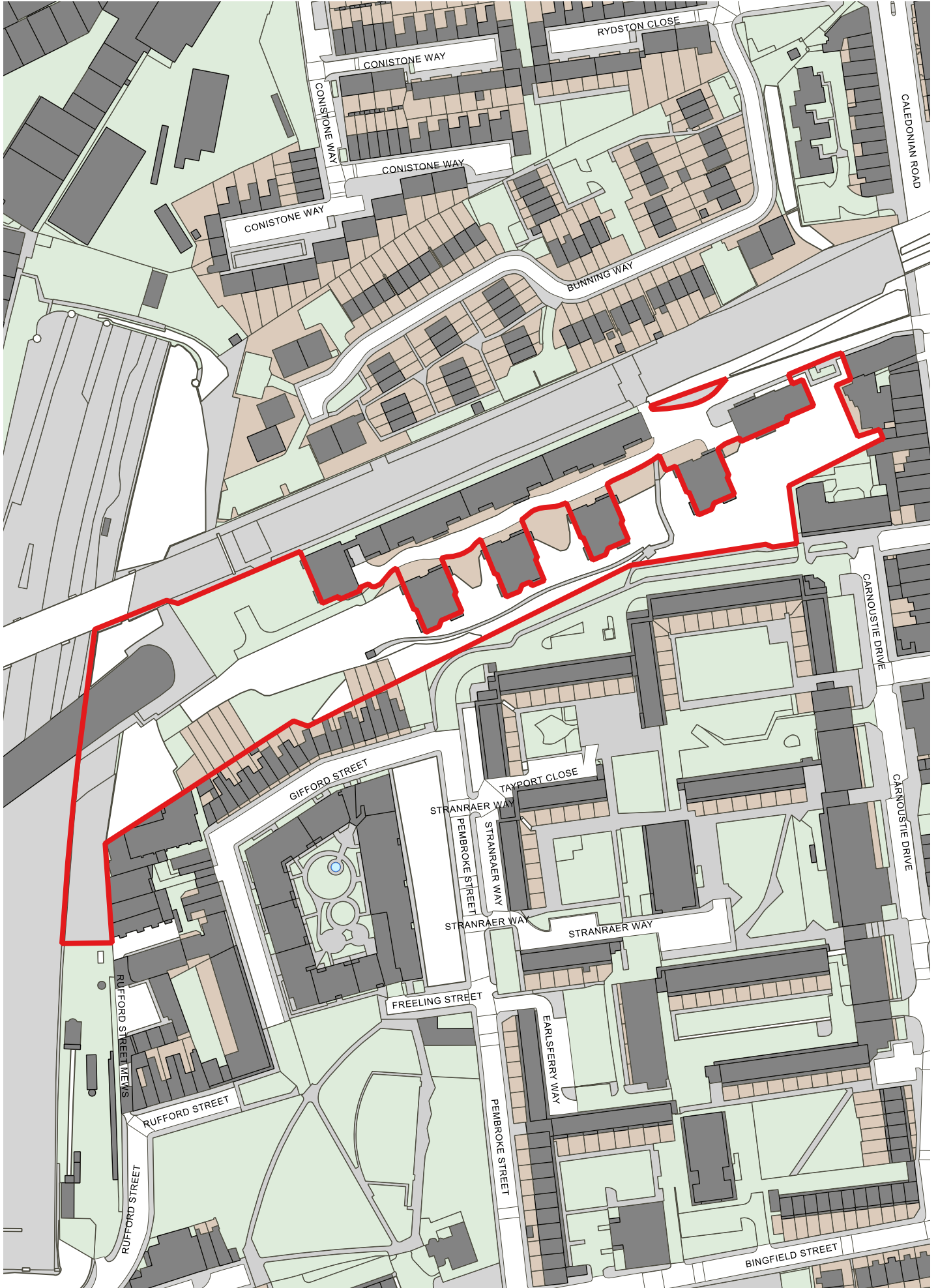
351 Caledonian Road Proposed SINC Boundary (Local)  
Regulation 19 version, now superseded



16 0 16 32 48 64 80m



# 351 Caledonian Road Proposed SINC Boundary (Local)



16 0 16 32 48 64 80 m



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## 3. Site allocations

3.1 As part of the examination the Council has allocated nine new Site Allocations, made amendments to two sites, and removed two sites.

### **New Site Allocations**

- OIS27: York Way Estate
- OIS28: Barnsbury Estate
- OIS29: Highbury Quadrant Congregational Church
- OIS30: Cluse Court Estate
- OIS31: Hillside Estate
- OIS32: New Orleans Estate
- OIS33: Drakeley Court Estate and Aubert Court Estate
- OIS34: Kerridge Court Estate
- KC8: Bemerton Estate South

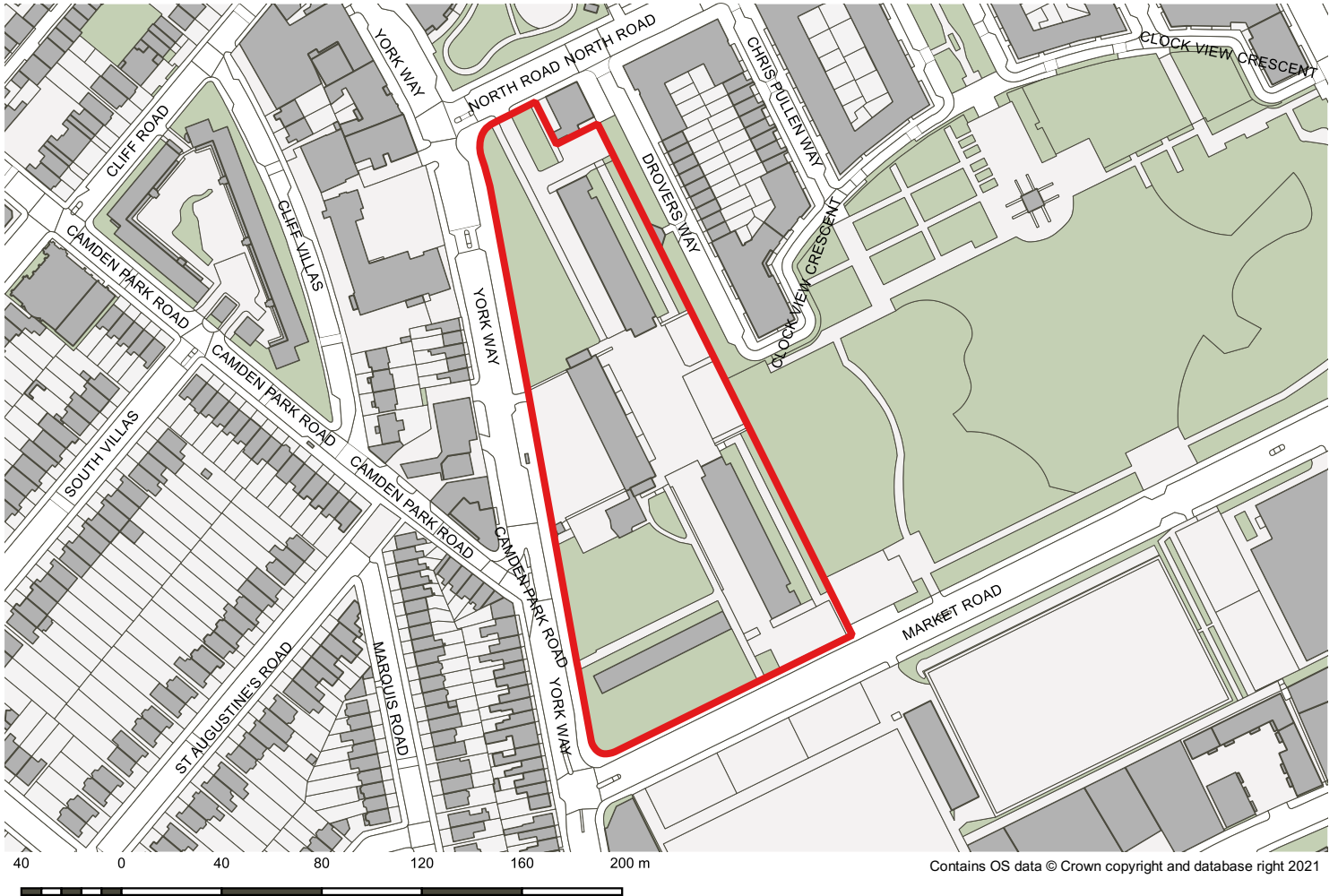
### **Amended Site Allocation boundaries**

- OIS4: BT Telephone Exchange, Kingsland Green
- OIS24: Pentonville Prison, Caledonian Road

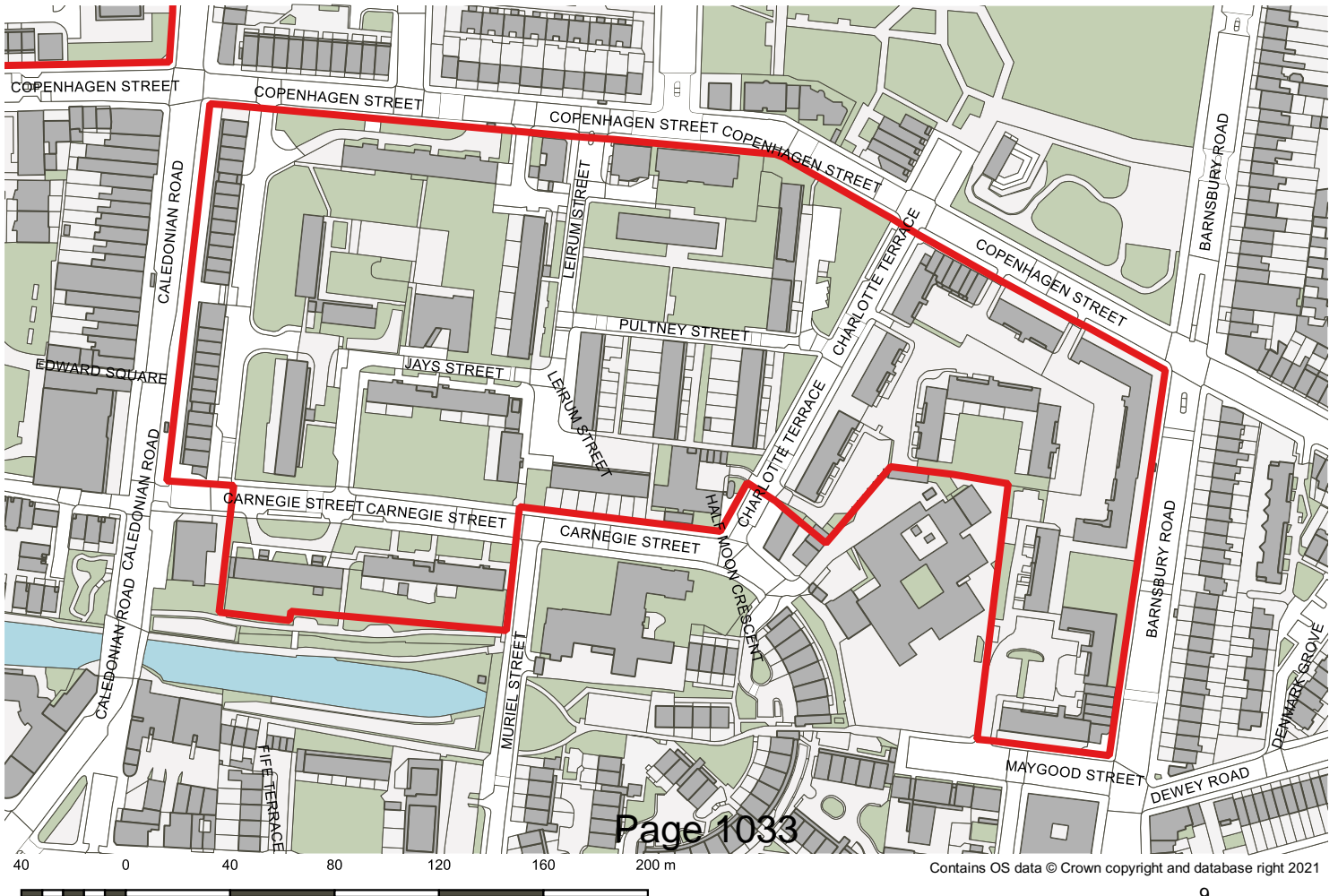
### **Removed Site Allocations**

- OIS9: Ladbroke House, 62-66 Highbury Grove
- FP10: Former George Robey Public House, 240 Seven Sisters Road

# OIS27 York Way Estate – Proposed New Allocation



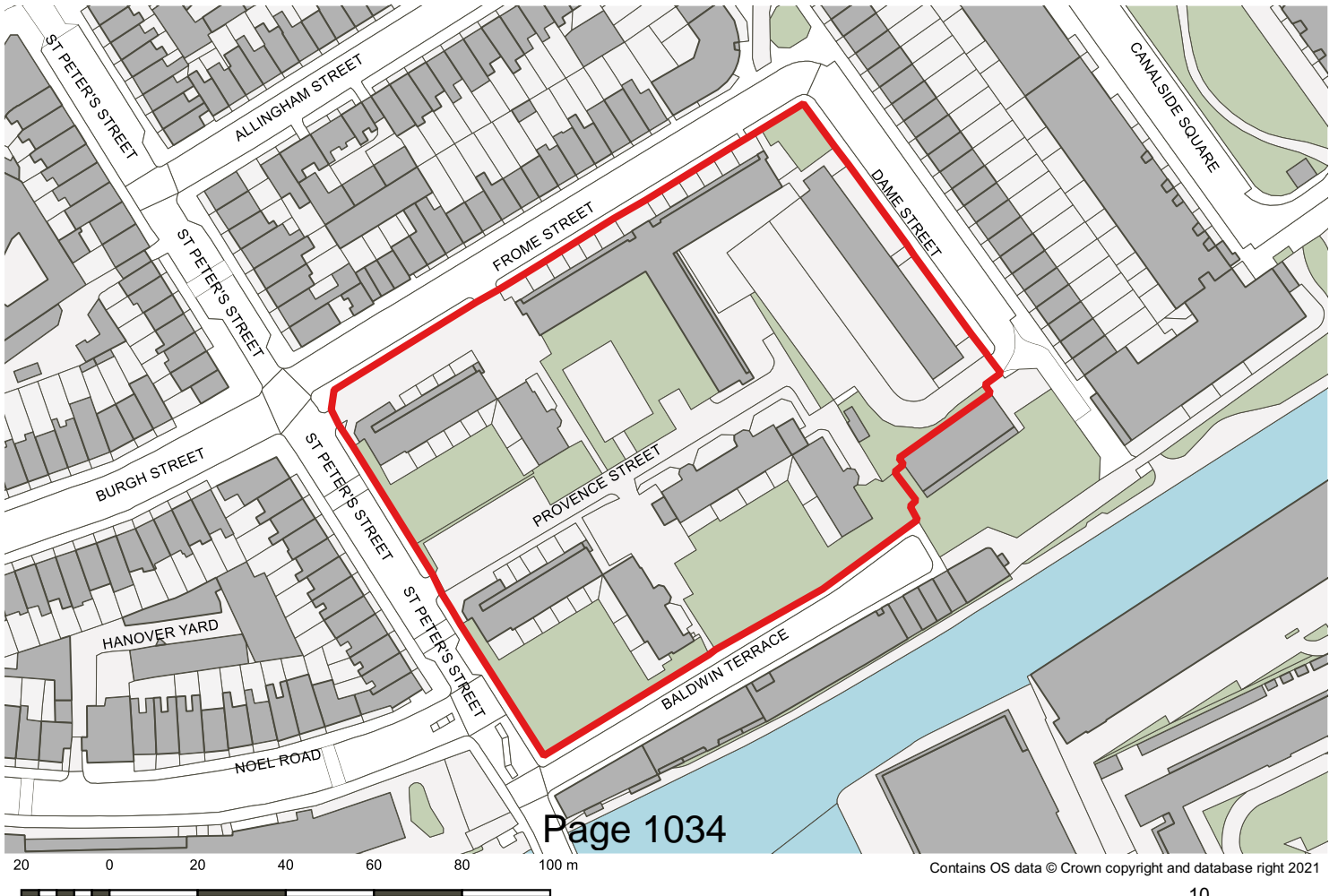
# OIS28 Barnsbury Estate – Proposed New Allocation



# OIS29 Highbury Quadrant Congregational Church – Proposed New Allocation



# OIS30 Cluse Court Estate – Proposed New Allocation



### OIS31 Hillside Estate – Proposed New Allocation



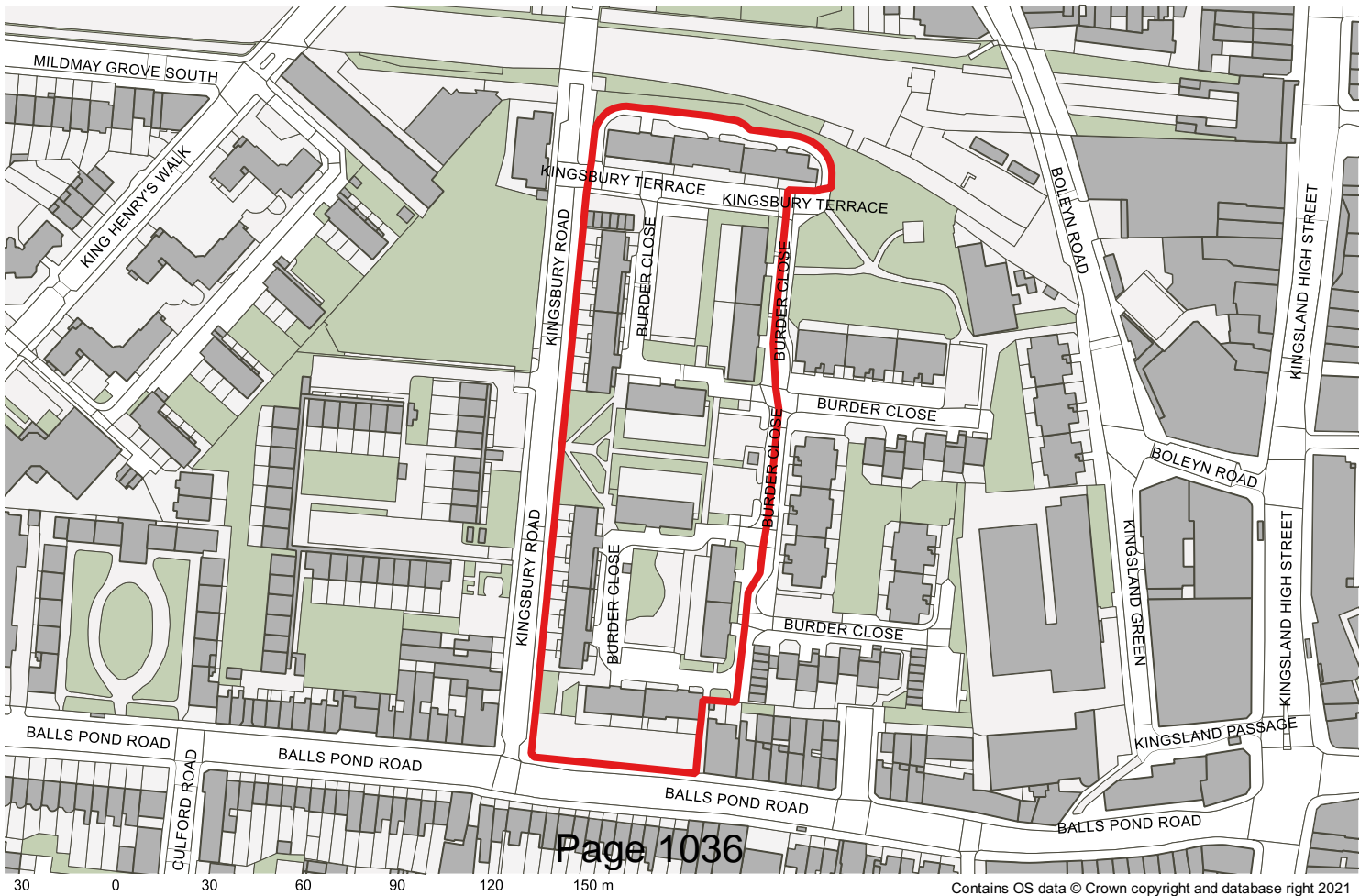
### OIS32 New Orleans Estate – Proposed New Allocation



# OIS33 Drakeley Court Estate and Aubert Court Estate – Proposed New Allocation

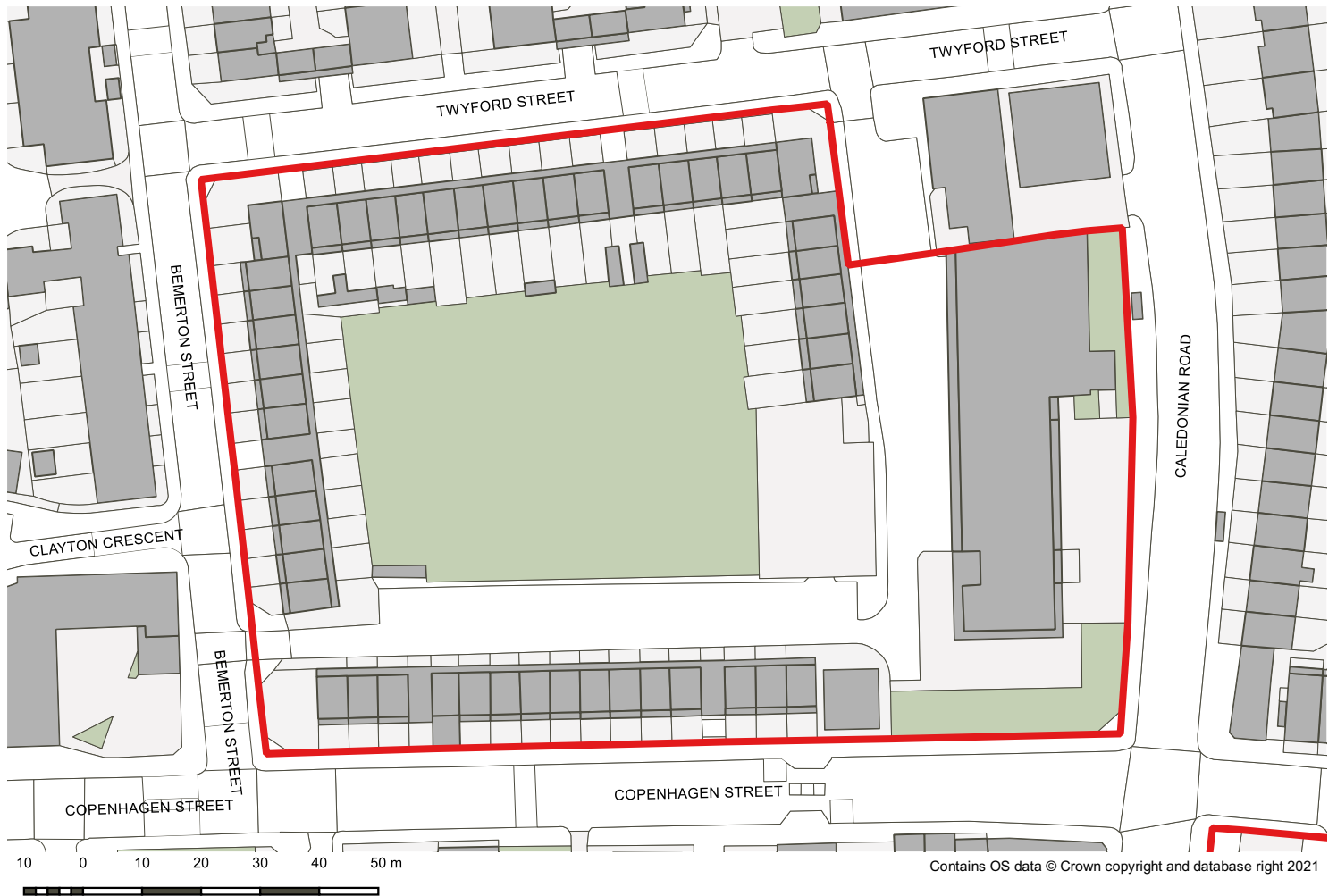


# OIS34 Kerridge Court Estate – Proposed New Allocation

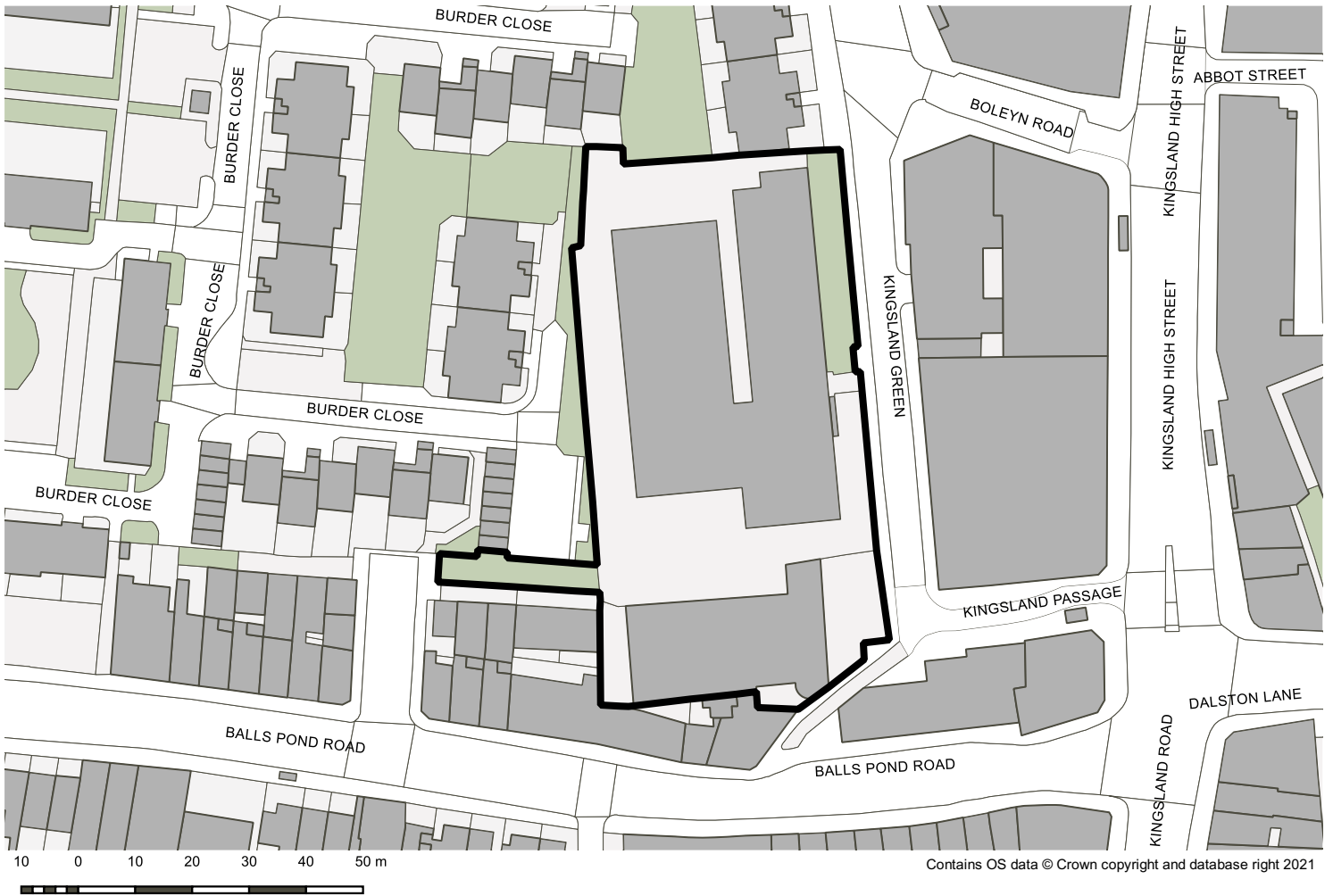




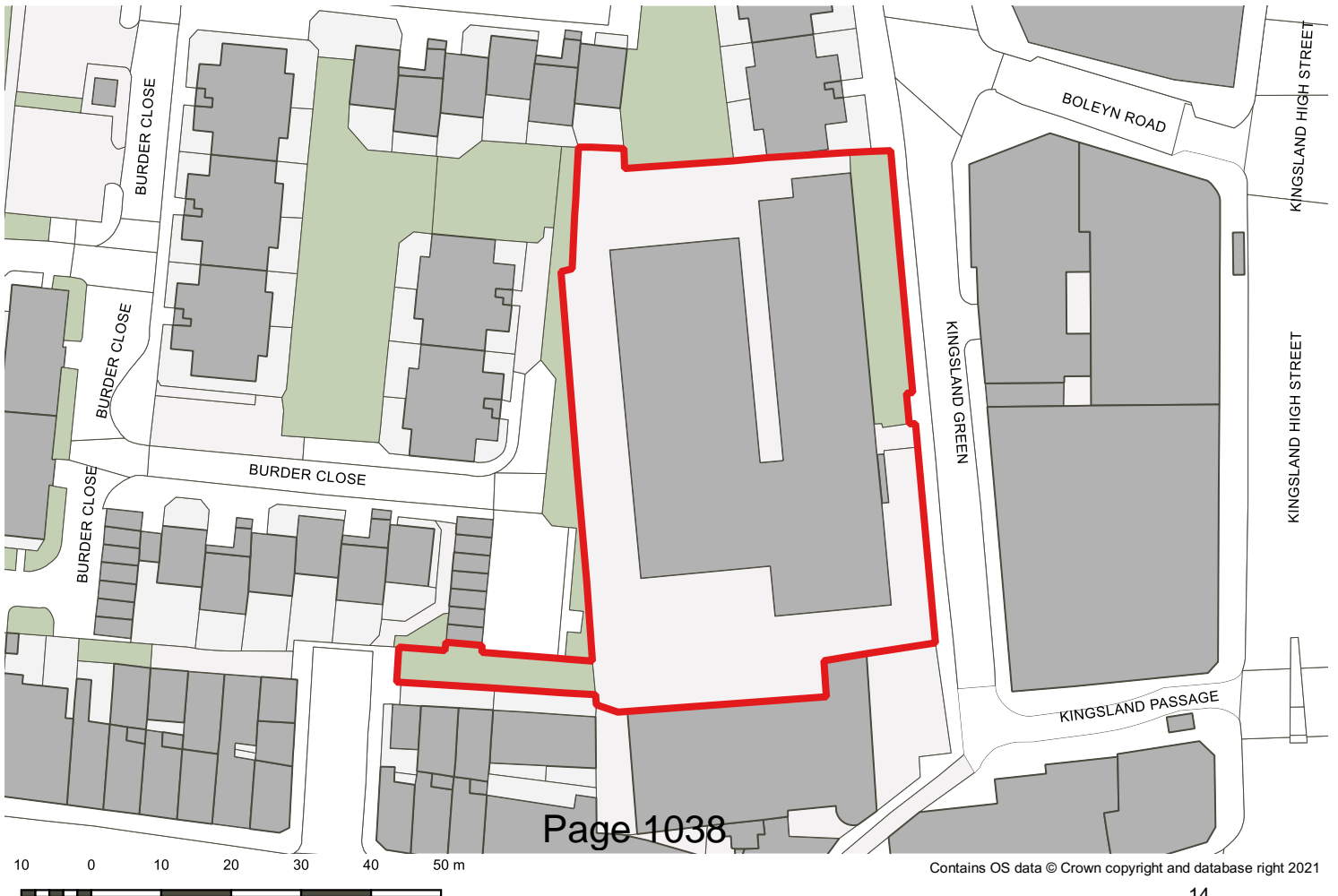
### KC8 Bemerton Estate South – Proposed New Allocation



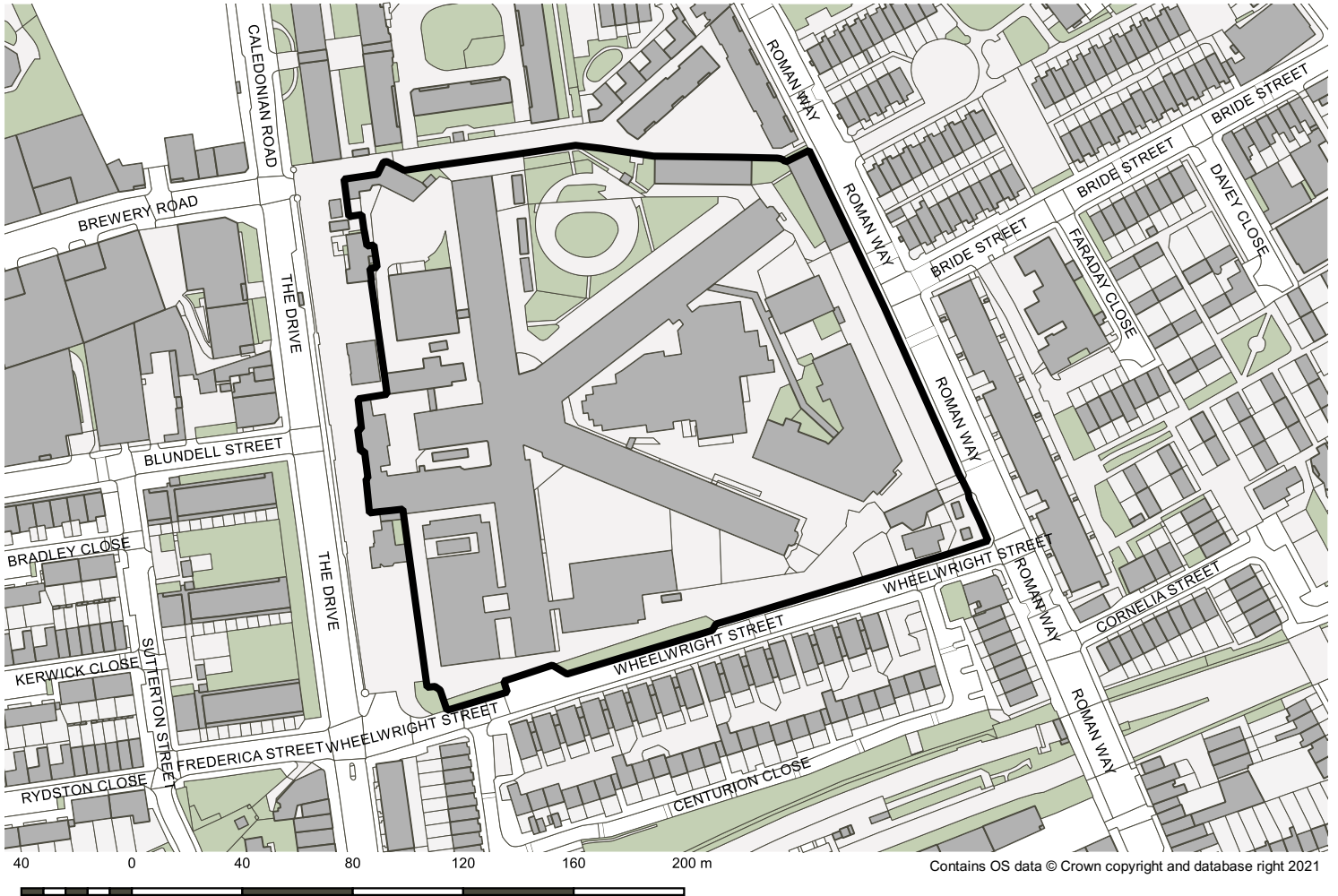
**OIS4 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green – Existing Site Allocation boundary**



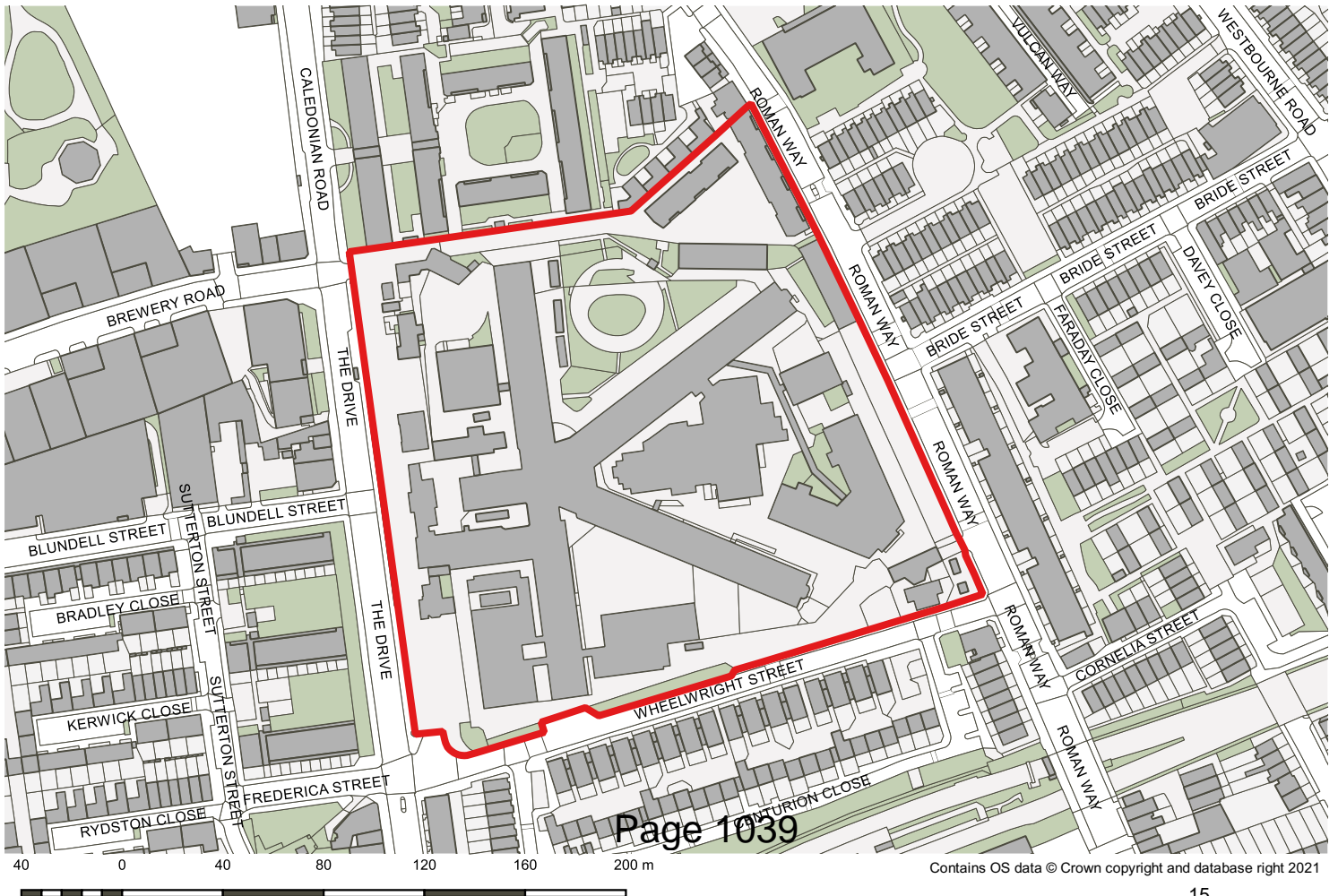
**OIS4 BT Telephone Exchange, Kingsland Green – Proposed New Allocation**



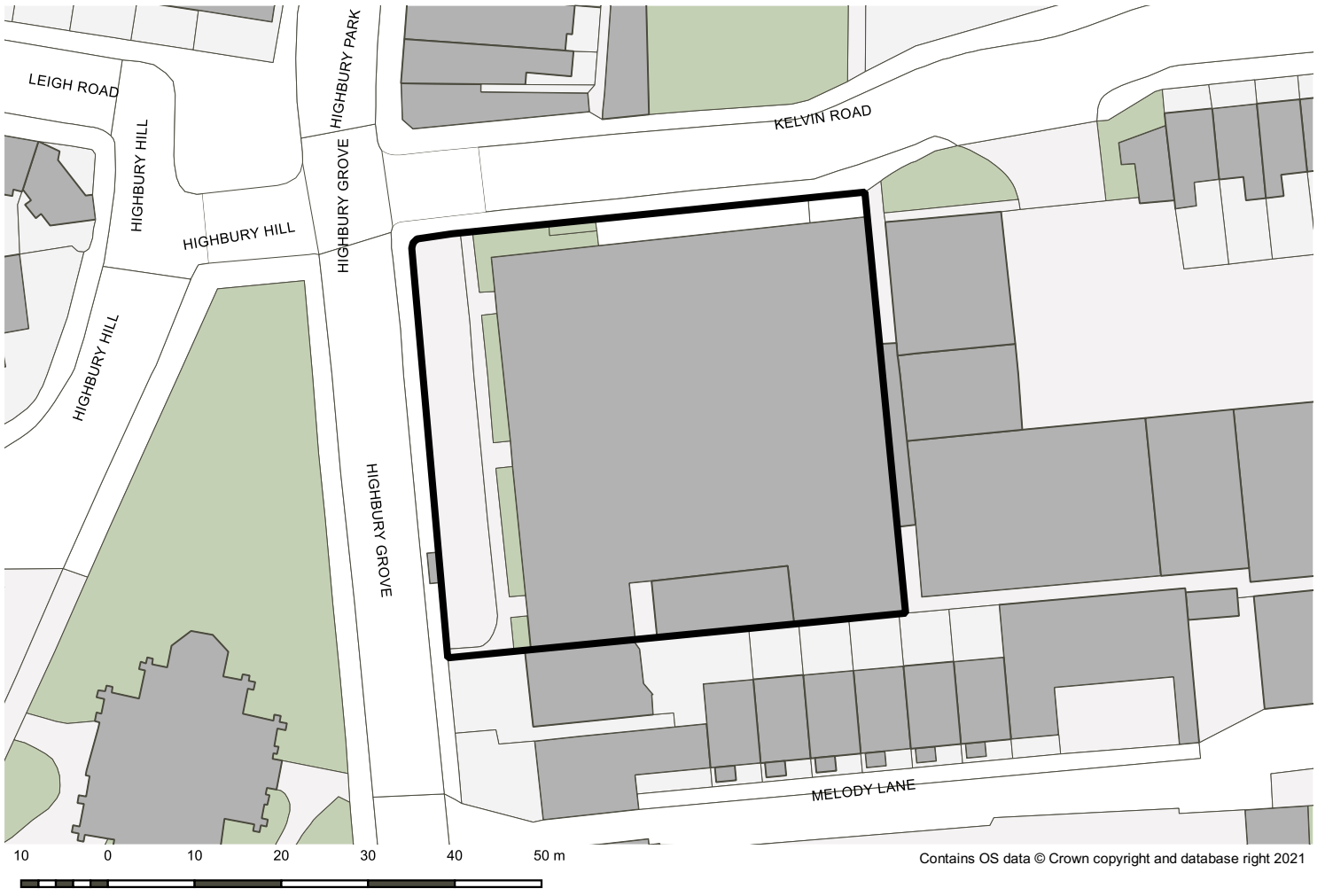
# OIS24 Pentonville Prison, Caledonian Road – Existing Site Allocation boundary



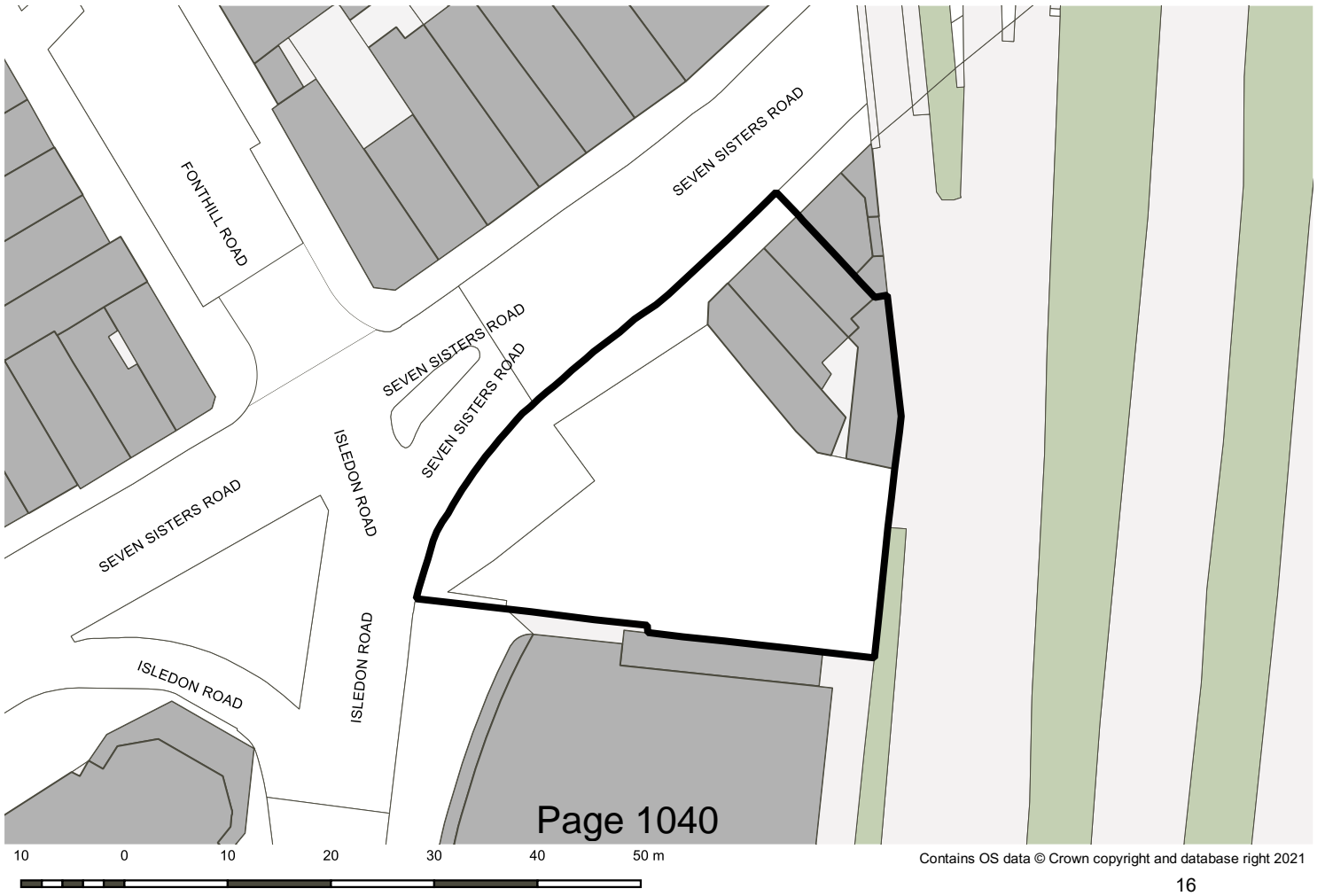
# OIS24 Pentonville Prison, Caledonian Road – Amended Site Allocation boundary



**OIS9 Ladbroke House, 62-66 Highbury Grove – Site Allocation removed**



**FP10 Former George Robey Public House, 240 Seven Sisters Road – Site Allocation removed**

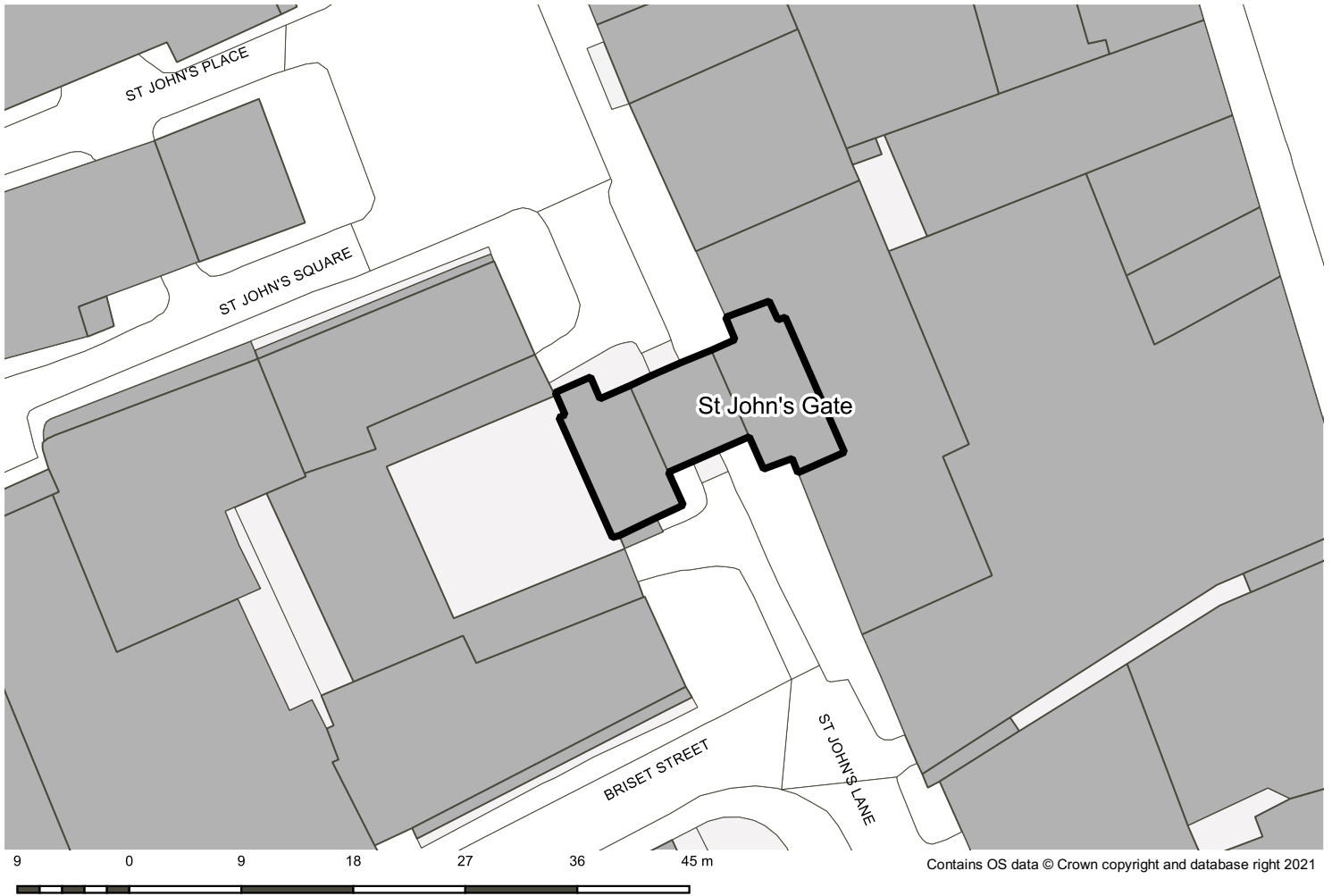


## 4. Scheduled Monuments

4.1 St John's Gate was de-scheduled from being a scheduled monument, but remains a Grade I listed building. This change is being made in response to Historic England Regulation 19 comments, and to update to reflect current heritage status of sites. The changes comprises:

- Removal of St. John's Gate as a scheduled monument
- The designation for the scheduled monument for the Nunnery of St. Mary de Fonte has been amended to exclude Saint James's Church, the designation is now called the Benedictine nunnery of St Mary, Clerkenwell to match the Historic England entry reference 1002003.

**St John's Gate Scheduled Monument - designation removed**



### Nunnery of Many de Fonte Scheduled Monument - existing boundary



### Benedictine nunnery of St Mary, Clerkenwell Scheduled Monument - proposed boundary

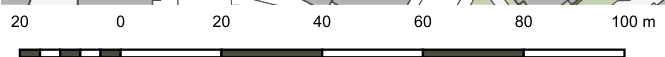
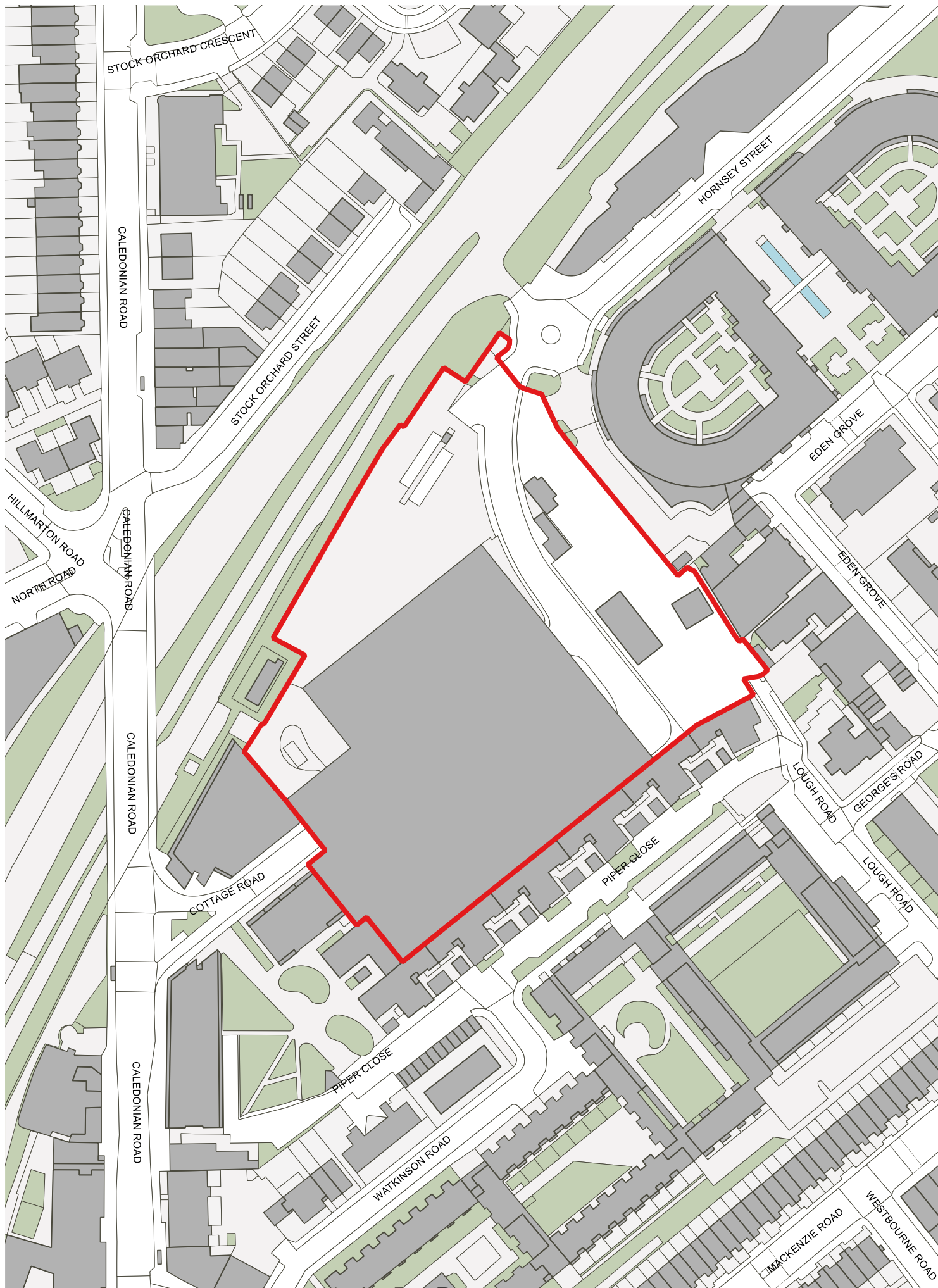


## 5. Waste site

- 5.1 The Hornsey Street Waste, Reuse and Recycling Centre will be shown on the Policies Map as a protected waste site in accordance with the North London Waste Plan.



# Waste Site: Islington Resue and Recycling Centre



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# Resident Impact Assessment

## Draft Local Plan modifications for consultation

### Service Area: Environment and Regeneration

#### 1. What are the intended outcomes of this policy, function etc?

Each Local Planning Authority (LPA) is required to produce a Local Plan setting out the strategic priorities for its area, opportunities for development and clear policies on what will or will not be permitted and where. Islington's current Local Plan includes the Core Strategy (2011), Development Management Policies, Site Allocations and Finsbury Local Plan (all 2013) Development Plan Documents (DPDs). The current Local Plan sets out strategic policies to guide the future development of the borough, together with non-strategic policies that are used to make decisions on planning applications. The Local Plan provides the basis for making decisions on planning applications, and both it and the evidence behind it need to be kept up-to-date to ensure that it can help the Council to better deliver on its objectives including through its Development Management functions. In light of this and informed by an up to date evidence base, new and revised policy approaches in the draft Local Plan have been developed to respond to changing development trends whilst recognising national and regional policy changes where relevant to Islington in order to continue to address the Council's priorities.

The key policy areas are summarised briefly below:

Housing: Delivery of genuinely affordable housing is a key strategic priority. Strategic policy expects 50% of all housing delivered to be affordable. This is to be achieved through a specific on-site target of 45% from developments without public subsidy, alongside policy which strongly encourages the use of public subsidy to help schemes achieve 50% on-site delivery (or more). Incentives including viability review mechanisms will also be used as part of policy to ensure developers try to get subsidy to achieve 50% on-site delivery.

The affordable housing tenure split will remain at 70% social rented and 30% intermediate rent to reflect the fact that maximising social rented housing remains an absolute priority. The tenure split reflects a need to contribute to delivering mixed and balanced communities. London Living Rent, a new form of tenure recently introduced by the Mayor of London will be promoted as the priority for the 30% intermediate tenure, which will provide additional affordable housing supply for those on moderate incomes, including key

workers, who are unable to obtain social housing and cannot afford market housing in the borough.

Islington's housing target, which is set out in the Mayor's draft London Plan, has decreased from 1,264 to 775 homes per annum, reflecting the scarcity of developable land in the borough. There are a number of Council policies designed to resist the development of specialist forms of housing (student accommodation, purpose built private rented sector housing and large-scale HMOs), primarily because these forms of housing take up scarce land supply and/or do not enable effective delivery of genuinely affordable housing. The need to provide housing for older people will be met primarily through conventional housing designed to be adaptable with different levels of care provided in people's homes rather than provision of specialist accommodation such as extra care housing.

Delivering high quality housing is a key priority with minimum standards for internal space, accessibility & inclusivity, floor to ceiling heights, private outdoor space, noise and other amenity considerations. All new housing development will be required to be 'tenure blind', where different tenures are indistinguishable from one another.

Employment: Over the period to 2036, evidence suggests that up to 50,500 extra jobs will need to be accommodated in Islington, most of which will be office based jobs. This requirement equates to 400,000sqm of office floorspace. Delivering this level of floorspace will be very challenging given competing development needs and the lack of land. In order to meet this need as far as possible, employment policies are seeking the maximisation of different types of business space - such as offices, light industrial space and SME space – within specific designated employment sites.

The Central Activities Zone (which is predominantly covered by the Bunhill and Clerkenwell AAP area) is expected to deliver the greatest uplift in office floorspace in the borough. To enable this, additional housing within the Bunhill and Clerkenwell area will not be actively promoted (with some site specific exceptions). Across the rest of the borough, existing employment land will be strongly protected.

Additional Locally Significant Industrial Sites (LSIS) have been designated in order to better protect important remaining small clusters of industrial uses across the borough. The Vale Royal/Brewery Road LSIS, the largest concentration of industrial uses in Islington, has its own spatial strategy to guide development in the area which reflects its particular importance to the local and central London economy. This area is considered suitable for the intensification of industrial uses, to meet the needs of small and medium size businesses.

10% affordable workspace, at peppercorn rent for 20 years, will be required from major development proposals (development of more than 1,000sqm) within various designated employment areas across the borough. On very large proposals in high value areas - such as the south of the borough - affordable workspace could be sought in perpetuity where viable.

Retail: The retail function of the four town centres of Angel, Nag's Head, Archway and Finsbury Park will be supported with a more focused retail core termed the 'primary shopping area', where a minimum level of retail uses will be maintained. The boundaries of these areas have been informed by detailed retail surveys. Outside the retail core a more

flexible approach will be implemented to allow change of use from shops to other town centre uses, for example a restaurant, pending assessment of other considerations including amenity impacts. This more flexible approach is a response to and reflects changes to retail behaviour and the way the retail industry operates, partly driven by the rise in online shopping.

Markets and the Camden Passage and Fonthill Road specialist shopping areas will continue to be strongly protected. Residential uses at ground floor level will be resisted in town centres and local shopping areas, due to the potential adverse impact on the retail function of these areas. Existing policy on hot food takeaways and betting shops will be strengthened with additional controls introduced in town centres and local centres. A new policy supporting meanwhile/temporary uses will be introduced.

Culture, night-time economy, hotels and leisure: New cultural quarters have been identified in Angel, parts of Clerkenwell/Farringdon and Archway. The night time economy, which includes a diverse range of uses including music venues, is supported with introduction of 'the agent of change' principle; this will help ensure that existing commercial uses are protected from complaints from new neighbouring residential development. Pubs are provided stronger protection against conversion, based on their social value, heritage merits and/or contribution to night time economy. A stronger protection against development of new hotels is introduced, focusing new hotels only on allocated sites or intensification of existing hotels subject to other constraints, and resisting their development outside these locations.

Design, heritage and tall buildings: Heritage policy has been revised in line with the NPPF, with additional clarity to reflect Islington's rich architectural history whilst also supporting innovation and architectural diversity. A detailed evidence base study of the local Islington character is being produced, to identify a number of character areas across the borough and provide basis for potential further supplementary design guidance for these areas. A policy for basements has been introduced which strengthens the current approach.

The draft Local Plan continues the current approach, which restricts buildings taller than 30 metres throughout the borough other than on specifically identified sites. Detailed evidence has been prepared to identify locations which are potentially suitable for tall buildings, to inform the Local Plan review. A number of potentially suitable sites have been identified in Archway, Finsbury Park, Nag's Head / Lower Holloway, Kings Cross fringe and around Old Street roundabout. Maximum heights have been identified for each site with design considerations set out in site allocations. Any proposals for tall buildings on the sites in question will have to satisfy a rigorous criteria-based policy which considers visual impact, functional impact and environmental impact of the proposal. This includes assessment of impacts on existing local views and strategic views, and daylight and sunlight impacts on properties in the surrounding area.

Sustainability: Delivering a sustainable built environment is crucial for Islington's long term sustainability and prosperity. The following changes to sustainability standards are proposed in the draft plan:

- New Fabric Energy Efficiency Standard for residential development to reduce carbon emissions.
- Retention of the carbon offset charge, based on updated information from the London Plan.

- Updated requirements on drainage to reduce flood risk.
- New separate policy on green roofs and new policy on adaptive design (circular economy).

Health, social and community infrastructure: Uses such as hospitals, doctors' surgeries, nurseries, schools, leisure centres, libraries and community centres are vital for the creation and maintenance of strong, vibrant and healthy communities. These facilities will be strongly protected as they are in the current Local Plan. However, the draft Local Plan allows for recognised public sector bodies to justify loss of facilities through provision of wider estate rationalisation plans, where these plans clearly demonstrate that overall provision within a specified area will not be diminished. An additional requirement to produce a Community Impact Assessment will also ensure that loss of facilities is only acceptable where applicants mitigate/prevent adverse impacts for their users.

Transport: The existing approach to car free development has been maintained.

Open space: Islington has one of the smallest amounts of open space per person in England and its urban and densely populated character means there is great deal of pressure on the borough's existing green spaces to perform multiple functions, and limited opportunity to create large new green spaces. Public open spaces and sites of nature conservation will retain their strong protection. Redevelopment of semi-private amenity spaces such as those on council estates will encourage re-provision in the first instance but a high quality proposal which results in some net loss may be acceptable. Additional policy on green infrastructure includes a requirement for major development to consider an urban greening factor in line with the draft London Plan, ensuring that a minimum level of green space is included as part of a development.

Bunhill and Clerkenwell Area Action Plan (formerly known as the Finsbury Local Plan): The Finsbury area (covering Bunhill and Clerkenwell wards) features a variety of uses often in close proximity to one another; significant competing development pressures; a unique historic character of the built environment and copious heritage assets. The Bunhill and Clerkenwell AAP is a fine-grain policy approach for this area, produced in response to these issues. Changes inside and outside the Bunhill and Clerkenwell AAP area necessitate a review of both the policy approach and related site allocations to ensure they remain up to date. The principal change is policy to prioritise business floorspace and require maximisation of such space across the area, rather than just in the most prominent commercial locations. Additional housing within the Bunhill and Clerkenwell AAP area will not be actively promoted (with some site specific exceptions). Neighbourhood policies, which provide strategic policies for various areas across the Bunhill and Clerkenwell AAP area, will be retained with some amendments to the area boundaries and policies.

Site allocations: Site allocations provide site specific policy for key sites to help to secure specific land uses, meet identified development needs (e.g. for housing and different types of business space) and secure the infrastructure required to support growth. Site allocations bring certainty about what will come forward on different sites. Many existing site allocations from the current Local Plan are proposed to be retained, though some need refinement in light of changed circumstances. There is also a need to identify additional sites for housing, business and other uses. Major new development opportunities likely to come forward during the lifetime of the draft Local Plan include Moorfields Eye Hospital, Holloway Prison and potentially Pentonville Prison.

## 2. Resident Profile

It is not possible to ascertain an exact service user profile as per the table below. The draft Local Plan is a long term plan which has potential impacts on many of the boroughs residents over time. Specific impacts could be determined at planning application stage.

The draft Local Plan will be subject to Integrated Impact Assessment (IIA), a combined approach to environmental, social and economic assessment which will also consider equality impacts. The IIA is considered as part of the approval process for the Local Plan through independent examination by a planning inspector. A draft IIA scoping report, including baseline demographic information, has been produced to support earlier drafts of the Local Plan -

<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/information/adviceandinformation/20182019/20181203integratedimpactassessmentscopingreportislingtonlocalplanreviewnov2018.pdf>

		Affected profile*	Service User profile
		<b>Total: 206,285</b>	<b>Total:</b>
Gender	Female	51%	N/A
	Male	49%	N/A
Age	Under 16	32,825	N/A
	16-24	29,418	N/A
	25-44	87,177	N/A
	45-64	38,669	N/A
	65+	18,036	N/A
Disability	Disabled	16%	N/A
	Non-disabled	84%	N/A
Sexual orientation	LGBT	No data	N/A
	Heterosexual/straight	No data	N/A
Race	BME	52%	N/A
	White	48%	N/A
Religion or belief	Christian	40%	N/A
	Muslim	10%	N/A
	Other	4.5%	N/A
	No religion	30%	N/A
	Religion not stated	17%	N/A

\*Census 2011 information

## 3. Equality impacts

The Equalities Impacts of the draft Local Plan policies were assessed as part of the Integrated Impact Assessment which accompanies the plan. An update to the IIA has been carried out which includes an assessment of the proposed modifications.

With reference to the [guidance](#), please describe what are the equality and socio-economic impacts for residents and what are the opportunities to challenge prejudice or promote understanding?

- Is the change likely to be discriminatory in any way for people with any of the protected characteristics? The draft Local Plan policies, taken together and including proposed modifications, will not be discriminatory for people with any of the protected characteristics.
- Is the proposal likely to have a negative impact on equality of opportunity for people with protected characteristics? Are there any opportunities for advancing equality of opportunity for people with protected characteristics? Overall there are unlikely to be negative impacts for those with protected characteristics in relation to equality of opportunity. The draft Local Plan is underpinned by a vision and objectives which seek to reduce inequalities. The draft Local Plan policies, taken together and including proposed modifications, will help to achieve the vision and objectives.
- Is the proposal likely to have a negative impact on good relations between communities with protected characteristics and the rest of the population in Islington? Are there any opportunities for fostering good relations? The draft Local Plan, including proposed modifications is unlikely to have a negative impact on good relations between communities with protected characteristics and the rest of the population of Islington. The draft Local Plan promotes mixed and balanced communities where people with all protected characteristics can live alongside one another without barriers, and ensures that new development is permeable and not gated. The draft plan objectives aim to tackle inequalities which will assist with building cohesive and resilient local communities.
- Is the proposal a strategic decision where inequalities associated with socio-economic disadvantage can be reduced? The Local Plan, when adopted, will be a strategic decision. This RIA relates to the draft Local Plan and proposed modifications. The draft Local Plan is still required to complete the independent examination process before it can be adopted. As noted above, the intention of the draft Local Plan is to address inequality within the boundaries of national and regional planning policy. For example a key priority of the draft Local plan is the delivery of genuinely affordable housing with a strategic target of 50% of all new housing developed in the borough to be affordable. This is intended to go as far as possible to address the serious affordability issue for housing in the borough, although it is important to note that the ultimate delivery of housing is something that is largely outside the council's control, particularly on private development sites.

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## 4. Safeguarding and Human Rights impacts



**a) Safeguarding risks and Human Rights breaches**

Please describe any safeguarding risks for children or vulnerable adults AND any potential human rights breaches that may occur as a result of the proposal? Please refer to **section 4.8** of the [guidance](#) for more information.

There are no safeguarding risks for children or vulnerable adults, and there are no potential breaches to human rights related to the draft Local Plan.

**If potential safeguarding and human rights risks are identified then please contact [equalities@islington.gov.uk](mailto:equalities@islington.gov.uk) to discuss further:**

## 5. Action

How will you respond to the impacts that you have identified in sections 3 and 4, or address any gaps in data or information?

For more information on identifying actions that will limit the negative impact of the policy for protected groups see the [guidance](#).

**No negative impacts where raised, as such, no actions are required.**

Action	Responsible person or team	Deadline

Please send the completed RIA to [equalities@islington.gov.uk](mailto:equalities@islington.gov.uk) and also make it publicly available online along with the relevant policy or service change.

**This Resident Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.**

**Staff member completing this form:**

Signed: Jonathan Gibb

Date: 11/01/2021

**Head of Service or higher:**

Signed: Sakiba Gurda

Date: 12/01/2021

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**Resources Directorate**  
**7 Newington Barrow Way, London, N7 7EP**

**Report of: Executive Member for Finance and Performance**

<b>Meeting of</b>	<b>Date</b>	<b>Ward(s)</b>
Council	25 February 2021	All

Delete as appropriate	Exempt	Non-exempt
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## **BUDGET PROPOSALS 2021/22 AND** **MEDIUM-TERM FINANCIAL STRATEGY**

### **1 SYNOPSIS**

- 1.1 The principal purpose of this report is for Full Council to approve, as recommended by the Executive, proposals in respect of the council's 2021/22 budget and level of council tax and the latest assumed medium-term financial position.
- 1.2 The budget proposals take into account an unprecedented level of uncertainty around the council's budget due to ongoing developments around the COVID-19 crisis and the delay of a longer-term local government funding settlement.
- 1.3 Outwith wartime, COVID-19 has caused the largest shock to the global economy on record, with severe restrictions put in place across huge swathes of economic and social activities. Rather than a one-off event that the council's budget is recovering from, it is expected that COVID-19 will continue to have a significant, currently unquantifiable, impact on the council's medium-term budget over and above the amount covered by the government's COVID support package announced to date. For example, the COVID support package provides no funding for business rates income losses in 2021/22 and only provides support for sales, fees and charges income losses up until June 2021. Therefore, it is essential that the council has sufficient annual contingency budget and reserves to boost financial resilience and protect residents.
- 1.4 The COVID-19 crisis has had a massive impact on the council's work, and how it supports and delivers its services to residents and local people. While supporting residents hardest hit by the pandemic, the council remains determined to make Islington a fairer place for all, so that:

- Everyone has a decent, genuinely affordable place to call home;
  - Everyone feels safe and does their bit to keep others safe too;
  - We build and support a thriving local economy that works for everyone, offering jobs and opportunities for local people; and
  - Everyone can enjoy a cleaner, greener, healthier future.
- 1.5 The 2021/22 budget outlines how the council will invest in new innovations and improvements to support that effort, including setting the foundations for becoming a net zero-carbon borough within a decade and continuing with our ambitious council house building programme. Alongside this, we are having to make savings of £25m in 2021/22 due to the impact of central government funding cuts over the past decade and rising costs and demand for council services. We have protected the services local people value and rely on, and we will continue to invest in the issues that matter most to our residents.
- 1.6 Based on the government’s methodology, Islington’s Core Spending Power (CSP) will increase by 3.7% in 2021/22, which represents a real term increase in resources but is less than the national average increase of 4.5%. The government has assumed that the council will increase core council tax by the maximum amount (1.99%) and will apply a 3% Adult Social Care (ASC) precept. Therefore, the proposed 2021/22 budget and MTFS is premised on a proposed increase in the basic Islington council tax of 1.99% in 2021/22 and, subject to review as part of future budget setting cycles, assumed increases of 1.99% in 2022/23 and 2023/24. A 1.99% increase in the basic Islington council tax (excluding the GLA precept) for the average (Band D) property equates to an increase of around 47p per week, or 4p per week for working aged council tax support recipients.
- 1.7 The proposed 2021/22 budget also assumes that the ASC precept of 3% will be applied. This equates to a further increase of around 70p per week for the average (Band D) property, or 6p per week for working aged council tax support recipients.
- 1.8 The Policy and Performance Scrutiny Committee reviewed the draft budget proposals on 21 January 2021 and its comments have been taken into account in finalising the budget proposals and proposed level of council tax.
- 1.9 The council also invited comments from business rates payers and representatives of business rates payers in Islington on the draft 2021/22 budget proposals. The consultation period ran from 15 January 2021 to 31 January 2021. No responses were received.
- 1.10 The contents of the report are summarised below.

**Section 2** sets out the recommendations.

**Section 3** summarises the assumptions within the General Fund (GF) Medium-Term Financial Strategy (MTFS) and sets out the 2021/22 net revenue budget, GF fees and charges and estimated GF reserves.

**Section 4** covers the Housing Revenue Account (HRA) and includes HRA rents, service charges and other fees and charges.

**Section 5** summarises the 2021/22 to 2023/24 capital programme and funding, and the latest indicative programme up until 2030/31, and includes the related Capital Strategy, Treasury Management Strategy and Investment Strategy documents.

**Section 6** includes the detailed, statutory council tax calculations and matters relating to retained business rates.

**Section 7** details the matters to formally consider in setting the final budget, namely the comments of the Section 151 Officer and the Monitoring Officer, an Equality Impact

Assessment (EQIA) of the budget proposals and budget consultation requirements. It also includes the Annual Pay Policy Statement 2021/22 for approval.

## **2 RECOMMENDATIONS**

### **The General Fund Budget 2021/22 and MTFs (Section 3)**

- 2.1 To approve, as recommended by the Executive, the latest assumed MTFs and balanced 2021/22 budget, including the underlying principles and assumptions. (**Paragraphs 3.1-3.30, Table 1 and Appendix A**)
- 2.2 To note the unprecedented level of uncertainty in the estimates due to COVID-19 and the wider local government funding outlook. (**Paragraphs 3.31-3.41**)
- 2.3 To approve, as recommended by the Executive, the proposed 2021/22 net budgets by directorate. (**Paragraph 3.5, Table 2 and Appendix A**)
- 2.4 To approve, as recommended by the Executive, the 2021/22 savings (**Paragraphs 3.42-3.45, Table 6 and Appendices B1-B2**), which in some cases remain subject to consideration of individual consultations before implementation.
- 2.5 To note the Dedicated Schools Grant (DSG) settlement for 2021/22 and related funding assumptions. (**Paragraphs 3.46-3.55**)
- 2.6 To note the fees and charges policy and the GF fees and charges for 2021/22 that have been approved by the Executive. (**Paragraphs 3.56-3.63 and Appendices C1-C5**)
- 2.7 To approve, as recommended by the Executive, the policy on GF contingency and reserves, including the target level of GF balances, and agree the movements to/from earmarked reserves assumed as part of the 2021/22 revenue budget. (**Paragraphs 3.64-3.72 and Table 7**)
- 2.8 To approve, as recommended by the Executive, that the Section 151 Officer be delegated responsibility for any technical adjustments required to be made to the 2021/22 budget (in line with the council's Financial Regulations).
- 2.9 To approve, as recommended by the Executive, that centrally held demographic growth be allocated to service budgets if and when the need materialises and approved by the Section 151 Officer. (**Paragraph 3.9**)

### **The HRA Budget and MTFs (Section 4)**

- 2.10 To approve, as recommended by the Executive, the balanced HRA 2021/22 budget and note the latest estimates over the 3-year MTFs period. (**Paragraphs 4.1-4.3, Table 8 and Appendix D1**)
- 2.11 To note the HRA rents and other HRA fees and charges for 2021/22 that have been approved by the Executive. (**Paragraphs 4.4-4.30, Tables 9-12 and Appendix D2**)

### **Capital Investment and Treasury and Investment Management (Section 5)**

- 2.12 To approve, as recommended by the Executive, the proposed 2021/22 to 2023/24 capital programme, including investment in projects related to the council's net zero carbon priority, and note the latest indicative capital programme for 2024/25 to 2030/31. (**Paragraph 5.1-5.5, Table 13 and Appendix E1**)
- 2.13 To note the estimated funding of the 2021/22 to 2023/24 capital programme and to delegate authority to the Section 151 Officer, where necessary, to apply capital resources to fund the capital programme in the most cost-effective way for the council. (**Paragraphs 5.6-5.7 and Table 14**)

- 2.14 To approve, as recommended by the Executive, the Capital Strategy, Minimum Revenue Provision (MRP) Policy Statement, Treasury Management Strategy and Investment Strategy. (**Paragraph 5.3** and **Appendices E2-E5**)

### **Council Tax and Retained Business Rates (Section 6)**

- 2.15 To note the 2020/21 council tax and business rates forecasts and budgetary impact over the medium term. (**Paragraphs 6.1-6.3, Table 15, Paragraph 6.17** and **Table 23**)
- 2.16 To approve, as recommended by the Executive, the calculations required for the determination of the 2021/22 council tax requirement and the level of council tax as detailed in **Section 6** and summarised below.
- 1) 2021/22 council tax requirement of £99,248,682.10. (**Paragraph 6.6** and **Table 16**)
  - 2) The relevant basic amount of Islington Band D council tax of £1,276.72, a 4.99% increase compared to 2020/21 (comprising 3.00% for expenditure on adult social care and 1.99% for other expenditure), and that this is not 'excessive'. (**Paragraphs 6.7-6.8** and **Table 17**)
  - 3) The basic amount of Islington Band D council tax for dwellings to which no special item relates (i.e. outside of the Lloyd Square Garden Committee area) of £1,276.48. (**Paragraph 6.9** and **Table 18**)
  - 4) The amount of 2020/21 council tax (excluding the GLA precept) for each valuation band over each of the Council's areas. (**Paragraph 6.11** and **Table 19**)
  - 5) The total amount of 2020/21 council tax (including the GLA precept) for each valuation band over each of the Council's areas. (**Paragraph 6.13** and **Table 21**)
- 2.17 To note the council's estimated retained business rates funding in 2021/22, as per the 2021/22 NNDR1 return estimate. (**Paragraph 6.14-6.16** and **Table 22**)
- 2.18 To note that the London Business Rates Pool will not continue in 2021/22. (**Paragraph 6.17**)
- 2.19 To note the significant funding risk for the council in relation to Material Change in Circumstance (MCC) business rates appeals due to COVID-19 and that additional appeals provision for this threat in 2020/21 or 2021/22 was not included in the 2021/22 NNDR1 return. (**Paragraphs 6.19-6.22**)

### **Matters to Consider in Setting the Budget (Section 7)**

- 2.20 To have regard to the Section 151 Officer's report on the robustness of the estimates included in the budget and the adequacy of the proposed financial reserves when making decisions about the budget and the level of council tax, as required under Section 25(2) of the Local Government Act 2003. (**Paragraphs 7.1-7.9**)
- 2.21 To note the Monitoring Officer comments. (**Paragraphs 7.10-7.14**)
- 2.22 To note the Equality Impact Assessment (**Paragraphs 7.15-7.17** and **Appendix F**) and to take fully account of it in approving the overall budget and related proposals.
- 2.23 To note that the council invited business rate payers or representatives of business rate payers in Islington to comment on the draft 2021/22 budget proposals, as required under Section 65 of the Local Government Finance Act 1992, and that no responses were received. (**Paragraphs 7.18-7.20**)
- 2.24 To approve, as recommended by the Executive, the Annual Pay Policy Statement 2021/22. (**Paragraph 7.21** and **Appendix G**)

### 3 **GENERAL FUND MTFS AND 2021/22 REVENUE BUDGET**

#### **Summary of MTFS 2021/22 to 2023/24**

3.1 The latest assumed budget position in 2021/22 and over the medium term is summarised in **Table 1** and detailed at **Appendix A**. There was an estimated gross budget gap of £25.745m in 2021/22 (balanced in full by the proposals in this report) and £80.405m over the medium term (with a remaining estimated 3-year gap of £34.209m after the proposals and underlying assumptions in this report).

**Table 1 – Summary Budget Gap 2021/22 to 2023/24**

	<b>2021/22 £m</b>	<b>2022/23 £m</b>	<b>2023/24 £m</b>	<b>Total £m</b>
Inflation and demographic growth	8.964	14.431	19.175	<b>42.570</b>
Base budget pressures	9.949	0.465	(0.100)	<b>10.314</b>
Corporate costs (e.g. capital financing/levies)	6.611	0.578	4.441	<b>11.630</b>
COVID-19 budget pressures/risks	5.500	0.000	0.000	<b>5.500</b>
Government funding	(5.279)	11.021	4.649	<b>10.391</b>
<b>Gross Budget Gap</b>	<b>25.745</b>	<b>26.495</b>	<b>28.165</b>	<b>80.405</b>
Assumed savings	(25.264)	(8.200)	(2.367)	<b>(35.831)</b>
Council tax base	4.496	(4.561)	(0.989)	<b>(1.054)</b>
Council tax increases (1.99% per annum)	(1.985)	(2.045)	(2.106)	<b>(6.136)</b>
ASC precept (3% in 2021/22)	(2.992)	(0.090)	(0.093)	<b>(3.175)</b>
<b>Net Budget Gap</b>	<b>0.000</b>	<b>11.599</b>	<b>22.610</b>	<b>34.209</b>

3.2 The proposed 2021/22 budget and MTFS complies with the CIPFA Financial Management Code and is under-pinned by the following key principles:

- Setting a balanced budget for the year ahead and working up robust estimates and funding scenarios over a 3-year period, as well as longer-term horizon scanning;
- Fully budgeting for ongoing budget pressures, and not applying one-off funding to bridge ongoing funding gaps;
- Reflecting the ongoing revenue cost of the capital programme (both the cost of servicing and, very importantly, setting aside enough to prudently repay debt principal) in the revenue budget, taking into account the potential for interest rates to increase;
- Not assuming additional funding from central government until it is confirmed, and developing exit plans in the event that specific funding streams end at short notice;
- Increasing the level of council tax in line with the government's expectations in local government finance settlements, in order to avoid an ongoing shortfall in the base budget; and
- Setting a sufficient contingency budget for in-year budget risks and using available one-off funding to strengthen financial resilience in reserves for hardening budget risks over the medium term.

3.3 The medium-term financial outlook for local government is the most uncertain it has ever been and there is unlikely to be any degree of certainty for some time. The economic ramifications of the COVID-19 pandemic are going to take some years to unfold, with an inevitable impact on public sector spending settlements going forward. The estimated

medium-term budget outlook will be kept under review and could be subject to significant change as further information emerges on key budget variables, including the following:

- Ongoing COVID-19 income losses (including council tax and business rates losses) and expenditure/demographic pressures, and the extent to which these are covered by central government funding;
- Delivery of the savings programme;
- The longer-term government Comprehensive Spending Review (CSR) and future local government finance settlements, and potential funding distribution reforms such as the reset of business rates retention growth and the fair funding review; and
- Government reforms of the business rates system and social care funding system.

3.4 The national economic outlook and the potential medium-term local government funding implications are considered in more detail later in the report.

### **Net Revenue Budget 2021/22**

3.5 Within the balanced 2021/22 budget position, **Table 2** summarises the proposed 2021/22 net revenue budget by directorate (cash-limited budgets). A breakdown of the movement between the 2020/21 and 2021/22 budget is shown in **Appendix A**.

**Table 2 – Net Revenue Budget 2021/22**

	<b>2021/22 Net Budget £m</b>
Chief Executive's	1.277
Environment and Regeneration	10.475
Housing	9.027
People	141.747
Public Health (net nil as wholly grant funded)	0.000
Resources/Corporate	49.651
<b>Net Cost of Services</b>	<b>212.177</b>
Contingency	5.000
COVID-19 Contingency	5.500
Transfer from Earmarked Reserves*	(15.047)
Unringfenced Grants	(7.540)
<b>Net Budget Requirement</b>	<b>200.090</b>
Settlement Funding Assessment	(109.848)
Business Rates Growth/Section 31 Grant	(13.629)
Collection Fund Deficit	22.636
<b>Council Tax Requirement</b>	<b>99.249</b>

*\*Excluding timing differences related to the COVID-19 Collection Fund deficit on council tax and business rates income, the 2021/22 budget assumes a net transfer of £7.589m to earmarked reserves.*

3.6 It should be noted that at the time of finalising the 2021/22 budget the council was consulting on a proposed restructure at corporate management level. The breakdown of the budget in this report reflects the current structure, which would need to be re-aligned upon the implementation of any structural changes.



## **Key Revenue Cost Pressures**

- 3.7 The government announced in Spending Review 2020 (SR20) that there will be a public sector pay freeze in 2021/22, excluding frontline NHS staff and those earning less than £24,000 (who will receive a minimum increase of £250). This is the assumption in the proposed 2021/22 budget, with a 2.5% per annum increase estimated from 2022/23 onwards. However, it is important to highlight that the government does not set the pay award for local government. If a local government pay increase is agreed for 2021/22, this would be funded from the revenue contingency budget, in-year, with the ongoing impact subsequently reflected in future year budgets. Employer pension contributions are expected to be unchanged in 2021/22 based on the 2019 triennial pension fund valuation.
- 3.8 The MTFS also provides for non-pay/contract inflation pressures of £5m per annum, the majority of which relates to inflation on the council's adult social care contracts with providers and the associated London Living Wage cost increases.
- 3.9 A further, significant cost pressure facing the council is the increasing quantum and complexity of demand for council services, including in adult and children's social care and homelessness/No Recourse to Public Funds (NRPF) services. Based on latest forecasts, albeit highly uncertain due to the ongoing impact of COVID-19, the MTFS assumes demographic budget growth of £4.307m in 2021/22 and £13.723m over the medium term. It is recommended that this demographic growth is held centrally and allocated to service budgets in-year once a more evidenced assessment is available and approved by the Section 151 Officer. There is a risk that COVID-19 leads to a long-term increase in demand for some council services (e.g. mental health services).
- 3.10 The proposed 2021/22 budget includes funding for ongoing base budget shortfalls that have been evidenced in the current financial year, as well as budget increases for the following areas in **Table 3** to support wider council improvements and transformation.

**Table 3 – Funding for Council Improvements 2021/22**

	<b>£m</b>
Equalities (recurring)	0.300
Organisational development (recurring)	0.450
HR improvements (recurring)	0.350
HR investment (one-off)	0.500
<b>Total</b>	<b>1.600</b>

- 3.11 Based on current treasury management assumptions, the MTFS fully provides for the capital financing costs (interest cost and repayment of debt) of the proposed 2021/22 to 2023/24 capital programme presented in **Section 5** of this report. The proposed 2021/22 budget also includes a recurring £0.6m per annum for additional revenue costs of the council's net zero carbon programme.
- 3.12 The council is committed to paying levies to a number of external organisations, which is estimated to total £18.663m in 2021/22. The most significant levies are the council's contribution to Transport for London (TfL) for the cost of concessionary fares (London Freedom Pass) and the North London Waste Authority (NLWA) levy towards the disposal of household waste in partnership with six other north London boroughs.
- 3.13 The estimated levies for 2021/22 are shown in **Table 4**.

**Table 4 – Levies 2021/22**

	<b>2021/22 Budget £m</b>	<b>2021/22 Estimate £m</b>	<b>Increase/ (Decrease) £m</b>
Concessionary Fares (London Freedom Pass)	11.392	9.932	(1.460)
North London Waste Authority	6.363	6.195	(0.168)
London Pensions Fund Authority	1.162	1.185	0.023
Inner London North Coroners Court	0.332	0.360	0.028
Traffic and Control Liaison Committee	0.268	0.254	(0.014)
Lee Valley Regional Park Authority	0.190	0.194	0.004
Environment Agency (Thames Region)	0.186	0.190	0.004
London Boroughs Grants Scheme	0.179	0.180	0.001
<b>Total</b>	<b>20.072</b>	<b>18.490</b>	<b>(1.582)</b>

- 3.14 The council's MTFS previously assumed a £1.144m overall increase in levies in 2021/22 compared to 2020/21. Based on latest estimates, and largely due to the impact of COVID-19 on activity levels (e.g. reduced concessionary fares passenger numbers), the latest estimate is a £1.582m decrease in 2021/22. This £2.726m decrease from the previous MTFS assumption (approximately comprising a £1.7m decrease in the concessionary fares estimates and a £1.0m decrease in the NLWA levy estimate) means that there is a one-off balance of £2.726m in 2021/22 to transfer to a levies smoothing earmarked reserve. This will help mitigate against future unexpected levy increases (such as fluctuations in borough waste tonnages that are used to calculate the NLWA levy).

**Local Government Finance Settlement 2021/22**

- 3.15 The provisional local government finance settlement for 2021/22 was announced on 17 December 2020, and the final settlement was confirmed on 9 February 2021. This report has been drafted based on the provisional settlement. The only change between the provisional and final settlement for Islington was a minimal decrease (£0.004m) in Revenue Support Grant due to correction of a historical discrepancy.
- 3.16 Based on the government's methodology, Islington's Core Spending Power (CSP) will increase by 3.7% in 2021/22, which represents a real term increase in resources but is less than the national average increase of 4.5%. This assumes that the council raises council tax by the maximum amount (1.99% referendum limit & 3% ASC precept).
- 3.17 In calculating CSP, the government has also assumed that each authority's taxbase has increased in line with their average taxbase growth since 2016/17. However, in reality the taxbase may often be lower than this because COVID-19 has resulted in lower growth rates and lower collection rates, combined with higher costs of local council tax support. The ability of an authority to generate additional resources from local council tax (i.e. the local taxbase) is now increasingly important in determining its increase in CSP. Islington's taxbase is below the London average, meaning that there is relatively lower scope for the council to raise additional income from council tax.
- 3.18 **Settlement Funding Assessment (SFA)/S31 grant for under-indexation** – Islington's SFA is made up of a Baseline Funding Level (BFL) under the partial business rates retention system (comprising a business rates baseline and a 'top-up' grant) and Revenue Support Grant (RSG). This is summarised in **Table 5**. In 2021/22, RSG will increase in line with the Consumer Price Index (CPI, 0.55%) and the BFL will be the same as in 2020/21 (owing to it being directly linked to the small business rates multiplier, which

will be frozen in 2021/22). The council will receive additional S31 grant to compensate for the impact of the small business rates multiplier freeze compared to a 0.55% inflationary uplift on SFA.

**Table 5 – Settlement Funding Assessment (SFA)**

	<b>2020/21 £m</b>	<b>2021/22 £m</b>	<b>Change £m</b>
Business rates baseline	82.456	82.456	0.000
Top-up grant	2.798	2.798	0.000
<b>Baseline Funding Level</b>	<b>85.254</b>	<b>85.254</b>	<b>0.000</b>
Revenue Support Grant	24.458	24.594	0.136
<b>Settlement Funding Assessment</b>	<b>109.712</b>	<b>109.848</b>	<b>0.136</b>

- 3.19 The business rates baseline is the amount that the government expects the council to retain under the Business Rates Retention System. In addition, the council retains a 30% share of any additional business rates income that the council collects over and above the business rates baseline. Conversely, should business rates income shrink, the council fully stands its share of the loss of the first 7.5% (£6.4m) below the baseline funding level down to a safety net level of £78.9m. The council's retained rates income for safety net purposes in 2021/22 is approximately £15.1m above the safety net level. This is the maximum (worst case scenario) loss of retained business rates funding that the council could incur in 2021/22 before being entitled to safety net funding from the government. The council's retained business rates funding is considered in more detail in **Section 6** of this report.
- 3.20 **Social care grant funding** – The council's share of the £300m additional Social Care Grant announced in SR20 is £2.596m (assumed ongoing but subject to confirmation in the next Spending Review/settlement). Allocations of the £300m grant have been 'equalised' for each authority's ability to generate income from the ASC precept (equalisation has been limited to £240m). All other social care grant funding in 2020/21 continues unchanged into 2021/22 (no inflation has been applied). In total, this means that the council will receive social care grant funding of £24.854m in 2021/22, comprising £14.076m Improved Better Care Fund and £10.778m Social Care Grant. However, there remains uncertainty around the 2021/22 allocation from the former Independent Living Fund (ILF) recipient grant (£1.182m for Islington in 2020/21).
- 3.21 **New Homes Bonus (NHB)** – The NHB will operate on the same basis in 2021/22 as in 2020/21. New allocations relating to housing growth over the past year will be one-off in nature and will not result in legacy payments in subsequent years on those allocations. Based on this, Islington will receive £2.448m NHB grant in 2021/22 (a decrease of £2.821m compared to 2020/21), diminishing to £0.649m in 2022/23 and zero by 2023/24 as legacy payments for prior year housing growth fall out. The reduction in New Homes Bonus is a key driver in Islington receiving a lower increase in Core Spending Power than the national average. A consultation on the reforms to the New Homes Bonus will commence shortly, with the aim to implement in 2022/23.
- 3.22 **Lower tier services grant** – There is a new, one-off lower tier services grant of £111m, of which Islington will receive £0.922m. The function of this grant appears to be to reduce the range of increases in CSP, largely by 'levelling up' those with the lowest taxbases, and to provide a 'floor' increase for every authority (i.e. to ensure that no authority's CSP is lower in 2021/22 than it was in 2020/21).
- 3.23 **Troubled families** – The government has now confirmed that the same amount (£165m) will be available nationally in 2021/22 as in 2020/21. Whilst there remains uncertainty

around the council's allocation, the MTFs currently assumes that costs will be contained within the available government funding, which is subject to demonstrating in the monitoring visit that the work carried out continues to represent value for money in outcomes for families and continued transformation.

- 3.24 **Homelessness Prevention Grant** – This grant combines and increases the previous Flexible Homelessness Support and Homelessness Reduction Grant. Islington's allocation for 2021/22 is £3.667m, an increase of £0.619m compared to 2020/21.
- 3.25 A number of other specific grants, including the ring-fenced Public Health grant, sit outside the main local government finance settlement and for which 2021/22 allocations have not yet been announced. The MTFs assumes that any changes in these specific grants compared to 2020/21 will be contained within the related service area.

### **COVID Support Package 2021/22**

- 3.26 Alongside the provisional local government finance settlement, the government published a consultative policy paper with further details on the COVID Support Package for 2021/22 announced in SR20. **It is expected that COVID-19 will continue to have a significant impact on the council's budget over and above the amount covered by this COVID support package. Therefore, it is essential that the council has sufficient annual contingency budget and reserves to boost financial resilience and protect residents.**
- 3.27 Final allocations on the £1.55bn COVID-19 tranche 5 grant have been announced (£9.312m for Islington). **The government has advised that councils should plan for no further funding, other than this package, to meet COVID-19 costs in 2021/22.**
- 3.28 The government propose to distribute a £670m Local Council Tax Support (LCTS) grant based on each billing authority's share of the England level working-age local council tax support caseload (using data from 2020/21 Q1 and Q2), adjusted to reflect the average bill per dwelling in the area. Islington's indicative allocation is £3.6m, and it is assumed in the 2021/22 budget that this is directly offset by a one-off reduction in the council taxbase due to the increased cost of providing the council's approved council tax support scheme. **The cost of council tax support in 2021/22 and over the medium term is highly uncertain as it will depend on future developments in the economy, including the level of unemployment, and government measures to support businesses and individuals.**
- 3.29 There will be a local tax guarantee scheme to provide compensation for 75% of irrecoverable council tax and business rates losses in the Collection Fund relating to 2020/21. Collection Fund deficits will also be spread over 3 years (2021/22 to 2023/24) instead of fully impacting on the 2021/22 budget as would ordinarily be the case. The local tax guarantee scheme will apply to 2020/21 losses only. **COVID-19 is expected to have a significant, currently unquantifiable, adverse impact on council tax and business rates income beyond 2020/21 that remains unfunded and a significant uncertainty in our budget planning for 2021/22 and over the medium term.** The government has set out how losses in scope of the 75% local tax income guarantee will be measured.
- For council tax, this is broadly a comparison of each authority's council tax requirement and an adjusted net collectable debit with no compensation for collection losses. Due to wider growth in the council's taxbase over the past year that offsets the increased cost of council tax support, the council is not expected to receive any compensation for the council's share of COVID-19 related council tax

losses. Therefore, these losses (latest estimate £1.433m) will need to be fully funded within the council's reserves.

- For business rates, this is broadly a comparison of income as calculated in the National Non-Domestic Rates (NNDR) statistical collection forms 1 and 3. Based on latest estimates, but subject to change by the end of the financial year, the council would receive £2.478m compensation towards its share of net business rates losses (£3.304m), leaving a remaining shortfall of £0.826m to be funded within the council's reserves.

3.30 The sales, fees and charges income loss scheme (whereby local authorities can claim back funding for 75% of income losses from sales, fees and charges, where these losses are greater than 5% of the council's planned income receivable) will continue for the first quarter of 2021/22 (until the end of June 2021). **It is likely that sales, fees and charges income losses will continue long after June 2021.**

### **Medium-Term Funding Outlook**

#### ***National Picture***

3.31 The national economic outlook is highly uncertain, with all parts of the UK still being in lockdown at the point of finalising this report. There is some hope with the development and approval of vaccines; the speed of vaccine rollout, as well as actual vaccine efficacy, will impact greatly on the pace at which the UK recovers from the pandemic, both in health and economic terms.

3.32 COVID-19 has delivered the largest peacetime shock to the global economy on record, greater even than the Great Depression or the 2008 Global Financial Crisis. There has been an unprecedented fall in national income, a huge rise in the in-year government deficit and the level of the overall UK national debt (effectively, accumulated deficits) has soared past £2tn, greater than 100% of the UK's Gross Domestic Product (GDP). The Office for Budget Responsibility's (OBR) central forecast assumes an 11% fall in GDP in 2020/21, the largest annual reduction since the Great Frost of 1709.

3.33 The OBR's latest, central forecast is that the combined impact of COVID-19 on the economy and the government's fiscal response, will result in a deficit of £394bn in 2020/21 (19% of GDP), with national debt at 105% of GDP. The central forecast then estimates that the in-year deficit falls to £102bn by 2025/26 (3.9% of GDP). Based on this forecast, the OBR estimate that a fiscal adjustment of £27bn would be required to match day-to-day spending to tax receipts by the end of 2025/26. This means an increase in taxation, a reduction in government spending, or a combination of the two. The size of the estimated fiscal adjustment will vary going forward; the Institute for Fiscal Studies had anticipated that this fiscal adjustment, prior to SR20, could be as high as £40bn. Any required fiscal tightening in the range of £27bn to £40bn, or higher, will involve some form of significant budgetary constraint for government departments over the medium term; fiscal tightening purely via tax increases is hard to envisage as being politically feasible, nationally.

#### ***Local Government Funding***

3.34 The headline announcement in the 2021/22 Provisional Local Government Finance Settlement is of a £2.2bn (4.5%) increase in CSP for local government in England. However, it is estimated that only £300m of this will come in the form of additional central government funding. The remaining £1.9bn is estimated to come from increases in council tax bills of up to 5%. Taken in the context of the national economic outlook, this is very concerning for local government going forward. Local government (ring-fenced schools funding aside) has not been a 'protected' spending area over the past decade, unlike

expenditure priorities such as the National Health Service (NHS) and Pensions; before COVID-19, the NHS and Pension budgets accounted for nearly 40% of government spending, with defence and interest costs taking the percentage up to 50%. This means that any spending reductions from the significant fiscal tightening required over the medium term will fall on a narrow set of spending departments, local government included. At best, this may mean that local government can expect cash flat local government finance settlements going forward, and potentially cash reductions.

- 3.35 The longer-term CSR and planned reforms to the local government finance system around business rates retention and the 'Fair Funding Review' (Review of Relative Needs and Resources) have all been delayed until 2021/22.
- 3.36 The 'Fair Funding Review' presents a particular risk to Islington Council with the potential that government funding could be redistributed away from authorities such as London boroughs (in particular, inner London) towards counties and districts; this is an added layer of risk over and above the local government funding outlook that could see cash flat funding, on average, nationally.

### ***Business Rates Review***

- 3.37 A fundamental Business Rates Review is due to report in Spring 2021 on how the business rates system works, issues to be addressed, ideas for change and alternative taxation options. This is likely to have significant consequences for local government funding. Business rates are a principal funding stream for local government, currently funding over 40% of local government spending and, since 2013/14, the business rates retention scheme has created a direct link between local business rates growth and locally retained funding. The government has noted that the "impact on the local government funding system will be an important consideration in reviewing the tax".
- 3.38 London Government has long held common ambitions regarding a greater role over the setting and retention of business rates and has worked closely together to put this case to government. In recent years concerns have been repeatedly raised regarding the sustainability of the tax, which is in desperate need of reform. The review is therefore very welcome.
- 3.39 However, it comes at a time of growing economic uncertainty caused by the COVID-19 pandemic, in which London businesses have been hit very hard. The grant support and temporary rate relief provided by the government to date has been very welcome, but substantial challenges remain for the foreseeable future, particularly in the retail, hospitality and leisure sectors.
- 3.40 More broadly, central London and its town centres – in common with cities across the country – face potentially far-reaching changes in business activity and property use, and it is too early to tell what the long-term impact will be on the commercial property market.
- 3.41 The review comes at an important crossroads for local government finance, with fundamental decisions to be taken soon regarding the overall quantum of local government funding in the next CSR period, the funding of adult social care reform, the business rates retention scheme, the 'Fair Funding Review' and on the broader relationship between local and central government in the Devolution and Recovery White Paper.

### **Revenue Savings**

- 3.42 The 2021/22 revenue budget assumes the delivery of savings totalling £25.264m in 2021/22, of which £14.066m are new savings proposals for approval in this report (**Appendix B1**) and £11.198m are previously agreed from prior year budget setting processes (**Appendix B1**). This is summarised by type of saving in **Table 6**.

**Table 6 – 2021/22 Budget Savings**

	<b>New £m</b>	<b>Previously Agreed £m</b>	<b>Total £m</b>
Efficiency	8.272	7.931	16.203
Funding substitution	2.149	0.000	2.149
Growth reduction	0.330	0.000	0.330
Income	1.469	1.617	3.086
Reduction in demand	0.450	0.000	0.450
Service reconfiguration	1.396	1.650	3.046
<b>Total</b>	<b>14.066</b>	<b>11.198</b>	<b>25.264</b>

- 3.43 It should be noted that a number of the proposed savings remain subject to individual consultation before they can be implemented. In the event that any savings do not proceed as planned following consultation, any in-year budget would need to be funded from the corporate contingency budget.
- 3.44 Updates on the delivery of the 2021/22 budget savings will be provided as part of the 2021/22 budget monitoring process.
- 3.45 The estimated future year implications of 2021/22 savings proposals in 2022/23 and 2023/24 are taken into account in the remaining medium-term budget gap in **Table 1**. These will be worked up further ahead of their inclusion in future year budget reports.

#### **Dedicated Schools Grant (DSG) Funding**

- 3.46 The provisional DSG settlement for 2021/22 was announced by the Department for Education (DfE) on 17 December 2020. The final settlement for the schools block and the central schools services block is due before the start of the next financial year. The early years block is subject to retrospective adjustments and will not be finalised until Summer 2022.
- 3.47 The DSG provisionally totals £196.062m for Islington in 2021/22, an overall increase of £10.148m on 2020/21. The provisional allocation includes the roll-in of the Teachers' Pay Grant (TPG) and the Teachers' Pension Employer Contribution Grant (TPECG) that account for £5.913m of the increase in funding across the Schools Block, Central School Services Block (CSSB) and High Needs Block. A revised like-for-like comparison is an increase of £4.235m (2.2%).

#### ***Schools Block***

- 3.48 This block is the main source of funding for mainstream schools and academies. Almost all of this funding is allocated to schools through the schools funding formula, with a small amount retained for growing schools and to support those with falling rolls, subject to specific criteria being met.
- 3.49 At a national level, schools block funding is set to increase by £2.2bn in 2021/22 as part of the government's commitment to increase funding by £7.1bn by 2023/24 compared to 2019/20 funding levels. A further increase of £2.3bn is due in 2023/24. Islington will receive an additional £0.892m (0.7%) in 2021/22 after allowing for the roll in of TPG and TPECG. Local authorities will have the freedom to set the Minimum Funding Guarantee (MFG) in local formulae between +0.5% and +2% per pupil. This means that all schools and academies can expect an increase in per pupil funding of at least 0.5% against pupil led factors. In Islington, this covers 80% of funding that is delegated to schools. Schools Forum agreed to continue to implement the National Funding Formula

in full in 2021/22 on 21 January 2021. This has been approved by the Executive Member for Children's and Families.

### ***Central School Services Block (CSSB)***

- 3.50 The CSSB provides funding for the provision of central services to schools and academies by local authorities. The council has received a 20% funding reduction (£0.132m) in relation to historic commitments, and a 0.6% funding increase (£0.006m) in relation to ongoing responsibilities. Further to this there has been an allocation of £0.101m for the roll in of TPG and TPEGC, leading to an overall reduction of 1.5% (£0.025m).

### ***High Needs Block***

- 3.51 The High Needs Block supports provision for children and young people with SEND from their early years to age 25 and alternative provision for pre-16 pupils who cannot receive education in schools. There is a like-for-like increase of 9.8% (£3.438m) in this Block in 2021/22 after allowing for the roll in of TPG and TPEGC. The provisional allocation for high needs is subject to a number of adjustments by the DfE and won't be finalised until the summer term 2022.
- 3.52 The additional funding will go some way to offsetting DSG demographic pressures in relation to children and young people with high needs. It is estimated that this will be sufficient to meet high needs budget pressures until the end of 2022/23. As there is no guarantee that the council will receive further funding increases beyond 2021/22, any unused balances from 2021/22 will be carried forward to phase in cost pressures from 2023/24.

### ***Early Years Block***

- 3.53 Provisional funding rates published by the DfE for Islington show that the hourly rate paid to the council for 3- and 4-year-old children provision is unchanged in 2021/22 at £7.81 per eligible child per hour, while the rate for 2-year-old provision has increased by 8p (1.2%) to £6.66 per eligible child per hour. Provisional allocations are based on the January 2020 headcount and will be updated to reflect the January 2021 headcount in the summer term.
- 3.54 There is a significant funding risk associated with the January 2021 headcount as a result of the pandemic – local authorities and settings will be required to absorb the first 15% of any reduction in numbers compared to the January 2020 headcount, and can only claim protection up to that amount where the headcount subsequently recovers during the spring term. This risk is particularly acute for the spring and summer terms 2021 (funding for the autumn term 2021 and spring term 2022 will eventually be updated to reflect the January 2022 headcount). The first 15% of any reduction in the January 2021 headcount would cost up to £0.978m per term. Any subsequent reduction that doesn't recover would cost £0.065m for each 1% reduction that doesn't recover.
- 3.55 The local early years funding formula and factor values and central retention are due to be agreed by the Schools Forum in January 2021. Central retention remains capped at 5% of Early Years Block funding. As in previous years, the council is applying to the Secretary of State to dis-apply this regulation in order to enable the local funding formula for eligible 2-year-olds to be cross-subsidised by funding for 3- and 4-year-olds, as the cost of provision is greater for 2-year-olds due to statutory requirements.

### **Fees and Charges**

- 3.56 Some fees and charges are prescribed by statute and are not within the council's power to vary locally; others are discretionary and set as part of the annual budget setting process.



- 3.57 In setting the fees and charges policy, consideration is given to the current level of inflation in the economy as well as the level of inflation expected to prevail over the forthcoming financial year.
- 3.58 The most widely used measure of inflation is the Consumer Price Index (CPI). This is currently very low (0.6% in December 2020) due to the extraordinary circumstances of the COVID-19 pandemic and therefore is not considered the best current estimate of inflation for the 2021/22 financial year.
- 3.59 For budget planning purposes, the council's policy is to uplift discretionary fees in line with external estimates of the level of inflation during 2021/22 unless a variation is agreed. The average estimates at the point finalising the fees and charges schedule was 2%, which is also in line with the government's official target inflation rate therefore this level has been applied.
- 3.60 Possible reasons for variation from the standard 2% uplift include separate existing council policy, benchmarking with alternative providers, level of increases in recent years and rounding for efficiency of collection.
- 3.61 Based on the policy, the GF discretionary fees and charges for 2021/22 are set out at **Appendices C1-C5**.
- 3.62 Any increase in fees and charges income that has not already been included separately as part of the budget savings proposals will be fully factored into the overall budget planning assumptions for the relevant services to cover corresponding inflation in costs incurred by the council.
- 3.63 This policy also applies to HRA fees and charges, except for HRA rents that will be increased in line with the government rent standard (September CPI 0.5% + 1%). HRA fees and charges are considered in the HRA section (**Section 4**) of this report.

#### **General Fund Contingency, Reserves and Balances**

- 3.64 A fundamental element of the robustness of the council's annual budget and MTFS is the level of contingency budget, earmarked reserves and GF balance, as determined by the Section 151 Officer.
- 3.65 Even prior to the COVID-19 crisis, the 2020/21 budget report had noted the need for the council to strengthen its financial resilience for deteriorating budget risks over the medium term.
- 3.66 Similarly, the findings of the External Auditor on the 2019/20 Statement of Accounts noted that the council's non-schools GF reserves are below the average level for London Boroughs and that:
- "It is critical that management continue to look beyond the current crisis and maintain sufficient reserves relative to likely future pressures as systemic change and transformation become embedded and begin to realise substantive recurrent savings, to mitigate risks posed by external factors outside of member and officer control."*
- 3.67 The significant expenditure pressures and income shortfalls incurred within a few weeks of the COVID-19 lockdown have highlighted the underlying level of risk in the council's budget. In particular, the council is currently estimating one of the highest COVID-19 sales, fees and charges income losses in London.
- 3.68 The 2021/22 budget includes an ongoing corporate contingency budget of £5m per annum, broadly in line with the 2020/21 financial year. The contingency budget is available as a last resort for in-year contingency pressures that cannot be funded from compensating underspends elsewhere and subject to approval in line with the council's Financial

Regulations. Directorates agree cash limited budget allocations and take responsibility for delivering a balanced budget unless a business case, presenting an exceptional circumstance, for contingency funding is approved.

- 3.69 Islington's current GF balance (£16.7m, excluding balances held on behalf of schools) equates to just over one week of GF gross expenditure. It is proposed that any underspend on the contingency budget at the end of each financial year is used to increase the GF balance (excluding schools balances) from the current level towards a target level of £40m over the medium to longer term. This £40m target level of GF balance (excluding schools balances) is approximately based on the latest estimated COVID-19 budget shortfall in the current financial year. It is the view of the Section 151 Officer that this is a reasonable proxy, subject to annual review, for the level of unquantifiable risk in the council's budget (as captured in the latest Principal Risk report to the council's Audit Committee in September 2020), and therefore the target balance needed to deal with economic shocks and insulate the council from potential reactionary cuts to key services in the short term.
- 3.70 In addition to the corporate contingency budget, the council has set aside an additional COVID-19 contingency budget of £5.5m. The current expectation is that this will be needed in full in 2021/22 for COVID-19 expenditure and income budget pressures not funded by available central government funding. If there is any underspend on COVID-19 contingency at the end of the financial year, it is recommended that this is transferred to earmarked reserve for COVID-19 pressures.
- 3.71 The government's financial assistance towards COVID-19 pressures will create complexities for reporting at the end of the current financial year due to timing differences between when funding is received and when it is applied against budget pressures. This is particularly the case for S31 grant compensation for COVID-19 business rates reliefs, where the grant income has been received in the current financial year, but the associated budget pressures will not come through until 2021/22 due to accounting arrangements.
- 3.72 The estimated level of GF reserves, reflecting current known movements, over the 3-year MTFS period is shown in **Table 7** followed by a brief description of each reserve. This reflects known reserves movements at the time of writing and assumes that the estimated budget gap for 2022/23 and 2023/24 will be fully closed without drawing down on reserves. It is expected that there will be additional movements to/from reserves that will be brought forward for approval once there is greater clarity on their timing and amount. This will include reserves movements related to the finalisation of the 2020/21 financial outturn after the end of the current financial year.

**Table 7 – Estimated General Fund Reserves**

	<b>31.3.20 Actual</b>	<b>31.3.21 Estimate</b>	<b>31.3.22 Estimate</b>	<b>31.3.23 Estimate</b>	<b>31.3.24 Estimate</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>Earmarked</b>					
BSF PFI	4.979	4.950	5.397	5.850	6.280
Budget Risk and Insurance	17.396	14.775	17.047	17.047	17.047
Budget Strategy	21.111	17.282	17.282	17.282	17.282
Cemeteries	1.634	1.634	1.634	1.634	1.634
CIL	9.428	9.428	9.428	9.428	9.428
Core Funding	7.723	39.644	17.008	15.429	13.850
Housing Benefit	7.921	7.921	6.512	5.103	3.694
Levies	0.000	0.000	2.726	2.726	2.726
Public Health	2.123	2.123	2.123	2.123	2.123
Social Care	0.000	3.704	3.704	3.704	3.704
Street Markets	0.260	0.260	0.260	0.260	0.260
<b>Total Excluding COVID-19</b>	<b>72.575</b>	<b>101.721</b>	<b>83.121</b>	<b>80.586</b>	<b>78.028</b>
COVID-19	7.684	0.000	0.000	0.000	0.000
<b>Total Including COVID-19</b>	<b>80.259</b>	<b>101.721</b>	<b>83.121</b>	<b>80.586</b>	<b>78.028</b>
<b>GF Balances</b>					
Non Schools	16.664	17.098	17.098	17.098	17.098
Schools*	11.208	11.208	11.208	11.208	11.208
<b>Total GF Balances</b>	<b>27.872</b>	<b>28.306</b>	<b>28.306</b>	<b>28.306</b>	<b>28.306</b>

*\*Pending review at the end of the financial year, schools balances have been assumed to be remain at the same level over the medium term.*

- Building Schools for the Future PFI Smoothing Reserve – The annual costs of PFI schemes fluctuate over the lifecycle of the schemes. This earmarked reserve helps to smooth the budgetary impact of PFI costs across financial years.
- Budget Risk and Insurance – to mitigate wider budget and insurance risks, including the impact of delayed savings delivery. This includes a £2.272m one-off transfer to the reserve due to a one-off positive movement in 2021/22 budget assumptions late in the budget setting process.
- Budget Strategy – to provide one-off funding linked to the delivery of the MTFs (e.g. one-off transformation/investment costs, revenue costs of capital projects, redundancy costs).
- Cemeteries – The council operates a shared cemeteries service with the London Borough of Camden, and any surplus at the end of each financial year is carried forward through this earmarked reserve for future investment.
- Community Infrastructure Levy (CIL) – This is the balance of CIL funding available for infrastructure investment.
- Core Fund Smoothing Reserve – This reserve is mainly an accumulation of unbudgeted retained business rates income in previous years, including the one-off financial gain

from being part of the London Business Rates Retention Pilot Pool in 2018/19 and 2019/20. This one-off funding has been set aside for significant risks around the council's core funding over the medium term, including business rates and council tax income. The estimated movements to/from the reserve reflect the estimated government grant funding due to be received in 2020/21 towards COVID-19 related Collection Fund losses and the spread of these losses over 3 years as required by government regulations.

- COVID-19 – This is the balance of COVID-19 government grant funding received in 2019/20 that will be used towards the significant COVID-19 related budget shortfall in 2020/21.
- Housing Benefit – This reserve is fully committed to funding the transitional costs of implementing Universal Credit. There is an estimated shortfall of £1.409m in the housing benefit administration budget that is being bridged by an annual drawdown from the Housing Benefit reserve (i.e. funding ongoing budget from one-off resources). As such, the proposed 2021/22 revenue budget includes a drawdown of £1.409m from this reserve, for approval. This base budget shortfall represents the amount by which the council's housing benefit administration costs exceed the housing benefit administration grant. The housing benefit reserve is sufficient to fund the base budget shortfall over the current 3-year MTFS period. The MTFS currently assumes that the base budget shortfall will be fully offset by a permanent reduction in ongoing expenditure upon the full implementation of Universal Credit and that it will not add to the estimated budget gap. This assumption should be kept under review, including any changes to the Universal Credit full implementation timetable, as the future shape of the remaining housing benefit service becomes clearer.
- Levies – to mitigate against future unexpected increases in levies (e.g. due to fluctuation in borough waste tonnages that are used to calculate the NLWA levy).
- Public Health – This is the balance of ring-fenced public health grant funding.
- Social Care – to mitigate significant uncertainty in social care demographic growth estimates.
- Street Markets – The council operates three street markets at Chapel Market, Whitecross Street and Exmouth Market. Under laws governing the operation of these markets, any surplus at the end of each financial year is carried forward using this earmarked reserve for future costs of operating the markets.

#### **4 HOUSING REVENUE ACCOUNT**

##### **Overview**

- 4.1 The HRA MTFS covers the cost of managing and maintaining council-owned housing stock, servicing both existing debt taken on as part of self-financing and new debt taken on to support the delivery of the new build programme and contributing towards the long-term investment in the existing stock, all of which is funded primarily from rents and tenants' and leaseholders' service charges.
- 4.2 The HRA has a 30-year business plan that is currently balanced over the medium and long term.
- 4.3 The proposed HRA budget for 2021/22 and latest estimates for the medium term, including HRA reserves estimates, is set out at **Appendix D1**. The movement between the approved 2020/21 budget and the proposed 2021/22 budget is summarised in **Table 8**.

**Table 8 – Summary of HRA Budget Changes 2020/21 to 2021/22**

	<b>£m</b>
<b>Expenditure</b>	
Staffing	0.5
Refinancing debt at lower rates of interest	(1.2)
Reduction in the cost of communal gas and electricity	(0.8)
Increase in bad debt provision	1.0
Increase in the cost of voids arising from greater use of general needs stock for temporary accommodation clients and the higher re-let rates	1.2
Inflationary increase PFI costs	0.7
Increase in depreciation	0.6
Increase in contingency to cover one-off pressures	1.3
Other	0.4
<b>Total Expenditure Increase</b>	<b>3.7</b>
<b>Income</b>	
Rent	3.7
Tenant Service Charges	(0.1)
Heating Charges (Tenants & Leaseholders)	(0.4)
Other income reductions	(1.5)
Leaseholder Annual Service Charges – Year 3 of phasing in charges to more closely align with actual costs	0.5
Income from lease extensions	0.5
Interest earned on HRA balances	0.2
Net increase in contribution from reserves	0.8
<b>Total Income Increase</b>	<b>3.7</b>

**Rental Income and Other HRA Fees and Charges**

- 4.4 The Welfare Reform and Work Act 2016 required local authorities to reduce the rents, in respect of all properties (excluding PFI managed properties) held in the HRA, by 1% each year for 4 consecutive years between 2016/17 and 2019/20.
- 4.5 In February 2019 the government issued a policy statement on rents for social housing effective from April 2020.
- 4.6 Compliance with this policy is effectively mandatory as for the first time the government has included local authority social housing within the remit of the Regulator of Social Housing (previously the Regulator’s remit was limited to private registered providers of social housing only (i.e. housing associations). The regulator is required by direction from the MHCLG to have regard to the policy statement referred to above and as such, the Regulator’s Rent Standard, first published in May 2019 and updated in December 2020, reflects the government’s policy statement.
- 4.7 The 2021/22 rents set out below have been calculated in accordance with the rent standard.
- 4.8 The rent standard does not apply to PFI managed properties.

## **Islington Council Managed General Needs Properties (excluding New Build Properties)**

- 4.9 **Table 9** sets out the average rent in 2021/22 for existing tenancies. The maximum 2021/22 permitted rent is the prior year 2020/21 actual rent plus CPI 0.5% (September 2020) plus 1%.
- 4.10 However, if the maximum rent exceeds the lower of the 2021/22 national rent cap or the 2021/22 national target rent then 2021/22 rent will be the higher of A or B:
- A. The lower of 2021/22 national target rent or the 2021/22 national rent cap; or
- B. 2020/21 actual rent plus CPI 0.5% (September 2020) plus 0%.
- 4.11 99.7% of the Islington Council general needs properties will be subject to the maximum rent increase in 2021/22 of 1.5% (i.e. CPI 0.5% at September 2020 + 1%) as their maximum rent in 2021/22 does not exceed the lower of the 2021/22 national target rent or the 2021/22 national rent cap.
- 4.12 Less than 1% (222) of the Islington Council general needs properties have a national target rent greater than the national rent cap.

**Table 9 – Existing Tenancies Average Weekly Rent 2021/22**

Average Weekly Rent 2020/21	£111.13
Increase (£)	£1.66
Increase (%)	1.50%
Average Weekly Rent 2021/22	£112.79

- 4.13 General needs properties will be re-let at the lower of the national rent cap or the national target rent. As 99% of Islington Council general needs properties have a national target rent below the national rent cap, it is likely that re-lets will be at national target rent.
- 4.14 In accordance with the rent standard, 2021/22 national target rents will reflect an increase of CPI 0.5% (September 2020) plus 1% and the 2021/22 national rent caps will reflect an increase of CPI 0.5% (September 2020) plus 1.5%.
- 4.15 **Table 10** sets out the likely average rent in 2021/22 for re-let properties.

**Table 10 – Re-Let Properties Likely Average Weekly Rent 2021/22**

Average Weekly National Target Rent 2020/21	£116.43
Increase (£)	£1.74
Increase (%)	1.50%
Average Weekly National Target Rent 2021/22	£118.17

## **Islington Council Managed General Needs New Build Properties**

- 4.16 2021/22 new build existing tenants' rents will reflect an increase of CPI 0.5% (September 2020) plus 1%.
- 4.17 2021/22 re-let and first-let new build rents will be based on new build target rents reflecting an increase of CPI 0.5% (September 2020) plus 1%.
- 4.18 New build target rents are based on 2015-16 target rents inflated by the relevant CPI plus 1% for each year from 2016/17 to 2021/22.

**LBI Managed Property Acquisitions used for Temporary Accommodation (TA)**  
(including reception centres and general needs properties assigned to TA clients)

4.19 Existing tenancies and re-let rents in 2021/22 will be set on the same basis as general needs properties referred to above.

**LBI Managed Property Acquisitions**

4.20 Existing Tenancies – 2021/22 rents will be set at the lower of:

- A. The 2020/21 rent plus CPI 0.5% (September 2020) plus 1%; or
- B. The lower of the relevant 2021/22 local housing allowance rate, or 80% of relevant market rent.

4.21 Re-lets and first-lets in 2021/22 will be set at the lower of:

- A. The relevant 2021/22 local housing allowance rate; or
- B. 80% of relevant market rent.

**Partners for Islington (PFI) Managed Properties**

4.22 As PFI managed properties are exempt from the rent standard, existing council policy continues to apply to all PFI managed properties.

4.23 This means that the principles of rent restructuring will continue to apply. As such existing tenancies (not previously re-let) will continue to move towards the lower of the 2021/22 PFI target rent or the PFI rent cap but subject to a maximum increase of CPI 0.5% (September 2020) plus 1% plus £2.

4.24 Where an existing tenancy rent is already at either the lower of the PFI target rent or the PFI rent cap (if not previously re-let) or the PFI target rent (if previously re-let) then the maximum increase will be plus CPI 0.5% (September 2020) plus 1%.

4.25 PFI property re-lets in 2021/22 will be based on the PFI target rent reflecting an increase of CPI 0.5% (September 2020) plus 1%.

4.26 PFI target rents are based on the 2015/16 target rents inflated by the relevant CPI plus 1% for each year from 2016/17 to 2021/22.

4.27 PFI rent caps are based on the 2015/16 national rent caps inflated by the relevant CPI plus 1.5% for each year from 2016/17 to 2021/22.

4.28 **Table 11** sets out the average rent in 2021/22 for existing PFI tenancies.

**Table 11 – Existing PFI Tenancies Average Weekly Rent 2021/22**

Average Weekly Rent 2020/21	£156.47
Increase (£)	£2.89
Increase (%)	1.85%
Average Weekly Rent 2021/22	£159.36

4.29 **Table 12** sets out the average target rent in 2021/22 for re-let PFI properties.

**Table 12 – PFI Re-Let Properties Likely Average Weekly Rent 2021/22**

Average Weekly PFI Target Rent 2020/21	£167.35
Increase (£)	£2.51
Increase (%)	1.50%
Average Weekly PFI Target Rent 2021/22	£169.86

### **Other HRA Fees and Charges**

4.30 All other HRA fees and charges are set out at **Appendix D2**. These will increase by 2% in line with the council's policy set out in this report, except for the following charges:

#### Caretaking/Cleaning and Estate Services

4.30.1 Caretaking charges will not increase in 2021/22 and the estate service charge is reducing by 28p per week in 2021/22 because of the assumed public sector pay freeze and the forecast reduction in communal electricity prices. If a local government pay increase is agreed for 2021/22, this would be funded from contingency budget with the ongoing impact subsequently reflected in future year budgets.

#### Heating and Hot Water

4.30.2 Gas prices are forecast to fall in 2021/22 and, as such, charges have reduced by 10%. A new charge of +15% on the heating only charge has been introduced for Braithwaite, which is based on all-year heating availability.

#### Concierge Service Charges

4.30.3 These have increased by 9% to reflect the final year of phasing in the recovery of the full costs related to the provision of this service. It should be noted that the overall average weekly increase to tenants in receipt of the concierge service when combining rent and all service charges including caretaking/cleaning and estate services is an average increase of £2.14 or 2%, from an average of £135.63 per week in 2020/21 to an average of £137.77 per week in 2021/22.

#### Diesel Surcharge (Off Street)

4.30.4 This charge has increased by £6 per year or 5% in 2021/22 to align with the on-street parking surcharge.

## **5 CAPITAL PROGRAMME**

5.1 The council committed to a new Corporate Asset Strategy in March 2020. The strategy aims to establish a bold new approach that ensures investment is directly linked to core council ambitions around fairness and community wealth building. It is designed to deliver a strategic, long-term approach to managing and enhancing our community asset base.

5.2 This budget represents a key step in implementing the new strategy by:

- Providing significant investment to support key council priorities on affordable housing and net zero carbon;
- Expanding the non-housing capital programme to support much-needed modernisation of a wide range of community assets; and
- Forecasting indicative capital investment over a longer time frame.



5.3 The proposed 2021/22 to 2023/24 capital programme as well as indicative estimates for 2024/25 to 2030/31 are summarised by council priority in **Table 13** and detailed at **Appendix E1**. This is estimated to deliver up to £1.6bn of capital investment in the borough over the next 10 years. The related Capital Strategy that underpins the capital programme (**Appendix E2**), Minimum Revenue Provision Policy Statement (**Appendix E3**), Treasury Management Strategy (**Appendix E4**) and Investment Strategy (**Appendix E5**) documents are included as appendices for approval.

**Table 13 – Capital Programme 2021/22 to 2023/24 and Indicative Programme 2024/25 to 2030/31**

	2021/22	2022/23	2023/24	2021/22 to 2023/24	2024/25 to 2030/31 (Indicative)	Total
	£m	£m	£m	£m	£m	£m
Decent & Affordable Homes	138.049	165.392	134.544	<b>437.985</b>	956.988	<b>1,394.973</b>
Jobs & Opportunity	9.006	1.400	1.400	<b>11.806</b>	11.300	<b>23.106</b>
A Safer Borough for All	1.500	1.700	0.200	<b>3.400</b>	1.400	<b>4.800</b>
Greener & Cleaner Islington	24.584	12.467	11.292	<b>48.343</b>	71.450	<b>119.793</b>
Enhancing Community Assets	13.650	9.376	14.640	<b>37.666</b>	68.955	<b>106.621</b>
<b>Total Capital Programme</b>	<b>186.789</b>	<b>190.335</b>	<b>162.076</b>	<b>539.200</b>	<b>1,110.093</b>	<b>1,649.293</b>

5.4 The capital programme over the next three years will support the council's objectives in the following areas.

#### **Decent and Genuinely Affordable Homes for All**

- Housing new build programme (£302m) – the continuation of our major programme of investment in new social housing in Islington; and
- Housing major works and improvements programme (£135m) – ongoing investment in council homes and estates, including cyclical improvements, mechanical and electrical works, fire safety and energy efficiency improvements.

#### **Jobs and Opportunity**

- Improving our early years accommodation, schools and youth provision (£10m); and
- Modernising our libraries and museum (£1.4m).

#### **A Safer Borough for All**

- CCTV upgrade (£3m) – upgrades to the council's core CCTV network and investment in CCTV-enabled vehicles to increase coverage for hot-spots.

## A Greener and Cleaner Islington

- Vehicle electrification infrastructure and replacement (£16m) – programme to develop electric charging infrastructure and replace our fleet with electric vehicles as part of our Net Zero Carbon Strategy;
- People Friendly Streets (£9m) and School Streets (£1m) – borough-wide programmes to reduce car trips and improve neighbourhoods for walking, cycling and living;
- Pilot retrofitting on housing estates (£3m) – energy efficiency measures across housing estates to reduce energy consumption and decrease carbon emissions;
- Cycle Schemes (£2m) – significant expansion of our borough-wide cycle parking and cycle hangars provision; and
- Solar Panels and LED Lighting (£2m) – installation of solar panels on our corporate estate where feasible and replacement of traditional light fittings with LED to lower emissions.

5.5 In addition to these programmes, the capital programme will support the effective management of Islington's infrastructure and estate. This includes:

- Structural maintenance of the highways infrastructure including carriageways, footways and drainage (£4m);
- Compliance and modernisation improvements (£8m) to deal with urgent property compliance issues and to assisting in providing funds for a cyclical maintenance and modernisation programme; and
- Use of Community Infrastructure Levy and s106 payments to make targeted investments across the borough (£15m), with spending decisions led and managed by local ward councillors.

5.6 The estimated funding of the 2021/22 to 2023/24 capital programme is summarised in **Table 14**. At the end of each financial year, the Section 151 Officer will apply resources to finance capital expenditure in the most cost-effective way for the council (including the availability of corporate capital funding such as Strategic Community Infrastructure Levy income).

**Table 14 – Estimated Funding of Capital Programme 2021/22 to 2023/24**

	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>Total</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b><u>General Fund Programme</u></b>				
Capital Grant	6.206	1.400	1.400	<b>9.006</b>
Section 106/CIL	10.430	8.482	6.500	<b>25.412</b>
Capital Receipts	30.358	17.249	6.818	<b>54.425</b>
General Fund Borrowing	23.561	26.810	35.955	<b>86.327</b>
<b>Total General Fund</b>	<b>70.555</b>	<b>53.941</b>	<b>50.673</b>	<b>175.169</b>
<b><u>HRA Programme</u></b>				
Capital Grant	0.000	0.000	0.000	<b>0.000</b>
Section 106/CIL	1.717	0.000	0.000	<b>1.717</b>
Capital Receipts	43.471	48.062	57.080	<b>148.613</b>
HRA Reserves	70.496	50.721	22.348	<b>143.565</b>
HRA Borrowing	0.550	37.611	31.975	<b>70.136</b>
<b>Total HRA</b>	<b>116.234</b>	<b>136.394</b>	<b>111.403</b>	<b>364.031</b>
<b>Total Capital Programme</b>	<b>186.789</b>	<b>190.335</b>	<b>162.076</b>	<b>539.200</b>

5.7 It should be noted that the projected capital receipts financing is intrinsically linked with the housing new build capital programme, and that there is uncertainty around the timing and value of these receipts given present economic conditions. To mitigate these risks the council maintains a regular review of the property market and has been prudent in its financial assumptions. Timing delays can largely be managed through the use of HRA reserves. In the event of a decrease in projected capital receipts, the new build programme would need to be re-assessed in line with the overall available funding.

## **6 COUNCIL TAX AND RETAINED BUSINESS RATES**

### **Council Tax Forecast 2020/21**

6.1 In the 2019/20 Statement of Accounts the final council tax outturn was a total surplus of £1.301m, of which £0.551m was forecast and allocated as part of 2020/21 budget setting and £0.750m is an additional unbudgeted surplus to be included in the 2021/22 budget. This will be allocated between the council (£0.589m) and the Greater London Authority (£0.161m) based on their respective share of 2020/21 council tax.

6.2 In relation to the 2020/21 council tax year, the Collection Fund forecast for council tax is a COVID-19 exceptional deficit of £1.824m to be shared between the council (£1.433m) and GLA (£0.391m) and spread over the 3 years 2021/22 to 2023/24. This exceptional deficit is due to the following variables:

- COVID-19 has led to a significant increase in the cost of the local council tax support scheme (which is currently approximately £1.5m higher than assumed at 2020/21 budget setting).
- The council collected rate is less than assumed at 2020/21 budget setting.

- The above is partially offset by growth in the overall council tax base not assumed at 2020/21 budget setting. For this reason, and due to the local tax guarantee scheme not covering collection losses for council tax, the council is not expected to receive any compensation for its share of the exceptional COVID-19 deficit. Therefore, these losses (latest estimate £1.433m) will be borne in full by the council.

6.3 The estimated impact of the 2020/21 council tax forecast on the council's budget over the medium term is summarised in **Table 15**. It is assumed that the annual budgetary impact will be funded from the Core Funding earmarked reserve.

**Table 15 – Medium-Term Budget Impact of 2020/21 Council Tax Forecast**

	<b>2021/22 £m</b>	<b>2022/23 £m</b>	<b>2023/24 £m</b>	<b>Total £m</b>
Residual surplus from 2019/20	0.589			0.589
2020/21 Exceptional Deficit	(0.478)	(0.478)	(0.478)	(1.433)
<b>Total Surplus/(Deficit)</b>	<b>0.111</b>	<b>(0.478)</b>	<b>(0.478)</b>	<b>(0.844)</b>

### **Council Tax Base 2021/22**

6.4 On 25 January 2021, the Audit Committee agreed a Band D equivalent council tax base for 2021/22 of 77,737.1 properties for the Council's whole area (a 4.29% decrease compared to 2020/21) and 44.2 properties for the Lloyd Square Garden Committee area.

6.5 The council taxbase calculation for 2021/22 has been prepared on the following basis:

- **The number of dwellings on the Valuation List as at 30 November 2020, adjusted for exemptions, discounts and disabled relief** – In line with previous years' methodology, and given the uncertainty around economic activity, the taxbase makes no projection for additional properties that may be added to the Valuation List during the 2021/22 financial year. Instead, any future additions to the taxbase will be reflected in future year (2022/23 onwards) taxbases once they have been formally confirmed.
- **The local council tax support scheme for 2021/22 agreed by council on 10 December 2020 and a projection of future demand** – Due to increased caseload as a result of the COVID-19 pandemic, the cost of the local council tax support scheme has already increased by approximately £2m since the start of the financial year. The 2021/22 taxbase calculation assumes that the higher caseload experienced during the current financial year will continue and projects a further increase during 2021/22. However, it should be noted that cost of local council tax support in 2021/22 and over the medium term is highly uncertain as it will depend on future developments in the economy, including the level of unemployment, and government measures to support businesses and individuals.
- **Continuation of council tax relief for care leavers, foster carers and Shared Lives carers** – These are estimated to continue in 2021/22 at current levels.
- **A budgeted council tax collection rate for 2021/22 of 96.5%** - This is a reduction of 1.5% from the 2020/21 budgeted collection rate of 98%. This reflects the reduction in council tax collection in the current financial year due to the COVID-19 pandemic and likely continued impact in 2021/22.

### **Level of Council Tax 2021/22**

- 6.6 Sections 31A and 31B of the amended Local Government Finance Act (LGFA) 1992 require the Council to calculate its gross expenditure, gross income and council tax requirement. For these purposes, HRA expenditure and income is included even though it has no effect on council tax, and the gross expenditure figure includes special expenses relating to part only of the Council's area. The calculation of the 2021/22 council tax requirement is set out in **Table 16**.

**Table 16 – Section 31A (amended LGFA 1992) Calculation 2021/22**

	<b>£</b>
Aggregate of the amounts which the Council estimates for items set out in Section 31A (2) (a) to (f) of the LGFA 1992 <b>(A)</b>	1,077,690,848.10
Aggregate of the amounts which the Council estimates for items set out on Section 31A (3) (a) to (d) of the LGFA 1992 <b>(B)</b>	(978,442,166.00)
Calculation of the council tax requirement under Section 31A (4), being the amount by which the sum aggregated at <b>(A)</b> above exceeds the aggregate at <b>(B)</b> above	<b>99,248,682.10</b>

- 6.7 The calculation of the relevant (average) 2021/22 council tax per Band D property is set out in **Table 17**.

**Table 17 – Section 31B (amended LGFA 1992) Calculation 2021/22**

Council Tax Requirement	99,248,682.10
Council Tax Base	77.737.10
<b>2021/22 Relevant Basic Band D Council Tax</b>	<b>1,276.72</b>
<b>Increase Compared to 2020/21</b>	<b>4.99%</b>

- 6.8 Each billing authority and precepting authority must determine whether its relevant basic amount of council tax for a financial year is excessive. If an authority's relevant basic amount of council tax is excessive, a referendum must be held in relation to that amount. For 2021/22, the relevant basic amount of council tax for Islington would be excessive if it is 5% or more greater than 2020/21 (comprising 3% for expenditure on adult social care, and 2% for other expenditure). Therefore, the proposed 4.99% increase in the relevant basic amount of Band D Islington council tax, which comprises 3.00% for expenditure on adult social care and 1.99% for other expenditure, is not excessive.
- 6.9 Additional council tax calculations are required where special items relate to part only of the Council's area (for Islington, the Lloyd Square Garden Committee special expense). The calculation of the 2021/22 basic amount of council tax for dwellings in Islington to which no special item relates (i.e. outside the Lloyd Square Garden Committee area) is shown in **Table 18**.

**Table 18 – 2021/22 Basic Council Tax for All Other Parts of the Council’s Area**

Council Tax Requirement (including Lloyd Square Garden Committee special expense)	£99,248,682.10
Less Lloyd Square Garden Committee special expense	£18,922.10
<b>Council Tax Requirement (excluding special expenses)</b>	<b>£99,229,760.00</b>
Council Tax Base	77,737.1
<b>2021/22 Basic Band D Council Tax for All Other Parts of the Council’s Area</b>	<b>£1,276.48</b>
<b>Increase Compared to 2020/21</b>	<b>4.99%</b>

- 6.10 The Lloyd Square Garden Committee has agreed a special expense of £18,922.10 for 2021/22 (unchanged from 2020/21). When this is divided by the Lloyd Square Garden Committee Band D tax base (44.2), it gives a charge of £428.10 per Band D property for 2021/22. This will be charged to Lloyd Square Garden area dwellings in addition to the basic Islington Band D council tax of £1,276.48 for all other parts of the Council’s area.
- 6.11 The 2021/22 basic amount of Islington council tax for each valuation band for the Lloyd Square Garden area and all other parts of the Council’s area are shown in **Table 19**. These amounts are calculated by multiplying the Band D council tax amount per property by the proportions set out in Section 5(1) of the LGFA 1992.

**Table 19 – Basic Islington Council Tax 2021/22**

<b>Valuation Band</b>	<b>Lloyd Square Garden Area (£)</b>	<b>All Other Parts of the Council’s Area (£)</b>
A	1,136.39	850.99
B	1,325.79	992.82
C	1,515.18	1,134.65
<b>D</b>	<b>1,704.58</b>	<b>1,276.48</b>
E	2,083.37	1,560.14
F	2,462.17	1,843.80
G	2,840.97	2,127.47
H	3,409.16	2,552.96

6.12 The proposed 2021/22 GLA precept for each valuation band is shown in **Table 20**. The Mayor of London’s final draft budget is scheduled to be considered by the Assembly on 25 February 2021 following which the Mayor will confirm formally the final precept and GLA group budget for 2021/22. This is the same date, but earlier in the day, as the Full Council meeting to agree Islington’s 2021/22 budget. In the event that the final GLA precept confirmed on 25 February 2021 is different from the proposed precept, this would require an amendment to Islington’s proposed budget at the Full Council meeting that evening.

**Table 20 – GLA Precept 2021/22**

<b>Valuation Band</b>	<b>GLA (£)</b>
A	242.44
B	282.85
C	323.25
<b>D</b>	<b>363.66</b>
E	444.47
F	525.29
G	606.10
H	727.32

6.13 **Table 21** shows the total amount of 2021/22 council tax (including GLA precept) for each valuation band over each of the Council’s areas.

**Table 21 – Total Islington and GLA Council Tax 2021/22**

<b>Valuation Band</b>	<b>Lloyd Square Garden Area (£)</b>	<b>All Other Parts of the Council’s Area (£)</b>
A	1,378.83	1,093.43
B	1,608.64	1,275.67
C	1,838.43	1,457.90
<b>D</b>	<b>2,068.24</b>	<b>1,640.14</b>
E	2,527.84	2,004.61
F	2,987.46	2,369.09
G	3,447.07	2,733.57
H	4,136.48	3,280.28

## **Retained Business Rates**

- 6.14 The council's 2021/22 NNDR1 return (detailed business rates estimate) has now been submitted to central government following the 31 January 2021 statutory submission deadline. The financial implications of this return are fully incorporated in the proposed 2021/22 budget. **Table 22** shows the movement between the 2020/21 and 2021/22 NNDR1 return estimates in terms of the council's total retained business rates funding.

**Table 22 – Retained Business Rates Funding**

	<b>2020/21 £m</b>	<b>2021/22 £m</b>	<b>Change £m</b>
Retained Rates Share (30%)	87.405	89.111*	1.706
Section 31 Compensation	7.833	6.974	(0.859)
<b>Total</b>	<b>95.238</b>	<b>96.084</b>	<b>0.847</b>

*\*This is 30% of the £297.037m business rates that the council expects to collect in relation to 2021/22 after estimated collection losses and provision for appeals. The remaining 70% is shared between the GLA (37%) and central government (33%).*

- 6.15 This assumes that COVID-19 business rates reliefs end on 31 March 2021 as previously indicated, which could change based on future government announcements (e.g. the Chancellor of the Exchequer's Budget 2021 statement on 3 March 2021). It is expected that the impact of any COVID-19 reliefs on the council's retained rates income would be offset by compensating Section 31 grant.
- 6.16 The business rates retention system includes a safety net to protect local authorities from significant negative shocks to their income by guaranteeing that no authority will see its income from business rates fall beyond a set percentage (7.5%) of its spending baseline. Islington's safety net level in 2021/22 will be £78.860m, unchanged from 2020/21. Based on the NNDR1 return estimate, Islington's retained business rates funding is approximately £15.1m above the safety net level in 2021/22. This is the maximum (worst case scenario) loss of retained business rates funding that the council could incur in 2021/22 before being entitled to safety net funding from the government.
- 6.17 Since 2018/19, the council has been part of the London Business Rates Pool covering the GLA and the 33 London billing authorities. Due to significant uncertainty around the impact of the COVID-19 pandemic on business rates income and therefore on the financial viability of the pool, London Government has decided that the pool will not go ahead in 2021/22.
- 6.18 The 2021/22 NNDR1 return also includes a forecast for 2020/21 business rates income. The estimated impact of this on the council's budget over the medium term is summarised in **Table 23**. It is assumed that the annual budgetary impact will be funded from the Core Funding earmarked reserve.

**Table 23 – Medium-Term Budget Impact of 2020/21 Business Rates Forecast**

	<b>2020/21 £m</b>	<b>2021/22 £m</b>	<b>2022/23 £m</b>	<b>2023/24 £m</b>	<b>Total £m</b>
Residual surplus from 2019/20		1.192			1.192
Up-front compensation for COVID-19 reliefs and 2021/22 budget impact of reliefs	22.838	(22.838)			0.000
2020/21 Exceptional Deficit*		(1.101)	(1.101)	(1.101)	(3.304)
Up-front compensation for 75% of Exceptional Deficit	2.478				2.478
<b>Total Surplus/(Deficit)</b>	<b>25.316</b>	<b>(22.748)</b>	<b>(1.101)</b>	<b>(1.101)</b>	<b>0.366</b>



*\*This is the council's 30% share of a total COVID-19 exceptional deficit of £11.013m.*

### *Material Changes in Circumstance (MCC) Business Rates Appeals*

- 6.19 There have been reports in the press and indications from the Valuation Office Agency (VOA) that they are working with Rating Agents to agree reductions to rateable values across a wide variety of sectors in response to the effects of the pandemic. Whilst the VOA has recently confirmed that discussion have been suspended to gather further evidence, the eventual result of these discussions is expected to be a temporary Material Change in Circumstance (MCC) reduction which could apply to almost every property sector including offices, retail, airports, stadiums, car parks and factories. The effect could result in reductions in both 2020/21 and 2021/22.
- 6.20 These reports and London-wide analysis of the current assessments that are under challenge due to the impact of the pandemic suggest that reductions could range from 20% up to 70%. This level of reduction could have a catastrophic impact on the business rates system and, without further government support, could lead to a significant reduction in the council's retained business rates income.
- 6.21 Under normal circumstances the council would give proper consideration to increasing appeals provisions in the NNDR1 return to cover a worst-case scenario. However, such action, in a climate of unprecedented uncertainty, could have far reaching and unintended consequences. In fact, given the potential impact, it could be a threat to the future operation of the entire business rates system. This is also coupled with a lack of clarity on whether the Retail, Hospitality and Leisure Relief will be extended into 2021/22. Therefore, without further information, a London-wide decision has been taken to not provide for threats in NNDR1 returns. The alternative action of including provision for MCC appeals in the NNDR1 return would have been exceptionally challenging, if not impossible, effectively making them meaningless.
- 6.22 For 2020/21, under the government's COVID support package, 75% of any business rates loss due to MCC appeals will attract government compensation and the net 25% loss would not impact until the 2022/23 budget (due to Collection Fund accounting arrangements). For 2021/22, in the absence of government support, this is a significant funding risk for the council and in theory could see the council lose retained business rates funding down to the level of the safety net (anything up to a £15.1m funding loss). As a last resort, any business rates funding loss relating to 2021/22 (which would impact the 2022/23 budget due to accounting arrangements) may need to be funded within the council's reserves (e.g. the Core Funding smoothing reserve) and any ongoing implications reflected as part of the base budget assumptions thereafter.

## **7 MATTERS TO CONSIDER IN SETTING THE BUDGET**

### **Comments of the Section 151 Officer**

- 7.1 This section contains the Section 151 Officer's report on the robustness of the estimates included in the budget and the adequacy of the proposed financial reserves, as required under Section 25(1) of the Local Government Act 2003. Section 25(2) of the same Act requires the authority to have regard to this report of the Section 151 Officer when making decisions about the budget and the level of council tax.
- 7.2 Developing the budget estimates for a given financial year is an ongoing process within the medium-term financial planning cycle that begins almost three years before any given budget report is agreed. This is a council-wide process involving all spending departments

whereby estimates are worked up, challenged and refined as further information becomes known. It takes into account the most recently available budget monitoring information and the latest view on budget assumptions for the forthcoming financial year. In particular, the proposed savings have been signed off as deliverable by key stakeholder across the organisation.

- 7.3 It is important to note that any one-year budget report is essentially a 'snapshot' and an estimate at a given time – assumptions and estimates are subject to change before, during and after the setting of the council's budget. This is particularly the case for the 2021/22 budget due to ongoing COVID-19 developments at the time of finalising the budget.
- 7.4 The thoroughness of the overall budget setting process and the council's proposed policy to strengthen financial resilience for hardening budget risks over the medium term provides the Section 151 Officer with assurance on the robustness of the council's budget estimates, contingency budget and reserves for the forthcoming financial year.
- 7.5 The Section 151 Officer also takes assurance on the robustness of the budget estimates from the Value for Money (VFM) conclusion of the External Auditor on the 2019/20 Statement of Accounts that the council has "proper arrangements for securing economy, efficiency and effectiveness in its use of resources". In particular, the VFM assessment noted that:
- The council has set out in a reasonable way estimates of the additional costs and reductions in income for the budgetary challenge through to 2023/24;
  - The council has identified the estimated gap using suitable assumptions and estimates which are in line with the External Auditor's expectations and similar councils;
  - The council has put in place robust arrangements to ensure that risks and uncertainties are given due consideration in short and medium-term financial planning and the impact is effectively modelled to the best of their ability, drawing on external support where knowledge gaps or wider unknowns are identified;
  - The outturn position for 2019/20 is broadly indicative that management's understanding of the key drivers for income and expenditure relating to core services and ability to understand impact of decisions taken is strong, and plans have been put in place for improvement to processes where significant variances were identified;
  - The methodology through which management have identified pressures resulting from COVID-19, and the reporting structure to members, is considered effective;
  - As a result of government funding and initiatives, prior year underspends and prudent financial planning including setting aside contingencies in the budget-setting process, the council has sufficient resources in place to meet the expected shortfalls in income and increases in expenditure for 2020/21 arising from the pandemic. However, in the medium term, the picture remains far more uncertain as the longer-lasting impact of the pandemic on the economy, in the context of wider financial risks beyond the control of officers or members, remains a significant unknown; and
  - Management are conscious of the need to remain responsive to emerging circumstances, whilst keeping sight of longer-term strategic goals which underpin future investment decisions from use of reserves.
- 7.6 In setting an ambitious GF balance target for the council to work towards over the medium and longer term, consideration has been given to the total level of budgets pressures that

the council has been exposed to during the pandemic (highlighting the inherent quantum of budget risk going forward) and the comments of the council's External Auditor on the council's reserves and GF balance.

- 7.7 The multi-year CSR, the planned reforms to the local government finance system around business rates retention and 'fair funding', and the long overdue reform of social care funding have been further delayed. As such, it is very difficult at this stage to estimate with any accuracy the external funding available to the council from 2022/23 onwards. As noted in paragraphs 6.18 to 6.21, there is also a significant risk around the sustainability of the council's business rates base over the medium term due to COVID-19 related Material Change in Circumstance (MCC) appeals. In addition, the severely bleak nature of the national economic backdrop presents hugely significant risks for the funding of local government going forward. A further period of austerity cannot be ruled out and MTFS assumptions will need to be revised, potentially significantly, as events unfold.
- 7.8 It should be noted that there is an underlying shortfall of approximately £1.4m in the housing benefit administration budget that is being bridged by an annual drawdown from the Housing Benefit reserve. This is an exception to the normal MTFS strategy because it is assumed that this base budget shortfall will be fully offset by a permanent reduction in ongoing expenditure upon the full implementation of Universal Credit and that it will not add to the estimated budget gap. This assumption should be kept under review, including any changes to the Universal Credit full implementation timetable as the future shape of the remaining housing benefit service becomes clearer.
- 7.9 Given the unprecedented uncertainty in the MTFS, the robustness of all assumptions, including delivery of savings, will be reviewed in early Spring 2021 in order to shape the medium-term budget setting process, beginning financial year 2022/23, from the outset.

#### **Comments of the Monitoring Officer**

- 7.10 This report sets out the basis upon which a recommendation will be made for the adoption of a lawful budget and the basis for the level of the council tax for 2021/22. It also outlines the council's current and anticipated financial circumstances, including matters relating to the General Fund budget and MTFS, the HRA, the capital programme, and borrowing and expenditure control.
- 7.11 The setting of the budget and council tax by Members involves their consideration of choices. No genuine and reasonable options should be dismissed out-of-hand and Members must bear in mind their fiduciary duty to the council taxpayers of Islington.
- 7.12 Members must have adequate evidence on which to base their decisions on the level of quality at which services should be provided. Where a service is provided pursuant to a statutory duty, it would not be lawful to fail to discharge it properly or abandon it, and where there is discretion as to how it is to be discharged, that discretion should be exercised reasonably. Where a service is derived from a statutory power and is in itself discretionary that discretion should be exercised reasonably.
- 7.13 The report sets out the relevant considerations for Members to consider during their deliberations and Members are reminded of the need to ignore irrelevant considerations. Members have a duty to seek to ensure that the council acts lawfully. They are under an obligation to produce a balanced budget and must not knowingly budget for a deficit. Members must not come to a decision which no reasonable authority could come to; balancing the nature, quality and level of services which they consider should be provided against the costs of providing such services.

- 7.14 Under the constitutional arrangements, the setting of the council budget is a matter for the council, having considered recommendations made by the Executive. Before the final recommendations are made to the council, the Policy and Performance Scrutiny Committee must have been given the opportunity to scrutinise these proposals and the Executive should take into account its comments when making those recommendations.

### **Equalities Impact Assessment**

- 7.15 The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (Section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 7.16 It is difficult to make savings on the scale required without any impact on residents, and there will inevitably be some impact on particular groups, including those with protected characteristics as defined by the Equality Act. The council is not legally obligated to reject savings with negative impacts on any particular groups but must consider carefully and with rigour the impact of its proposals on the Public Sector Equality Duty, take a reasonable and proportionate view about the overall impact on particular groups and seek to mitigate negative impacts where possible.
- 7.17 The EQIA of the budget proposals is set out at **Appendix F**. It is supplemented at a departmental level by detailed EQIAs of major proposals. These demonstrate that the council has met its duties under the Equality Act 2010 and has taken account of its duties under the Child Poverty Act 2010.

### **Budget Consultation**

- 7.18 Section 65 of the Local Government Finance Act 1992 requires the council each financial year to consult persons or bodies representative of business rate payers about expenditure proposals.
- 7.19 The council must make available the information described in the Non-Domestic Ratepayers (Consultation) Regulations 1992/3171, including:
- Details of proposals for expenditure in the financial year to which the consultation relates;
  - Estimates of expenditure in the preceding financial year; and
  - Particulars of significant changes in the level of proposed expenditure between the two years.
- 7.20 The council invited comments from business rates payers and representatives of business rates payers in Islington on the draft 2021/22 budget proposals. The consultation period ran from 15 January 2021 to 31 January 2021. No responses were received.

### **Annual Pay Policy Statement 2021/22**

- 7.21 Section 38 of the Localism Act 2011 requires local authorities to publish an annual 'Pay Policy Statement', setting out their policies in respect of chief officer remuneration and other specified matters. Regard must be had to guidance to be published by the Secretary of State in preparing the statement, which must be approved by Full Council. The council is then constrained by its pay policy statement when making determinations on chief officer pay, although the statement may be amended at any time by a further resolution of Full

Council. The council's Annual Pay Policy Statement for 2021/22 is provided at **Appendix G**.

**Appendices:**

- Appendix A General Fund Medium-Term Financial Strategy 2021/22 to 2023/24
- Appendix B1 General Fund Savings 2021/22 – New Proposals
- Appendix B2 General Fund Savings 2021/22 – Previously Agreed
- Appendix C1 General Fund Fees and Charges 2021/22
- Appendix C2 Cemeteries Fees and Charges 2021/22
- Appendix C3 GLL Activity Prices 2021/22
- Appendix C4 GLL Memberships 2021/22
- Appendix C5 GLL Trampoline Pricing 2021/22
- Appendix D1 HRA MTFS 2021/22 to 2023/24
- Appendix D2 HRA Fees and Charges 2021/22
- Appendix E1 Capital Programme 2021/22 to 2023/24
- Appendix E2 Capital Strategy 2021/22
- Appendix E3 Minimum Revenue Provision (MRP) Policy Statement 2021/22
- Appendix E4 Treasury Management Strategy 2021/22
- Appendix E5 Investment Strategy 2021/22
- Appendix F 2021/22 Budget Equality Impact Assessment
- Appendix G Annual Pay Policy Statement 2021/22

**Background papers:** None

Final report clearance:

**Signed by:**



17 February 2021

**Executive Member for  
Finance and Performance**

Date

**Responsible Officers:** Dave Hodgkinson, Corporate Director of Resources (Section 151 Officer)  
Paul Clarke, Director of Finance

**Report Authors:** Martin Houston, Strategic Financial Advisor  
Tony Watts, Head of Financial Planning

**Legal Implications:** Peter Fehler, Acting Director of Law and Governance (Monitoring Officer)

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## Appendix A: Medium-Term Financial Strategy 2021/22 to 2023/24

	2020/21	2021/22				2022/23					2023/24			
	Budget	Virements	Inflation/ Growth	Adjustments	Savings	Budget	Inflation/ Growth	Adjustments	Savings	Estimate	Inflation/ Growth	Adjustments	Savings	Estimate
	£m	£m		£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m
Chief Executive's Directorate	1.134	(0.248)	0.147	1.563	(1.319)	1.277			(0.840)	0.437				0.437
Environment and Regeneration	17.330	(0.425)	0.525	(1.716)	(5.239)	10.475			(0.451)	10.024			(0.136)	9.888
Housing	10.371	(0.928)	0.250	0.264	(0.930)	9.027			(0.250)	8.777			(0.250)	8.527
People - Adult Social Care	63.549	(0.622)	2.212	0.317	(5.309)	60.147			(4.396)	55.751			(1.962)	53.789
People - Children, Employment and Skills	84.671	0.879	0.464	(2.739)	(1.675)	81.600		0.964	(0.958)	81.606		(0.100)	(0.019)	81.487
People	148.220	0.257	2.676	(2.422)	(6.984)	141.747	0.000	0.964	(5.354)	137.357	0.000	(0.100)	(1.981)	135.276
Public Health	0.000			1.839	(1.839)	0.000		0.250	(0.250)	0.000				0.000
Resources Directorate/Corporate	41.692	2.400	4.627	9.885	(8.953)	49.651	17.385	2.572	(12.654)	56.954	16.194	7.422	(22.610)	57.960
<b>NET COST OF SERVICES</b>	<b>218.747</b>	<b>1.056</b>	<b>8.225</b>	<b>9.413</b>	<b>(25.264)</b>	<b>212.177</b>	<b>17.385</b>	<b>3.786</b>	<b>(19.799)</b>	<b>213.549</b>	<b>16.194</b>	<b>7.322</b>	<b>(24.977)</b>	<b>212.088</b>
Contingency	5.455	(1.056)		0.601		5.000				5.000				5.000
COVID-19 Contingency	0.000			5.500		5.500				5.500				5.500
Transfer to/(from) Earmarked Reserves	9.507			(24.554)		(15.047)		16.059		1.012				1.012
Transfer to/(from) General Balances	0.434			(0.434)		0.000				0.000				0.000
New Homes Bonus Grant	(5.269)			2.821		(2.448)		1.799		(0.649)		0.649		0.000
Local Council Tax Support Grant	0.000			(3.600)		(3.600)		3.600		0.000				0.000
Local Tier Service Grant	0.000			(0.922)		(0.922)		0.922		0.000				0.000
Council Tax Administration Grant	(0.570)					(0.570)				(0.570)				(0.570)
<b>NET BUDGET REQUIREMENT</b>	<b>228.304</b>	<b>0.000</b>	<b>8.225</b>	<b>(11.175)</b>	<b>(25.264)</b>	<b>200.090</b>	<b>17.385</b>	<b>26.166</b>	<b>(19.799)</b>	<b>223.842</b>	<b>16.194</b>	<b>7.971</b>	<b>(24.977)</b>	<b>223.030</b>
Revenue Support Grant	(24.459)			(0.135)		(24.594)		4.000		(20.594)		4.000		(16.594)
Business Rates Baseline	(82.456)					(82.456)				(82.456)				(82.456)
(Top-up) Tariff	(2.798)					(2.798)				(2.798)				(2.798)
<b>SETTLEMENT FUNDING ASSESSMENT</b>	<b>(109.713)</b>	<b>0.000</b>	<b>0.000</b>	<b>(0.135)</b>	<b>0.000</b>	<b>(109.848)</b>	<b>0.000</b>	<b>4.000</b>	<b>0.000</b>	<b>(105.848)</b>	<b>0.000</b>	<b>4.000</b>	<b>0.000</b>	<b>(101.848)</b>
Additional business rates related income	(12.782)			(0.847)		(13.629)				(13.629)				(13.629)
Collection Fund (Surplus)/Deficit:														
- Business Rates	(6.606)			29.353		22.747		(21.646)		1.101				1.101
- Council Tax	(0.434)			0.323		(0.111)		0.589		0.478				0.478
<b>COUNCIL TAX REQUIREMENT</b>	<b>98.769</b>	<b>0.000</b>	<b>8.225</b>	<b>17.519</b>	<b>(25.264)</b>	<b>99.249</b>	<b>17.385</b>	<b>9.109</b>	<b>(19.799)</b>	<b>105.944</b>	<b>16.194</b>	<b>11.971</b>	<b>(24.977)</b>	<b>109.132</b>

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## **Appendix B1 - New Savings Proposals**

<b>Number</b>	<b>Directorate</b>	<b>Summary Description</b>	<b>Savings Type</b>	<b>2021/22 £m</b>
<b>1</b>	Cross-cutting	Implement a council-wide vacancy factor of 5%	Efficiency	4.217
<b>2</b>	Cross-cutting	Funding substitutions	Funding substitution	2.143
<b>3</b>	Environment and Regeneration	Move Bank Holiday waste collections to following Saturday	Service reconfiguration	0.146
<b>4</b>	Environment and Regeneration	Increase pay & display diesel surcharge from £3 to £5 per hour (short stay)	Income	0.397
<b>5</b>	Environment and Regeneration	Pay & display based charging (free for EV vehicles, higher charge for all other vehicles)	Income	0.490
<b>6</b>	Environment and Regeneration	Capture illegal parking suspensions	Income	0.150
<b>7</b>	Environment and Regeneration	Adjust budget to reflect realised contract savings from relocation of CCTV PCN processing function that has already happened	Efficiency	0.218
<b>8</b>	Environment and Regeneration	Reduce Geographic Information System (GIS) officers from 2 to 1 FTE in Parking Service	Efficiency	0.040
<b>9</b>	Environment and Regeneration	Implementation of Contract Performance Manager and associated data analyst to more effectively target deployed resource and increase PCN issue rate	Efficiency	0.679
<b>10</b>	Environment and Regeneration	Street Works, Highways & Energy	Service reconfiguration	0.114
<b>11</b>	Environment and Regeneration	Create single team to support licensing, street trading, land charges, naming and numbering with automation through new back office system	Efficiency	0.030
<b>12</b>	Environment and Regeneration	Reconfigure Trading Standards	Service reconfiguration	0.050
<b>13</b>	Environment and Regeneration	Reduce the % of planning officer posts filled by agency staff	Efficiency	0.045
<b>14</b>	Environment and Regeneration	Review Discretionary fees and charges for Planning Service - Planning Pre-applications, Planning Performance Agreements, Design Review Panel etc.	Income	0.130
<b>15</b>	Environment and Regeneration	Divisional Development (Greenspace)	Efficiency	0.154
<b>16</b>	Environment and Regeneration	Increase resident parking permit prices	Income	0.222
<b>17</b>	Housing	Reduction in Specialist Housing Needs team combined with a partial transfer of justifiable cost to the HRA, where tenants would benefit from the activity of the team	Growth reduction	0.280
<b>18</b>	Housing	Decommissioning of the high cost temporary accommodation scheme in Station Road, Barnet and replacement with lower cost provision	Efficiency	0.050
<b>19</b>	Housing	Anticipated reduction in No Recourse to Public Funds caseload	Efficiency	0.050
<b>20</b>	People - ASC	Recommissioning of the 'low support' Housing Related Support services, moving towards a model of enhanced housing management	Service reconfiguration	0.192
<b>21</b>	People - ASC	Reduce the need for double up care (2 carers) for domiciliary care service users	Efficiency	0.100
<b>22</b>	People - ASC	Managing the provider uplift process to reduce costs	Efficiency	0.500
<b>23</b>	People - ASC	Set up a negotiating team to renegotiate placement costs	Efficiency	0.300
<b>24</b>	People - ASC	Review and reduce the floating support service	Service reconfiguration	0.157
<b>25</b>	People - ASC	Mental Health - Demand Management, and review of residents based out of area with care packages	Reduction in demand	0.100
<b>26</b>	People - ASC	Further learning disability reviews, transitions and additional savings from the learning disability placement reviews & renegotiation of learning disability out-of-borough residential placements	Reduction in demand	0.100
<b>27</b>	People - ASC	Transformation of Operational Social Work Teams	Service reconfiguration	0.366

## Appendix B1 - New Savings Proposals

Number	Directorate	Summary Description	Savings Type	2021/22 £m
28	People - ASC	Review of Deprivation of Liberty office with a view to carry out more best interest assessments (BIA) in-house and raise practice standards across ASC operations	Efficiency	0.075
29	People - ASC	Create a centre of commissioning excellence - cross cutting saving across People and potentially Public Health	Service reconfiguration	0.115
30	People - ASC	Assistive Technology Transformation	Reduction in demand	0.100
31	People - ASC	Review charging policy with a view to maximise income	Income	0.080
32	People - CES	Bring remand budget in line with demand	Reduction in demand	0.150
33	People - CES	Short breaks efficiencies	Efficiency	0.068
34	People - CES	Reduction in previously allocated budget growth for Violence Against Women and Girls (VAWG) due to existing budget underspend	Growth reduction	0.050
35	People - CES	Investment in the House Project as a permanent service in Islington	Service reconfiguration	0.036
36	People - CES	Service and staffing efficiencies across Children, Employment and Skills	Efficiency	0.240
37	People - CES	S106 funding substitution in Children, Employment and Skills	Funding substitution	0.006
38	People - CES	Adult Community Learning service - S106 funding substitution	Efficiency	0.030
39	People - CES	Libraries - Stock fund reduction	Service reconfiguration	0.030
40	People - CES	Libraries - deletion of vacant posts	Service reconfiguration	0.010
41	Public Health	Further Grant Uplift Efficiency	Efficiency	1.000
42	Public Health	Stop funding for hospital based alcohol liaison post	Service reconfiguration	0.080
43	Public Health	Sexual Health budget reduction	Efficiency	0.150
44	Public Health	Substance Misuse budget reduction	Efficiency	0.150
45	Public Health	Health Visiting Transformation	Service reconfiguration	0.100
47	Resources	Facilities management savings	Efficiency	0.176
		<b>Total</b>		<b>14.066</b>
		<b>Directorate Summary - New Proposals</b>		<b>2021/22 £m</b>
		Chief Executive's		0.000
		Cross-cutting		6.360
		Environment and Regeneration		2.865
		Housing		0.380
		People - ASC		2.185
		People - CES		0.620
		Public Health		1.480
		Resources		0.176
		<b>Total</b>		<b>14.066</b>
		<b>Directorate Summary - New + Previously Agreed Proposals</b>		<b>2021/22 £m</b>
		Chief Executive's		1.319
		Cross-cutting		8.435
		Environment and Regeneration		5.239
		Housing		0.930
		People - ASC		5.309
		People - CES		1.675
		Public Health		1.839
		Resources		0.518
		<b>Total</b>		<b>25.264</b>

## Appendix B2 - Previously Agreed Proposals

#	Directorate	Summary Description	Savings Type	2021/22 £m
1	Chief Executive's	Savings resulting from a new property strategy, increasing income, more co-locating with partners and reducing the council's office footprint	Efficiency	1.158
2	Chief Executive's	Additional commercial income for print services	Income	0.075
3	Cross-cutting	Corporate review of contracting and procurement arrangements	Efficiency	0.900
4	Cross-cutting	Consolidating and streamlining business administration functions	Efficiency	0.500
5	Cross-cutting	Implementation of the new "Localities" model in partnership with the voluntary and community sector, health organisations and our other local partners to align preventative services and reduce long-term demand	Efficiency	0.375
6	Cross-cutting	Redesigning our customer service offer, including additional channel shift	Efficiency	0.300
7	Environment and Regeneration	Income generation from package of zero carbon policies including lorry ban & parking charges (including diesel surcharge), and efficiencies from shift to e-parking solution	Income	0.875
8	Environment and Regeneration	Efficiencies in SES following investment in new technology	Efficiency	0.467
9	Environment and Regeneration	Income generation from roll out of School Streets phase 2	Income	0.375
10	Environment and Regeneration	SES - Annual charge for waste containers	Income	0.237
11	Environment and Regeneration	SES - Integration of Services with Housing	Service reconfiguration	0.225
12	Environment and Regeneration	A more efficient operation at the Waste and Recycling Centre, using technology to automate access to the facility	Efficiency	0.145
13	Environment and Regeneration	Improved use of technology and resource to focus more capacity on income generation	Efficiency	0.050
14	Housing	Improve the quality and reduce the cost of temporary accommodation through purchasing homes to be owned by the council and used by it for temporary accommodation	Service reconfiguration	0.375
15	Housing	Offer more permanent housing to families in temporary accommodation	Efficiency	0.175
16	People - ASC	Conduct annual reviews of Adult Social Care packages in line with relevant legislation, applying a strengths-based approach to create better outcomes for residents in the care system	Efficiency	0.680
17	People - ASC	Package of savings through recommissioning of services	Service reconfiguration	0.550
18	People - ASC	In-house services transformation	Service reconfiguration	0.500
19	People - ASC	Learning Disability Reviews	Efficiency	0.260
20	People - ASC	Assistive Technology - The aim of this project is to increase the quality of life and independence of people receiving support from ASC through the increased use of assistive technology	Efficiency	0.150
21	People - ASC	Demand management and better use of residential based block provision	Efficiency	0.984
22	People - CES	Demand management for children's social care and new commissioning strategy for children looked after including asylum seekers	Efficiency	0.567
23	People - CES	Review of the Early Help 0 to 19 service	Efficiency	0.328
24	People - CES	Rental income from letting surplus space at Central Library	Income	0.055
25	People - CES	Increase use of pre-payment cards for Direct Payments	Efficiency	0.050
26	People - CES	Maintain the availability and scope of play and youth provision by reducing its costs through new commissioning arrangements and more efficient back-office support	Efficiency	0.035
27	People - CES	Staff savings through flexible retirements	Efficiency	0.020
28	Public Health	Change the way we deliver public health behaviour-change programmes, including health checks and exercise on referral, through our universal services and other more cost-effective methods	Efficiency	0.180

## **Appendix B2 - Previously Agreed Proposals**

#	Directorate	Summary Description	Savings Type	2021/22 £m
<b>29</b>	Public Health	Public Health workforce - efficiencies	Efficiency	0.179
<b>30</b>	Resources	Legal - Efficiencies from case management system	Efficiency	0.185
<b>31</b>	Resources	Review of HR structure due to increased automation	Efficiency	0.157
<b>32</b>	Chief Executive's	Reduce number of national graduate trainees	Efficiency	0.070
<b>33</b>	Chief Executive's	Reduction in facilities costs as Vorley Road is vacated	Efficiency	0.016
		<b>Total</b>		<b>11.198</b>
		<b>Directorate Summary - Previously Agreed Proposals</b>		<b>2021/22 £m</b>
		Chief Executive's		1.319
		Cross-cutting		2.075
		Environment and Regeneration		2.374
		Housing		0.550
		People - ASC		3.124
		People - CES		1.055
		Public Health		0.359
		Resources		0.342
		<b>Total</b>		<b>11.198</b>

Appendix C1: General Fund Fees and Charges 2021/22

Department	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2020/21 Price	2021/22 Price	% Change	Comments
Town Hall	Birth, Deaths, Marriages	License for Approved Premises		Annual Period	£1,550.00	£1,550.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Licensed Venue External to Town Hall		Monday-Friday	£620.00	£620.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Licensed Venue External to Town Hall		Saturday	£700.00	£700.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Licensed Venue External to Town Hall		Sunday	£800.00	£800.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Licensed Venue External to Town Hall		Bank Holiday	£800.00	£800.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Licensed Venue External to Town Hall		Out of Hours (6-10pm) Monday to Saturday	£800.00	£800.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Licensed Venue External to Town Hall		Out of Hours (6-10pm) Sunday / Bank Holiday / Christmas Eve, New Years Eve	£900.00	£900.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Richmond Room		Saturday only (2pm to 6pm)	£500.00	£500.00	0.00%	Maximum of 60 guests. VAT Inclusive.
Town Hall	Birth, Deaths, Marriages	Mayor's Parlour	Marriage or civil partnerships	Tuesday, Wednesday, Thursday, Friday	£400.00	£400.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Mayor's Parlour		Saturday	£600.00	£600.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Mayor's Parlour		Sunday	£700.00	£700.00	0.00%	Basic Ceremony - maximum of 30 Guests. VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Room 99	Marriage or Partnership Ceremony	Monday	£57.00	£57.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Room 99	Marriage or Partnership Ceremony	Tuesday, Wednesday, Thursday	£190.00	£190.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Room 99	Marriage or Partnership Ceremony	Friday	£240.00	£240.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Room 99	Marriage or Partnership Ceremony	Saturday	£290.00	£290.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Re-booking of ceremony			£40.00	£40.00	0.00%	VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Tues, Weds, Thurs, Fri	£500.00	£500.00	0.00%	Includes use of balcony. VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Saturday	£700.00	£700.00	0.00%	Includes use of balcony. VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Sunday	£800.00	£800.00	0.00%	Includes use of balcony. VAT Inclusive
Town Hall	Birth, Deaths, Marriages	Births, deaths, marriages and civil partnership certificates	Express same day within 1 hour (walk in service before 11am)		£35.00	£35.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Private Citizenship Ceremony (Mon-Fri)		Per single adult	£125.00	£125.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Private Citizenship Ceremony (Mon-Fri)		Per (per family)	£185.00	£185.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Private Citizenship Ceremony (Sat)		Per single adult	£155.00	£155.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Private Citizenship Ceremony (Sat)		Per (per family)	£230.00	£230.00	0.00%	
Town Hall	Birth, Deaths, Marriages	Proof of life stamping			£10.00	£10.00	0.00%	
Town Hall	Assembly Hall - Commercial	Wedding celebration package		Any day	£6,350.00	£6,500.00	2.36%	VAT Inclusive
Town Hall	Assembly Hall - Commercial	Wedding dry hire package			£3,600.00	£3,700.00	2.78%	VAT Inclusive
Town Hall	Assembly Hall - Commercial	Live event hire for downstairs standing only			£1,500.00	£1,550.00	3.33%	
Town Hall	Assembly Hall - Commercial	Live event hire for full venue			£1,700.00	£1,750.00	2.94%	
Town Hall	Assembly Hall - Commercial	Venue Levy	Fee added to the price of each ticket bought at Islington Assembly Hall via all ticket agents		£0.00	£1.00	NA	New charge for 2021/22.
Town Hall	Assembly Hall - Non-Commercial	Community and Charity			To be negotiated	To be negotiated	N/A	
Town Hall	Assembly Hall - Non-Commercial	Meal charges during holiday			£2.00	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	School Meals	childcare provision		Per day	£2.00	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 1 (Up to £24,999)	Per Week	£150.00	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 2 (£25,000 - £39,999)	Per Week	£211.25	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 3 (£40,000 - £59,999)	Per Week	£229.50	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 4 (£60,000 - £79,999)	Per Week	£247.75	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 5 (£80,000 - £99,999)	Per Week	£285.81	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	New Band 6 (£100,000 - £119,999)	Per Week	£323.87	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	New Band 7 (£120,000 - £139,999)	Per Week	£361.93	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	New Band 8 (£160,000 - £179,999)	Per Week	£399.99	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	New Band 9 (£180,000 - £199,999)	Per Week	£438.05	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	New Band 10 (£200,000 - £219,999)	Per Week	£476.11	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	New Band 11 (£220,000 - £239,999)	Per Week	£514.17	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - Under 2s	Out of Borough/Marketed	Per Week	£472.69	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 1 (Up to £24,999)	Per Week	£195.49	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 2 (£25,000 - £39,999)	Per Week	£207.10	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 3 (£40,000 - £59,999)	Per Week	£228.71	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 4 (£60,000 - £79,999)	Per Week	£249.32	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 5 (£80,000 - £99,999)	Per Week	£287.38	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	New Band 6 (£100,000 - £119,999)	Per Week	£325.44	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	New Band 7 (£120,000 - £139,999)	Per Week	£363.50	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	New Band 8 (£160,000 - £179,999)	Per Week	£401.56	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	New Band 9 (£180,000 - £199,999)	Per Week	£439.62	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	New Band 10 (£200,000 - £219,999)	Per Week	£477.68	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time & Holidays - 2 to 3s	New Band 11 (£220,000 - £239,999)	Per Week	£515.74	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 1 (Up to £24,999)	Per Week	£137.00	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 2 (£25,000 - £39,999)	Per Week	£144.98	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 3 (£40,000 - £59,999)	Per Week	£157.76	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 4 (£60,000 - £79,999)	Per Week	£174.83	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 5 (£80,000 - £99,999)	Per Week	£196.14	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	New Band 6 (£100,000 - £119,999)	Per Week	£221.73	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	New Band 7 (£120,000 - £139,999)	Per Week	£230.42	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	New Band 8 (£160,000 - £179,999)	Per Week	£251.25	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	New Band 9 (£180,000 - £199,999)	Per Week	£265.67	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	New Band 10 (£200,000 - £219,999)	Per Week	£279.57	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	New Band 11 (above £120,000)	Per Week	£285.92	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Out of Borough/Marketed	Per Week	£301.44	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 1 (Up to £24,999)	Per Week	£78.20	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 2 (£25,000 - £39,999)	Per Week	£82.85	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 3 (£40,000 - £59,999)	Per Week	£90.15	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 4 (£60,000 - £79,999)	Per Week	£99.90	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 5 (£80,000 - £99,999)	Per Week	£112.08	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	New Band 6 (£100,000 - £119,999)	Per Week	£126.70	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	New Band 7 (£120,000 - £139,999)	Per Week	£131.67	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	New Band 8 (£160,000 - £179,999)	Per Week	£143.57	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	New Band 9 (£180,000 - £199,999)	Per Week	£151.82	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	New Band 10 (£200,000 - £219,999)	Per Week	£154.61	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021

Appendix C1: General Fund Fees and Charges 2021/22

CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	New Band 11 (above £120,000)	Per Week	£163.38	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Out of Borough/Marketed	Per Week	£172.25	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	Band 1 (Up to £24,999)	Per Week	£156.57	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	Band 2 (£25,000 - £30,999)	Per Week	£165.69	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	Band 3 (£31,000 - £39,999)	Per Week	£180.31	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	Band 4 (£40,000 - £49,999)	Per Week	£189.42	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	Band 5 (£50,000 - £59,999)	Per Week	£204.04	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	New Band 6 (£60,000 - £69,999)	Per Week	£233.41	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	New Band 7 (£70,000 - £79,999)	Per Week	£263.34	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	New Band 8 (£80,000 - £89,999)	Per Week	£287.14	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	New Band 9 (£90,000 - £99,999)	Per Week	£305.92	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	New Band 10 (£100,000 - £120,000)	Per Week	£399.29	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	New Band 11 (above £120,000)	Per Week	£326.76	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Children's & Community Centres	Holidays - 3 & 4s	Out of Borough/Marketed	Per Week	£344.49	See Comment	NA	TBC - subject to consultation and agreement, before new school year Sept 2021
CES	Library & Heritage Services	Sale of Obsolete Stock			£0.10 - £2.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Digital Images	Local History	Per Image	£18.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Reservation Charge for Items Not in Stock			£3.80	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	PC Printing		Per sheet	15p b/w 50p colour	15p b/w 50p colour	0.00%	
CES	Library & Heritage Services	Genealogical Research		Per 30 minutes	£15.00	£15.00	0.00%	Minimum slot of 1 hour
CES	Library & Heritage Services	Local History Photography Pass		Per Day	£6.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Charges for Overdue Books		Per Day (maximum charge per item)	£7.20		NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Hire of Music	CDs		17p per day 50p 60+ free	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Photocopying		Per sheet	15p A4 b/w 20p A3 b/w 50p A4 colour £1 A3 colour	15p A4 b/w 20p A3 b/w 50p A4 colour £1 A3 colour	0.00%	
CES	Library & Heritage Services	Hall Lettings			£29 to £175 per hour	£29 to £175 per hour	0.00%	Price depends on room and venue
CES	Library & Heritage Services	Charges for Lost Items			Original purchase price	Original purchase price	NA	
CES	Library & Heritage Services	Replacement Library Card		Per Night	£2.20	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	DVD Hire Charge			£1.95	See Comment	NA	
CES	Library & Heritage Services	Local History and Re-Sale Material			£26.00	See Comment	NA	Charge based on item being purchased and finish required
CES	Library & Heritage Services	Local History Centre - Commercial	Front Cover/Jacket		£80.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Local History Centre - Commercial	Interior		£55.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Local History Centre - Commercial	Leaflets & Brochures		£25.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Local History Centre - Commercial	Advertising in Newspapers & Postcards, greetings cards, giftware,		£80.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Local History Centre - Commercial	Postcards, greetings cards, giftware,		£140.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Commercial Interior Design & Additional Images	Up to 5 Images		£275.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Commercial Interior Design & Additional Images	Additional Images		£25.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Television	One Showing		£80.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Television	5-Year unlimited transmission		£275.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	DVDs, Films, Videos & CD-ROMs			£140.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Exhibitions			£80.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Web Use			£80.00	See Comment	NA	Charge being removed for 2021/22 due to low use of service
CES	Library & Heritage Services	Education Library Service	Primary School	Per Pupil	£18.00	See Comment	NA	TBC - Charges are reviewed on an academic year basis
CES	Library & Heritage Services	Education Library Service	Secondary School	Full Subscription	£5,464.60	See Comment	NA	TBC - Charges are reviewed on an academic year basis
CES	Library & Heritage Services	Education Library Service	Secondary School	Tutor Box Only	£2,613.50	See Comment	NA	TBC - Charges are reviewed on an academic year basis
CES	Library & Heritage Services	Education Library Service	PVI Nurseries	Out of Borough Schools	£1,968.00	See Comment	NA	TBC - Charges are reviewed on an academic year basis
CES	Library & Heritage Services	Education Library Service	Artifact Topic Box		£75.00	See Comment	NA	TBC - Charges are reviewed on an academic year basis
Resources	Telecare	Monitoring Service		Per week	£3.80	£3.90	2.63%	Provision of alarm service to residents
Resources	Telecare	Full Service		Per week	£7.59	£7.75	2.11%	Provision of alarm service to residents
Resources	Telecare	Peabody Trust	Alleyn House	Annual	£6,338.22	£6,465.00	2.00%	Provision of alarm service to Housing Association
Resources	Telecare	Peabody Trust	Lampson House	Annual	£1,868.00	£1,900.00	1.96%	Provision of alarm service to Housing Association
Resources	Telecare	Peabody Trust	Darwin Court	Annual	£1,178.31	£1,140.00	1.98%	Provision of alarm service to Housing Association
Resources	Telecare	Peabody Trust	Davey Court	Annual	£6,107.74	£6,230.00	2.00%	Provision of alarm service to Housing Association
Resources	Telecare	Peabody Trust	Lomond House	Annual	£6,799.18	£6,935.00	2.00%	Provision of alarm service to Housing Association
Resources	Telecare	Peabody Trust	Walston and Founders House	Annual	£5,762.02	£5,880.00	2.05%	Provision of alarm service to Housing Association
Resources	Telecare	Peabody Trust	Elwood Court	Annual	£7,029.86	£7,170.00	2.00%	Provision of alarm service to Housing Association
Resources	Telecare	Hullington & Shoreditch		Annual	£4,817.69	£4,915.00	2.02%	Provision of alarm service to Housing Association
Resources	Telecare	Barnsbury Housing		Annual	£3,571.51	£3,645.00	2.06%	Provision of alarm service to Housing Association
Resources	Law & Governance - Residential	NTB Lease Print (on grant of right to buy lease)			£90.00	£92.00	2.22%	
Resources	Law & Governance - Residential	Sealing fee (RTBs)			£15.00	£15.50	3.33%	
Resources	Law & Governance - Residential	Certificate of Compliance			£255.00	£260.00	1.96%	
Resources	Law & Governance - Residential	Release of Charge (DS1)			£120.00	£125.00	4.17%	
Resources	Law & Governance - Residential	Release of Restriction (RX1)			£120.00	£125.00	4.17%	
Resources	Law & Governance - Residential	Variation of Restrictions			£305.00	£310.00	1.64%	
Resources	Law & Governance - Residential	Memorandum of Staircasing			£255.00	£260.00	1.96%	
Resources	Law & Governance - Residential	Postponement of Charge			£255.00	£260.00	1.96%	
Resources	Law & Governance - Residential	Combined Standard Deeds of Variation & Licences to Alter	e.g. loft space; works; change of lease plans		£715.00	£730.00	2.10%	
Resources	Law & Governance - Residential	Combined Other Deeds of Variation & Licences to Alter			£895.00	£915.00	2.23%	
Resources	Law & Governance - Residential	Separate Deed of Variation			£460.00	£470.00	2.17%	
Resources	Law & Governance - Residential	Separate Licence to Alter			£460.00	£470.00	2.17%	
Resources	Law & Governance - Residential	Letter of Consent			£360.00	£370.00	2.78%	
Resources	Law & Governance - Residential	Deed of Covenant			£100.00	£100.00	0.00%	
Resources	Law & Governance - Residential	NTB Supplemental Lease			£665.00	£680.00	2.26%	
Resources	Law & Governance - Residential	Lease Extension			£1,000.00	£1,050.00	5.00%	
Resources	Law & Governance - Residential	Freehold Enfranchisement (statutory or voluntary deeds)			£1,000.00	£1,050.00	5.00%	
Resources	Law & Governance - Residential	Freehold Enfranchisement with leaseback			£1,350.00	£1,380.00	2.22%	
Resources	Commercial - Law & Governance - Commercial	Grant of new commercial lease	Assignment, alterations, rectification, subletting etc.	Minimum Charge	£1,000.00	£1,050.00	5.00%	
Resources	Commercial - Law & Governance - Commercial	All licences and deeds		Minimum Charge	£850.00	£870.00	2.35%	
Resources	Commercial - Law & Governance - Commercial	Notice of Charge/Assignment			£65.00	£65.00	0.00%	
Resources	Commercial - Law & Governance - Commercial	Notice to Complete			£255.00	£260.00	1.96%	
HASS	Adult Social Services	Meals in Day Care Centres			£3.10	£3.10	0.00%	
HASS	Adult Social Services	Deferred Payments		Set up fee	£1,590.00	£1,620.00	1.89%	
HASS	Adult Social Services	Deferred Payments		Annual fee	£96.50	£97.40	0.97%	
HASS	Adult Social Services	Deferred Payments	Complex case	Per hour	£134.10	£137.00	2.16%	
HASS	Adult Social Services	Deputyship		Annual management fee	Various fixed rates	Various fixed rates	NA	
HASS	Adult Social Services	Protection of Property		Admin Fee	£386.00	£394.00	2.07%	
HASS	Adult Social Services	Protection of Property		Fee per hour	£29.00	£29.60	2.07%	
HASS	Adult Social Services	Protection of Property - Pets	Dog	Per Week	£17.40	£17.75	2.01%	
HASS	Adult Social Services	Protection of Property - Pets	Cat	Per Week	£11.50	£11.75	2.17%	
HASS	Adult Social Services	Community care charges			assessed charge under Government regulations	assessed charge under Government regulations	NA	
HASS	Adult Social Services	Residential care charges			assessed charge under Government regulations	assessed charge under Government regulations	NA	
HASS	Housing Needs & Strategy	Furniture Storage			£153.95	£156.00	1.99%	
E & R	Public Protection	Public Protection Officer		Hourly Rate	£75.00	£75.00	0.00%	
E & R	Public Protection	Charges for carrying out works in default following service of Notices			£2500 per hour	£2500 per hour	0.00%	
E & R	Public Protection	Land Charges LA Searches	LLC1	Per Case	£11.50	£11.75	2.01%	
E & R	Public Protection	Land Charges LA Searches	Con29R		£27.00	£27.00	0.00%	

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Public Protection	Land Charges LA Searches	Enhanced Personal search		£0.00	£0.00	0.00%	
E & R	Public Protection	Land Charges LA Searches	Information search		£58.00	£58.00	0.00%	
E & R	Public Protection	Land Charges LA Searches	Personal inspection of the Local Land Charges Register under EIR		£0.00	£0.00	0.00%	
E & R	Public Protection	Land Charges LA Searches	Part 2 (Con290) questions		£12.00	£12.00	0.00%	
E & R	Public Protection	Land Charges LA Searches	Part 3 (your own) questions		£25.00	£25.00	0.00%	
E & R	Public Protection	Land Charges LA Searches	Right of Light Registration		£81.00	£81.00	0.00%	
E & R	Public Protection	Land Search Enquiry	Per Reply Letter		£71.00	£71.00	0.00%	
E & R	Public Protection	Land Search Enquiry	Per Copy of Consent		£1.00	£1.00	0.00%	
E & R	Animal Services	Dog Recovery			£31.50	£32.15	2.06%	
E & R	Animal Services	Animal Rehoming			£55.65	£56.75	1.98%	
E & R	Animal Services	Animal Boarding			£12.60	£12.85	1.98%	
E & R	Animal Services	Register of Seized Dogs			£4.41	£4.50	2.04%	
E & R	Animal Services	1963	Licence		£370.65	£378.00	1.98%	
E & R	Animal Services	1963	Renewal		£370.65	£378.00	1.98%	
E & R	Animal Services	Breeding Dogs Act 1973	Licence		£305.55	£312.00	2.11%	
E & R	Animal Services	Breeding Dogs Act 1973	Renewal		£305.55	£312.00	2.11%	
E & R	Animal Services	Dangerous Wild Animals Act 1976	Licence		£370.65	£378.00	1.98%	
E & R	Animal Services	Dangerous Wild Animals Act 1976	Renewal		£370.65	£378.00	1.98%	
E & R	Animal Services	Act 1925	Registration		£57.75	£59.00	2.16%	
E & R	Animal Services	Act 1925	Copy Certificate		£22.00	£22.50	2.04%	
E & R	Animal Services	Pet Animals Act 1951	Licence		£370.65	£378.00	1.98%	
E & R	Animal Services	Pet Animals Act 1951	Renewal		£370.65	£378.00	1.98%	
E & R	Animal Services	Riding Establishments Act 1964	Licence		£522.90	£534.00	2.12%	
E & R	Animal Services	Riding Establishments Act 1964	Renewal		£522.90	£534.00	2.12%	
E & R	Animal Services	Pest Control	Contracted Pest Control treatments	Per Hour	£187.10	£191.00	2.08%	
E & R	Health	Act 2004			£645.00	£658.00	2.02%	
E & R	Residential Environmental Health	Finbury Park - Selective Licensing		5-Year	£500.00	£500.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	Finbury Park - Selective Licensing	Accredited Landlord	5-Year	£425.00	£425.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	Finbury Park - Selective Licensing	Additional for Assisted Application	5-Year	£167.00	£167.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing		5-Year	£288.00	£288.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing	Accredited Landlord	5-Year	£345.00	£345.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing	Additional for Assisted Application	5-Year	£352.00	£352.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing	Large Student Accommodation Block	5-Year	£33.00	£33.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing - S257		5-Year	£703.00	£703.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing - S257	Accredited Landlord	5-Year	£597.00	£597.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Residential Environmental Health	HMO Licensing - S257	Additional for Assisted Application	5-Year	£181.00	£181.00	0.00%	5 year license fees are statutory and agreed following a consultation process every five years. The last consultation process was in 2019/20.
E & R	Health	Food Hygiene Training		Per Hour	£69.00	£69.00	0.00%	
E & R	Health	Food Hygiene Retraining		Per Hour	£75.00	£75.00	0.00%	
E & R	Commercial Environmental Health	EH & TS Regulatory Services (including PAP)		Per Hour	£75.00	£76.50	2.00%	
E & R	Property Record Viewing	Solicitor's Enquiry	24 Hour Response	Per Property	£134.00	£137.00	2.24%	
E & R	Trading Standards & Street Trading	Business Advice	Business advice and ancillary advice services	Per Hour	£75.00	£76.50	2.00%	
E & R	Trading Standards & Street Trading	Business Advice	Primary Authority charge for business advice/ancillary advice		£75.00	£76.50	2.00%	
E & R	Trading Standards & Street Trading	Business Advice	London Local Authorities Act 2007 (S75)		£155.00	£155.00	0.00%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Examining, testing, certifying, stamping, authorising or reporting on special weighing or measuring equipment.	Per Officer Per Hour	£106.00	£108.00	1.89%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weights	Exceeding 5kg or not exceeding 5g	£15.50	£16.00	3.23%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weights	Other weights	£14.50	£15.00	3.45%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Measures	Linear measures not exceeding 3m	£15.50	£16.00	3.23%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	Not exceeding 15kg	£37.00	£38.00	2.70%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	15kg to 100kg	£57.00	£58.00	1.75%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	100kg to 250 kg	£74.00	£76.00	2.70%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	250 kg to 1 tonne	£132.00	£135.00	2.27%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	1 tonne to 10 tonne	£231.00	£236.00	2.16%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	10 tonne to 30 tonne	£451.00	£460.00	2.00%	
E & R	Trading Standards & Street Trading	Weighing & Measuring Equipment	Weighing Machines	30 tonne to 60 tonne	£670.00	£685.00	2.24%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Intoxicating Liquor		Not exceeding 150 ml	£26.00	£26.00	0.00%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Intoxicating Liquor		Other	£27.00	£27.00	0.00%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Liquid Fuel and Lubricants	Multigrade	Container Type - Unsubdivided	£105.00	£107.00	1.90%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Liquid Fuel and Lubricants	Multigrade	Solely price adjustment	£132.00	£135.00	2.27%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Liquid Fuel and Lubricants	Multigrade	Otherwise	£231.00	£236.00	2.16%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Liquid Fuel and Lubricants		Other types-single outlets	£104.00	£106.00	1.92%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Liquid Fuel and Lubricants		Other types-single outlets	£145.00	£148.00	2.07%	
E & R	Trading Standards & Street Trading	Measuring Instruments for Liquid Fuel and Lubricants		Other types - Multi outlets - Rate per meter	£143.00	£146.00	2.10%	
E & R	Trading Standards & Street Trading	Other Charges	Cancellation/Alteration of Appointment	Appointment between 9am-5pm Monday - Friday	£98.00	£100.00	2.04%	Only applies to cancellation/significant alteration of appointment without written prior notice.
E & R	Trading Standards & Street Trading	Other Charges	Cancellation/Alteration of Appointment	Appointment outside of 9am-5pm Monday - Friday	£147.00	£150.00	2.04%	Only applies to cancellation/significant alteration of appointment without written prior notice.
E & R	Trading Standards & Street Trading	Other Charges	Visit by Trading Standards Officer	Per hour, between 9am-5pm Monday - Friday	£98.00	£100.00	2.04%	A minimum charge of £100 will be made for the first hour or part thereof and then at a rate of £150 per hour thereafter. If the service has to hire additional weights or equipment to carry out testing or examination the additional cost will be payable by the submitter.
E & R	Trading Standards & Street Trading	Other Charges	Visit by Trading Standards Officer	Per hour, outside of 9am-5pm Monday - Friday	£147.00	£150.00	2.04%	A minimum charge of £150 will be made for the first hour or part thereof and then at a rate of £100 per hour thereafter. If the service has to hire additional weights or equipment to carry out testing or examination the additional cost will be payable by the submitter.
E & R	Trading Standards & Street Trading	GLC General (Powers) Act 1984	Sale of Goods by Competitive Bidding		£252.00	£257.00	1.98%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Dealer - Site Licence	3 Years	£558.00	£570.00	2.15%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Dealer renewal		£558.00	£570.00	2.15%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Dealer variation		£280.00	£286.00	2.14%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Collector		£336.00	£343.00	2.08%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Collector renewal		£336.00	£343.00	2.08%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Collector variation		£268.00	£274.00	2.24%	
E & R	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Duplicates for either		£6.50	£6.50	0.00%	
E & R	Tables, Chairs, Advertising Boards	Tables and Chairs	Processing Fee - New Application - All bands		£788.00	£805.00	2.16%	
E & R	Tables, Chairs, Advertising Boards	Tables and Chairs	Processing Fee - Renewal - All bands		£440.00	£450.00	2.27%	

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Tables, Chairs, Advertising Boards	Tables and Chairs	Band A	Per Sq Metre	£104.00	£106.00	1.92%
E & R	Tables, Chairs, Advertising Boards	Tables and Chairs	Band B	Per Sq Metre	£70.00	£71.50	2.14%
E & R	Tables, Chairs, Advertising Boards	Tables and Chairs	Band C	Per Sq Metre	£42.00	£43.00	2.38%
E & R	Tables, Chairs, Advertising Boards	A Boards, Tables and Chairs	Band A	Per A board added to existing Tables and Chair licence	£302.00	£308.00	1.99%
E & R	Tables, Chairs, Advertising Boards	A Boards, Tables and Chairs	Band B	Per A board added to existing Tables and Chair licence	£217.00	£221.50	2.07%
E & R	Tables, Chairs, Advertising Boards	A Boards, Tables and Chairs	Band C	Per A board added to existing Tables and Chair licence	£88.00	£90.00	2.27%
E & R	Tables, Chairs, Advertising Boards	A Board Only	Band A	Per A board only	£421.00	£430.00	2.14%
E & R	Tables, Chairs, Advertising Boards	A Board Only	Band B	Per A board only	£302.00	£308.00	1.99%
E & R	Tables, Chairs, Advertising Boards	A Board Only	Band C	Per A board only	£129.00	£131.50	1.94%
E & R	Tables, Chairs, Advertising Boards	Other Fees		Non-refundable charge in cases of early determination of refusal of application	£150.00	£153.00	2.00%
E & R	Tables, Chairs, Advertising Boards	Other Fees		Variation fee (additional A Boards or licensees/premise name change)	£70.00	£71.50	2.14%
E & R	Gambling Act 2005	Bingo Club License Fees	New Application		£2,035.00	£2,076.00	2.01%
E & R	Gambling Act 2005	Bingo Club License Fees	Annual Fee		£1,040.00	£1,061.00	2.02%
E & R	Gambling Act 2005	Bingo Club License Fees	Variation		£1,430.00	£1,460.00	2.10%
E & R	Gambling Act 2005	Bingo Club License Fees	Transfer		£190.00	£194.00	2.11%
E & R	Gambling Act 2005	Bingo Club License Fees	Re-instatement		£190.00	£194.00	2.11%
E & R	Gambling Act 2005	Bingo Club License Fees	Provisional Statement		£2,035.00	£2,080.00	2.21%
E & R	Gambling Act 2005	Bingo Club License Fees	New Application from Provisional Statement holder		£190.00	£194.00	2.11%
E & R	Gambling Act 2005	Betting Premises License Fees	Excluding Tracks - Re-instatement		£190.00	£194.00	2.11%
E & R	Gambling Act 2005	Betting Premises License Fees	Excluding Tracks - New Application from Provisional Statement holder		£190.00	£194.00	2.11%
E & R	Gambling Act 2005	Betting Premises License Fees	Excluding Tracks - Application for Provisional Statement		£2,035.00	£2,076.00	2.01%
E & R	Gambling Act 2005	Betting Premises License Fees	Tracks - New Application		£2,035.00	£2,076.00	2.01%
E & R	Gambling Act 2005	Betting Premises License Fees	Tracks - Transfer		£435.00	£444.00	2.07%
E & R	Gambling Act 2005	Betting Premises License Fees	Tracks - Re-instatement		£435.00	£444.00	2.07%
E & R	Gambling Act 2005	Betting Premises License Fees	Tracks - Provisional Statement		£2,035.00	£2,076.00	2.01%
E & R	Gambling Act 2005	Betting Premises License Fees	Tracks - New Application from provisional statement holder		£435.00	£444.00	2.07%
E & R	CCTV Enquiries	Request from Solicitors, Lawyers, Courts		DVD Single Camera footage	£103.00	£105.00	1.94%
E & R	CCTV Enquiries	Request from Solicitors, Lawyers, Courts		DVD Multiple camera footage	£128.00	£130.50	1.95%
E & R	Planning & Development	Research Fee		Admin Time	£56.00	£57.00	1.79%
E & R	Planning & Development	Pre-Application & Other Advice		Duty Planning Officer Slot	£79.25	£81.00	2.27%
E & R	Planning & Development	Pre-Application & Other Advice		Householder application (changes to a single house or flat)	£286.00	£292.00	2.10%
E & R	Planning & Development	Pre-Application & Other Advice		Householder application with site visit	£465.00	£474.00	1.94%
E & R	Planning & Development	Pre-Application & Other Advice		Householder follow up meeting	£185.00	£189.00	2.16%
E & R	Planning & Development	Pre-Application & Other Advice		Listed building consent	£425.00	£434.00	2.12%
E & R	Planning & Development	Pre-Application & Other Advice		Listed building consent with site visit	£611.00	£623.00	1.96%
E & R	Planning & Development	Pre-Application & Other Advice		Listed Building consent follow up meeting	£212.00	£216.00	1.89%
E & R	Planning & Development	Pre-Application & Other Advice		Small scale minor application with site visit	£1,184.00	£1,208.00	2.03%
E & R	Planning & Development	Pre-Application & Other Advice		Small scale minor follow up meeting	£680.00	£694.00	2.06%
E & R	Planning & Development	Pre-Application & Other Advice		Larger scale minor development (4-6 residential units, or 500-999 sq.m commercial) - 4a category	£1,888.00	£1,926.00	2.01%
E & R	Planning & Development	Pre-Application & Other Advice		Larger scale minor follow up meeting (4-6) 4a	£1,173.00	£1,197.00	2.05%
E & R	Planning & Development	Pre-Application & Other Advice		Larger scale minor development (7-9 residential units, or 500-999 sq.m commercial) - 4b category	£2,264.00	£2,310.00	2.03%
E & R	Planning & Development	Pre-Application & Other Advice		Larger scale minor follow up meeting (7-9) 4b	£1,410.00	£1,440.00	2.13%
E & R	Planning & Development	Pre-Application & Other Advice		(5a) Major application: 10-20 residential units or 1000 to 1999sqm	£8,171.00	£8,335.00	2.01%
E & R	Planning & Development	Pre-Application & Other Advice		(5a) Major Applications follow up meeting	£2,431.00	£2,480.00	2.02%
E & R	Planning & Development	Pre-Application & Other Advice		(5b) Major application >21 residential units <40 units or >2000sqm < 5000sqm commercial floorspace	£10,720.00	£10,935.00	2.01%
E & R	Planning & Development	Pre-Application & Other Advice		(5b) Major application per extra meeting	£5,360.00	£5,470.00	2.05%
E & R	Planning & Development	Pre-Application & Other Advice		Planning Performance Agreement - (5a) Major application - Set up Fee only, extra charges for delivering an agreed programme	£8,130.00	£8,295.00	2.03%
E & R	Planning & Development	Pre-Application & Other Advice		Planning Performance Agreement - Major application (excluding 5a)	Bespoke	Bespoke	NA
E & R	Planning & Development	Pre-Application & Other Advice		Meeting charge to Discuss Non-Material Amendments to Major Development (56a)	To be negotiated	To be negotiated	NA
E & R	Planning & Development	Pre-Application & Other Advice		Planning Performance Agreement (conditions)	Bespoke	Bespoke	NA
E & R	Planning & Development	Pre-Application & Other Advice		Planning Performance Agreement (57) - for Major Developments	Bespoke	Bespoke	NA
E & R	Planning & Development	Pre-Application & Other Advice		Extensions of time - minor 4a	£1,230.00	£1,255.00	2.03%
E & R	Planning & Development	Pre-Application & Other Advice		Extensions of time - minor 4b	£1,643.00	£1,676.00	2.01%
E & R	Planning & Development	Pre-Application & Other Advice		Extension of times Majors (5a)	£8,171.00	£8,335.00	2.01%
E & R	Planning & Development	Pre-Application & Other Advice		Extension of times Majors (5b)	£10,720.00	£10,935.00	2.01%
E & R	Planning & Development	Pre-Application & Other Advice		Design review panel	£4,340.00	£4,430.00	2.07%
E & R	Planning & Development	Pre-Application & Other Advice		Design Review Panel (Second/Third Meeting)	£3,330.00	£3,400.00	2.10%
E & R	Planning & Development	Pre-Application & Other Advice		Other research/ correspondence per hour	£141.00	£144.00	2.13%
E & R	Planning & Development	Pre-Application & Other Advice		Express Enforcement correspondence	£645.00	£658.00	2.02%
E & R	Planning & Development	Pre-Application & Other Advice		Refund for returned invalid application	20% of application fee	20% of application fee	NA
E & R	Planning & Development	Pre-Application & Other Advice		Streetbook Surgeries	£1,625.00	£1,660.00	2.15%
E & R	Building Control	Property Record Viewing, Photocopying		Enquiry Charge - all information readily available on back-office/land charges or statutory register	£110.00	£112.50	2.27%
E & R	Building Control	Property Record Viewing, Photocopying		Enquiry Charge - additional research required	£110.00	£112.50	2.27%
E & R	Building Control	Property Record Viewing, Photocopying		Additional page/drawing	£1.00	£1.00	0.00%
E & R	Building Control	Property Record Viewing, Photocopying		Each single copy of microfiche	£11.00	£11.50	4.55%
E & R	Building Control	Property Record Viewing, Photocopying		Solicitor's enquiry (48 hour response)	£300.00	£306.00	2.00%
E & R	Building Control	Temporary Structure		Renewal - Professional/Technical Time	£110.00	£112.50	2.27%
E & R	Building Control	Temporary Structure		Renewal - Administrative Time	£110.00	£112.50	2.27%
E & R	Building Control	Temporary Structure		Renewal - Demolition Notice Standard Application	£550.00	£561.00	2.00%
E & R	Building Control	Temporary Structure		Renewal - Demolition Notice Complex Application	£990.00	£1,009.00	2.00%



Appendix C1: General Fund Fees and Charges 2021/22

E & R	Building Control	Temporary Structure	New - Minimum Charge		£350.00	£350.00	0.00%
E & R	Building Control	Dangerous Structure	Standard Charge on Issue of Notice		£330.00	£330.00	0.00%
E & R	Building Control	Dangerous Structure	Site visits and Dealing with Matters	Per Hour	£440.00	£440.00	0.00%
E & R	Building Control	Miscellaneous Charges	Refunds & Cancellations		£115.00	£115.00	0.00%
E & R	Building Control	Miscellaneous Charges	Service Not Stated		On application	On application	NA
E & R	Public Protection	Street Naming or Numbering: New Site	1-9 units		£215.00	£215.00	0.00%
E & R	Public Protection	Street Naming or Numbering: New Site	10-20 units		£280.00	£280.00	0.00%
E & R	Public Protection	Street Naming or Numbering: New Site	For each additional unit over 20		£40.00	£40.00	0.00%
E & R	Building Control	Street Naming or Numbering: Existing Site	Naming a new street (including access ways, mews, cul-de-sacs)		£0.00	£0.00	0.00%
E & R	Public Protection	Street Naming or Numbering: Existing Site	Renaming a street		£455.00	£465.00	2.20%
E & R	Public Protection	Street Naming or Numbering: Existing Site	Naming or re-naming of a property		£263.00	£269.00	2.28%
E & R	Public Protection	Street Naming or Numbering: Existing Site	Renumbering of a property		£263.00	£269.00	2.28%
E & R	Building Control	Street Naming or Numbering: Existing Site	Postcode enquiries		£0.00	£0.00	0.00%
E & R	Building Control	Street Naming or Numbering: Existing Site	Resubmission with new proposals if original application refused and within 1 month of refusal		£0.00	£0.00	0.00%
E & R	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 1 - Highway search - provide plan		£50.00	£52.00	4.00%
E & R	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 2 - Highway search plan & written response to 1 question		£98.00	£100.00	2.04%
E & R	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 3 - Highway Search plan and written response provided up to 5 questions		£180.00	£190.00	5.56%
E & R	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 4 - Highway search plans and written response to 6+ questions		£235.00	£250.00	6.38%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway	Up to 3 Days	£400.00	£410.00	2.50%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway	4-10 Days	£850.00	£875.00	2.94%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway	Over 10 Days	£2,250.00	£2,300.00	2.22%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway - Non excavation		£300.00	£350.00	16.67%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway - Extension fee Footway Works		£225.00	£250.00	11.11%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway - Extension fee Carriageway Works		£450.00	£500.00	11.11%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Temporary Crossover permission - Standard Vehicle		£850.00	£900.00	5.88%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Temporary Crossover permission - Heavy Duty Vehicle over 5 tonnes in weight		£2,250.00	£2,500.00	11.11%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Extension fees Temporary Crossovers - Standard Vehicle		£225.00	£250.00	11.11%
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Extension fees Temporary Crossovers - Heavy Duty Vehicle Over 5 tonne in weight		£0.00	£600.00	NA
E & R	Environmental Services - Highways	Permissions Highways Act 1980	Site inspection fee for valid complaints or unauthorised overstay		£225.00	£250.00	11.11%
E & R	Environmental Services - Highways	Skips	Highways Management/Coordination		£98.00	£100.00	2.04%
E & R	Environmental Services - Highways	Highways License	Highways Occupation Licence		£600.00	£625.00	4.17%
E & R	Environmental Services - Highways	Highways License	Highways pre-works advice for highway activities and construction management	Per Hour	£58.00	£65.00	12.07%
E & R	Environmental Services - Highways	Highways License	Short hold traffic arrangements assessment and permission		£150.00	£155.00	3.33%
E & R	Environmental Services - Highways	Materials License Fee	Deposit value <£750 Level 1 Fee		£400.00	£425.00	6.25%
E & R	Environmental Services - Highways	Materials License Fee	£751-£1500 Level 2 Fee		£600.00	£625.00	4.17%
E & R	Environmental Services - Highways	Materials License Fee	£1501-£3000 Level 3 Fee		£950.00	£1,000.00	5.26%
E & R	Environmental Services - Highways	Materials License Fee	£3001-£6000 Level 4 Fee		£1,100.00	£1,200.00	9.09%
E & R	Environmental Services - Highways	Materials License Fee	£6001- Level 5 Fee	Fee 40% of deposit	Fee 40% of deposit	NA	
E & R	Environmental Services - Highways	Scaffold License Fee	Deposit value <£750 Level 1 Fee		£400.00	£425.00	6.25%
E & R	Environmental Services - Highways	Scaffold License Fee	£751-£1500 Level 2 Fee		£600.00	£625.00	4.17%
E & R	Environmental Services - Highways	Scaffold License Fee	£1501-£3000 Level 3 Fee		£950.00	£1,000.00	5.26%
E & R	Environmental Services - Highways	Scaffold License Fee	£3001-£6000 Level 4 Fee		£1,100.00	£1,200.00	9.09%
E & R	Environmental Services - Highways	Scaffold License Fee	£6001- Level 5 Fee	Fee 40% of deposit	Fee 40% of deposit	NA	
E & R	Environmental Services - Highways	Scaffold Gantry License Fee	Deposit value <£750 Level 1 Fee		£800.00	£850.00	6.25%
E & R	Environmental Services - Highways	Scaffold Gantry License Fee	£751-£1500 Level 2 Fee		£1,200.00	£1,300.00	8.33%
E & R	Environmental Services - Highways	Scaffold Gantry License Fee	£1501-£3000 Level 3 Fee		£1,600.00	£1,700.00	6.25%
E & R	Environmental Services - Highways	Scaffold Gantry License Fee	£3001-£6000 Level 4 Fee		£1,700.00	£1,800.00	5.88%
E & R	Environmental Services - Highways	Scaffold Gantry License Fee	£6001- Level 5 Fee	Fee 40% of deposit	Fee 40% of deposit	NA	
E & R	Environmental Services - Highways	Hoarding License Fee	Deposit value <£750 Level 1 Fee		£400.00	£425.00	6.25%
E & R	Environmental Services - Highways	Hoarding License Fee	£751-£1500 Level 2 Fee		£600.00	£625.00	4.17%
E & R	Environmental Services - Highways	Hoarding License Fee	£1501-£3000 Level 3 Fee		£950.00	£1,000.00	5.26%
E & R	Environmental Services - Highways	Hoarding License Fee	£3001-£6000 Level 4 Fee		£1,100.00	£1,200.00	9.09%
E & R	Environmental Services - Highways	Hoarding License Fee	£6001- Level 5 Fee	Fee 40% of deposit	Fee 40% of deposit	NA	
E & R	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 1		£225.00	£250.00	11.11%
E & R	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 2		£325.00	£350.00	7.69%
E & R	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 3		£425.00	£450.00	5.88%
E & R	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 4		£525.00	£550.00	4.76%
E & R	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 5		£625.00	£650.00	4.00%
E & R	Environmental Services - Highways	Hoarding License Fee	Site inspection fee for valid complaints or unauthorised overstay		£225.00	£250.00	11.11%
E & R	Environmental Services - Highways	Construction Site Service Area	Deposit value <£750 Level 1 Fee		£400.00	£450.00	12.50%
E & R	Environmental Services - Highways	Construction Site Service Area	£751-£1500 Level 2 Fee		£600.00	£650.00	8.33%
E & R	Environmental Services - Highways	Construction Site Service Area	£1501-£3000 Level 3 Fee		£950.00	£1,000.00	5.26%
E & R	Environmental Services - Highways	Construction Site Service Area	£3001-£6000 Level 4 Fee		£1,100.00	£1,200.00	9.09%
E & R	Environmental Services - Highways	Construction Site Service Area	£6001- Level 5 Fee	Fee 40% of deposit	Fee 40% of deposit	NA	
E & R	Environmental Services - Highways	Crane Operation Licenses	Oversailing the highway		£900.00	£950.00	5.56%
E & R	Environmental Services - Highways	Crane Operation Licenses	Operation on the highway		£425.00	£450.00	5.88%
E & R	Environmental Services - Highways	Crane Operation Licenses	Overhang licence section 177 Highways Act 1980		£425.00	£450.00	5.88%
E & R	Environmental Services - Highways	Containers	Management fee		£210.00	£220.00	4.76%
E & R	Environmental Services - Highways	Containers	Weekly storage fee on the highway		£220.00	£230.00	4.55%

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Environmental Services - Highways	Legal Notices & Works Road Traffic Act 1984	Temporary Traffic Restriction Orders/Notices (incl statutory press notices) under section 14(1) for max of 3 months or Emergency works 14(2)		E3,700.00	E3,775.00	2.03%
E & R	Environmental Services - Highways	Legal Notices & Works Road Traffic Act 1984	Extension to section 14 closure per month		E550.00	E575.00	4.55%
E & R	Environmental Services - Highways	Legal Notices & Works Road Traffic Act 1984	Temporary Traffic Restriction Orders/Notices (incl statutory press notices) under section 16A Commercial Street Parties		E3,700.00	E3,775.00	2.03%
E & R	Environmental Services - Highways	Legal Notices & Works Road Traffic Act 1984	Permanent traffic orders under all sections of the highways, traffic regulation and road traffic acts		E2,475.00	E2,525.00	2.02%
E & R	Environmental Services - Highways	Planter Application Fee	Planter application for assessment and Permission	1 - 5 years	E0.00	E102.46	NA
E & R	Environmental Services - Highways	Planter Licence fee	Planter licence fee to occupy Public Highways (1 year)	1 year	E0.00	E116.00	NA
E & R	Environmental Services - Highways	Rental fee for Planter Container	Planter Container to rent and fill soil	1- 5 year (300x690x600)	E0.00	E770.00	NA
E & R	Environmental Services - Highways	Rental fee for Planter Container	Planter Container to rent and fill soil	1- 5 year (600x990x600)	E0.00	E900.00	NA
E & R	Environmental Services - Highways	Rental fee for Planter Container	Planter Container to rent and fill soil	1- 5 year (1300x1300x800)	E0.00	E1,000.00	NA
E & R	Environmental Services - Highways	Hedge, tree and Foliage overhang inspection and admin	Hedge, Tree and Foliage - Management and assessment Fee		E0.00	E260.00	NA
E & R	Environmental Services - Highways	Hedge, tree and Foliage overhang assessment fee for actual works	Hedge, tree and foliage pruning and removal of waste	Per Hour	E0.00	E85.00	NA
E & R	Environmental Services - Highways	Rechargeable Works	Professional fees for works: Site Visits/Estimates /Works management			30% of works cost	30% of works cost NA
E & R	Environmental Services - Highways	Rechargeable Works	Emergency call out works: Vehicle and response team		E680.00	E715.00	5.15%
E & R	Commercial Waste	Waste Management	Sacks	Per 50	E89.50	E89.50	0.00%
E & R	Commercial Waste	Waste Management	Rec Sacks	Per 50	E70.50	E70.50	0.00%
E & R	Commercial Waste	Waste Management	Bulk	Per Item (minimum charge E50)	E23.80	E23.80	0.00%
E & R	Commercial Waste	Waste Management	Paladin	Per lift	E16.30	E16.30	0.00%
E & R	Commercial Waste	Waste Management	Paladin	Annual hire	E130.20	E130.20	0.00%
E & R	Commercial Waste	Waste Management	Wheelie Bin 240 litre	Per lift	E7.50	E7.50	0.00%
E & R	Commercial Waste	Waste Management	Wheelie Bin 240 litre (Rec)	Per lift	E6.70	E6.70	0.00%
E & R	Commercial Waste	Waste Management	Wheelie Bin 330/360 litre	Per lift	E9.30	E9.30	0.00%
E & R	Commercial Waste	Waste Management	Wheelie Bin 330/360 litre (Rec)	Per lift	E6.70	E6.70	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 550/660 litre	Per lift	E13.00	E13.00	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 550/660 litre (Rec)	Per lift	E8.00	E8.00	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 550/660 litre	Annual hire	E141.00	E141.00	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 770 litre	Per lift	E14.10	E14.10	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 770 litre	Annual hire	E162.70	E162.70	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 1100 litre	Per lift	E17.40	E17.40	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 1100 litre	Annual hire	E10.00	E10.00	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 1280 litre	Per lift	E195.20	E195.20	0.00%
E & R	Commercial Waste	Waste Management	Eurobin 1280 litre	Annual	E18.40	E18.40	0.00%
E & R	Commercial Waste	Waste Management	Skips Light Waste (8 yarder)	Per lift	E217.00	E217.00	0.00%
E & R	Commercial Waste	Waste Management	Skips Building Material (8 yarder)	Per lift	E304.00	E304.00	0.00%
E & R	Commercial Waste	Waste Management	Special Collections (Minimum Charge)	One off	E369.00	E369.00	0.00%
E & R	Commercial Waste	Waste Management	Confidential Waste Collection	One off	E86.80	E86.80	0.00%
E & R	Commercial Waste	Purchase of Eurobins	240 litre		E57.50	E57.50	0.00%
E & R	Commercial Waste	Purchase of Eurobins	360 litre		E104.10	E104.10	0.00%
E & R	Commercial Waste	Purchase of Eurobins	660 litre		E412.00	E412.00	0.00%
E & R	Commercial Waste	Purchase of Eurobins	770 litre		E434.00	E434.00	0.00%
E & R	Commercial Waste	Purchase of Eurobins	1100 litre		E466.00	E466.00	0.00%
E & R	Commercial Waste	Purchase of Eurobins	1280 litre		E477.00	E477.00	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Sacks	Per 50	E44.40	E44.40	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Paladin hire	Per lift	E8.80	E8.80	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Paladin hire	Annual hire	E130.20	E130.20	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Wheelie Bin 240 litre	Per lift	E4.40	E4.40	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Wheelie Bin 330/360 litre	Per lift	E6.60	E6.60	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 550/660 litre	Per lift	E7.10	E7.10	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 550/660 litre	Annual hire	E141.00	E141.00	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 770/800 litre	Per lift	E8.20	E8.20	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 770/800 litre	Annual hire	E162.70	E162.70	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 1100 litre	Per lift	E8.80	E8.80	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 1100 litre	Annual hire	E195.20	E195.20	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 1280 litre	Per lift	E10.00	E10.00	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Eurobin 1280 litre	Annual hire	E216.90	E216.90	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Skips Light Waste (8 yarder)	Per lift	E216.90	E216.90	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Skips Light Waste (12 yarder) perm	Per lift	E227.80	E227.80	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Special Collections (Minimum Charge)	One off	E104.10	E104.10	0.00%
E & R	Charity/Educational Establishment Waste	Waste Management	Confidential Waste Collection	One off	E70.50	E70.50	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	240 litre		E57.50	E57.50	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	360 litre		E104.10	E104.10	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	660 litre		E412.00	E412.00	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	770 litre		E434.00	E434.00	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	1100 litre		E466.00	E466.00	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	1280 litre		E477.00	E477.00	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	Duty of Care Document Charge	Quarterly	E17.40	E17.40	0.00%
E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	Duty of Care Document Charge	Semi-Annually	E34.70	E34.70	0.00%

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Charity/Educational Establishment Waste	Purchase of Eurobins	Duty of Care Document Charge	Annually	£68.30	£68.30	0.00%
E & R	Clinical Waste	Removal of Bagged Clinical Waste	Min charge per visit	Up to (and including) 7 Bags	£38.00	£38.00	0.00%
E & R	Clinical Waste	Removal of Bagged Clinical Waste	Each additional bag over 7 collected	Each Bag	£6.00	£6.00	0.00%
E & R	Clinical Waste	Sharps	Min charge per visit	Up to (and including) 5 Boxes	£38.00	£38.00	0.00%
E & R	Clinical Waste	Removal of Bagged Clinical Waste	Each additional box over 5 collected	Each Bag	£6.00	£6.00	0.00%
E & R	Bulky Waste	Removal of Bulky Waste	Bulky Waste	Per item (minimum charge £15.50)	£10.30	£10.50	1.94%
E & R	Bulky Waste	Removal of Bulky Waste	Reusable bulky waste	Per item (minimum charge £15.90)	£5.20	£5.30	1.92%
E & R	Parking Permits	Blue Badges	Blue Badge processing		£0.00	£0.00	0.00%
E & R	Parking Permits	Blue Badges	Associated residents permit for Blue Badge holders		£0.00	£0.00	0.00%
E & R	Parking Permits	Blue Badges	Blue Badge replacement for lost 1st one in 3 years		£0.00	£0.00	0.00%
E & R	Parking Permits	Blue Badges	Blue Badge replacement for stolen 1st one in 3 years		£0.00	£0.00	0.00%
E & R	Parking Permits	Blue Badges	Blue Badge replacement for lost subsequent ones in 3 years		£10.00	£10.00	0.00%
E & R	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	1 month permit	£10.30	£10.50	1.94%
E & R	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	3 month permit	£30.90	£31.50	1.94%
E & R	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	6 month permit	£61.80	£63.00	1.94%
E & R	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	12 month permit	£123.60	£126.00	1.94%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	1 month permit	£0.00	£7.50	NA
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	3 month permit	£0.00	£7.50	NA
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	6 month permit	£0.00	£12.50	NA
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	12 month permit	£0.00	£25.00	NA
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	3 month permit	£7.50	£10.00	33.33%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	6 month permit	£10.30	£15.00	45.63%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	12 month permit	£20.60	£30.00	45.63%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	3 month permit	£7.50	£10.00	33.33%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	6 month permit	£11.35	£17.50	54.19%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	12 month permit	£22.70	£35.00	54.19%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	3 month permit	£8.15	£12.50	53.37%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	6 month permit	£16.30	£20.00	22.70%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	12 month permit	£32.60	£40.00	22.70%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	1 month permit	£7.50	£10.00	33.33%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	3 month permit	£21.70	£25.00	15.21%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	6 month permit	£43.35	£47.50	9.57%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	12 month permit	£86.70	£95.00	9.57%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	1 month permit	£8.90	£12.50	40.45%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	3 month permit	£26.50	£30.00	13.21%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	6 month permit	£52.95	£57.50	8.59%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	12 month permit	£105.90	£115.00	8.59%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	1 month permit	£9.50	£15.00	57.89%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	3 month permit	£28.50	£35.00	22.81%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	6 month permit	£57.00	£62.50	9.65%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	12 month permit	£114.00	£125.00	9.65%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	1 month permit	£11.90	£17.50	47.06%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	3 month permit	£35.50	£40.00	12.68%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	6 month permit	£71.00	£75.00	5.63%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	12 month permit	£142.00	£150.00	5.63%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	1 month permit	£13.60	£20.00	47.06%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	3 month permit	£40.70	£45.00	10.57%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	6 month permit	£81.40	£87.50	7.49%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	12 month permit	£162.75	£175.00	7.53%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	1 month permit	£15.95	£22.50	41.07%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	3 month permit	£47.65	£60.00	25.92%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	6 month permit	£95.25	£100.00	4.99%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	12 month permit	£190.45	£200.00	5.01%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	1 month permit	£20.15	£25.00	24.07%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	3 month permit	£60.40	£70.00	15.89%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	6 month permit	£120.80	£127.50	5.55%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	12 month permit	£241.55	£255.00	5.57%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201-225g/km)	1 month permit	£23.45	£27.50	17.77%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201-225g/km)	3 month permit	£70.25	£75.00	6.76%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201-225g/km)	6 month permit	£140.45	£147.50	5.02%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201-225g/km)	12 month permit	£280.90	£295.00	5.02%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	1 month permit	£32.75	£40.00	22.14%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	3 month permit	£98.20	£110.00	12.02%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	6 month permit	£196.35	£207.50	5.68%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	12 month permit	£392.65	£415.00	5.69%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	1 month permit	£42.25	£45.00	6.51%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	3 month permit	£126.40	£135.00	6.80%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	6 month permit	£252.75	£267.50	5.84%
E & R	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	12 month permit	£505.45	£535.00	5.85%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	1 month permit	£0.00	£7.50	NA
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	3 month permit	£0.00	£7.50	NA
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	6 month permit	£0.00	£12.50	NA
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	12 month permit	£0.00	£25.00	NA

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	3 month permit	£7.50	£10.00	33.33%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	6 month permit	£10.30	£15.00	45.63%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	12 month permit	£20.60	£30.00	45.63%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	3 month permit	£7.50	£10.00	33.33%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	6 month permit	£11.35	£17.50	54.19%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	12 month permit	£22.70	£35.00	54.19%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	3 month permit	£8.15	£12.50	53.37%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	6 month permit	£16.30	£20.00	22.70%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	12 month permit	£32.60	£40.00	22.70%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	1 month permit	£7.50	£10.00	33.33%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	3 month permit	£21.70	£25.00	15.21%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	6 month permit	£43.35	£47.50	9.57%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	12 month permit	£86.70	£95.00	9.57%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	1 month permit	£8.90	£12.50	40.45%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	3 month permit	£26.50	£30.00	13.21%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	6 month permit	£52.95	£57.50	8.59%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	12 month permit	£105.90	£115.00	8.59%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	1 month permit	£9.50	£15.00	57.89%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	3 month permit	£28.50	£35.00	22.81%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	6 month permit	£57.00	£62.50	9.65%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	12 month permit	£114.00	£125.00	9.65%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	1 month permit	£11.90	£17.50	47.06%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	3 month permit	£35.50	£40.00	12.68%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	6 month permit	£71.00	£75.00	5.63%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	12 month permit	£142.00	£150.00	5.63%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	1 month permit	£13.60	£20.00	47.06%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	3 month permit	£40.70	£45.00	10.57%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	6 month permit	£81.40	£87.50	7.49%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	12 month permit	£162.75	£175.00	7.53%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	1 month permit	£15.95	£22.50	41.07%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	3 month permit	£47.65	£60.00	25.92%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	6 month permit	£95.25	£100.00	4.99%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	12 month permit	£190.45	£200.00	5.01%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	1 month permit	£20.15	£25.00	24.07%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	3 month permit	£60.40	£70.00	15.89%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	6 month permit	£120.80	£127.50	5.55%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	12 month permit	£241.55	£255.00	5.57%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	1 month permit	£23.45	£27.50	17.27%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	3 month permit	£70.25	£75.00	6.76%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	6 month permit	£140.45	£147.50	5.02%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	12 month permit	£280.90	£295.00	5.02%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	1 month permit	£32.75	£40.00	22.14%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	3 month permit	£98.20	£110.00	12.02%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	6 month permit	£196.35	£207.50	5.68%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	12 month permit	£392.65	£415.00	5.69%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	1 month permit	£42.25	£45.00	6.51%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	3 month permit	£126.40	£135.00	6.80%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	6 month permit	£252.75	£267.50	5.84%
E & R	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	12 month permit	£505.45	£535.00	5.85%
E & R	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	1 month permit	£7.50	£7.50	0.00%
E & R	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	3 month permit	£14.65	£15.00	2.39%
E & R	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	6 month permit	£29.30	£30.00	2.39%
E & R	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	12 month permit	£58.55	£60.00	2.48%
E & R	Parking Permits	Motorcycle Parking Permit	Residents match day permit - valid only during match or event days		£0.00	£0.00	0.00%
E & R	Parking Permits	Motorcycle Parking Permit	Hire Car permit (linked to hire car vouchers)		£15.80	£16.10	1.90%
E & R	Parking Permits	Motorcycle Parking Permit	Residents permit - black taxi concession - one band lower than the norm		Various	Various	NA
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Electric Vehicles	Per Complete Month	£1.70	£2.00	17.65%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band A	Per Complete Month	£1.70	£2.50	47.06%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band B	Per Complete Month	£1.85	£2.75	48.65%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band C	Per Complete Month	£2.70	£3.25	20.37%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band D	Per Complete Month	£7.20	£7.50	4.17%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band E	Per Complete Month	£8.90	£9.25	3.93%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band F	Per Complete Month	£9.50	£10.00	5.26%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band G	Per Complete Month	£11.90	£12.00	0.84%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band H	Per Complete Month	£13.60	£14.00	2.94%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band I	Per Complete Month	£15.95	£16.25	1.88%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band J	Per Complete Month	£20.15	£21.00	4.22%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band K	Per Complete Month	£23.45	£24.00	2.35%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band L	Per Complete Month	£32.75	£34.00	3.82%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band M	Per Complete Month	£42.25	£44.00	4.14%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Admin fee - refund handling charge	Per Complete Month	£25.85	£26.50	2.51%
E & R	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Diesel vehicle surcharge refund - 1 month	Per Complete Month	£10.00	£10.00	0.00%
E & R	Parking Permits	Visitor Parking Vouchers	Half hour vouchers	Book of 20	£12.40	£12.65	2.02%
E & R	Parking Permits	Visitor Parking Vouchers	3-hour vouchers	Book of 10	£34.00	£34.70	2.06%
E & R	Parking Permits	Visitor Parking Vouchers	All day voucher		£15.70	£16.00	1.91%

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Parking Permits	Visitor Parking Vouchers	Half hour vouchers (concessionary)		£6.20	£6.35	2.42%
E & R	Parking Permits	Visitor Parking Vouchers	3-hour vouchers (concessionary)		£17.00	£17.35	2.06%
E & R	Parking Permits	Visitor Parking Vouchers	All day voucher (concessionary)		£7.85	£8.00	1.91%
E & R	Parking Permits	Visitor Parking Vouchers	E-visitor voucher charges (per half hour)		£0.50	£0.50	0.00%
E & R	Parking Permits	Visitor Parking Vouchers	E-visitor voucher charges (concessionary - per half hour session)		£0.25	£0.25	0.00%
E & R	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - all day (concessionary)		£14.25	£14.50	1.75%
E & R	Parking Permits	Visitor Parking Vouchers	E-visitors - evenings (C & K zones only)		£7.10	£7.25	2.11%
E & R	Parking Permits	Visitor Parking Vouchers	Hire car permit holder vouchers - half hour	Book of 20	£9.70	£9.90	2.06%
E & R	Parking Permits	Visitor Parking Vouchers	Hire car permit holder vouchers - 3 hour	Book of 10	£26.25	£26.80	1.95%
E & R	Parking Permits	Visitor Parking Vouchers	1-hour business voucher	Book of 10	£13.65	£13.90	2.21%
E & R	Parking Permits	Visitor Parking Vouchers	New parents vouchers - 40 hours free		£0.00	£0.00	0.00%
E & R	Parking Permits	Visitor Parking Vouchers	1-hour business visitor vouchers	Book of 20	£58.75	£60.00	2.13%
E & R	Parking Permits	Business Visitor Parking Vouchers	Business visitor Half hour vouchers	Book of 20	£14.60	£14.90	2.05%
E & R	Parking Permits	Business Visitor Parking Vouchers	Business visitor All day voucher		£32.70	£33.35	1.99%
E & R	Parking Permits	Other Permits	Doctors parking permit	Annual	£276.00	£281.50	1.99%
E & R	Parking Permits	Other Permits	(New Doctors parking place installation - includes 1 permit)		£3,130.00	£3,185.00	2.08%
E & R	Parking Permits	Other Permits	Essential Services Permit (formerly Teacher Permit)	Annual	£390.00	£398.00	2.05%
E & R	Parking Permits	Other Permits	Business permit (under 150kg/m2 or up to 1600cc)	Annual	£778.00	£794.00	2.06%
E & R	Parking Permits	Other Permits	Business permit (under 150kg/m2 or up to 1600cc) 2nd permit	Annual	£1,040.00	£1,060.00	1.92%
E & R	Parking Permits	Other Permits	Business permit (over 151kg/m2 or over 1600cc)	Annual	£1,295.00	£1,320.00	1.93%
E & R	Parking Permits	Other Permits	Business permit (over 151kg/m2 or over 1600cc) 2nd permit	Annual	£1,540.00	£1,570.00	1.95%
E & R	Parking Permits	Other Permits	Business permit - electric		£602.00	£614.00	1.99%
E & R	Parking Permits	Other Permits	Business permit - linked to vouchers scheme	Annual	£20.40	£20.80	1.96%
E & R	Parking Permits	Other Permits	Match day and event day trader permits	Annual	£714.00	£728.00	1.96%
E & R	Parking Permits	Other Permits	Permission to Park	Per Day	£28.30	£28.90	2.12%
E & R	Parking Permits	Other Permits	Permission to Park	Per Week	£112.00	£115.00	1.95%
E & R	Parking Permits	Other Permits	Permission to Park	Per Month	£438.70	£448.00	2.12%
E & R	Parking Permits	Other Permits	Universal all-zone permit (1-25 fleet vehicles)	Annual	£4,275.00	£4,360.00	1.99%
E & R	Parking Permits	Other Permits	Universal all-zone permit (26-50 fleet vehicles)	Annual	£2,850.00	£2,910.00	2.11%
E & R	Parking Permits	Other Permits	Universal all-zone permit (50+ fleet vehicles)	Annual	£1,460.00	£1,490.00	2.05%
E & R	Parking Permits	Other Permits	Universal all-zone permit (non-fleet)	Per Month	£375.00	£382.50	2.00%
E & R	Parking Permits	Other Permits	Universal permit - discounted fee for electric vehicles		£3,085.00	£3,148.00	2.04%
E & R	Parking Permits	Other Permits	Universal permit - discounted fee for registered charities		£3,085.00	£3,148.00	2.04%
E & R	Parking Permits	Other Permits	Car club permit		£265.00	£270.00	1.89%
E & R	Parking Permits	Other Permits	Trader's Permit		£27.15	£27.70	2.03%
E & R	Parking	Parking Suspensions	Permission to place a licensed skip in a parking place - no dedicated suspension		£65.20	£66.50	1.99%
E & R	Parking	Parking Suspensions	Suspension admin charge (non residents)	First Day	£113.75	£118.00	1.99%
E & R	Parking	Parking Suspensions	Suspension admin charge (residents)	First Day	£102.40	£104.50	2.05%
E & R	Parking	Parking Suspensions	Suspension admin charge (all applicants)	Per Subsequent Day	£32.60	£33.25	1.99%
E & R	Parking	Parking Suspensions	Film work waiver	Per Day	£52.25	£53.50	2.01%
E & R	Parking	Parking Suspensions	Yellow line essential parking waiver	Per Day	£64.15	£65.50	2.10%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 1	Per Hour	£1.25	£1.25	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 2	Per Hour	£1.85	£1.85	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 3	Per Hour	£2.05	£2.05	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 4	Per Hour	£2.45	£2.45	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 5	Per Hour	£3.05	£3.05	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 6	Per Hour	£3.70	£3.70	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 7	Per Hour	£4.10	£4.10	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 8	Per Hour	£4.40	£4.40	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 9	Per Hour	£5.15	£5.15	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 10	Per Hour	£5.55	£5.55	0.00%
E & R	Parking	Pay & Display Tariffs	Minimum made order - Band 11	Per Hour	£6.20	£6.20	0.00%
E & R	Parking	Pay & Display Tariffs	Diesel vehicle surcharge	Per Hour	£3.00	£5.00	66.67%
E & R	Parking	Pay & Display Tariffs	Electric vehicle nominal fee		£0.00	£0.20	NA
E & R	Parking	Pay & Display Tariffs	Petrol vehicle surcharge 1-185g/km CO2	Per Hour	£0.00	£1.00	NA
E & R	Parking	Pay & Display Tariffs	Petrol vehicle surcharge 186-225g/km CO2	Per Hour	£0.00	£2.00	NA
E & R	Parking	Pay & Display Tariffs	Petrol vehicle surcharge 226g/km and over CO2	Per Hour	£0.00	£3.00	NA
E & R	Parking	Abandoned Vehicle Disposal	Motor Vehicle from Private Land		£212.70	£217.00	2.02%
E & R	Parking	Abandoned Vehicle Disposal	Motorcycle/PTW from Private Land		£158.60	£163.00	2.10%
E & R	Parking	Cycle Hangars	Annual rental of secure covered parking space		£107.25	£110.00	2.56%
E & R	Parking	Cycle Hangars	Refundable Key deposit		£25.75	£26.50	2.91%
E & R	Parking	Cycle Hangars	Daily charges for external bus hire clients	Per Half Day	£75.00	£76.50	2.00%
E & R	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Adult standard	£10.75	£11.00	2.33%
E & R	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Adult BETTER (any)	£9.25	£9.45	2.16%
E & R	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Child Standard	£4.90	£5.00	2.04%
E & R	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Child BETTER (any)	£3.85	£3.95	2.60%
E & R	Parks - Sports	Football	Barnard Park - Redgra	No changing rooms - 1 hour	£0.00	£0.00	0.00%
E & R	Parks - Sports	Football	Highbury Fields - Astrotrurf - 1 hour session	Full rate - full pitch	£80.35	£82.00	2.05%
E & R	Parks - Sports	Football	Highbury Fields - Astrotrurf - 1 hour session	BETTER Card / Clubmark - full pitch	£68.75	£70.00	1.82%
E & R	Parks - Sports	Football	Highbury Fields - Astrotrurf - 1 hour session	Child rate - full pitch	£39.20	£40.00	2.04%
E & R	Parks - Sports	Football	Highbury Fields - Astrotrurf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	£33.00	£33.70	2.12%
E & R	Parks - Sports	Football	Paradise Park - Astrotrurf - 1 hour session	Full rate - full pitch	£46.40	£47.30	1.94%
E & R	Parks - Sports	Football	Paradise Park - Astrotrurf - 1 hour session	BETTER Card / Clubmark - full pitch	£40.20	£41.00	1.99%
E & R	Parks - Sports	Football	Paradise Park - Astrotrurf - 1 hour session	Child rate - full pitch	£27.30	£27.85	2.01%
E & R	Parks - Sports	Football	Paradise Park - Astrotrurf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	£22.30	£22.75	2.02%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	Full rate - full pitch	£91.70	£93.50	1.96%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	Full rate - half pitch	£45.85	£46.75	1.96%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	BETTER Card / Clubmark - full pitch	£79.40	£81.00	2.02%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	BETTER Card / Clubmark - half pitch	£39.70	£40.50	2.02%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	Child rate - full pitch	£54.60	£55.70	2.01%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	Child rate - half pitch	£27.30	£27.85	2.01%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	£44.10	£45.00	2.04%
E & R	Parks - Sports	Football	Rosemary Gardens - Astrotrurf - 1 hour session	Child BETTER Card / Clubmark / School - half pitch	£22.05	£22.50	2.04%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Full rate - per 11 a side pitch	£100.50	£102.50	1.99%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	BETTER Card / Clubmark - per 11 a side pitch	£89.10	£91.00	2.13%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child rate - per 11 a side pitch	£60.30	£61.50	1.99%

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child BETTER Card / Clubmark / School - per 11 a side pitch	£49.70	£50.70	2.01%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Full rate - per 9 a side pitch	£82.40	£84.00	1.94%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	BETTER Card / Clubmark - per 9 a side pitch	£71.40	£72.80	1.96%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child rate - per 9 a side pitch	£49.50	£50.50	2.02%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child BETTER Card / Clubmark / School - per 9 a side pitch	£40.60	£41.40	1.97%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Full rate - per 7 a side pitch	£63.90	£65.20	2.03%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	BETTER Card / Clubmark - per 7 a side pitch	£55.90	£57.00	1.97%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child rate - per 7 a side pitch	£38.40	£39.20	2.08%
E & R	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child BETTER Card / Clubmark / School - per 7 a side pitch	£31.70	£32.35	2.05%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Full rate - full pitch	£100.50	£102.50	1.99%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Full rate - 3rd of pitch	£45.30	£46.20	1.99%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	BETTER Card / Clubmark - full pitch	£88.85	£90.65	2.03%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	BETTER Card / Clubmark - 3rd of a pitch	£40.20	£41.00	1.99%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child rate - full pitch	£59.90	£61.10	2.00%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child rate - 3rd of a pitch	£26.80	£27.35	2.05%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	£46.60	£47.50	1.93%
E & R	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - 3rd of a pitch	£21.30	£21.75	2.11%
E & R	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	Full rate - per pitch	£57.00	£58.15	2.02%
E & R	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	BETTER Card / Clubmark - per pitch	£47.50	£48.45	2.00%
E & R	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	Child rate - per pitch	£33.50	£34.20	2.09%
E & R	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	Child BETTER Card / Clubmark / School - per pitch	£27.50	£28.05	2.00%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	Full rate	£103.50	£104.55	2.00%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	BETTER Card / Clubmark	£87.00	£88.75	2.01%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	Child rate	£43.50	£44.40	2.07%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	Child BETTER Card / Clubmark / School	£43.50	£44.40	2.07%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	Full rate	£75.50	£77.00	1.99%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	IZZ Card / Clubmark	£64.00	£65.30	2.03%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	Child rate	£32.00	£32.65	2.03%
E & R	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	Child IZZ Card / Clubmark / School	£32.00	£32.65	2.03%
E & R	Parks - Sports	Bowls	Finbury Square	Per Person, Per Hour	£7.25	£7.40	2.07%
E & R	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Full rate - per court	£37.50	£38.25	2.00%
E & R	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	BETTER Card / Clubmark - per court	£32.00	£32.65	2.03%
E & R	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Child rate - per court	£22.50	£22.95	2.00%
E & R	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Child BETTER Card / Clubmark - per court	£19.00	£19.40	2.11%
E & R	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	School - whole tarmac area per hour - 8.0am to 4.00pm - Term time only	£25.00	£25.50	2.00%
E & R	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Community sports development - whole tarmac area per hour - Saturday 9.00am - 1.00pm	£25.00	£25.50	2.00%
E & R	Ecology Centre	Building hire	To Individuals & non-profit organisations	Per hour	£32.50	£33.15	2.00%
E & R	Ecology Centre	Building hire	To Individuals & non-profit organisations	Per day (8 hours)	£225.00	£229.50	2.00%
E & R	Ecology Centre	Building hire	To Individuals & non-profit organisations	Weddings & similar - per day (8 hours)	£500.00	£510.00	2.00%
E & R	Ecology Centre	Equipment Charges	Slide projector		£21.50	£22.00	2.33%
E & R	Ecology Centre	Equipment Charges	Flip chart - per pad		£8.00	£8.50	6.25%
E & R	Ecology Centre	Equipment Charges	Digital Projector and Laptop		£43.50	£44.50	2.30%
E & R	Ecology Centre	Equipment Charges	Plasma Screen		£17.00	£17.50	2.94%
E & R	Ecology Centre	Tuition charges for schools	Islington Council schools	1 hour visit	£61.50	£63.00	2.44%
E & R	Ecology Centre	Tuition charges for schools	Islington Council schools	1.5 hour visit	£72.50	£74.00	2.07%
E & R	Ecology Centre	Tuition charges for schools	Private & Out of Borough Schools	1 hour	£92.00	£94.00	2.17%
E & R	Ecology Centre	Tuition charges for schools	Private & Out of Borough Schools	1.5 hour	£138.00	£141.00	2.17%
E & R	Allotments	Large Plot	Nominal 60m2		£93.00	£96.00	3.23%
E & R	Allotments	Large Plot	Concession Nominal 60m3		£46.50	£48.00	3.23%
E & R	Allotments	Medium Plot	Nominal 40m2		£62.00	£64.00	3.23%
E & R	Allotments	Medium Plot	Concession Nominal 40m3		£31.00	£32.00	3.23%
E & R	Allotments	Small Plot	Nominal 20m2		£31.00	£32.00	3.23%
E & R	Allotments	Small Plot	Concession Nominal 20m3		£15.50	£16.00	3.23%
E & R	Parks - Events	Application Fee	Community Event		£41.67	£41.67	0.00%
E & R	Parks - Events	Application Fee	1 day events for up to 500 people without licensable activities		£100.00	£105.00	5.00%
E & R	Parks - Events	Application Fee	than 500 people or with licensable activities		£350.00	£360.00	2.86%
E & R	Parks - Events	Site Hire Fee	No more than 50 people (over the course of the whole event)	Half Day	£575.00	£590.00	2.61%
E & R	Parks - Events	Site Hire Fee	No more than 50 people (over the course of the whole event)	Full Day	£825.00	£845.00	2.42%
E & R	Parks - Events	Site Hire Fee	51 to 500 people (over the course of the whole event)	Half Day	£875.00	£895.00	2.29%
E & R	Parks - Events	Site Hire Fee	51 to 500 people (over the course of the whole event)	Full Day	£1,350.00	£1,380.00	2.22%
E & R	Parks - Events	Site Hire Fee	501 to 1,000 people (over the course of the whole event)	Half Day	£1,350.00	£1,380.00	2.22%
E & R	Parks - Events	Site Hire Fee	501 to 1,000 people (over the course of the whole event)	Full Day	£1,700.00	£1,740.00	2.35%
E & R	Parks - Events	Site Hire Fee	1,001 to 2,500 people (over the course of the whole event)	Half Day	£1,700.00	£1,740.00	2.35%
E & R	Parks - Events	Site Hire Fee	1,001 to 2,500 people (over the course of the whole event)	Full Day	£2,100.00	£2,150.00	2.38%
E & R	Parks - Events	Site Hire Fee	2,501 to 5,000 people (over the course of the whole event)	Half Day	£2,100.00	£2,150.00	2.38%
E & R	Parks - Events	Site Hire Fee	2,501 to 5,000 people (over the course of the whole event)	Full Day	£2,400.00	£2,450.00	2.08%
E & R	Parks - Events	Cancellation Fee	More than 28 days prior to event		25.00%	25.00%	0.00%
E & R	Parks - Events	Cancellation Fee	15-28 days prior to event		50.00%	50.00%	0.00%
E & R	Parks - Events	Cancellation Fee	7-14 days prior to event		75.00%	75.00%	0.00%
E & R	Parks - Events	Cancellation Fee	Less than 7 days prior to event		100.00%	100.00%	0.00%
E & R	Parks - Events	Overstay Fee		Per Hour	20.00%	20.00%	0.00%
E & R	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per hour (weekdays)	£30.00	£30.60	2.00%
E & R	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per hour (weekends)	£50.00	£51.00	2.00%
E & R	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per day (weekday 8 hours max)	£240.00	£245.00	2.08%

Appendix C1: General Fund Fees and Charges 2021/22

E & R	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per day (weekends 8 hours max)	£400.00	£408.00	2.00%
E & R	Cally Clock Tower Heritage Centre	Equipment Charges	Slide projector		£21.50	£22.00	2.33%
E & R	Cally Clock Tower Heritage Centre	Equipment Charges	Flip chart - per pad		£8.00	£8.50	6.25%
E & R	Cally Clock Tower Heritage Centre	Equipment Charges	Digital Projector and Laptop		£43.50	£44.00	1.15%
E & R	Cally Clock Tower Heritage Centre	Equipment Charges	Plasma Screen		£17.00	£17.50	2.94%

Where VAT is applicable, all fees and charges noted are VAT exclusive, except where otherwise stated.

**Appendix C2: Cemeteries Fees and Charges 2021/22**

Department	Category	Fee/Charge	Resident			Non-Resident		
			2020/21 Price	2021/22 Price	% Change	2020/21 Price	2021/22 Price	% Change
Burials	Private Grave	Classic Grave Space	£1,340.00	£1,355.00	1%	£3,100.00	£3,130.00	1%
Burials	Private Grave	Classic Premium Grave Space	£1,800.00	£1,820.00	1%	£2,800.00	£2,830.00	1%
Burials	Private Grave	7'x3' Grave Space	£2,350.00	£2,375.00	1%	£4,130.00	£4,170.00	1%
Burials	Private Grave	9'x4' Grave Space	£2,510.00	£2,535.00	1%	£4,640.00	£4,685.00	1%
Burials	Private Grave	Woodland Burial	£2,270.00	£2,295.00	1%	£3,810.00	£3,850.00	1%
Burials	Private Grave	Front lawn areas - 7'x3' Grave Space	£3,850.00	£3,890.00	1%	£6,900.00	£6,970.00	1%
Burials	Private Grave	Front lawn areas - 9'x4' Grave Space	£5,960.00	£6,020.00	1%	£10,750.00	£10,860.00	1%
Burials	Private Grave	Trent Park- 8'x5' Grave Space	£2,350.00	£2,375.00	1%	£4,800.00	£4,850.00	1%
Burials	Private Grave	Children's Memorial Garden	£420.00	£425.00	1%	£900.00	£910.00	1%
Burials	Interment Fees	Individual 16 yrs and over- all cemeteries	£1,150.00	£1,160.00	1%	£2,050.00	£2,070.00	1%
Burials	Interment Fees	Individual under 16 yrs	£500.00	£500.00	0%	£885.00	£885.00	0%
Burials	Interment Fees	Front lawn areas - Adult	£2,095.00	£2,115.00	1%	£3,860.00	£3,900.00	1%
Burials	Interment Fees	Front lawn areas - under 16 yrs	£910.00	£920.00	1%	£1,615.00	£1,630.00	1%
Burials	Interment Fees	Saturday Burial extra charge	£740.00	£750.00	1%	£740.00	£750.00	1%
Burials	Interment Fees	Sunday Burial extra charge	£950.00	£960.00	1%	£950.00	£960.00	1%
Burials	Interment Fees	Saturday burial of ashes extra charge	£150.00	£155.00	3%	£150.00	£155.00	3%
Burials	Interment Fees	Sunday burial of ashes extra charge	£210.00	£215.00	2%	£210.00	£215.00	2%
Burials	Interment Fees	Hand Digging Fee	£530.00	£535.00	1%	£530.00	£535.00	1%
Burials	Public Grave	Adult	£295.00	£295.00	0%	£460.00	£465.00	1%
Burials	Public Grave	Child 3-16 yrs	£105.00	£105.00	0%	£140.00	£140.00	0%
Burials	Public Grave	Baby to 3 yrs	£65.00	£65.00	0%	£110.00	£110.00	0%
Burials	Grave Unit	Purchase of Double vault including 1st Interment & 60 year lease	£7,140.00	£7,210.00	1%	£10,580.00	£10,685.00	1%
Burials	Grave Unit	Purchase of Double front lawn vault inc 1st Interment & 60 year lease	£9,730.00	£9,830.00	1%	£14,910.00	£15,060.00	1%
Burials	Mausolea	Purchase of VLA single unit and Interment (inc burial rights) all rows	£6,200.00	£6,260.00	1%	£9,200.00	£9,295.00	1%
Burials	Mausolea	Purchase of HRC single unit and Interment (inc burial rights) all rows	£11,000.00	£11,000.00	0%	£13,000.00	£13,000.00	0%
Burials	Mausolea	Interment Fees	£885.00	£895.00	1%	£885.00	£895.00	1%
Burials	Purchase in Reserve	Classic Grave Space 6.6 x2.6	£2,010.00	£2,030.00	1%	£4,640.00	£4,685.00	1%
Burials	Purchase in Reserve	7'x3' Grave Space	£3,530.00	£3,565.00	1%	£6,190.00	£6,250.00	1%
Burials	Purchase in Reserve	9'x4' Grave Space	£3,760.00	£3,800.00	1%	£6,970.00	£7,040.00	1%
Burials	Purchase in Reserve	Woodland Burial	£3,410.00	£3,445.00	1%	£5,710.00	£5,770.00	1%
Burials	Purchase in Reserve	Front lawn areas - 7x3 Grave Space	£5,780.00	£5,840.00	1%	£10,350.00	£10,455.00	1%
Burials	Purchase in Reserve	Front lawn areas - 9x4 Grave Space	£8,950.00	£9,040.00	1%	£16,130.00	£16,295.00	1%
Burials	Purchase in Reserve	Trent Park- Grave Space 8x5???	£2,280.00	£2,305.00	1%	£4,640.00	£4,690.00	1%
Burials	Purchase in Reserve	Children's Memorial Garden	£650.00	£655.00	1%	£1,280.00	£1,295.00	1%
Burials	Purchase in Reserve	Purchase of Double vault including 1st Interment & 60 year lease	£10,710.00	£10,820.00	1%	£15,870.00	£16,030.00	1%
Burials	Purchase in Reserve	Purchase of Double front lawn vault Inc. 1st Interment & 60 yr. lease	£14,600.00	£14,750.00	1%	£22,370.00	£22,600.00	1%
Burials	Purchase in Reserve	Purchase of single unit and Interment (Inc. burial rights)-1st and 3rd row	£9,410.00	£9,505.00	1%	£13,890.00	£14,030.00	1%
Burials	Purchase in Reserve	Purchase of single unit and Interment (Inc. burial rights)-2nd row	£10,560.00	£10,665.00	1%	£15,430.00	£15,585.00	1%
Burials	Renewal Of Grave Lease	Weekday extended service time in chapel (extra half hour)	£110.00	£110.00	0%	£110.00	£110.00	0%
Burials	Renewal Of Grave Lease	Weekend extended service time in chapel (extra half hour)	£150.00	£150.00	0%	£150.00	£150.00	0%
Burials	Renewal Of Grave Lease	Admin fee for 2 interment in niche at columbarium	£25.00	£25.00	0%	£25.00	£25.00	0%
Burials	Exhumation	First coffin - admin fee	£500.00	£505.00	1%	£500.00	£505.00	1%
Burials	Exhumation	Second coffin - admin fee	£210.00	£210.00	0%	£210.00	£210.00	0%
Burials	Exhumation	Ashes Exumation Fee First Interment	£250.00	£250.00	0%	£250.00	£250.00	0%
Burials	Exhumation	Additional Ashes Exumation Fee	£150.00	£150.00	0%	£150.00	£150.00	0%
Burials	Remove & Replace Mem	Lawn style memorial up to 7'x3'	£230.00	£235.00	2%	£230.00	£235.00	2%
Burials	Remove & Replace Mem	Traditional style memorial up to 7'x3'	£350.00	£355.00	1%	£350.00	£355.00	1%
Burials	Remove & Replace Mem	Memorial Plaques	£60.00	£60.00	0%	£60.00	£60.00	0%
Burials	Remove & Replace Mem	Ash Plot Memorial	£60.00	£60.00	0%	£60.00	£60.00	0%
Burials	Remove & Replace Mem	Memorial base	£130.00	£130.00	0%	£260.00	£260.00	0%
Burials	Memorial License Fees	Old section Grave Spaces (Traditional)	£330.00	£330.00	0%	£330.00	£335.00	2%
Burials	Memorial License Fees	Private Earthen Graves Lawn sections	£230.00	£230.00	0%	£230.00	£235.00	2%
Burials	Memorial License Fees	Common Graves	£70.00	£70.00	0%	£70.00	£70.00	0%
Burials	Memorial License Fees	Additional Memorial Work	£80.00	£80.00	0%	£80.00	£80.00	0%
Burials	Memorial License Fees	Annual clean	£30.00	£30.00	0%	£30.00	£30.00	0%
Burials	Memorial License Fees	Ash Plot	£150.00	£150.00	0%	£150.00	£150.00	0%
Burials	Miscellaneous	Burial of ashes - 16 yrs old and over	£90.00	£90.00	0%	£140.00	£140.00	0%
Burials	Miscellaneous	Burial of ashes - under 16 years	Free	Free	0%	Free	Free	0%
Burials	Miscellaneous	Scattering ashes from elsewhere (large casket)	£75.00	£75.00	0%	£75.00	£75.00	0%
Burials	Miscellaneous	Transfer Fee	£50.00	£50.00	0%	£50.00	£50.00	0%
Burials	Miscellaneous	Stone Removal 7*3	£340.00	£345.00	1%	£345.00	£350.00	1%
Burials	Miscellaneous	Stone Removal 7*3 Permit	£320.00	£325.00	2%	£320.00	£325.00	2%
Burials	Miscellaneous	Stone Removal headstone only	£220.00	£225.00	2%	£220.00	£225.00	2%
Burials	Miscellaneous	Stone Removal Headstone only Permit	£230.00	£235.00	2%	£235.00	£240.00	2%
Burials	Miscellaneous	Stone Removal 9*4 and over	Quote	Quote	0%	Quote	Quote	0%
Burials	Miscellaneous	Stone Removal 9*4 and over Permit	£320.00	£325.00	2%	£320.00	£325.00	2%
Burials	Miscellaneous	Certificate of Burial	£30.00	£30.00	0%	£30.00	£30.00	0%
Burials	Miscellaneous	Burial Record Search for up to 3	£45.00	£45.00	0%	£45.00	£45.00	0%
Burials	Miscellaneous	Database Record Search	£15.00	£15.00	0%	£15.00	£15.00	0%
Burials	Miscellaneous	Extending standard grave to allow for extra large coffin	£70.00	£70.00	0%	£135.00	£135.00	0%
Cremation	Cremation Services	Individual 16 years and over	£650.00	£655.00	1%	£650.00	£655.00	1%
Cremation	Cremation Services	Individual under 16 years	£35.00	£35.00	0%	£35.00	£35.00	0%
Cremation	Cremation Services	Early Morning Cremation	£325.00	£325.00	0%	£325.00	£325.00	0%
Cremation	Cremation Services	Double funeral service	£770.00	£780.00	1%	£770.00	£780.00	1%
Cremation	Cremation Services	Evenings and Saturday Cremation	£800.00	£810.00	1%	£800.00	£810.00	1%
Cremation	Cremation Services	Sunday Cremation	£980.00	£990.00	1%	£980.00	£990.00	1%



**Appendix C2: Cemeteries Fees and Charges 2021/22**

Cremation	Cremation Services	Weekday extended service time in chapel (extra half hour)	£110.00	£110.00	0%	£110.00	£110.00	0%
Cremation	Cremation Services	Weekend extended service time in chapel (extra half hour)	£150.00	£155.00	3%	£150.00	£155.00	3%
Cremation	Cremation Services	Direct Cremation	£250.00	£250.00	0%	£250.00	£250.00	0%
Cremation	Cremation Services	Contract Cremation	£130.00	£130.00	0%	£130.00	£130.00	0%
Cremation	Cremation Services	Use of Organist	£70.00	£70.00	0%	£70.00	£70.00	0%
Cremation	Audio-Visual System	Live Webcast	£30.00	£30.00	0%	£30.00	£30.00	0%
Cremation	Audio-Visual System	Live Webcast & Re-Watch again within 28 days	£45.00	£45.00	0%	£45.00	£45.00	0%
Cremation	Audio-Visual System	Webcast DVD/BluRay	£50.00	£50.00	0%	£50.00	£50.00	0%
Cremation	Audio-Visual System	Webcast CD	£45.00	£45.00	0%	£45.00	£45.00	0%
Cremation	Audio-Visual System	Webcast Additional DVD/BluRay (each)	£35.00	£35.00	0%	£35.00	£35.00	0%
Cremation	Audio-Visual System	Single Photo (continuously displayed throughout service)	£12.00	£12.00	0%	£12.00	£12.00	0%
Cremation	Audio-Visual System	Simple slideshow (Max 25 photos-played once during service)	£40.00	£40.00	0%	£40.00	£40.00	0%
Cremation	Audio-Visual System	Professional Tribute (Max 25 photos-Set to a music track of choice-Played once during service)	£70.00	£70.00	0%	£70.00	£70.00	0%
Cremation	Audio-Visual System	Family supplied tribute	£20.00	£20.00	0%	£20.00	£20.00	0%
Cremation	Removal of Ashes	Holding Ashes on Temporary Deposit	£20.00	£20.00	0%	£20.00	£20.00	0%
Pet Cemetery	Pet Cemetery Fees	Large grave	£580.00	£585.00	1%	£580.00	£585.00	1%
Pet Cemetery	Pet Cemetery Fees	Medium grave	£470.00	£475.00	1%	£470.00	£475.00	1%
Pet Cemetery	Pet Cemetery Fees	Small grave	£400.00	£405.00	1%	£400.00	£405.00	1%
Pet Cemetery	Pet Cemetery Fees	Scattering of ashes	Free	Free	0%	Free	Free	0%
Pet Cemetery	Pet Cemetery Fees	Burial of ashes with marker	£100.00	£100.00	0%	£100.00	£100.00	0%
Hampstead Cemetery	Hampstead Cemetery	Interment Fee Traditional	£1,620.00	£1,640.00	1%	£2,400.00	£2,425.00	1%
Hampstead Cemetery	Hampstead Cemetery	Memorial Traditional	£350.00	£355.00	1%	£335.00	£340.00	1%
Hampstead Cemetery	Hampstead Cemetery	Interment Fee Lawn	£1,620.00	£1,640.00	1%	£2,400.00	£2,425.00	1%
Hampstead Cemetery	Hampstead Cemetery	Memorial Lawn	£230.00	£230.00	0%	£230.00	£230.00	0%
Hampstead Cemetery	Hampstead Cemetery	Turf Lawn	£130.00	£130.00	0%	£130.00	£130.00	0%

Where VAT is applicable, all fees and charges noted are VAT exclusive.



**Appendix C4: GLL Memberships 2021/22**

	Prepaid Memberships									Swimming Lesson					
	Monthly			Annual			Joining Fees			Monthly			1-1 Lessons		
	2020 Price	2021 Price	% Change	2020 Price	2021 Price	% Change	2020 Price	2021 Price	% Change	2020 Price	2021 Price	% Change	2020 Price	2021 Price	% Change
60+	£20.50	£20.90	2%	£205.00	£225.70	10%	£25.00	£25.00	0%	-	-	0%	-	-	0%
Adult Concession	£30.00	£30.60	2%	£300.00	£330.50	10%	£15.00	£15.00	0%	£20.00	£20.90	4%	£24.50	£25.50	4%
Adult (BHF)	£51.45	£51.45	0%	£514.50	£555.65	8%	£25.00	£25.00	0%	£26.30	£27.35	4%	£24.50	£25.50	4%
Student	£37.00	£38.10	3%	£370.00	£411.50	11%	£15.00	£15.00	0%	-	-	0%	-	-	0%
Student Spa	£52.00	£53.55	3%	£529.50	£578.35	9%	£15.00	£15.00	0%	-	-	0%	-	-	0%
Gym Only Cally	£24.95	£24.95	0%	£308.35	£269.45	-13%	£15.00	£15.00	0%	-	-	0%	-	-	0%
Gym Only Sobell	£30.75	£31.65	3%	£369.00	£341.80	-7%	£15.00	£15.00	0%	-	-	0%	-	-	0%
Highbury Membership	£31.50	£32.45	3%	£324.45	£350.45	8%	£25.00	£25.00	0%	-	-	0%	-	-	0%
Junior	£15.90	£16.35	3%	£190.80	£176.60	-7%	£15.00	£15.00	0%	£20.50	£22.00	7%	£24.50	£25.50	4%
Junior Concession	£11.00	£11.20	2%	-	-	0%	£15.00	£15.00	0%	£15.00	£15.65	4%	£24.50	£25.50	4%
BHF Off Peak	£45.65	£47.00	3%	£456.50	£507.60	11%	£15.00	£15.00	0%	-	-	0%	-	-	0%
Corporate	£48.20	£49.50	3%	£482.00	£534.60	11%	£25.00	£25.00	0%	-	-	0%	-	-	0%
NHS	£41.90	£43.00	3%	£419.00	£506.00	21%	£25.00	£25.00	0%	-	-	0%	-	-	0%
Joint	£100.95	£103.95	3%	£1,009.50	£1,122.65	11%	£25.00	£25.00	0%	-	-	0%	-	-	0%
Adult ICE	£28.35	£29.20	3%	-	-	0%	£25.00	£25.00	0%	-	-	0%	-	-	0%
H&F ICE Junior	£21.13	£21.75	3%	-	-	0%	£15.00	£15.00	0%	-	-	0%	-	-	0%
<b>INCLUSIVE</b>	<b>£21.35</b>	<b>£22.00</b>	<b>3%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>0%</b>

**Appendix C5: Trampoline Pricing 2021/22**

<b>Trampoline Park Pricing</b>	<b>2020</b>	<b>2021</b>	<b>% Change</b>
1 hr Peak Adult	£10.95	£11.30	3.00%
1hr Peak Junior	£8.80	£9.00	3.00%
1 hr Peak 1 Adult & 1 Under 5	£14.95	£15.40	3.00%
1 hr Off Peak Adult	£7.95	£8.20	3.00%
1hr Off Peak Junior	£7.95	£8.20	3.00%
1hr Off Peak 1 Adult & 1 Under 5	£11.90	£12.25	3.00%
1hr Off Peak Toddler Jump 1 Adult & 1 Toddler	£7.95	£8.20	3.00%
Disability Jump	£5.95	£6.10	3.00%
This Girl Can Jump	£3.10	£3.20	3.00%
1 hr Early Bird Jump	£5.95	£6.10	3.00%
Early Bird Jump 1 adult & 1 under 5	£10.00	£10.30	3.00%
1hr Family Adult jump	£7.95	£8.20	3.00%
1hr Junior Family Jump	£7.95	£8.20	3.00%
1hr 1 Adult & 1 under 5 Family Jump	£7.95	£8.20	3.00%
Birthday party (Price Per Person - Minimum 10)	£19.50	£20.10	3.00%

**Appendix D1: HRA Medium-Term Financial Strategy 2021/22-2023/24**

	2020/21	2021/22	2022/23	2023/24
	Estimate	Estimate	Indicative Estimate	Indicative Estimate
	£m	£m	£m	£m
<b>HRA INCOME</b>				
Tenants Rents	156.800	160.500	165.400	170.200
Tenant Service Charges	18.400	18.300	18.600	19.000
<b>Sub-Total Dwellings Income</b>	<b>175.200</b>	<b>178.800</b>	<b>184.000</b>	<b>189.200</b>
Commercial Income	1.600	1.600	1.600	1.600
Heating Charges	2.600	2.100	2.100	2.200
Leaseholder Annual Service Charges	11.700	12.200	12.400	12.700
Leaseholder Major Works Charges	3.500	3.500	3.500	3.500
<b>Sub-Total Leaseholder Charges</b>	<b>15.200</b>	<b>15.700</b>	<b>15.900</b>	<b>16.200</b>
Other Charges/Income for Services	4.000	3.000	3.100	3.100
PFI Government Subsidy	22.900	22.900	6.200	6.200
Interest Receivable	0.700	1.000	0.200	0.100
Transfers from the General Fund for Shared Services	0.800	0.800	0.800	0.800
Contribution from Reserves	0.000	18.800	13.000	0.000
<b>Gross Income</b>	<b>223.000</b>	<b>244.700</b>	<b>226.900</b>	<b>219.400</b>
<b>HRA EXPENDITURE</b>				
General Management	52.200	52.900	59.900	61.200
Special Services	25.300	24.700	25.200	25.700
PFI Payments	44.200	44.900	12.900	13.200
Repairs & Maintenance	34.100	35.300	40.900	41.700
Rent, Rates & Other Charges	1.300	1.300	1.300	1.300
Interest Charges on Borrowing	17.900	16.700	18.200	17.800
Revenue Contributions to Capital	0.000	31.900	31.900	8.100
Depreciation - Contribution to the Major Repairs Reserve	30.600	31.200	31.800	32.400
<b>Sub-Total Capital Financing Costs</b>	<b>48.500</b>	<b>79.800</b>	<b>81.900</b>	<b>58.300</b>
Increase in Bad Debt Provision	1.200	2.200	2.200	2.200
Contingency	2.300	3.600	2.600	2.600
Contribution to Reserves	13.900	0.000	0.000	13.200
<b>Gross Expenditure</b>	<b>223.000</b>	<b>244.700</b>	<b>226.900</b>	<b>219.400</b>
<b>Net</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>

<b>HRA Reserves</b>				
Opening Balance		105.400	86.600	73.600
LESS: Contribution from Reserves		18.800	13.000	0.000
ADD: Contribution to Reserves		0.000	0.000	13.200
<b>Closing Balance</b>		<b>86.600</b>	<b>73.600</b>	<b>86.800</b>

## Appendix D2: HRA Fees and Charges 2021/22

### Tenant Service Charges and Digital TV Charges

	<b>£</b>
Caretaking and Cleaning	10.54
Estate Services (estate lighting, communal estate repairs and grounds maintenance)	5.24
<b>Tenant Service Charge</b>	<b>15.78</b>
Digital TV (Installation & maintenance)	0.35
Digital TV (maintenance only)	0.20
Compensation for loss of caretaking service	£2.49 per day (after 5 consecutive days of lost service)
<p><b>Note:</b> The weekly tenant service charge for caretaking and estate services reduces by 28p per week from £16.06 to £15.78. Charges have decreased by 28p per week (1.7%) primarily because communal electricity prices are forecast to fall in 2021/22. Caretaking compensation remains in line with last year. Digital TV installation &amp; maintenance have increased by estimated 2% inflation.</p>	

### Heating and Hot Water Charges

	<b>Bedsit Weekly Charge £</b>	<b>1-Bed Weekly Charge £</b>	<b>2-Bed Weekly Charge £</b>	<b>3-Bed Weekly Charge £</b>	<b>4-Bed Weekly Charge £</b>
General:					
Heating and Hot Water	7.70	8.53	10.12	11.90	13.48
Heating Only (60% of Full Charge)	4.52	5.01	5.94	6.98	7.92
Heating Only (60% of Full Charge + 15%) All Year heating (Braithwaite)	5.20	5.76	6.83	8.03	9.11
Bunhill Energy Network (St Luke's, Stafford Cripps, Redbrick & Kings SQ)	6.93	7.68	9.10	10.71	12.13
<p>Compensation (after 5 consecutive days or more of lost service, backdated to the start of the heating loss period): Heating and Hot Water £7.58 per day Heating only £7.07 per day Hot Water only £0.92 per day</p>					

**Note:** Gas prices are forecast to fall in 2021/22 as such Heating Charges in 2021/22 have been reduced by 10% as compared to 2020/21. Heating Compensation remains in line with last year.

### **Estate Parking Charges**

	<b>EMISSION BANDS / CHARGES</b>			
<b>CARBON EMISSION AND ENGINE SIZES:</b>	<b>BAND A</b>	<b>BAND B</b>	<b>BAND C</b>	<b>BAND D</b>
Carbon CO2 Rating G/km (Grams per kilometre)	0-120	121-150	151-185	186+
Engine Size CC (Cylinder Capacity)	Up To 1100	1101-1399	1400-1850	1851+
	<b>Weekly Charge £</b>	<b>Weekly Charge £</b>	<b>Weekly Charge £</b>	<b>Weekly Charge £</b>
<b>Rent &amp; Service Charge Payers:</b>				
- Garage	10.44	20.88	20.88	22.97
- Car Cage	4.88	9.76	9.76	10.74
- Parking Space	2.67	5.32	5.32	5.85
- Integral Garage	7.21	14.38	14.38	15.83
<b>Non-Rent &amp; Service Charge Payers:</b>				
- Garage	21.76	43.46	43.46	47.78
- Car Cage	10.20	20.32	20.32	22.35
- Parking Space	5.98	12.74	12.74	17.53
				<b>£</b>
<b>Garages Used For Non-Vehicle Storage – Rent &amp; Service Charge Payers</b>				22.97
<b>Garages Used For Non-Vehicle Storage – Non-Rent &amp; Service Charge Payers</b>				47.78
Diesel Surcharge – applies to both Rent/Service Charge Payers & Non Rent/Service Charge Payers in respect of all parking facilities				126.00 per Year OR 2.42 per Week
A 50% or 100% discount is offered on all vehicle parking charges to holders of an Islington Council disability parking blue badge.				
VAT will be added to the above charges where applicable.				



**Note:** Charges increase in line with estimated inflation 2%.

For example, the charge to an LBI Tenant or Leaseholder for a garage with a band B vehicle increases by 41p from £20.47 to £20.88 per week.

With the exception of the diesel surcharge which has increased by £6 (5%) per year in order to align the surcharge with the on-street (outside council estates) surcharge.

Electric Car users: Rent & Service Charge payers will continue to have free access to all council estate parking facilities and Non-Rent & Service payers will continue to be charged at Band A rates.

### **Concierge Service Charges**

	<b>Weekly Charge £</b>
Category A (Concierge Office in Block)	15.72
Category B (Concierge Office in Estate)	11.80
Category C (Concierge Office – Remote multiple cameras)	7.09
Category D (Concierge Office – Remote a small number of cameras)	2.23
<b>Note:</b> The weekly tenant charges have increased by 9.2% to more closely reflect the true cost of the service provided. For example the charge to tenants who receive a Category B service increases by 99p from £10.81 to £11.80 per week.	

### **Parking Penalty Charge Notices (PCN)**

	<b>Council Estates £</b>
Parking Charge Notices	100.00
Parking Charge Notices (Paid within 14 days of issue)	60.00
<b>Note:</b> The maximum charges for unauthorised parking on council estates (off-street parking) are recommended by the British Parking Association on behalf of the Home Office. No increase is recommended in 2021/22. Where Traffic Management Orders have been introduced on estates the charges will be aligned to those applied to on-street parking referred to below For on-street parking (outside council estates), the Council charges between £80 and £130 depending on the seriousness of the offence (with 50% discount if paid within 14 days).	

## **Storage Units**

	<b>Weekly Charge £</b>
Rent & Service Charge Payers	1.87
Non-Rent & Service Charge Payers	3.75
<b>Note:</b> Charges increase in line with inflation (estimated 2%). The charge to Rent & Service Charge Payers has increased by 4p from £1.83 to £1.87 and that for Non-Rent & Service Charge Payers has increased by 7p from £3.68 to £3.75	

## **Floor Coverings (including underlay, carpets & fitting):**

Covering the Bedroom(s), Front Room, Hallway & Staircase

2021/22 charges to tenants commencing the scheme wef 2017/18 reflects a more robust/substantial underlay.  
Increased in line with estimated 2% inflation.

No of Beds	2021/22 Charge	Weekly Charge to Tenants over 5 years
1	£743	£2.86
2	£1,087	£4.18
3	£1,430	£5.50
4	£1,716	£6.60

## **Home Ownership Unit Charges:**

Fees have increased in line with inflation (estimated 2%).

### **1. Lease Holder Fees in respect of Structural Alterations & Additions:**

		<b>Home Ownership Fees 2021/22</b>	<b>Technical Property Services Fees 2021/22</b>
a	Minor alterations (e.g.: flues, extractor fans)	£91 – letter of consent	None
b	Deed of variation for windows	£255	None
c	Minor structural alterations	£91	£205
d	Major structural alterations (e.g. roofs, conservatories)	£111	£205 – technical inspections £62 per hour if additional technical work required
e	Retrospective consent	a/b/c/d +£323	£411 – technical inspections £62 per hour if additional technical work required

f	Re-drawing lease plans	£54	£466
g	Purchase of land/space e.g. garden/loft/basement	£114	£616 and any additional inspections £62 per hour, £514 valuation fee

## 2. Lease Holder Miscellaneous Fees:

		<b>Home Ownership Fees 2021/22</b>
a	Sub-let Registration	£44
b	Assignment pack	£199 L/Holder £86 F/Holder
c	Re-mortgage pack	£142 L/Holder £73 F/Holder
d	S146 costs	£286
e	Copy of lease	£28
f	Letter of Satisfaction	£57
g	Copy of service charge invoice	£28
h	Breakdown of charges for a previous year	£28
i	Notice of assignment or charge	£70
j	Combined notice of assignment and charge	£140
k	Removal of Land Registry charge	£118
l	Details of planned major works	£56
m	Postponement charge	£224
n	Major works extended payment plan – legal charge	£224
o	Removal of Land Registry charge for major works extended payment plan	£118
p	Letter before legal action	£42

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**Appendix E: Capital Programme 2021/22 to 2023/24 and Indicative Programme 2024/25-2030/31**

Scheme Title	Directorate	Project Description	21/22 Expenditure £m	21/22 Funding £m	22/23 Expenditure £m	22/23 Funding £m	23/24 Expenditure £m	23/24 Funding £m	21/22 - 23/24 Expenditure £m	21/22 - 23/24 Funding £m	Net Requirement 21/22 - 23/24 £m	24/25 - 30/31 Expenditure £m	24/25 - 30/31 Funding £m
<b>A Safer Borough for All</b>													
Corporate CCTV Upgrade	E&R	Urgent upgrades to the Council's core CCTV network to increase resilience and minimise downtime. Also includes investment in a CCTV-enabled vehicle to increase coverage for hot-spots, aligned to growth for the Antisocial Behaviour team.	1.500	0.000	1.700	0.000	0.200	0.000	3.400	0.000	3.400	1.400	0.000
<b>Decent &amp; Affordable Homes</b>													
Housing Revenue Account Major Works and Improvements	Housing - HRA	Ongoing programme of investment in council homes and estates, including cyclical improvements (e.g. kitchens & bathrooms, smoke and heat detection, windows), mechanical and electrical (e.g. lifts, door entry, water tanks, CCTV) and fire safety (e.g. fire risk assessment works, front entrance doors, fire-fighting facilities and fire safety measures in street properties and tall blocks).	34.864	(34.864)	38.135	(18.855)	43.017	(32.961)	116.016	(86.680)	29.336	181.877	(143.256)
Housing Revenue Account Major Works and Improvements - Energy Efficiency	Housing - HRA	Ongoing programme of investment in council homes and estates, focusing on improving energy efficiency through enhancements to individual/communal heating. As well as Decent Homes for all this also supports our Net Zero 2030 Vision and fuel poverty reduction.	5.136	(5.136)	6.865	0.000	6.983	0.000	18.984	(5.136)	13.848	168.123	(168.123)
HRA Current New Build Programme - HRA Social Rented Units	Housing - HRA	Our major programme of investment in new social housing to provide high quality and genuinely affordable council rent housing supply to Islington residents.	64.412	(64.412)	65.431	(65.431)	26.946	(26.946)	156.789	(156.789)	0.000	0.000	0.000
HRA Pipeline New Build Programme - HRA Social Rented Units	Housing - HRA	Our major programme of investment in new social housing to provide high quality and genuinely affordable council rent housing supply to Islington residents.	10.922	(10.922)	24.513	(14.497)	33.007	(19.521)	68.442	(44.940)	23.502	393.905	(176.450)
HRA Current New Build Programme - General Fund Open Market Sales Units	Housing - GF	Our major programme of investment in new social housing. Provision of housing supports local plan objectives for delivery and provides a cross subsidy for affordable homes and public infrastructure.	15.909	(30.358)	17.249	(17.249)	6.818	(6.818)	39.976	(54.425)	(14.449)	0.000	0.000
HRA Pipeline New Build Programme - General Fund Open Market Sales units	Housing - GF	Our major programme of investment in new social housing. Provision of housing supports local plan objectives for delivery and provides a cross subsidy for affordable homes and public infrastructure.	5.881	0.000	13.199	0.000	17.773	0.000	36.853	0.000	36.853	212.102	(251.569)
Finsbury Leisure Centre Development	E&R	The council is seeking to redevelop Finsbury leisure centre and surrounds as a mixed use development - delivering new affordable housing & other significant community benefits. A cost of £1m is expected to get the project to planning application through completion of detailed design, with work currently ongoing to review options and move towards a preferred outline design.	0.925	(0.575)	0.000	0.000	0.000	0.000	0.925	(0.575)	0.350	0.981	(0.981)
<b>Enhancing Community Assets</b>													
Adult social care commissioned services	People	Various essential works to buildings occupied by adult social care commissioned services for residents to ensure they remain safe and compliant.	0.165	0.000	0.000	0.000	0.000	0.000	0.165	0.000	0.165	0.000	0.000
Adventure Playgrounds - Cornwallis Adventure Playground	People	Project to demolish and build a new adventure playground; main building was also in urgent need of replacement.	0.300	0.000	0.000	0.000	0.000	0.000	0.300	0.000	0.300	0.000	0.000
Adventure Playgrounds - Martin Luther King	People	Delivery of a new main building (built from straw bales) as well as a 'terrace' of play and work spaces.	0.300	0.000	0.000	0.000	0.000	0.000	0.300	0.000	0.300	0.000	0.000
Compliance and Modernisation (non-housing)	Cross-Cutting	Funds to deal with urgent property compliance issues and to assist in providing funds for a cyclical maintenance and modernisation programme across the council's estate.	2.865	0.000	2.960	0.000	2.965	0.000	8.790	0.000	8.790	19.155	0.000
Greenspaces - Binfield Park (including Crumbles Castle legacy)	E&R	Enhancements to Binfield Park including improved, more welcoming entrances and planting, enhanced sports facilities and new play equipment.	0.677	(0.434)	0.000	0.000	0.000	0.000	0.677	(0.434)	0.243	0.000	0.000
Highways - Highways	E&R	Structural maintenance of the highways infrastructure including carriageways, footways, drainage, bridges, pipe subways. Capital investment helps to slow the rate of deterioration extend the life of Islington streets, improve streetscape, meet legal obligations, reduce cyclic repairs and maintenance costs and reduce insurance liability risk claims.	1.400	0.000	1.400	0.000	1.400	0.000	4.200	0.000	4.200	9.800	0.000
Hungerford Rd Cladding Replacement	Resources	Government grant funded project to replace the cladding on the flats leased to a housing trust on the Council-owned Bridge School campus. As well as complying with all fire and health and safety regulations, the new cladding will provide an enhanced insulated and environmentally friendly building.	0.977	(0.977)	0.000	0.000	0.000	0.000	0.977	(0.977)	0.000	0.000	0.000
Jean Stokes community hub	Housing - HRA	Bringing lower ground floor back into use to establish a new, multi-generational community hub as part of Good Growth 2.	0.350	(0.350)	0.000	0.000	0.000	0.000	0.350	(0.350)	0.000	0.000	0.000
Jean Stokes Community Hub (General Fund Contribution)	Housing - GF	Bringing lower ground floor back into use to establish a new, multi-generational community hub as part of Good Growth 2.	0.250	0.000	0.000	0.000	0.000	0.000	0.250	0.000	0.250	0.000	0.000
Leisure - Strategic Provision	E&R	Provisional sums held for strategic development of leisure facilities at Finsbury Leisure Centre and Cally Pool; dependent on decision relating to Council-led redevelopment which may mean capital investment is required. Capital funding also identified to mitigate against potential risk associated with leisure contract and protect revenue return.	0.000	0.000	0.000	0.000	5.275	0.000	5.275	0.000	5.275	5.000	0.000
Repairs and Renewal of Council Buildings	E&R	Completion of works at Environment & Regeneration buildings including 222 Upper Street generators and Clerkenwell Green public toilets.	0.085	0.000	0.000	0.000	0.000	0.000	0.085	0.000	0.085	0.000	0.000
Section 106/CIL Funded Schemes	E&R	S106/CIL income is allocated to projects soon after it is received, but there is often uncertainty around when they will commence (e.g. pre-planning or awaiting additional funding). Projects are added to the capital programme when they become live schemes, funded from this annual S106/CIL funded capital budget.	5.000	(5.000)	5.000	(5.000)	5.000	(5.000)	15.000	(15.000)	0.000	35.000	(35.000)
Sotheby Mews Remedial Works	People	A range of tests (such as legionella and fixed electrical) need to take place and any required remedial works following these tests in preparation for reopening services. This is required to make the building fit for use to support the local community.	0.040	0.000	0.000	0.000	0.000	0.000	0.040	0.000	0.040	0.000	0.000
St Anne's residential care home, 60 Durham Road	People	Essential work to replace wiring and boilers and to deal with subsidence at St Anne's.	0.100	0.000	0.000	0.000	0.000	0.000	0.100	0.000	0.100	0.000	0.000
Whittington Park Hocking Hall Community Centre Phase 1	E&R	Refurbishment and structural repairs to Hocking Hall, Whittington Community Centre to ensure it is kept in a fit state and enable the expansion of the centre to ensure it better serves local community needs.	0.941	0.000	0.016	0.000	0.000	0.000	0.957	0.000	0.957	0.000	0.000
Wiray Court and Orchard Close residential care homes for people with learning difficulties	People	Various urgent structural repairs/modernisation, including bathroom/wet-room re-fits, multi-tracking hoist systems, new windows, smart heating, air conditioning and outdoor space improvements.	0.200	0.000	0.000	0.000	0.000	0.000	0.200	0.000	0.200	0.000	0.000
<b>Greener &amp; Cleaner Islington</b>													
Clerkenwell Green	E&R	Pedestrian, cycle and public realm improvements - scheme will remove most through traffic and parking to transform the Green into a more welcoming public space. In addition, there will be investment in new community facilities to help further integrate local communities and celebrate the area's heritage.	1.781	(1.781)	0.416	(0.416)	0.000	0.000	2.197	(2.197)	0.000	0.000	0.000
Energy - LED Lighting Upgrades	E&R	Replace traditional lighting fittings with LED lights wherever possible in both corporate buildings and housing. Part of the Net Zero Vision 2030 strategy.	0.334	0.000	0.333	0.000	0.333	0.000	1.000	0.000	1.000	0.000	0.000
Energy - Solar Panels on Corporate Buildings	E&R	Install solar panels wherever financially and technically feasible on our corporate estate. This is a commitment within the Net Zero Vision 2030 strategy. Savings from generating our own electricity also support effective budget management.	0.334	0.000	0.333	0.000	0.333	0.000	1.000	0.000	1.000	0.000	0.000
Extension of energy network to Highbury West incl Harvist Estate	E&R	Installation of ground source heat pump system at the Harvist Estate to replace current electric storage heaters to address fuel poverty and cut carbon emissions.	0.000	0.000	0.000	0.000	0.500	(0.500)	0.500	(0.500)	0.000	0.000	0.000
Greenspaces - Barnard Park Renewal	E&R	Full renovation of Barnard Park including 3G all-weather sports pitch, low carbon community hub building heated by ground source heat pump, green oval area for general leisure and informal sports, outdoor gym equipment, increased biodiversity, increased seating, new footpath routes and improved entrances.	0.903	(0.903)	0.943	(0.943)	0.000	0.000	1.846	(1.846)	0.000	0.000	0.000
Greenspaces - Greenspace (Park Improvements)	E&R	Park improvements including Highbury Fields Sports Pitch. As well generating income the pitches play a key role in maintaining and improving the physical and mental health of the community by providing quality year round facilities for physical activity.	0.435	(0.056)	0.000	0.000	0.000	0.000	0.435	(0.056)	0.380	0.000	0.000
Greenspaces - Highbury Bandstand/Highbury Fields	E&R	Completion of works to cafe and toilets and funding for Christ Church to accommodate a stay & play service. This will protect under 5 stay and play provision, improves the provision of toilets and aims to make the building as energy efficient as possible to support the Council's zero carbon 2030 target.	0.690	(0.445)	0.000	0.000	0.000	0.000	0.690	(0.445)	0.245	0.000	0.000
Greenspaces - New River Walk	E&R	Repairs to the lining of the watercourse, bridge and other associated features, improving bio-diversity and safety and reducing water loss in support of Islington's Biodiversity Action Plan.	0.403	0.000	0.000	0.000	0.000	0.000	0.403	0.000	0.403	0.000	0.000
Greenspaces - Playground Water Features	E&R	Replacement of damaged/dysfunctional water play facilities in parks.	0.030	0.000	0.000	0.000	0.000	0.000	0.030	0.000	0.030	0.000	0.000
Greenspaces - Woodfall Park Improvements	E&R	Playground improvements to improve the pitch, replace playground surfacing and play equipment, replace site furniture, soft landscaping and tree works and installation of electricity and water point for events.	0.200	0.000	0.313	(0.513)	0.000	0.000	0.513	(0.513)	0.000	0.000	0.000
Greenspaces - 3G Football Pitch Replacement	E&R	Relaying of carpets on 3G pitches - carpets need relaying every 7 to 10 years (depending on wear). This contributes to improving physical and health opportunities for the community and protects income from use of these pitches.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.781	0.000
Islington Heat Networks	E&R	Expand existing heat networks and develop new ones following the decentralised energy masterplan. Part of the Council's Net Zero Vision 2030 strategy.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	19.241	0.000
Leisure - Tunnell Park all-weather pitch	E&R	Conversion of this current grass football pitch to a grass hybrid pitch which will allow for more year round play and greater flexibility around the use of the space for a range of sporting activities.	0.400	0.000	0.000	0.000	0.000	0.000	0.400	0.000	0.400	0.000	0.000
Leisure - Cally Pool	E&R	Urgent repairs to the roof of Cally Pool.	0.250	0.000	0.000	0.000	0.000	0.000	0.250	0.000	0.250	0.000	0.000
Leisure - Floodlight Upgrades	E&R	Floodlight upgrades for various Greenspace locations through converting all parks' pitch lighting to LED to reduce running costs and carbon emissions. Replacement required to ensure that lights do not ultimately fail, and prevent lost income associated with this risk.	0.090	0.000	0.000	0.000	0.000	0.000	0.090	0.000	0.090	0.095	0.000
Leisure - Leisure repairs/modernisation	E&R	Capital investment relating to the leisure contract, delivering £12.016m of investment in the leisure estate over 15 years (2014/15 to 2028/29), essential to improving physical and health opportunities for the community.	0.100	0.000	0.375	0.000	0.000	0.000	0.475	0.000	0.475	0.000	0.000

**Appendix E: Capital Programme 2021/22 to 2023/24 and Indicative Programme 2024/25-2030/31**

Scheme Title	Directorate	Project Description	21/22 Expenditure £m	21/22 Funding £m	22/23 Expenditure £m	22/23 Funding £m	23/24 Expenditure £m	23/24 Funding £m	21/22 - 23/24 Expenditure £m	21/22 - 23/24 Funding £m	Net Requirement 21/22 - 23/24 £m	24/25 - 30/31 Expenditure £m	24/25 - 30/31 Funding £m
<b>People Friendly Streets - Low Traffic Neighbourhoods</b>	E&R	Borough wide programme to reduce car trips and improve neighbourhoods for walking, cycling and living. As part of the Council's post Covid transport response the programme has been accelerated with 8 Low Traffic Neighbourhoods to be delivered by the end of 2020/21. Further investment will deliver 20 Low Traffic Neighbourhood across all of Islington under the banner of 'People friendly streets.'	4.243	(0.403)	0.000	0.000	0.000	0.000	4.243	(0.403)	3.840	0.000	0.000
<b>People Friendly Streets - Liveable Neighbourhoods</b>	E&R	Following the delivery of Low Traffic Neighbourhoods across the borough Islington will have the opportunity to deliver wide-sweeping environmental improvements on local streets including planting, footway improvements and pocket parks to all 20 Low Traffic Neighbourhoods transforming them into 'Liveable Neighbourhoods', following extensive consultation and engagement with local communities.	1.950	0.000	1.500	(0.950)	1.500	0.000	4.950	(0.950)	4.000	12.250	0.000
<b>Public Realm - Fortune Street Area</b>	E&R	The scheme will involve the development of a Fortune Street masterplan incorporating the enhancement of Fortune Street to make the street more pedestrian friendly, greener and to integrate the park with the wider neighbourhood. This will improve physical and health opportunities and access to nature.	0.000	0.000	0.410	(0.410)	0.000	0.000	0.410	(0.410)	0.000	0.000	0.000
<b>Public Realm - Kings Square Shopping Area Public Space</b>	E&R	Community driven public realm improvement project as part of public realm improvement plan. Will improve the space outside the shops to encourage community use of the space (e.g. to socialise). Opportunity for public realm feature (e.g. play equipment, public art or other) to act as a focal point.	0.547	(0.547)	0.000	0.000	0.000	0.000	0.547	(0.547)	0.000	0.000	0.000
<b>Public Realm - Old Street/Clerkenwell Road</b>	E&R	Public realm improvements to reduce through traffic, making route safer for pedestrians and cyclists, improving air quality and making area greener, healthier and a more attractive place.	0.000	0.000	0.000	0.000	1.000	(1.000)	1.000	(1.000)	0.000	0.000	0.000
<b>Public Realm - St Johns Street Public Realm Improvements</b>	E&R	Public realm improvements and pedestrian and cycling safety measures - proposal includes reallocation of road space to pedestrians and traffic management changes to reduce non-local traffic. Project linked to Farringdon Station which will have 140,000 passengers a day when Crossrail opens.	0.000	0.000	0.250	(0.250)	0.000	0.000	0.250	(0.250)	0.000	0.000	0.000
<b>Recycling Site Improvement</b>	E&R	Delivering improvements to recycling and waste facilities for purpose built blocks of flats, to drive down contamination, increase recycling and improve the environment and standard of living on estates.	0.100	0.000	0.100	0.000	0.100	0.000	0.300	0.000	0.300	0.700	0.000
<b>Retrofiting Housing Estates - Pilot Projects</b>	Housing - HRA	Pilot projects to install energy efficiency measures across Housing Estates to reduce energy consumption and decrease carbon emissions as part of our Net Zero Carbon Strategy. Decision to proceed with projects dependent on outputs from feasibility studies.	0.550	0.000	1.450	0.000	1.450	0.000	3.450	0.000	3.450	0.000	0.000
<b>School Streets</b>	E&R	Temporary street closures to become a pedestrian and cycle zone during the school's opening and closing times to reduce congestion and pollution at the school gates as well as make it easier and safer for children to get to and from school. Improvements for schools on the main roads will include measures to improve air quality, increase road safety and encourage active travel. Measures will include widening footways, tree planting and green screens and secure cycle and scooter parking.	0.400	0.000	0.400	0.000	0.400	0.000	1.200	0.000	1.200	2.800	0.000
<b>Traffic &amp; Parking - T&amp;E Cycle Schemes</b>	E&R	Borough-wide cycle parking and cycle hangars to provide secure cycle storage (especially for residents without domestic or garden space) to overcome a major barrier for new and continuing cyclists. Significant additional investment in the bike hangar programme to reduce the waiting list, and contribute to our Net Zero 'Vision 2030' strategy and improve Air Quality.	0.907	(0.107)	0.450	0.000	0.450	0.000	1.807	(0.107)	1.700	3.150	0.000
<b>Traffic &amp; Parking - T&amp;E EV Charging Points</b>	E&R	Borough-wide electric vehicle charging points. On-street charging points are essential to facilitate the switch to electric vehicles for the majority of motorists who park on-street. Islington Council is committed to encourage the switch to low emission vehicles to reduce emissions and increase air quality.	0.160	0.000	0.160	0.000	0.160	0.000	0.480	0.000	0.480	1.120	0.000
<b>Traffic &amp; Parking - T&amp;E Safety Schemes</b>	E&R	Borough-wide safety and corridor schemes - support of People Friendly Streets programme by delivering walking and cycling improvements on main roads. Will deliver improved and new crossings to create safe walking and cycling links, provide additional pedestrian facilities at local amenities and town centres, and deliver improvement to main roads such as improving bus priority. Will also look at maximising junction capacities to ensure that main roads do not become heavily congested and address emerging collision hotspots in line with collision data and collision studies.	0.778	0.000	0.500	0.000	0.500	0.000	1.778	0.000	1.778	3.500	0.000
<b>Traffic &amp; Parking - T&amp;E Traffic Enforcement/Parking</b>	E&R	Borough-wide traffic enforcement and parking schemes, including dedicated disabled bay scheme and other accessibility improvements across the borough. Addressing emerging issues through traffic restrictions is an essential part of managing traffic in the borough and protecting the local environment and communities from excessive traffic, air pollution and road safety risks.	0.400	0.000	0.300	0.000	0.300	0.000	1.000	0.000	1.000	2.100	0.000
<b>Tree Planting Programme</b>	E&R	Borough wide tree planting programme linked to outcome of tree canopy cover assessment and subsequent tree planting strategy. This will increase the canopy cover, amenity and climate change resilience of the borough.	0.239	(0.115)	0.160	0.000	0.160	0.000	0.559	(0.115)	0.444	1.120	0.000
<b>Vehicle fleet electrification (Infrastructure)</b>	E&R	Development of a new substation/high voltage connection into the National Grid, low voltage network across the site and a contribution towards charging infrastructure. Supports the 'greening' of the Council's fleet and upgrades electrical infrastructure to ensure HGV element of the fleet can be switched to EV. This supports the Council's Net Zero Carbon Vision.	3.566	(1.485)	0.359	0.000	0.406	0.000	4.331	(1.485)	2.846	1.953	0.000
<b>Vehicle Replacement</b>	E&R	Replacement of ageing fleet to decrease the use of hire vehicles and ensure that the Council is operating newer vehicles which are Euro 6/ULEZ compliant and replacement of petrol/diesel vehicles with electric vehicles on an ongoing ten year programme.	4.600	0.000	3.715	0.000	3.700	0.000	12.015	0.000	12.015	18.990	0.000
<b>Vehicle Replacement (Housing)</b>	Housing - HRA	Replacement of ageing fleet to decrease the use of hire vehicles and ensure that the Council is operating newer vehicles which are Euro 6/ULEZ compliant and replacement of petrol/diesel vehicles with electric vehicles on an ongoing ten year programme.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	3.650	(3.650)
<b>Wray Crescent Cricket Pavilion</b>	E&R	Completion of works at the building, which will also have a green roof and ground source heat pump which supports the Net Zero Carbon 2030 Strategy, as well as supporting physical and community activity in the borough.	0.194	(0.064)	0.000	0.000	0.000	0.000	0.194	(0.064)	0.130	0.000	0.000
<b>Jobs &amp; Opportunity</b>													
<b>Early Years and Children's Centres</b>	People	Package of urgent repairs and modernisation across the majority of the Council's early years facilities and children's centres.	0.583	0.000	0.000	0.000	0.000	0.000	0.583	0.000	0.583	0.000	0.000
<b>Early Years Capital</b>	People	Children's Centres remodelling and additional places for 2 to 3 year olds to meet statutory requirements and local needs.	0.666	0.000	0.000	0.000	0.000	0.000	0.666	0.000	0.666	0.000	0.000
<b>Libraries - Islington Museum and Local History Centre</b>	People	Redesign and refurbishment of museum space (exhibition space and permanent gallery) in a new and imaginative way to attract new groups, building on project and community consultation work. Will support resident engagement and host more activities to promote and explore the heritage of the borough.	0.300	0.000	0.000	0.000	0.000	0.000	0.300	0.000	0.300	0.000	0.000
<b>Libraries Modernisation</b>	People	Urgent modernisation to building fabric and fixtures & fittings across the Council's library estate in order to ensure they are fit for purpose and support community objectives.	0.500	0.000	0.000	0.000	0.000	0.000	0.500	0.000	0.500	0.000	0.000
<b>Libraries - South Library</b>	People	Bringing the disused first floor hall back into use, delivering rental income and social value.	0.300	0.000	0.000	0.000	0.000	0.000	0.300	0.000	0.300	0.000	0.000
<b>Libraries - West Library</b>	People	West Library refurbishment funded by Good Growth Fund (GLA Funding) including links to employment and affordable work space.	0.300	(0.300)	0.000	0.000	0.000	0.000	0.300	(0.300)	0.000	0.000	0.000
<b>Rose Bowl</b>	People	Facility built in 2001 and will need future capital redevelopment in next 10 years in order for the up keep of provision for youth activities.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.500	0.000
<b>Schools - Schools Condition Schemes</b>	People	Government grant funding for condition maintenance covering the fabric of school buildings, roofs, brickwork, windows and internal works. Also includes grant funding to undertake investments in provision for pupils with special educational needs and disabilities, such as new places and improvements to facilities for pupils with education, health and care plans in mainstream and special schools, nurseries, colleges and other provision.	4.328	(3.444)	1.400	(1.400)	1.400	(1.400)	7.128	(6.244)	0.884	9.800	(9.800)
<b>Schools - Other Schools/Contingency</b>	People	Schools capital to be allocated in order to enable the general upkeep of school buildings across the estate.	0.279	0.000	0.000	0.000	0.000	0.000	0.279	0.000	0.279	0.000	0.000
<b>Schools - Tufnell Park School Expansion</b>	People	New Build replacement and expansion of existing 1.5 form entry school to 3 form entry school.	0.250	0.000	0.000	0.000	0.000	0.000	0.250	0.000	0.250	0.000	0.000
<b>Toffee Park-Play &amp; Youth Capital</b>	People	Substantial refurbishment to Youth Centre and Nursery Buildings to create a 'start well' campus on the wider site and to provide spaces for a range of children's and community services, under the start well strand of Fairer Together.	1.500	0.000	0.000	0.000	0.000	0.000	1.500	0.000	1.500	0.000	0.000
<b>TOTAL</b>			<b>186.789</b>	<b>(162.678)</b>	<b>190.335</b>	<b>(125.914)</b>	<b>162.076</b>	<b>(94.146)</b>	<b>539.200</b>	<b>(382.738)</b>	<b>156.463</b>	<b>1,110.093</b>	<b>(788.829)</b>

**Appendix E: Capital Programme 2021/22 to 2023/24 and Indicative Programme 2024/25-2030/31**

Scheme Title	Directorate	Project Description	21/22 Expenditure £m	21/22 Funding £m	22/23 Expenditure £m	22/23 Funding £m	23/24 Expenditure £m	23/24 Funding £m	21/22 - 23/24 Expenditure £m	21/22 - 23/24 Funding £m	Net Requirement 21/22 - 23/24 £m	24/25 - 30/31 Expenditure £m	24/25 - 30/31 Funding £m
<b>RESERVE LIST</b>													
<b>Greener &amp; Cleaner Islington</b>													
<b>Energy - GreenSCIES</b>	E&R	The project consist of the construction of a heat network that integrates other aspects of energy use in the local community such as: heating, cooling, renewable power generation, EV charging, batteries storage and mobility. Part of Islington's Net Zero 'Vision 2030' strategy.	0.000	0.000	0.000	0.000	5.000	(5.000)	5.000	(5.000)	0.000	15.000	(5.000)
<b>Retrofitting Housing Estates</b>	Housing - HRA	Installing energy efficiency measures across Housing Estates to reduce energy consumption and decrease carbon emissions. Part of the Zero Net Carbon action plan.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	300.000	0.000
<b>Jobs &amp; Opportunity</b>													
<b>Libraries - Vorley Road</b>	People	New Library in Vorley Road, as a possible replacement for Archway Library if development in Archway (affordable homes, a new GP surgery and a new library) proceeds.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	2.000	0.000
<b>TOTAL (RESERVE LIST)</b>			<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>5.000</b>	<b>(5.000)</b>	<b>5.000</b>	<b>(5.000)</b>	<b>0.000</b>	<b>317.000</b>	<b>(5.000)</b>

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## **Appendix E2: Capital Strategy Report 2021/22**

### **Introduction**

This capital strategy report gives an overview of how capital expenditure, capital financing and treasury management activity contribute to the achievement of council priorities and provision of services in Islington. It also presents an overview of how associated risk is managed and the implications for future financial sustainability.

Decisions made this year on capital and treasury management will have financial consequences for the council for many years into the future. They are therefore subject to both a national regulatory framework and to a local policy framework, summarised in this report.

### **Planned Capital Expenditure**

Capital expenditure is where the authority spends money on assets, such as property or vehicles, that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The authority has some limited discretion on what counts as capital expenditure, for example assets costing below £10,000 are not capitalised and are charged to revenue in year.

The council committed to a new Corporate Asset Strategy in March 2020. The strategy aims to establish a bold new approach that ensures investment is directly linked to core council ambitions around fairness and community wealth building. It is designed to deliver a strategic, long-term approach to managing and enhancing our community asset base. As part of this approach, in 2021/22, the authority is planning capital expenditure of £187m (including expected reprofiling as at Month 8 in 2020/21) as summarised below:

*Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ millions*

	<b>2019/20 actual</b>	<b>2020/21 forecast</b>	<b>2021/22 budget</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>	<b>2024/25- 2030/31 indicative</b>	<b>2019/20- 2030/31 Total</b>
General Fund services	41.590	34.897	70.555	53.941	50.673	362.538	<b>614.194</b>
Council housing (HRA)	76.937	91.164	116.234	136.394	111.403	747.555	<b>1,279.687</b>
<b>TOTAL</b>	118.527	126.061	186.789	190.335	162.076	1,110.093	<b>1,893.881</b>

The capital programme will deliver £539m of capital investment over the next three years to support the achievement of council objectives. Key projects contributing to these objectives are summarised below along with spend over the next three years.

### **Decent and genuinely affordable homes for all**

- Housing new build programme (£302m); our major programme of investment in new, affordable social housing in Islington. Ensuring everyone has a decent, secure and genuinely affordable home is a key council priority and the council has been building well-designed, good quality new council homes for 10 years – out of old garages, on car parks, in old undercrofts and on top of existing buildings. The majority of this spend occurs in the HRA but there is also General Fund spend relating to the open market sales elements of the housing programme (£76m), with the upfront costs of building funded by temporary borrowing for cash flow purposes. This is recouped by the capital receipts when the completed units are sold and funds further investment in our council house building programme.
- In 2021/22 alone the council will invest £80m in our ongoing New Build Programme, as we work towards our commitment to build 550 new council homes by 2022 – the largest new-build programme for council homes in Islington in 30 years. Housing major works and improvements programme (£135m), ongoing investment in council homes and estates, including cyclical improvements, mechanical and electrical works, fire safety and energy efficiency.

### **Jobs and opportunity**

- Improving our early years accommodation, schools and youth provision (£10m)
- Modernising our libraries and museum (£1.4m)

### **A safer borough for all**

- CCTV upgrade (£3m); upgrades to the council's core CCTV network and investment in CCTV-enabled vehicle to increase coverage for hot-spots

### **A greener and cleaner Islington**

- Vehicle electrification infrastructure and replacement (£16m); programme to develop electric charging infrastructure and replace our fleet with electric vehicles as part of our Net Zero Carbon Strategy
- People Friendly Streets (£9m) and School Streets (£1m); borough-wide programme to reduce car trips and improve neighbourhoods for walking, cycling and living

- Pilot retrofitting on Housing estates (£3m); installing energy efficiency measures across Housing Estates to reduce energy consumption and decrease carbon emissions
- Cycle Schemes (£2m); significant expansion of our borough-wide cycle parking and cycle hangars provision
- Solar Panels and LED Lighting (£2m); install solar panels where feasible on our corporate estate and replace traditional light fittings with LED to lower emissions

In addition to these programmes, the capital programme will support the effective management of Islington's infrastructure, modernisation of community assets, and investments to enhance specific parts of the borough. This includes:

- Structural maintenance of the highways infrastructure including carriageways, footways and drainage (£4m)
- Compliance and modernisation (£8m); funds to deal with urgent property compliance issues and to assisting in providing funds for a cyclical maintenance and modernisation programme
- Use of Community Infrastructure Levy and s106 payments to make targeted investments across the borough (£15m), with spending decisions led & managed by local ward councillors

Full details of the authority's capital programme are found at Appendix E1.

### **Capital Governance**

Oversight and governance of the capital programme is supported by a comprehensive framework of advisory boards with member and officer involvement:

- The Corporate Asset Delivery Board, comprised of officers and members, is accountable for the overall delivery of the corporate asset strategy, with oversight of all material asset and capital related decisions. It reviews the 10-year capital strategy and supporting annual programmes, subject to formal budget approval.
- The Major Projects Board, comprised of officers, is accountable for initiating and monitoring delivery of significant mixed-use developments including those led by development partners, as well as smaller but complex schemes cutting across different directorates and/or with complex stakeholder management issues.
- The Housing Delivery Board, comprised of officers and members, integrates governance of new homes delivery and major works across the council's existing stock.
- The Borough Investment Panel, comprised of officers and members, is accountable for recommending approval of all CIL/s106 investment decisions and spend oversight.

- A series of Directorate level programme delivery boards, comprised of officers, are accountable for all other asset development and capital programme activity and linked to wider Directorate governance arrangements.

In relation to the annual capital programme, service managers submit capital submission bid requests annually to include projects in the authority's capital programme. Bids are collated by corporate finance who calculate the financing cost (which can be nil if the project is fully externally financed) and assess the overall affordability of the capital programme. This includes an assessment of the revenue implications of the projects as part of the revenue budget setting process.

A rigorous assurance and prioritisation exercise is then undertaken, assessing capital projects against their contribution to council priorities and their deliverability. The prioritisation process supports the council in making decisions about which project to progress, especially in an environment of challenging financial resources. All bids are appraised at Corporate Management Board who then make recommendations to members. The final capital programme is then presented to the Executive in January and to council in February each year.

### **Capital Financing**

All capital expenditure must be financed, either from external sources (government grants and other contributions), the authority's own resources (revenue, reserves and capital receipts) or debt (borrowing, leasing and Private Finance Initiative). The main sources of capital funding the council uses are summarised below:

- Capital Grants: predominantly government grants and are usually provided to the council for the specific use of funding capital expenditure for certain schemes and programmes (e.g. Department for Education funding for schools' condition works)
- Section 106/CIL: developer contributions towards infrastructure; Section 106 contributions relate to specific projects and outcomes
- Capital receipts: when a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The council primarily generates capital receipts from the open market sale homes used to finance the building of the council homes.
- Other capital contributions: specific contributions received for projects from third parties who may have a specific output or benefit achieved through the capital works the council is providing (e.g. landlord/tenant contributions to modernisation works)
- Revenue contributions: direct revenue contributions towards capital expenditure; a minimal source of funding due to pressures on the revenue budget

- HRA Reserves: direct funding from the HRA to support its capital programme through the use of the Major Repairs Reserve and revenue contribution to capital works
- Borrowing: typically, Public Works Loan Board (PWLB) loans to support capital expenditure. This form of capital funding has revenue implications (i.e. interest and provision to pay back loan) which are accounted for as part of the budget setting process.

The planned financing of the council's capital programme is shown in table 2. This only includes the years to 2023/24 as these are the years which are currently financed as part of the council's Medium-Term Financial Strategy (MTFS).

*Table 2: Capital financing in £ millions*

	<b>2019/20 actual</b>	<b>2020/21 forecast</b>	<b>2021/22 budget</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>
<b><u>General Fund Programme</u></b>					
Capital Grants	6.959	4.291	6.206	1.400	1.400
Section 106/CIL	7.042	5.031	10.430	8.482	6.500
Capital Receipts	10.129	1.237	30.358*	17.249	6.818
Other capital contributions	0.555	0.740	0.000	0.000	0.000
Revenue contributions	0.161	0.000	0.000	0.000	0.000
General Fund Borrowing	16.744	23.598	23.561	26.810	35.955
<b>Total General Fund</b>	<b>41.590</b>	<b>34.897</b>	<b>70.555</b>	<b>53.941</b>	<b>50.673</b>
<b><u>HRA Programme</u></b>					
Capital Grants	0.081	1.700	0.000	0.000	0.000
Section 106/CIL	10.545	3.172	1.717	0.000	0.000
Capital Receipts	19.983	27.457	43.471	48.062	57.080
HRA Reserves	46.328	58.835	70.496	50.721	22.348
HRA Borrowing	0.000	0.000	0.550	37.611	31.975
<b>Total HRA</b>	<b>76.937</b>	<b>91.164</b>	<b>116.234</b>	<b>136.394</b>	<b>111.403</b>
<b>Total Capital Programme</b>	<b>118.527</b>	<b>126.061</b>	<b>186.789</b>	<b>190.335</b>	<b>162.076</b>

*\* £8.318m of the 2021/22 General Fund Capital Receipts are assumed to repay prior year temporary borrowing as shown in table 3. This is related to the building of private dwellings to sell on the open market as part of the council's housing new build programme. The upfront cost of building these private dwellings is funded by temporary borrowing for cash flow purposes, recouped by the capital receipts when the completed units are sold.*

The largest risk in relation to capital financing relates to capital receipts, of which the council expects to generate £74m in 2021/22. All these projected capital receipts are from the open market sales of housing and are intrinsically linked with the housing new build capital programme. Given present economic conditions there is uncertainty around the timing and value of these receipts. To mitigate these risks the council maintains a regular review of the property market and has been prudent in its financial assumptions. Timing delays can largely be managed through the use of HRA reserves. In the event of a decrease in projected capital receipts, the new build programme would need to be re-assessed in line with the overall available funding.

Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as Minimum Revenue Provision (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance. Planned MRP and use of capital receipts are as follows:

*Table 3: Replacement of debt finance in £ millions*

	<b>2019/20 actual</b>	<b>2020/21 forecast</b>	<b>2021/22 budget</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>
MRP	1.893	2.463	3.376	4.368	4.874
Use of capital receipts	0.000	0.000	8.318	0.000	0.000
Repayment of PFI/Leases	11.754	14.301	12.343	3.469	3.133
<b>TOTAL</b>	<b>13.647</b>	<b>16.764</b>	<b>24.037</b>	<b>7.837</b>	<b>8.007</b>

Each year the council is required to agree a MRP policy for the 'prudent' annual repayment of debt associated with the financing of capital expenditure. The guiding principle of the regulations and statutory guidance is that MRP is charged over a period that is reasonably commensurate with the period over which the capital expenditure which gave rise to the debt provides benefits.

Since 2017/18, the council has adopted the asset life (annuity) method (based on a prudent assessment of average asset life). In calculating the asset life (annuity) MRP, the average interest rates published by the Public Works Loans Board in the relevant financial year for new annuity loans will be used. Based on this policy, the estimated MRP in 2021/22 is £3.376m.

The council's cumulative outstanding amount of debt finance is measured by the Capital Financing Requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The CFR

is expected to increase by £8.392m during 2021/22. Based on the above figures for expenditure and financing, the authority's estimated CFR is as follows:

*Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions*

	<b>31.3.20 actual</b>	<b>31.3.21 forecast</b>	<b>31.3.22 budget</b>	<b>31.3.23 budget</b>	<b>31.3.24 budget</b>
General Fund Services	135.483	155.174	175.359	197.801	228.882
HRA	466.254	466.254	466.804	504.415	536.390
PFI Liabilities	110.674	96.373	84.030	80.561	77.428
<b>Total CFR</b>	<b>712.411</b>	<b>717.801</b>	<b>726.193</b>	<b>782.777</b>	<b>842.700</b>

### **Treasury Management**

Treasury management is concerned with keeping sufficient but not excessive cash available to meet the authority's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The authority is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

Due to decisions taken in the past, the authority currently has (as at 15 January 2021) £383m borrowing at an average interest rate of 3.83% and £208m treasury investments at an average rate of 0.87%.

**Borrowing strategy:** The authority's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the authority therefore seeks to strike a balance between cheap short-term loans (currently available at around 0.10%) and long-term fixed rate loans where the future cost is known but higher (currently 1.25 to 1.78%).

Projected levels of the authority's total outstanding debt (which comprises borrowing, PFI liabilities, leases) are shown below, compared with the capital financing requirement (see above).

*Table 5: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions*

	<b>31.3.20 actual</b>	<b>31.3.21 forecast</b>	<b>31.3.22 budget</b>	<b>31.3.23 budget</b>	<b>31.3.24 budget</b>
Debt (incl. PFI & leases)	441.600	525.000	559.400	718.600	782.700
Capital Financing Requirement	712.411	717.801	726.193	782.777	842.700

Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. As can be seen from table 6, the authority expects to comply with this in the medium term.

**Liability benchmark:** To compare the authority's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This strategy assumes that you would take up all your borrowing need and hold minimum surplus cash. Hence foregoing investment income to minimise debt interest. This assumes that cash and investment balances are kept to a minimum level of £10m at each year-end. This benchmark is currently £298.2m and is forecast to rise to £455.9m over the next three years.

*Table 6: Borrowing and the Liability Benchmark in £ millions*

	<b>31.3.20 actual</b>	<b>31.3.21 forecast</b>	<b>31.3.22 budget</b>	<b>31.3.23 budget</b>	<b>31.3.24 budget</b>
Outstanding borrowing	346.100	383.600	477.200	591.600	659.500
Liability benchmark	308.200	339.100	367.400	428.600	465.900

The table shows that the authority expects to remain borrowed above its liability benchmark. This is because cash outflows to date have been below the assumptions made when the loans were borrowed and a surplus in working capital.

**Affordable borrowing limit:** The authority is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.

*Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt in £m*



	<b>2020/21 limit</b>	<b>2021/22 limit</b>	<b>2022/23 limit</b>	<b>2023/24 limit</b>
Authorised limit – borrowing	430.000	577.000	642.000	710.000
Authorised limit – PFI and leases	106.000	92.000	88.000	83.000
Authorised limit – total external debt	536.000	739.000	730.000	793.000
Operational boundary – borrowing	400.000	527.000	592.000	660.000
Operational boundary – PFI and leases	101.000	87.000	83.000	78.000
Operational boundary – total external debt	501.000	614.000	675.000	738.000

- Further details on borrowing are included in the Treasury Management Strategy (**Appendix E4**).

**Treasury investment strategy:** Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

The authority’s policy on treasury investments is to prioritise security and liquidity over yield, that is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which investments to buy and the authority may request its money back at short notice.

*Table 8: Treasury management investments in £millions*

	<b>31.3.20 actual</b>	<b>31.3.21 forecast</b>	<b>31.3.22 budget</b>	<b>31.3.23 budget</b>	<b>31.3.24 budget</b>
Near-term investments	148.800	108.700	70.000	70.000	70.000
Longer-term investments	0.000	0.000	30.000	20.000	20.000
<b>TOTAL</b>	<b>148.800</b>	<b>108.700</b>	<b>100.000</b>	<b>90.000</b>	<b>90.000</b>

- Further details on treasury investments are included in the Treasury Management Strategy (**Appendix E4**).

**Risk management:** The effective management and control of risk are prime objectives of the authority's treasury management activities. The treasury management strategy therefore sets out various indicators and limits to constrain the risk of unexpected losses.

**Governance:** Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Corporate Director of Resources and staff, who must act in line with the treasury management strategy approved by council. The Audit committee is responsible for scrutinising treasury management decisions.

### **Investments for Service Purposes**

The authority makes investments to assist local public services, including making loans to and buying shares in local service providers, local small businesses to promote economic growth, the authority's subsidiaries that provide services. In light of the public service objective, the authority is willing to take more risk than with treasury investments, however it still plans for such investments to break even after all costs.

Total investments for service purposes are currently valued at £2m with the largest being soft loans to employees of £1.1m providing a net return after all costs of 0%. This also includes loans to and equity investments in:

- Islington Limited (iCo), a wholly owned subsidiary providing local services, a loan of £0.050m;
- Three private companies responsible for managing schools under the Building Schools for the Future programme (a loan of £0.684m);
- A local charity (a loan of £0.098m);
- Equity investment in a private company responsible for managing schools under the Building Schools for the Future programme (fair value of £0.096m)

**Governance:** Decisions on service investments are made by the relevant service manager in consultation with the Director of Finance and must meet the criteria and limits laid down in the investment strategy.

- Further details on service investments are included in the Investment Strategy (**Appendix E5**).

### **Commercial Activities**

The council hold investment property (value of £33.2m as at 31/03/2020) in order to generate income to spend on services in Islington. The council has consistently taken a prudent approach to this – no new commercial properties have been purchased in recent years and there are no current plans to invest in commercial properties over the medium term. In November 2020 PWLB guidance was updated and PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield. The authority intends to avoid this activity in order to retain its access to PWLB loans.

The council also has a wholly owned subsidiary – Islington Limited (iCo), the purpose of which is to trade for profit with public bodies, private organisations and members of the public to provide a return to the council. The services provided by iCo are in activities related to municipal functions in which relevant expertise is held (for instance Commercial Waste, Tree Maintenance and Memorials). The council has loaned iCo £0.050m, which is due to be repaid in 2020/21.

**Governance:** If and when the council does engage in further commercial activity, the council will consider fully its risk exposure against financial returns in order to ensure that commercial investments remain proportionate to the size of the authority with appropriate contingency plans in place should expected yields not materialise. If the council did decide to make a commercial investment it is unlikely that the council would invest in assets outside of the borough and would only do so where there were strategic benefits for the council (e.g. in respect of regeneration).

Decisions on commercial investments are to be made by senior officers in line with the criteria and limits approved by council in the Investment Strategy. Property and most other commercial investments are also capital expenditure and purchases will therefore also be approved as part of the capital programme.

- Further details on commercial investments are included in the Investment Strategy (**Appendix E5**).

## **Liabilities**

In addition to debt of £384m detailed above, the authority is committed to making future payments to cover its pension fund deficit (£249m as at the last valuation setting contributions – 31<sup>st</sup> March 2019). The council has also set aside provisions to cover probable liabilities that can be measured reliably. The most significant of these are the NNDR appeals provision (£15.9m as at 31/03/2020 in terms of the council's share, £33.2m in total including the central government and GLA shares) and the insurance fund provision (£14.2m as at 31/03/2020). The insurance fund provision covers anticipated liabilities for Errors and Omissions, Libel and Slander, Motor (Third

Party), Employers' Liability, Public Liability, Fire and other risks – up to a specific limit for any one claim. External policies cover claims in excess of these limits.

**Governance:** Decisions on incurring new discretionary liabilities are taken by service managers in consultation with the Section 151 Officer. The risk of liabilities crystallising and requiring payment is monitored by corporate finance and reported as part of the annual closing of accounts process and as appropriate during the financial year. Corporate risks and risk management are also reported to Executive.

- Further details on liabilities and guarantees can be found in the 2019/20 statement of accounts:

<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/finance/information/adviceandinformation/20202021/20201130islingtonstatementofaccounts201920.pdf>

### **Revenue Budget Implications**

Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from council tax, business rates and general government grants.

*Table 9: Prudential Indicator: Proportion of financing costs to net revenue stream*

	<b>2019/20 actual</b>	<b>2020/21 forecast</b>	<b>2021/22 budget</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>
Financing costs (£m)	13.857	12.976	13.832	15.256	15.159
Proportion of net revenue stream	6.4%	5.7%	6.9%	6.8%	6.8%

**Sustainability:** Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for many years into the future. The Section 151 Officer is satisfied that the proposed capital programme is prudent, affordable and sustainable because revenue costs of borrowing have been fully incorporated in the 2021/22 revenue budget and MTFs. Additionally, the council is moving towards the development of a ten-year capital programme, and indicative requirements to 2030/31 are known. This enhanced long term budgetary planning will continue to be developed.

### **Knowledge and Skills**

The council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. The authority pays for junior staff to study towards relevant professional qualifications including CIPFA (Chartered Institute of Public Finance and Accountancy).

Where council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The authority currently employs Arlingclose Limited as treasury management advisers. This approach is more cost effective than employing such staff directly and ensures that the authority has access to knowledge and skills commensurate with its risk appetite.

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## **Appendix E3: Minimum Revenue Provision Statement 2021/22**

Where the authority finances capital expenditure by debt, it must put aside resources to repay that debt in later years. The amount charged to the revenue budget for the repayment of debt is known as Minimum Revenue Provision (MRP), although there has been no statutory minimum since 2008. The Local Government Act 2003 requires the authority to have regard to the Ministry of Housing, Communities and Local Government's Guidance on Minimum Revenue Provision (the MHCLG Guidance) most recently issued in 2018.

The broad aim of the MHCLG Guidance is to ensure that capital expenditure is financed over a period that is either reasonably commensurate with that over which the capital expenditure provides benefits, or, in the case of borrowing supported by Government Revenue Support Grant, reasonably commensurate with the period implicit in the determination of that grant.

The MHCLG Guidance requires the authority to approve an Annual MRP Statement each year and recommends options for calculating a prudent amount of MRP. The following statement incorporates options recommended in the Guidance:

- For unsupported capital expenditure incurred after 31<sup>st</sup> March 2008, MRP is determined by charging the expenditure over the expected useful life of the relevant asset as the principal repayment on an annuity with an annual interest rate equal to the average 25-year PWLB rate for the year of expenditure, starting in the year after the asset becomes operational. MRP on purchases of freehold land is charged over 50 years. MRP on expenditure not related to fixed assets but which has been capitalised by regulation or direction is charged over 20 years.
- For assets acquired by leases or the Private Finance Initiative, MRP is determined as being equal to the element of the rent or charge that goes to write down the balance sheet liability. However, for long life or high value PFI contracts, MRP is spread across the expected life of the asset, in equal instalments.
- No MRP is charged in respect of assets held within the Housing Revenue Account.

Capital expenditure incurred during 2021/22 will not be subject to a MRP charge until 2022/23 or the year after it becomes operational, whichever is the later.

Based on the authority's latest estimate of its capital financing requirement (CFR) on 31<sup>st</sup> March 2021, the budget for MRP has been set as follows:

	<b>31.03.2021 Estimated CFR £m</b>	<b>2021/22 Estimated MRP £</b>
Capital expenditure before 01.04.2008	89.416	0.954
Unsupported capital expenditure after 31.03.2008	65.758	2.422
Leases and Private Finance Initiative	96.373	0.000
<b>Total General Fund</b>	<b>251.546</b>	<b>3.376</b>
<b>Total Housing Revenue Account</b>	<b>466.254</b>	<b>0.000</b>
<b>Total</b>	<b>717.801</b>	<b>3.376</b>



## **Appendix E4: Islington Treasury Management Strategy Statement** **2021/22**

### **Introduction**

Treasury management is the management of the authority's cash flows, borrowing and investments, and the associated risks. The authority has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the authority's prudent financial management.

Treasury risk management at the authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the authority to approve a treasury management strategy before the start of each financial year. This report fulfils the authority's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.

Investments held for service purposes or for commercial profit are considered in a different report, the Investment Strategy (**Appendix E5**).

### **External Context**

**Economic background by our advisors, Arlingclose:** The impact on the UK from coronavirus, lockdown measures, the rollout of vaccines, as well as the new trading arrangements with the European Union (EU), will remain major influences on the authority's treasury management strategy for 2021/22.

The Bank of England (BoE) maintained Bank Rate at 0.10% in December 2020 and Quantitative Easing programme at £895 billion having extended it by £150 billion in the previous month. The Monetary Policy Committee (MPC) voted unanimously for both, but no mention was made of the potential future use of negative interest rates. In the November Monetary Policy Report (MPR) forecasts, the Bank expects the UK economy to shrink -2% in Q4 2020 before growing by 7.25% in 2021, lower than the previous forecast of 9%. The BoE also forecasts the economy will now take until Q1 2022 to reach its pre-pandemic level rather than the end of 2021 as previously forecast. By the time of the December MPC announcement, a COVID-19 vaccine was approved for use, which the Bank noted would reduce some of the downside risks to the economic outlook outlined in the November MPR.

UK Consumer Price Inflation (CPI) for November 2020 registered 0.3% year on year, down from 0.7% in the previous month. Core inflation, which excludes the more volatile components, fell to 1.1% from 1.5%. The most recent labour market data for the three months to October 2020 showed the unemployment rate rose to 4.9% while the employment rate fell to 75.2%. Both measures are expected to deteriorate further due to the ongoing impact of coronavirus on the jobs market, particularly when the various government job retention schemes start to be unwound in 2021, with the BoE forecasting unemployment will peak at 7.75% in Q2 2021. In October, the headline 3-month average annual growth rate for wages were 2.7% for total pay and 2.8% for regular pay. In real terms, after adjusting for inflation, total pay growth was up by 1.9% while regular pay was up 2.1%.

GDP growth rebounded by 16.0% in quarter 3, 2020 having fallen by -18.8% in the second quarter, with the annual rate rising to -8.6% from -20.8%. All sectors rose quarter-on-quarter, with dramatic gains in construction (41.2%), followed by services and production (both 14.7%). Monthly GDP estimates have shown the economic recovery slowing and remains well below its pre-pandemic peak. Looking ahead, the BoE's November MPR forecasts economic growth will rise in 2021 with GDP reaching 11% in Q4 2021, 3.1% in Q4 2022 and 1.6% in Q4 2023.

GDP growth in the euro zone rebounded by 12.7% in Q3 2020 after contracting by -3.7% and -11.8% in the first and second quarters, respectively. Headline inflation however, remains extremely weak, registering -0.3% year-on-year in November, the fourth successive month of deflation. Core inflation registered 0.2% year-on-year in November, well below the European Central Bank's (ECB) target of 'below, but close to 2%'. The ECB is expected to continue holding its main interest rate of 0% and deposit facility rate of -0.5% for some time but expanded its monetary stimulus in December 2020, increasing the size of its asset purchase scheme to €1.85 trillion and extended it until March 2022.

The US economy contracted at an annualised rate of 31.4% in Q2 2020 and then rebounded by 33.4% in q. The US Federal Reserve bank maintained the Fed Funds rate at between 0% and 0.25% and announced a change to its inflation targeting regime to a more flexible form of average targeting. The Fed also provided strong indications that interest rates are unlikely to change from current levels over the next three years.

Former vice-president Joe Biden won the 2020 US presidential election. Mr Biden is making tackling coronavirus his immediate priority and has reversed several executive orders signed by his predecessor and take the US back into the Paris climate accord and the World Health Organization.

**Credit outlook:** After spiking in late March as coronavirus became a global pandemic and then rising again in October/November, credit default swap (also known as CDS and

is a financial product or contract that allows an investor to "swap" or offset his or her credit risk with that of another investor) prices for the larger UK banks have steadily fallen back to almost pre-pandemic levels. Although uncertainly around COVID-19 related loan defaults lead to banks provisioning billions for potential losses in the first half of 2020, drastically reducing profits, reported impairments for Q3 were much reduced in some institutions. However, general bank profitability in 2020 and 2021 may be significantly lower than in previous years.

The credit ratings for many UK institutions were downgraded on the back of downgrades to the sovereign rating. Credit conditions more generally though in banks and building societies have tended to be relatively benign, despite the impact of the pandemic.

Looking forward, the potential for bank losses to be greater than expected when government and central bank support starts to be removed remains a risk, suggesting a cautious approach to bank deposits in 2021/22 remains advisable.

**Interest rate forecast:** The authority's treasury management adviser Arlingclose is forecasting that BoE Bank Rate will remain at 0.1% until at least the first quarter of 2024. The risks to this forecast are judged to be to the downside as the BoE and UK government continue to react to the coronavirus pandemic and the new EU trading arrangements. The BoE extended its asset purchase programme to £895 billion in November while keeping Bank Rate on hold and maintained this position in December. However, further interest rate cuts to zero, or possibly negative, cannot yet be ruled out but this is not part of the Arlingclose central forecast.

Gilt yields are expected to remain very low in the medium-term while short-term yields are likely remain below or at zero until such time as the BoE expressly rules out the chance of negative interest rates or growth/inflation prospects improve. The central case is for 10-year and 20-year to rise to around 0.60% and 0.90% respectively over the time horizon. The risks around the gilt yield forecasts are judged to be broadly balanced between upside and downside risks, but there will almost certainly be short-term volatility due to economic and political uncertainty and events.

A more detailed economic and interest rate forecast provided by Arlingclose is attached at Appendix A.

For the purpose of setting the budget, it has been assumed that new treasury investments will be made at an average rate of 0.50% and that new long-term loans will be borrowed at an average rate of 2.5%

### **Local Context**

On 15 January the authority held £383m of borrowing and £208m of treasury investments. This is set out in further detail at **Appendix B**. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

*Table 1: Balance sheet summary and forecast*

	<b>31.3.20 Actual £m</b>	<b>31.3.21 Estimate £m</b>	<b>31.3.22 Forecast £m</b>	<b>31.3.23 Forecast £m</b>	<b>31.3.24 Forecast £m</b>
<b>Total CFR</b>	<b>712.411</b>	<b>717.801</b>	<b>726.193</b>	<b>782.777</b>	<b>842.700</b>
Less: Other debt liabilities *	-110.674	-96.373	-84.030	-80.561	-77.428
	<b>601.800</b>	<b>621.428</b>	<b>642.163</b>	<b>702.216</b>	<b>765.272</b>
Less: External borrowing **	-302.100	-346.100	-477.200	-641.000	-709.500
<b>Internal (over) borrowing</b>	<b>299.637</b>	<b>275.328</b>	<b>164.963</b>	<b>61.216</b>	<b>55.772</b>
Less: Usable reserves	-281.000	-255.100	-234.200	-228.400	-249.800
[Less/Plus]: Working capital	-132.800	-132.800	-132.800	-132.800	-132.800
<b>Treasury investments (or New borrowing)</b>	<b>-114.163</b>	<b>-112.572</b>	<b>-202.037</b>	<b>-299.984</b>	<b>-326.828</b>

\* leases and PFI liabilities that form part of the authority's total debt

\*\* shows only loans to which the authority is committed and excludes optional refinancing

The underlying need to borrow or finance from other long term liabilities for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. The authority's current strategy is to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing.

CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the authority's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the authority expects to comply with this recommendation during 2021/22.

**Liability benchmark:** To compare the council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This assumes the same forecasts as table 1 above, but that cash and investment balances are kept to a minimum level of £10m at each year-end to maintain sufficient liquidity but minimise credit risk.

*Table 2: Liability benchmark*

	<b>31.3.20 Actual £m</b>	<b>31.3.21 Estimate £m</b>	<b>31.3.22 Forecast £m</b>	<b>31.3.23 Forecast £m</b>	<b>31.3.24 Forecast £m</b>
Total CFR	712.400	717.801	726.193	782.777	842.700
Less: Usable reserves	-281.000	-255.100	-234.200	-228.400	-249.800
Less: Working capital	-132.800	-132.800	-132.800	-132.800	-132.800
Plus: Minimum investments	10.000	10.000	10.000	10.000	10.000
<b>Liability benchmark</b>	<b>308.600</b>	<b>339.901</b>	<b>369.193</b>	<b>431.577</b>	<b>470.100</b>

### **Borrowing Strategy**

The authority currently holds £361.5million of loans, an increase of £20 million on the previous year, as part of its strategy for funding previous years' capital programmes. The balance sheet forecast in table 1 shows that the authority expects to borrow up £477.2m in 2021/22. The figure of £477.2m includes a provision by the authority to pre-fund future years' requirements, if it is deemed that rates are on the rise and providing this does not exceed the authorised limit for borrowing of£ 536 million.

**Objectives:** The authority's principal objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the authority's long-term plans change is a secondary objective.

**Strategy:** The authority's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. With short-term interest rates currently much lower than long-term rates, it is likely to be more cost effective in the short-term to either use internal resources, or to borrow short-term loans instead. The use of internal resources in lieu of borrowing and short to medium term borrowing will continue because of the 'cost of carry' (that is the difference between debt costs and investment earnings where cash is held).

By doing so, the authority is able to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk. The benefits of internal and short-term borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise modestly. Its output may determine whether the authority borrows additional sums at long-term fixed rates in 2021/22 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

The authority has previously raised the majority of its long-term borrowing from the PWLB but will consider long-term loans from other sources including banks, pensions and local authorities, and will investigate the possibility of issuing bonds and similar

instruments, in order to lower interest costs and reduce over-reliance on one source of funding in line with the CIPFA Code. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the authority intends to avoid this activity in order to retain its access to PWLB loans.

Alternatively, the authority may arrange forward starting loans, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.

In addition, the authority may borrow short-term loans to cover unplanned cash flow shortages.

**Sources of borrowing:** The approved sources of long-term and short-term borrowing are:

- HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
- any institution approved for investments (see below)
- any other bank or building society authorised to operate in the UK
- any other UK public sector body
- UK public and private sector pension funds (except your local Pension Fund)
- capital market bond investors
- UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues

**Other sources of debt finance:** In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

- Leasing-a contract outlining the terms under which one party agrees to rent a property owned by another party
- Hire purchase-financing where you make monthly payments but do not own until the last payment is made
- Private Finance Initiative –is a procurement method which uses private sector investment to deliver public sector infrastructure
- Sale and leaseback- selling a property you own and occupy and entering a lease arrangement with the purchaser

**PWLB :** On 25 November 2020, the Chancellor announced the conclusion to the review of margins over gilt yields for PWLB rates; the standard and certainty margins were reduced by 1% but a prohibition was introduced to deny access to borrowing from the PWLB for any local authority which had purchase of assets for yield in its three-year capital programme. The new margins over gilt yields are as follows: -.

- **PWLB Standard Rate** is gilt plus 100 basis points (G+100bps)
- **PWLB Certainty Rate** is gilt plus 80 basis points (G+80bps)

- **PWLB HRA Standard Rate** is gilt plus 100 basis points (G+100bps)
- **PWLB HRA Certainty Rate** is gilt plus 80bps (G+80bps)
- **Local Infrastructure Rate** is gilt plus 60bps (G+60bps)

**Municipal Bonds Agency:** The UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities. This is a more complicated source of finance than the PWLB for two reasons: borrowing authorities will be required to provide bond investors with a guarantee to refund their investment if the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will therefore be the subject of a separate report to full council

**LOBOs:** The authority holds no LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the authority has the option to either accept the new rate or to repay the loan at no additional cost.

**Debt rescheduling:** The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. The authority may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk.

### **Treasury Investment Strategy**

The authority holds invested funds, representing income received in advance of expenditure plus balances and reserves held. In the past 12 months, the authority's treasury investment balance has ranged between £100m and £200 million, and similar levels are expected to be maintained in the forthcoming year.

**Objectives:** The CIPFA Code requires the authority to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The authority's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the authority will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.

**Negative interest rates:** The COVID-19 pandemic has increased the risk that the Bank of England will set its Bank Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. Since investments cannot pay negative income, negative rates will be applied by reducing the value of investments. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.

**Strategy:** Given the increasing risk and very low returns from short-term unsecured bank investments, the authority aims to reduce its temporary debt and majority of the authority's surplus cash currently remains invested in short-term unsecured bank deposits, DMO and other local authorities and money market funds. This diversification will represent a continuation of the strategy

**Business models:** Under the new IFRS 9 standards, the accounting for certain investments depends on the authority's 'business model' for managing them. The authority aims to achieve value from its treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.

**Approved counterparties:** The authority may invest its surplus funds with any of the counterparty types in **Appendix** -Approved counterparty List, subject to the limits shown.

The council has reviewed the way it formulates its counterparty criteria. The lending list criteria is devised from the use of rating agencies which will include) as well as other factors. The main sovereign states whose banks are to be included are Australia, Canada, Finland, France, Denmark, Germany, Netherlands, Switzerland and the US.



These countries and the Banks within them have been selected after analysis and careful monitoring of:

- Credit Ratings (minimum long-term A+ minimum short term F1).
- Credit Default Swaps- a financial contract that allows investor to offset their credit risk
- GDP; Net Debt as a Percentage of GDP.
- Sovereign Support Mechanisms / potential support from a well-resourced parent institution.
- Share Price.

The council has restricted its investment activity to the following institutions while conditions in the financial sector are monitored for stability and cashflow positions are averaging around £100m.

- The Debt Management Agency Deposit Facility (The rates of interest from the DMADF are below equivalent money market rates. However, the returns are an acceptable trade-off for the guarantee that the council's capital is secure).
- AAA-rated Money Market Funds with a Constant Net Asset Value (CNAV).
- Deposits with other local authorities.
- Business reserve accounts and term deposits. These have been primarily restricted to UK institutions that are rated at least A+ long term.

**Government:** Loans to, and bonds and bills issued or guaranteed by, national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in (where burden of failure is shared with creditors) and there is generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.

**Banks and building societies (unsecured):** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. See below for arrangements relating to operational bank accounts.

**Registered providers (unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed.

**Money market funds:** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a small fee. Although no sector limit applies to money market funds, the authority will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times.

**Strategic pooled funds:** Bond, equity and property funds that offer enhanced returns over the longer term but are more volatile in the short term. These allow the authority to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the authority's investment objectives will be monitored regularly.

**Real estate investment trusts:** Shares in companies that invest mainly in real estate and pay the majority of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties.

### **Net Zero Carbon**

As a responsible investor, the council is committed to considering environmental, social, and governance issues, and has a particular interest in taking action to contribute to our strategy of Building a Net Zero Carbon Islington by 2030.

However, investment guidance, both statutory and from professional guidelines (CIPFA), dictates that investment activities must adopt 'SLY' principles – prioritising security, liquidity and yield.

There are already touch points with local authority investing, including the incorporation of Environment, Social and Governance (ESG) metrics into credit rating agency assessments. There are also a small, but growing number of financial institutions and fund managers promoting ESG products. Advisors are looking at ways in which to incorporate these factors into their creditworthiness assessment service that will be shared and adopted. The council will continue to monitor this as the market develops, noting that the lack of consistency and coverage in current market products alongside the treasury management 'SLY' priorities means that it is not currently practicable to formally include ESG targets as part of our treasury management or investment strategies.

It is the council's intention to exploit the treasury strategy to further the aims of the council and it will therefore actively consider appropriate ESG products as they emerge.

**Operational bank accounts:** The authority may incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services, to any UK bank with credit ratings no lower than BBB- and with assets greater than £25 billion. These are not classed as investments but are still subject to the risk of a bank bail-in, and balances will therefore be kept below 30 million per bank. The Bank of England has stated that in the event of failure, banks with assets greater than £25 billion are more likely to be bailed-in than made insolvent, increasing the chance of the authority maintaining operational continuity.

**Risk assessment and credit ratings:** Credit ratings are obtained and monitored by the authority's treasury advisers, who will notify changes in ratings as they occur. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

- no new investments will be made,
- any existing investments that can be recalled or sold at no cost will be, and
- full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.

Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "negative watch") so that it may fall below the approved rating criteria, then only investments that can be withdrawn] will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

**Other information on the security of investments:** The authority understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support, reports in the quality financial press and analysis and advice from the authority's treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.

When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2020, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the authority will restrict its investments to those organisations of higher credit quality and reduce the

maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the authority’s cash balances, then the surplus will be deposited with the UK Government, or with other local authorities. This will cause investment returns to fall but will protect the principal sum invested.

**Investment limits:** The authority’s revenue reserves available to cover investment losses are forecast to be £255 million on 31<sup>st</sup> March 2021. In order that no more than 10% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £15 million. A group of entities under the same ownership will be treated as a single organisation for limit purposes.

Limits are also placed on fund managers, investments in brokers’ nominee accounts and foreign countries. Investments in pooled funds and multilateral development banks do not count against the limit for any single foreign country, since the risk is diversified over many countries.

**Liquidity management:** The authority uses purpose-built database cash flow forecasting software and excel to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the authority being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the authority’s medium-term financial plan and cash flow forecast.

**Treasury Management Indicators**

The authority measures and manages its exposures to treasury management risks using the following indicators.

**Security:** The authority has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

<b>Credit risk indicator</b>	<b>Target</b>
Portfolio average credit	<i>A+</i>

**Liquidity:** The authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling one month period, without additional borrowing.

<b>Liquidity risk indicator</b>	<b>Target</b>
Total cash available within 1 months	£25m

**Interest rate exposures:** This indicator is set to control the authority's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interest rates will be:

<b>Interest rate risk indicator</b>	<b>Limit(£m)</b>
Upper limit on one-year revenue impact of a 1% <u>rise</u> in interest rates	£3.430
Upper limit on one-year revenue impact of a 1% <u>fall</u> in interest rates	£1.470

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates.

**Maturity structure of borrowing:** Local Authorities are exposed to the risk of having to refinance debt at a time in the future when interest rates may be volatile or uncertain. The maturity structure of borrowing indicator is designed to assist Authorities in avoiding large concentrations of debt that has the same maturity structure and would therefore need to be replaced at the same time. The indicator is calculated as the amount of projected borrowing that is maturing in each period expressed as a percentage of total projected borrowing. For each maturity period an upper and lower limit is set. The upper and lower limits on the maturity structure of borrowing will be:

<b>Refinancing rate risk indicator</b>	<b>Upper limit</b>	<b>Lower limit</b>
Under 12 months	100%	12%
12 months and within 24 months	100%	5%
24 months and within 5 years	100%	16%
5 years and within 10 years	100%	7%
10 years and within 20 years	100%	20%
More than 20 years	100%	40%

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

**Principal sums invested for periods longer than a year:** The purpose of this indicator is to control the authority’s exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

<b>Price risk indicator</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
Limit on principal invested beyond year end	£30m	£20m	£20m

### **Related Matters**

The CIPFA Code requires the authority to include the following in its treasury management strategy.

**Financial derivatives:** Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in section 1 of the *Localism Act 2011* removes much of the uncertainty over local authorities’ use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).

The authority will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the authority is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Existing derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. An allowance for credit risk calculated using the methodology in the Treasury Management Practices document will count against the counterparty credit limit and the relevant foreign country limit.

In line with the CIPFA Code, the authority will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.

**Housing Revenue Account** On 1<sup>st</sup> April 2012, the authority notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and

discounts on early redemption) will be charged/ credited to the respective revenue account. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. This balance will be measured each month and interest transferred between the General Fund and HRA at the authority's average interest rate on investments.

**Internal borrowing** Where the HRA or GF has surplus cash balances which allow either account to have external borrowing below its level of CFR (internal borrowing), the rate charged on this internal borrowing will be based on the 14.5 -15year PWLB fixed loan rate to reflect the assumed opportunity cost forgone.

**Markets in Financial Instruments Directive:** The authority has opted up to professional client status (versus retail status) with its providers of financial services, including advisers, banks, brokers and fund managers, allowing it access to a greater range of services but with the greater regulatory protections afforded to individuals and small companies (retail clients). Given the size and range of the authority's treasury management activities, the Corporate Director of Resources believes this to be the most appropriate status.

### **Financial Implications**

The budget for investment income in 2021/22 is £0.95 million. Presently the investment portfolio has averaged a balance of £100 million and an interest rate of 0.5% however both of these variables move throughout the year. The budget for debt interest paid in 2021/22 is £12 million, based on an average debt portfolio of £461 million at an average interest rate of 3.7%. If actual levels of investments and borrowing, or actual interest rates, differ from those forecasts, performance against budget will be correspondingly different.

### **Other Options Considered**

The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Corporate Director of Resources having consulted the Executive Member for Finance and Performance, believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

<b>Alternative</b>	<b>Impact on income and expenditure</b>	<b>Impact on risk management</b>
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Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain



## **Appendix A – Arlingclose Economic & Interest Rate Forecast – December 2020**

### **Underlying assumptions:**

- The medium-term global economic outlook has improved with the distribution of vaccines, but the recent upsurge in coronavirus cases has worsened economic prospects over the short term.
- Restrictive measures and further lockdowns are likely to continue in the UK and Europe until the majority of the population is vaccinated by the second half of 2021. The recovery period will be strong thereafter, but potentially longer than previously envisaged.
- Signs of a slowing UK economic recovery were already evident in UK monthly GDP and PMI data, even before the second lockdown and Tier 4 restrictions. Employment is falling despite an extension to support packages.
- The need to support economic recoveries and use up spare capacity will result in central banks maintaining low interest rates for the medium term.
- Brexit will weigh on UK activity. The combined effect of Brexit and the after-effects of the pandemic will dampen growth relative to peers, maintain spare capacity and limit domestically generated inflation. The Bank of England will therefore maintain loose monetary conditions for the foreseeable future.
- Longer-term yields will also remain depressed, anchored by low central bank policy rates, expectations for potentially even lower rates and insipid longer-term inflation expectations. There is a chance yields may follow a slightly different path in the medium term, depending on investor perceptions of growth and inflation, or the deployment of vaccines.

### **Forecast:**

- Arlingclose expects Bank Rate to remain at the current 0.10% level.
- Our central case for Bank Rate is no change, but further cuts to zero, or perhaps even into negative territory, cannot be completely ruled out, especially with likely emergency action in response to a no-deal Brexit.
- Gilt yields will remain low in the medium term. Shorter term gilt yields are currently negative and will remain around zero or below until either the Bank expressly rules out negative Bank Rate or growth/inflation prospects improve.
- Downside risks remain, and indeed appear heightened, in the near term, as the government reacts to the escalation in infection rates and the Brexit transition period ends.

	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24
<b>Official Bank Rate</b>													
Upside risk	0.00	0.00	0.15	0.15	0.15	0.15	0.30	0.30	0.30	0.30	0.30	0.30	0.30
Arlinglose Central Case	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Downside risk	0.30	0.40	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
<b>3-month money market r</b>													
Upside risk	0.05	0.05	0.10	0.10	0.15	0.20	0.30	0.30	0.30	0.30	0.30	0.30	0.30
Arlinglose Central Case	0.10	0.10	0.15	0.15	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
Downside risk	0.30	0.40	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
<b>1yr money market rate</b>													
Upside risk	0.05	0.05	0.10	0.10	0.15	0.20	0.40	0.40	0.40	0.40	0.40	0.40	0.40
Arlinglose Central Case	0.15	0.15	0.25	0.25	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
Downside risk	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15
<b>5yr gilt yield</b>													
Upside risk	0.40	0.40	0.45	0.45	0.50	0.50	0.55	0.60	0.60	0.65	0.65	0.70	0.70
Arlinglose Central Case	0.00	0.00	0.05	0.10	0.15	0.20	0.20	0.20	0.25	0.25	0.25	0.25	0.25
Downside risk	0.40	0.45	0.50	0.55	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
<b>10yr gilt yield</b>													
Upside risk	0.30	0.35	0.40	0.45	0.50	0.50	0.55	0.60	0.60	0.65	0.65	0.70	0.70
Arlinglose Central Case	0.25	0.30	0.35	0.35	0.40	0.40	0.45	0.45	0.50	0.55	0.55	0.55	0.60
Downside risk	0.50	0.50	0.55	0.55	0.55	0.55	0.55	0.55	0.55	0.55	0.55	0.55	0.55
<b>20yr gilt yield</b>													
Upside risk	0.40	0.40	0.45	0.45	0.50	0.50	0.55	0.60	0.60	0.65	0.65	0.70	0.70
Arlinglose Central Case	0.70	0.70	0.75	0.75	0.75	0.80	0.80	0.85	0.85	0.85	0.85	0.90	0.90
Downside risk	0.30	0.30	0.35	0.35	0.35	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
<b>50yr gilt yield</b>													
Upside risk	0.40	0.40	0.45	0.45	0.50	0.50	0.55	0.60	0.60	0.65	0.65	0.70	0.70
Arlinglose Central Case	0.60	0.60	0.65	0.65	0.65	0.70	0.70	0.75	0.75	0.75	0.75	0.80	0.80
Downside risk	0.30	0.30	0.35	0.35	0.35	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40

PWLB Certainty Rate (Maturity Loans) = Gilt yield + 0.80%

PWLB Infrastructure Rate (Maturity Loans) = Gilt yield + 0.60%

**Appendix B – List of Institutions Lent To & Approved Counter Party List  
2021/22**

**List of Institutions Lent to As At 15 January 2021**

<b>Class</b>	<b>Type</b>	<b>Counterparty</b>	<b>Outstanding Balance</b>	<b>Profile</b>
Deposit	Fixed	Birmingham City Council	-£5,000,000.00	Maturity
Deposit	Fixed	DMADF (Debt Management Account Deposit Facility)	-£25,000,000.00	Maturity
Deposit	Fixed	DMADF (Debt Management Account Deposit Facility)	-£39,800,000.00	Maturity
Deposit	Fixed	Surrey County Council	-£10,000,000.00	Maturity
Deposit	Fixed	Windsor and Maidenhead Royal Borough Council	-£5,000,000.00	Maturity
Deposit	Fixed	Swale Borough Council	-£5,000,000.00	Maturity
Deposit	Fixed	Wokingham Borough Council	-£10,000,000.00	Maturity
Deposit	Fixed	Kirklees Council	-£5,000,000.00	Maturity
Deposit	Fixed	Kirklees Council	-£5,000,000.00	Maturity
Deposit	Fixed	Kirklees Council	-£5,000,000.00	Maturity
Deposit	Fixed	Swindon Borough Council	-£10,000,000.00	Maturity
Deposit	Fixed	Cherwell District Council	-£5,000,000.00	Maturity
Deposit	Fixed	Eastleigh Borough Council	-£5,000,000.00	Maturity
Deposit	Fixed	Liverpool City Council	-£5,000,000.00	Maturity
Deposit	Fixed	Birmingham City Council	-£10,000,000.00	Maturity
Deposit	Fixed	Gloucester City Council	-£3,700,000.00	Maturity
Deposit	Fixed	Thurrock Borough Council	-£15,000,000.00	Maturity
Deposit	Fixed	Cambridgeshire County Council	-£10,000,000.00	Maturity
Deposit	Fixed	Warrington Borough Council	-£15,000,000.00	Maturity
Deposit	Fixed	London Borough of Croydon	-£5,000,000.00	Maturity
Deposit	Fixed	Liverpool City Council	-£10,000,000.00	Maturity
		<b>Deposits</b>	<b>-£208,500,000.00</b>	

Minimum criteria	A+	F1	A1	P-1	A+	A-1											
	Fitch L/T	Fitch S/T	Moody's L/T	Moody's S/T	S & P L/T	S & P S/T	Sovereign Rating - F/IM/S&P	5 year CDS	Share Price	Maximum Limit - £	Maximum Term	LBI	Arlingclose Current Advice	Lending at 15/01/2021			
<b>UK Banks</b>																	
Barclays	A+	F1	A1	P-1	A	A-1	AA-/Aa2/Aau	54	64	30,000,000	36 Months	Council Bankers from Mar 2015 - overnight liquidity only	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
HSBC	AA-	F1+	Aa3	P-1	A+	A-1	AA-/Aa2/Aau	48	60	30,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Lloyds	A+	F1	A1	P-1	A+	A-1	AA-/Aa2/Aau	42	75	30,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
RBS	A+	F1	A1	(P)P-1	A	A-1	AA-/Aa2/Aau	52	58	30,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Santander UK	A+	F1	A1	P-1	A	A-1	AA-/Aa2/Aau/	51	42	30,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Standard Chartered	A+	F1	A1	P-1	A	A-1	AA-/Aa2/Aau	48	32	30,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Ulster Bank Limited	A+	F1	A1	P-1	A	A-1	AA-/Aa2/Aau	52	58								
<b>UK Building Societies</b>																	
Coventry	A-	F1	A2	P-1			AA-/Aa2/Aau	N/A	N/A	30,000,000	34 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Leeds	A+	F1	A3	P-2			AA-/Aa2/Aau	N/A	N/A	30,000,000	35 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Nationwide	A+	F1	A1	P-1	A	A-1	AA-/Aa2/Aau	N/A	N/A	30,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Yorkshire	A+	F1	A3	P-2	NR	NR	AA-/Aa2/Aau	N/A	N/A	30,000,000	37 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
<b>Non UK Banks</b>																	
<b>Australia</b>																	
Australia & NZ Banking Group	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAAu	35	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Commonwealth Bank of Australia	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAAu	N/A	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
National Australia Bank	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAAu	35	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Westpac Banking Group	AA-	F1+	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAAu	50	N/A	15,000,000	36 Months	Suspended.	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
<b>Canada</b>																	
Bank of Montreal	AA	F1+	Aa2	P-1	A+	A-1	AA+/Aaa/AAA	N/A	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Bank of Nova Scotia	AA	F1+	Aa2	P-1	A+	A-1	AA+/Aaa/AAA	N/A	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Canadian Imperial Bank of Commerce	AA	F1+	Aa2	P-1	A+	A-1	AA+/Aaa/AAA	N/A	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Royal Bank of Canada	AA+	F1+	Aa2	P-1	AA-	A-1+	AA+/Aaa/AAA	N/A	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
Toronto-Dominion Bank	AA	F1+	Aaf1	P-1	AA-	A-1+	AA+/Aaa/AAA	N/A	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
<b>Finland</b>																	
Nordea Bank ABP	AA	F1+	Aa3	P-1	AA-	A-1+	AA+/Aa1/AA+	20	95	15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
<b>Germany</b>																	
DZ BANK AG DEUTSCHE ZENTRAL-	AA-	F1+	Aa1	P-1	AA-	A-1+	AAA/Aaa/AAAu	35		15,000,000	36 Months	Limit to 6 Months	Limit to 35 days / %5 Deposits & CDs/ 10% Secured				
<b>Netherlands</b>																	
ING Bank	A+	F1	Aa3	P-1	A+	A-1	AAA/Aaa/AAAu	40	N/A	15,000,000	36 Months	Suspended.	Suspended.				
Cooperative Rabobank	AA-	F1+	Aa3	P-1	A+	A-1	AAA/Aaa/AAAu	20	N/A	15,000,000	36 Months	Limit to 6 Months	Limit to 6 Months				
<b>Sweden</b>																	
Handelsbanken	AA	F1+	Aa2	P-1	AA-	A-1+	AAA/Aaa/AAAu	25	N/A	15,000,000	36 Months	Suspended.	Suspended.				
Nordea Bank AB	AA-	F1+	Aa3	P-1	A+	A-1	AAA/Aaa/AAAu	25	N/A	15,000,000	36 Months	Suspended.	Limit to 6 Months				
<b>Switzerland</b>																	
Credit Suisse	A	F1	A1	P-1	A	A-1	AAA/Aaa/AAAu	90	N/A	15,000,000	36 Months	Suspended.	Suspended.				
<b>Other</b>																	
Deutsche Bank Global Liquidity Fund	AA+	F1+	AA2	(P)P-1			AAA/Aaa/AAAu	N/A	N/A	15,000,000	N/A	OK - Limit to 0.5% of Fund Size (approx £25M)	OK - Limit to 0.5% of Fund Size (approx £25M)				
UK Local Authorities							N/A	N/A	15,000,000(per authority)	24 Months - amended 11/12/18	OK	Limit to 24 Months - WEF 11/12/2018	143,700,000				
Supra-National Bonds ( EIB )	AAA	F1+	Aaa	P-1	AAA	A-1+	N/A	N/A	Unlimited	Unlimited	Limit to 6 Months	Limit to 15 years 10% of portfolio					
UK DMADF	AA		Aa2		AA		N/A	N/A	Unlimited	6 Months	OK	OK	64,800,000				
<b>TOTAL FUNDS INVESTED</b>													<b>208,500,000</b>				



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## **Appendix E5: Investment Strategy Report 2021/22**

### **Introduction**

The authority invests its money for three broad purposes:

- because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**),
- to support local public services by lending to or buying shares in other organisations (**service investments**), and
- to earn investment income (known as **commercial investments** where this is the main purpose).

This investment strategy meets the requirements of statutory guidance issued by the government in January 2018 and focuses on the second and third of these categories.

### **Treasury Management Investments**

The authority typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy. The balance of treasury management investments is expected to fluctuate between £100m and £70m during the 2021/22 financial year.

**Contribution:** The contribution that these investments make to the objectives of the authority is to support effective treasury management activities.

**Further details:** Full details of the authority's policies and its plan for 2021/22 for treasury management investments are covered in a separate document, the Treasury Management Strategy. (**Appendix E4**)

### **Service Investments: Loans**

**Contribution:** The council lends money to its subsidiaries, local businesses, local charities and its employees to support local public services and stimulate local economic growth. The council has lent £0.050m to its wholly owned subsidiary, Islington Limited (iCo), at market rate. The loan serves to support the working capital of iCo where the timings of its payments and receipts do not coincide. In addition, as at 31.03.2020, the council had lent £0.678m (including accrued interest) to three private companies responsible for managing schools under the Building Schools for

the Future programme (Transform Islington Phase 1 Holdings Limited, Transform Islington Phase 2 Holdings Limited and Transform Islington Limited). All loans were issued at market rates. Where loans are advanced at below market rates they are classed as 'soft loans'. As at 31.3.2020 the council had also issued around £1.1m of soft loans, mainly to employees (e.g. travel season ticket, gym membership, home computer loans).

**Security:** The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the authority, upper limits on the outstanding loans to each category of borrower have been set as follows:

*Table 1: Loans for service purposes in £ millions*

Category of borrower	31.3.20 actual			2021/22
	Balance owing	Loss allowance	Net figure in accounts	Approved Limit
Subsidiaries	0.050	(0.021)	0.029	0.100
Local businesses	0.678	0.000	0.678	0.750
Local charities	0.098	0.000	0.098	0.200
Employees	1.100	0.000	1.100	1.500
<b>TOTAL</b>	<b>1.926</b>	<b>(0.021)</b>	<b>1.905</b>	<b>2.550</b>

Accounting standards require the authority to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the authority's statement of accounts are shown net of this loss allowance. However, the authority makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.

**Risk assessment:** The authority assesses the risk of loss before entering into and whilst holding service loans. In relation to iCo, the council has representation (2 councillors and 3 senior officers on the board and regularly monitors performance and financial risks. Regarding the soft loans available for employees, there is a process in place whereby employees can apply for the loans (season tickets, gym membership and a home computer scheme) and a monthly deduction is taken from salaries to repay this loan. There are procedures in place to deduct any remaining amount due in the event the employee leaves the organisation in their final pay cheque. In relation to the loan to a local charity, we provide grants to this organisation annually



in excess of the loaned amount. In the eventuality of a default, the organisation would reclaim payments through deductions grants or any other payments we make to them.

In relation to the three private companies responsible for managing schools under the Building Schools for the Future programme, the council has representation (a senior officer) on the board and regularly monitors performance and financial risks.

### **Service Investments: Shares**

**Contribution:** The council invests in the shares of its subsidiaries and local businesses to support local public services and stimulate local economic growth. The council holds equity investments in Islington Limited (iCo), a wholly owned subsidiary providing local services, and minority (10%) equity investments in three private companies responsible for managing schools under the Building Schools for the Future programme (Transform Islington Phase 1 Holdings Limited, Transform Islington Phase 2 Holdings Limited and Transform Islington Limited). The fair value of these shares is nil and the shares are not traded in an active market. The council has no current plans to dispose any of these shareholdings.

**Security:** One of the risks of investing in shares is that they can fall in value meaning that the initial outlay may not be recovered. In order to limit this risk, upper limits on the sum invested in each category of shares have been set as follows:

*Table 2: Shares held for service purposes in £ millions*

Category of company	31.3.20 actual			2021/22
	Amounts invested	Gains or losses	Value in accounts	Approved Limit
Local businesses	N/A	0.096	0.096	0.150
<b>TOTAL</b>	<b>N/A</b>	<b>0.096</b>	<b>0.096</b>	<b>0.150</b>

**Risk assessment:** The authority assesses the risk of loss before entering into and whilst holding shares. The authority has no current plans to purchase any new shareholdings. In relation to the three private companies responsible for managing schools under the Building Schools for the Future programme, the council has representation (a senior officer) on the board and regularly monitors performance and financial risks.

**Liquidity:** Liquidity risk is considered low due to the nature of the shares held, their low value in the 2019/20 Statement of the Accounts (£96.4k for Transform Islington Limited and nil for all others) and the service reasons for holding the shares over the long term.

**Non-specified Investments:** Shares are the only investment type that the authority has identified that meets the definition of a non-specified investment in the government guidance. The limits above on share investments are therefore also the authority's upper limits on non-specified investments. The authority has not adopted any procedures for determining further categories of non-specified investment since none are likely to meet the definition.

### **Commercial Investments: Property**

**Contribution:** The council invests in local and regional commercial property with the intention of making a profit that will be spent on local public services. The market value of all such properties as at 31.3.2020 was £33.2m. The council has not purchased new commercial properties in recent years nor does it have any plans to do so over the medium term. In 2019/20, rental income from investment property was £2.3m against direct operating expenditure arising from investment property of £2.3m

Additionally, although not strictly investment properties, the council's housing new build programme includes the building of private dwellings to sell on the open market. The upfront costs of building these private dwellings is funded by temporary borrowing for cash flow purposes, to be recouped by the capital receipts when the completed units are sold. These capital receipts also contribute to the funding of the wider new build programme of social housing. In 2021/22, there is forecast capital expenditure of £21.8m on the building of such private dwellings, of which £5.9m will be funded from temporary borrowing (on top. This temporary borrowing of £5.9m is currently forecast to be repaid in full by the end of 2025/26 from the estimated capital receipts.

The purchase cost of investment properties is not held as they do not have a revaluation reserve and all changes in value are credited/debited in the comprehensive income and expenditure statement.

*Table 3: Property held for investment purposes in £ millions*

<b>Property Type</b>	<b>Actual</b>	<b>31.12.20 Actual</b>	<b>31.3.21 expected**</b>
	<b>Purchase cost</b>	<b>Value in accounts</b>	<b>Value in accounts</b>
Admin Building	N/A	0.319	0.319
Advertising site	N/A	0.009	0.009
Café	N/A	0.340	0.340
Community Office	N/A	0.000	0.000
Offices	N/A	26.744	26.744

Shop	N/A	0.275	0.275
Store	N/A	2.985	2.985
Warehouse	N/A	2.508	2.508
<b>TOTAL</b>	N/A	<b>33.178</b>	<b>33.178</b>

\*We do not hold purchase cost information for investment properties as they do not have a revaluation reserve and all changes in value are credited/debited to the CIES.

\*\*2021/22 Valuations have not yet taken place.

**Security:** In accordance with government guidance, the authority considers a property investment to be secure if its accounting valuation is at or higher than its purchase cost including taxes and transaction costs.

A fair value assessment of the authority's investment property portfolio has been made within the past twelve months, and the underlying assets provide security for capital investment. Should the 2020/21 year-end accounts preparation and audit process value these properties below their purchase cost, then an updated investment strategy will be presented to full council detailing the impact of the loss on the security of investments and any revenue consequences arising therefrom.

**Risk assessment:** The authority assesses the risk of loss before entering into and whilst holding property investments. The council has no current plans to purchase new investment properties.

**Liquidity:** Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice and can take a considerable period to sell in certain market conditions. To ensure that the invested funds can be accessed when they are needed, for example to repay capital borrowed, the authority ensures dwellings are of a type and location that is marketable and has proven demand. The council also has scope to continue to generate an income stream whilst they are being marketed.

### **Loan Commitments and Financial Guarantee**

Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the authority and are included here for completeness.

The council has provided a guarantee to its wholly owned subsidiary, Islington Limited (iCo), should it request it. There is currently no indication that this is likely to happen. The net current liabilities of iCo (Unaudited Statement of Accounts) as at 31.03.2020 were £0.017m.

## **Net Zero Carbon**

As a responsible investor, the council is committed to considering environmental, social, and governance issues, and has a particular interest in taking action to contribute to our strategy of Building a Net Zero Carbon Islington by 2030.

However, investment guidance, both statutory and from professional guidelines (CIPFA), dictates that investment activities must adopt 'SLY' principles – prioritising security, liquidity and yield.

There are already touch points with local authority investing, including the incorporation of Environment, Social and Governance (ESG) metrics into credit rating agency assessments. There are also a small, but growing number of financial institutions and fund managers promoting ESG products. Advisors are looking at ways in which to incorporate these factors into their creditworthiness assessment service that will be shared and adopted. The council will continue to monitor this as the market develops, noting that the lack of consistency and coverage in current market products alongside the treasury management 'SLY' priorities means that it is not currently practicable to formally include ESG targets as part of our treasury management or investment strategies.

It is the council's intention to exploit the treasury strategy to further the aims of the council and it will therefore actively consider appropriate ESG products as they emerge.

## **Proportionality**

Whilst the council is dependent on some profit generating investment activity from treasury management and commercial property investments to achieve a balanced revenue budget, this amounts to less than 1% of the overall gross revenue budget and therefore is considered proportionate. The assumptions around profit generating investment activity are reviewed as part of the annual budget monitoring process and, if necessary, revised as part of the following year's budget setting process.

The 2021/22 revenue budget includes a corporate contingency budget of £5.4m to mitigate against budget risks.

## **Borrowing in Advance of Need**

Government guidance is that local authorities must not borrow more than or in advance of their needs purely in order to profit from the investment of the extra sums borrowed. The authority has chosen to follow this guidance. However, If market rates were to fall considerably, or future rates were expected to rise, then some borrowing could be taken ahead of spend. The borrowing strategy will therefore consider opportunities to borrow not only for 2021/22 but ahead for the next two financial years.

### **Capacity, Skills and Culture**

**Elected members and statutory officers:** There are a number of procedures and processes that enable elected members and statutory officers to make appropriate investment decisions, including:

- All elected members and statutory officers are aware of the council's strategic objectives.
- Training on treasury management is available and can be tailored to needs.
- The council's constitution and financial regulations determine the authorisations required for investment decisions.
- Financial and legal implications (including statutory and regulatory frameworks) are required as part of all decision-making reports.
- The council has a multi-disciplinary governance process for reviewing budget proposals, including any future commercial investment proposals.
- Specialist external advice is sought and considered where it is deemed necessary.
- The council has an embedded risk management and reporting framework

**Commercial deals:** Financial and legal implications (including statutory and regulatory frameworks) are required as part of all decision-making reports. Specialist external advice is sought where appropriate to advise on commercial transactions. The council ensures external advisors are fully aware of the prudential framework and of the regulatory regime within which it operates.

**Corporate governance:** The authority's Annual Governance Statement details arrangements put in place to ensure accountability and responsibility for those making decisions and can be found here:

(<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/finance/information/adviceandinformation/20202021/20201130201920annualgovernance1.pdf>).

### **Investment Indicators**

The authority has set the following quantitative indicators to allow elected members and the public to assess the authority's total risk exposure as a result of its investment decisions.

**Total risk exposure:** The first indicator shows the authority's total exposure to potential investment losses. This includes amounts the authority is contractually committed to lend but have yet to be drawn down and guarantees the authority has issued over third-party loans. It is assumed that non treasury management investments remain at the same value as in the 2019/20 Statement of Accounts given that there are no current plans to increase/decrease these investments. The future investment exposure will however be affected by valuations in the Statement of Accounts, particularly in relation to investment properties.

*Table 5: Total investment exposure in £millions*

<b>Total investment exposure</b>	<b>31.3.20 Actual</b>	<b>31.3.21 Forecast</b>	<b>31.3.22 Forecast</b>
Treasury management investments	148.800	108.700	100.000
Service investments: Loans	1.905	1.905	1.905
Service investments: Shares	0.096	0.096	0.096
Commercial investments: Property	33.178	33.178	33.178
<b>TOTAL INVESTMENTS</b>	<b>183.979</b>	<b>143.879</b>	<b>135.179</b>
Guarantees issued on loans	0.017	0.017	0.017
<b>TOTAL EXPOSURE</b>	<b>183.996</b>	<b>143.896</b>	<b>135.196</b>

**How investments are funded:** Government guidance is that these indicators should include how investments are funded. Since the authority does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. It is assumed the authority's investments are funded by usable reserves and income received in advance of expenditure, rather than borrowing.

**Rate of return received:** This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred. Only the rate of return on treasury investments are included in the table below. The rate of return on other investments (e.g. service

loans/shares) is considered immaterial. Investment properties are not included as we do not hold the purchase cost (as explained earlier in the strategy).

*Table 7: Investment rate of return (net of all costs)*

<b>Investments net rate of return</b>	<b>2019/20 Actual</b>	<b>2020/21 Forecast</b>	<b>2021/22 Forecast</b>
Treasury management investments	0.82%	0.88%	0.50%

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## **Appendix F: Budget 2021/22 Cumulative Equalities Impact Assessment**

### **1. Purpose of Report**

This report assesses the equalities impacts of the savings proposals set out in the Council's Budget for 2021/22.

It provides an assessment of the likely impacts of the budget savings on residents and employees with 'protected characteristics' as defined by the Equality Act 2010. It also considers the impacts on those facing socio-economic disadvantage, which is also a consideration in Islington's Equalities Impact Assessment process.

The report assesses the overall impacts of the suite of savings proposals (cumulative impact) set out in the 2021/22 budget on residents and staff. It also provides a more detailed review – by specific groups and by directorate – of the cumulative impacts of existing savings set out last year, and in this new budget, on specific groups, and the actions to reduce or mitigate these impacts.

### **2. Context**

#### Our commitment to fairness and equality

The Council's vision is to make Islington a fairer place – to create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.

Challenging inequality, racism and injustice is mission critical for Islington. We cannot realise our vision of creating a fairer borough for all our residents without tackling the inequality that continues to hold back some communities. Our new 'Challenging Inequality Programme' sets out our long-term ambition for challenging inequality, inequity, racism and promoting inclusion. We are determined to improve life chances for our residents and staff, ensuring no-one is left behind.

We want to challenge inequality in every capacity available to us, taking advantage of our position as an employer, strategic leader and as a service provider/ commissioner.

Equality impact assessments are an important part of ensuring our services are responsive to the needs of our diverse communities and help tackle inequality creating a fairer borough for all. Each of the savings proposals set out in this budget has been considered through an equalities lens and, where there is a potential or perceived negative impact, a full Equalities Impact Assessment has been undertaken and actions identified to mitigate any risks.

These individual assessments have been used to inform this overall assessment of the impacts of our budget savings proposals on residents and staff and, in particular, on any specific group.

### Our priorities

We want residents to have the opportunity to realise their potential and enjoy a good quality of life. To help bring our vision to life, we have four clear priorities:

- **Decent and genuinely affordable homes for all:** building new council homes, protecting private renters, being a good landlord and preventing homelessness
- **Jobs and opportunity:** delivering an inclusive economy, supporting people into work and ensuring young people have the best possible start
- **A safer borough for all:** tackling antisocial behaviour, ensuring young people are safe and encouraging a more cohesive borough for all
- **A greener and cleaner Islington:** keeping Islington clean and tidy, encouraging greener travel, creating a healthier environment for all and tackling the climate crisis

### Our legal duties

Under Section 149 of the Equality Act 2010, the Council has a legal duty to have "due regard" to the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity and
- foster good relations between different groups.

The precise wording of the Public Sector Equality Duty (PSED), together with a list of the 'protected characteristics' defined in the Act, is set out at Annex A.

We are required to demonstrate fulfilment of our duty to pay 'due regard' in the decision-making process and, as such, we need to understand the effect our policies and practices have on equality. Although the Council is not legally obligated to reject savings or growth proposals that could have negative impacts on any particular groups, it must carefully and with rigour consider the impact of its proposals on the PSED, take a reasonable and proportionate view about the overall impact on particular groups, and seek to mitigate negative impacts where possible.

### Our diverse population

Islington is an Inner London borough with a diverse population. Data from sources such as Census 2011, the Joint Strategic Needs Assessment and The Islington Evidence Hub, help to paint a profile of Islington as a place and our diverse communities:

- **Population:** Islington has an estimated population of 236,400 in 2020 compared to 211,000 in 2011. It is estimated that our population will grow by a further 3% (7,000 people) over the next 10 years. Islington is the most densely populated local authority area in England and Wales, with 16,097 people per square km.

This is almost triple the London average and more than 37 times the national average.

- **Age:** Islington has a relatively young population with 38,000 people aged under 18. Of the 176,600 people aged 25-34, 62,900 are aged 25-34. 9% of the population is aged over 65, compared with an average of 12% in London and 19% nationally.
- **Ethnicity:** Islington is a diverse borough, with Black or Minority Ethnic (BME) groups accounting for 32% of our population. 33% of residents are estimated to be born outside of the UK, compared to a national average of 14%.

Children growing up in BME households in Islington are more likely to be living in poverty in comparison to white children.

- **Sex:** The proportion of men and women in the borough is roughly 50/50. However, there are variations in life expectancy between men and women. Life expectancy at birth for men in Islington is 79.6 years, whilst women in Islington have a longer life expectancy of 83.3 years

93% of lone parents with dependent children are female. This is significant because unemployment rates among lone parents are far higher than the wider population - this is likely to affect household income and therefore deprivation levels. In Islington 56% of lone parents are not in employment while just 21% are in full-time employment - half the figure for the wider population.

- **Disability:** In May 2019, there were 6,104 Disability Living Allowance claimants in Islington. 16% of the working age population who identified themselves as disabled or having a long-term health problem in Islington are economically active.

National figures show that 30% of people in a family with at least one disabled person live in poverty, compared to 19% of people in families with no disabled people in 2017/18.

- **Socio-economic:** Islington is the most deprived borough in London for income deprivation affecting children, and fourth highest for income deprivation affecting older people. Poverty is an issue in every part of the borough: almost every ward includes one of the most deprived LSOAs in Islington. Finsbury Park is the most deprived ward. As mentioned above, children in BME households or in lone parent households, and households with a disabled person, are more likely to be living in poverty.
- **Housing:** Islington has a relatively high proportion of social housing. Those in social housing are more likely to be on low income, though increasingly we are seeing households in the private rented sector struggling. Both social and private sector tenants who have moved to Universal Credit have seen increased levels of debt, which may put their tenancies at risk. 9% of households in Islington are lone parents and 11% of households are overcrowded.

## The impact of COVID-19

We know that COVID-19 has had a disproportionate impact on many disadvantaged groups. COVID-19 has impacted residents in many ways including affecting employment, health and education to name a few. Our research supports findings nationally that certain groups are more likely to have been disproportionately impacted by COVID-19 such as Black, Asian and Minority Ethnic, the elderly including those shielding, young people particularly those living in large households, and those with mental health conditions. We are working hard to support those affected ensuring they receive the support they need. The savings proposals set out in this report will not impact on the level of support provided to those impacted by COVID-19.

COVID-19 has also highlighted issues around digital inclusion (exclusion). Over the years an increasing number of services have moved online but COVID-19 has turbo-charged this trend, necessitating the move to more virtual methods of service delivery in order to continue to support residents. This presents a risk for some residents who may not be able to access services online and therefore risk becoming socially isolated. The reasons for this may include a lack of digital skills / confidence to use digital channels, communication challenges e.g. language and literacy barriers, physical or learning disability and affordability issues (digital poverty).

The proposals in this report do not directly impact or amplify the issues identified around digital exclusion. Where consultation is required on proposals, service leads will ensure that a variety of methods are used to engage residents ensuring we reach those that would otherwise be excluded.

## The scale of the challenge

We are currently expecting to have to close a net budget gap of £25m over the 2021/22 financial year. This is in addition to approximately £250m savings we have already had to make over the past ten years. So the scale of the challenge is huge and the Council has been faced with some difficult choices.

This year, as in previous years, we have made every endeavour to protect those in greatest need and at most risk. Where possible, savings focus on optimising efficiencies in service delivery. However, some reductions in services have been unavoidable. Where this is the case, we have assessed the potential impact on groups with protected characteristics. In Islington, with high levels of poverty and deprivation, we also consider socio-economic disadvantage when assessing the impacts of changes to policies and services.

### **3. Equalities Impacts: overall cumulative impact**

The overall assessment is that there is **no cumulative negative impact** as a result of the budget savings proposals for 2021/22.

The budget sets out 46 new proposals, which will deliver savings of around £14m in 2021/22. This is in addition to £11m savings for 2021/22 agreed in last year's budget.

The majority of savings will come from efficiencies, maximising use of the various funding streams the Council has access to, and making better use of technology. These will result in 'back office' changes but with little or no impact on residents.

However, there are some savings that have the potential to impact upon:

- All residents
- Specific service users
- Staff

#### Impacts on all residents

There are a small number of changes to universal services and charges, and these have the potential to affect all residents. The key proposals are:

- Council Tax increase
- Increased charges related to parking and enforcement and planning
- The change from Bank Holiday waste collections to the following Saturday

Residents will see a small increase in their Council Tax and some may also be impacted by increases in other charges e.g. parking and discretionary planning fees.

However, the most vulnerable residents will continue to be protected. Older people and those on low incomes are eligible for subsidised Council Tax through our Council Tax Support Scheme. Islington's Resident Support Scheme continues to provide a safety net for those in crisis and facing severe financial hardship, and has provided crucial support over the past year for those economically impacted by COVID-19.

Disabled people and others with Blue Badges will continue to be able to park free of charge in designated spaces and will therefore not be affected by increased charges.

#### Impacts on specific service users

There are a number of proposals that relate to changes in services which support specific groups of residents and their families. These include services for vulnerable adults, disabled people, and those with learning disabilities or mental health problems, and children and young people.

The key impact for these groups is a potential change to the service they currently receive. This may be in the shape of a new provider where services are being re-commissioned to achieve savings, or a review of support packages to focus more upon a person's strengths, resources and ability to access help in their community (strengths-based approach), rather than automatically assigning the highest level of care, regardless of needs or abilities.

Overall, there should be no negative impact on the vulnerable groups these services support as each person will continue to be assessed and to receive the level of support required to meet their needs. Indeed, there may be a positive impact as

people are empowered and supported to access help in their community and retain their independence for longer.

However, there is a risk that service users, families and carers could be unsettled by any change in the normal support arrangements and feel worried that the revised offer will not meet their needs. It will therefore be essential for services to ensure that service users and their families and carers are involved in any review of the support offer, and that the offer is reviewed on a regular basis to identify and respond to any change in needs and tailor the offer accordingly.

Evidence from services that have already moved to a strengths-based approach has been positive. Services users have felt supported and there have been no challenges to date.

### Impacts on staff

The vast majority of staff savings and efficiencies will come from deleting / not recruiting to vacant posts, so there will be no direct impact on most staff or specific protected characteristics.

There are a number of proposals relating to reconfiguring or consolidating teams, bringing common functions together to achieve staff efficiencies. However, the number of anticipated redundancies from these proposals is low (maximum of 6 staff). It is not possible at this stage to assess the overall impacts on any specific protected characteristics but as numbers are low and spread across a number of services / types of roles there are unlikely to be any groups disproportionately impacted. Any restructure will be subject to staff and staff union consultation, in accordance with the council's reorganisation policy and procedures. Where redundancies are necessary, affected staff will be offered support and prioritised for any new jobs being advertised within the council.

### Overall equalities impact assessment

Looking at the totality of the savings to be delivered in 2021/22, the impacts on Islington residents and staff are assessed as follows:

- There are no significant impacts on Islington residents as a whole – and where changes have been introduced around universal services and charges, vulnerable residents are not disproportionately impacted and those facing socio-economic disadvantage are protected from financial impacts.
- There are some changes to services for specific groups – older vulnerable people, disabled people, including those with learning disabilities, and mental health problems. However, service users will continue to receive the appropriate level of support to meet their needs. Where potential impacts have been identified for individual proposals, mitigating actions have been set out which will minimise any adverse impact.
- A number of proposals will bring positive impacts for the community (for instance Schools Streets) and a move to a strengths-based approach could have a positive

impact on service users by supporting them to retain some independence and engage in their community

- However, a number of savings proposals, together with wider initiatives e.g. People Friendly Streets, will impact vulnerable older people and those with physical or learning disabilities in particular. Whilst these changes are largely positive, any change can be disruptive. It is therefore essential that we continue to engage with these groups to ensure their voice are heard and that we recognise and respond to any needs and concerns as proposals are developed and rolled out.
- There are no significant impacts on staff – the number of redundancies from these proposals is low and there are no obvious impacts on specific protected characteristics.

The conclusion is that the Council’s proposals for achieving savings are therefore considered reasonable and have shown due regard to the PSED.

#### 4. Equalities groups impacted by savings proposals

This section looks in more detail at the impacts of specific proposals on protected characteristics and on socio-economic disadvantage. It includes proposals from this year’s budget and from the budget last year that have a potential equalities impact.

Based on individual Equalities Impact Assessments the following protected characteristics are potentially impacted by one or more of the savings proposals for 2021/22:

<b>Characteristic</b>	<b>Proposal</b>	<b>Directorate</b>
<b>Age (older people)</b>	<ul style="list-style-type: none"> <li>• Temporary Accommodation</li> <li>• Mental Health - Demand Management</li> <li>• Transformation of Operational Social Work Teams</li> <li>• Assistive Technology Transformation</li> <li>• Review of Charging Policy</li> <li>• School Streets Phase 2</li> </ul>	Housing People – Adult Social Care People – Adult Social Care  People – Adult Social Care People – Adult Social Care Environment & Regeneration
<b>Age (younger people)</b>	<ul style="list-style-type: none"> <li>• Short Breaks Efficiencies</li> <li>• Investment in the House Project</li> <li>• Health Visiting Transformation</li> <li>• Demand Management - Children's Social Care</li> <li>• Review of Early Help Service</li> <li>• Play and Youth Commissioning</li> </ul>	People – Children, Employment & Skills People – Children, Employment & Skills Public Health People- Children, Employment & Skills People – Children, Employment & Skills People – Children, Employment & Skills
<b>Disability</b>	<ul style="list-style-type: none"> <li>• Temporary Accommodation</li> <li>• Mental Health - Demand Management</li> <li>• Learning Disability Reviews</li> <li>• Transformation of Operational Social Work Teams</li> <li>• Assistive Technology Transformation</li> <li>• Review of Charging Policy</li> </ul>	Housing People – Adult Social Care People – Adult Social Care People – Adult Social Care  People – Adult Social Care People – Adult Social Care

	<ul style="list-style-type: none"> <li>Review of Floating Support Services</li> </ul>	People – Adult Social Care
<b>Sex</b>	<ul style="list-style-type: none"> <li>Health Visiting Transformation</li> </ul>	Public Health
<b>Race</b>	<ul style="list-style-type: none"> <li>Short Breaks Efficiencies</li> <li>Temporary Accommodation</li> <li>Mental Health Demand Management</li> </ul>	People – Children, Employment & Skills Housing People – Adult Social Care
<b>Pregnancy / maternity</b>	<ul style="list-style-type: none"> <li>Health Visiting Transformation</li> </ul>	Public Health
<b>Sexual orientation</b>	<ul style="list-style-type: none"> <li>Mental Health - Demand Management</li> </ul>	People – Adult Social Care

There are no disproportionate impacts relating to:

- Religion and belief
- Marriage and civil partnership
- Gender re-assignment
- Socio-economic disadvantage

## 5. Savings proposals and impacts – by directorate

This section provides a detailed assessment by Directorate of those savings proposals – both new and existing - that will potentially impact specific groups.

### a) Council wide

- Council tax increase

Out of 32 London Boroughs (excluding the City of London), Islington’s basic council tax is currently the 12th lowest (i.e. below the median) in London and significantly below the national average.

In 2021/22, the government has confirmed that the council tax referendum threshold will remain at 2% and there will be further flexibility for an Adult Social Care (ASC) precept of 3% specifically for ASC services.

It is proposed that the council increases core council tax by 1.99% and applies the 3% ASC precept, and this proposal is assumed within the council’s overall budget gap. This will enable us to continue to deliver good quality basic services – such as cleaning the streets and emptying the bins – together with vital support for the most vulnerable, including older people (through the ASC precept), children and families in need, and disabled people.

The financial impact of the increase will be minimal – the proposed 1.99% increase in core Islington council tax and 3% ASC precept (4.99% in total) equates to an additional £1.18 per week in 2021/22 for the average (Band D) property.

The increase will have a socio-economic impact on residents. However, we will continue to support and protect the most vulnerable groups: foster carers are exempt from paying Council Tax, older people will continue to receive £100



discount, and families struggling on low incomes (including single parents, disabled people, and BME families) can apply for a significantly reduced rate through our Council Tax Support Scheme. The average increase for working age council tax support clients will be 10p per week.

Poorer residents tend to be heavier users of council services and so may experience disruption with the introduction of new delivery models, although our Council Tax Support Scheme and Resident Support Scheme will protect the most financially vulnerable. Though proposals have been prepared with an emphasis on prevention and efficient use of resources, careful planning and monitoring is in hand to manage changes.

## **b) Environment and Regeneration**

### *New savings:*

This year's budget for 2021/22 sets out 15 savings proposals, which have no specific impact on residents with protected characteristics. While the proposal to create a single team to support licensing, street trading, land charges, naming and numbering through new back office system will not impact residents it will have an impact on a small number of staff and result in the deletion of 3-4 posts. Any restructure will be subject to staff and staff union consultation, in accordance with the council's reorganisation policy and procedures, to ensure that there is not an unfair impact on any member of staff or group.

### *Existing Savings:*

There is one previously approved saving proposals, which identified potential impacts on protected characteristics:

- School Streets Roll out: Phase 2

The School Streets programme forms part of Islington's commitment to create a healthy, fair, accessible and enjoyable transport environment. The primary aim of the programme is to restrict through-traffic to schools at drop-off and pick-up times. It has already been rolled out across a number of locations in the borough. Phase 2 will introduce the scheme to more schools across the borough.

This will have a positive impact on a number of groups with protected characteristics. For young people, there will be a reduction in their level of exposure to harmful vehicle fumes and a reduced risk of collisions with vehicles. Residents with cognitive disabilities will benefit from the reduction in noise pollution. Pedestrian enhancements will positively benefit disabled people, including but not limited to those using walking aids, wheelchair or mobility scooters. This will also help parents with prams or who use bicycles for family mobility. Older people, who have higher instance of disabling conditions such as mobility impairment, deafness or blindness will benefit

from reduced traffic and road danger. In addition, older people are also more likely to live with dementia and will benefit from reduced noise pollution. In London, women are less represented than men in cycling, and lack of cycle infrastructure disproportionately impacts women. Reduced traffic during the school run will therefore benefit and empower more women to cycle.

Disabled residents or older people who may rely more on private cars or private vehicles may be inconvenienced by longer journeys if they regularly travel through the school street zones. Longer journeys may also involve higher costs. However, data indicates that private cars are just one means of travel for disabled residents and therefore should be considered on balance with the many benefits from a decrease in through traffic in the borough generally.

Additionally, residents, local businesses or disabled residents will be able to apply for exemptions if they will be affected by the location of one of the sites. People living within the school streets zone with parking permits will be automatically exempt from the scheme.

Exemptions will also be provided to blue badge holders from outside the area who require access to the streets during the school street hours and further individual assessments will be undertaken for those without blue badges who have mobility issues.

The London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired.

## **c) Housing**

### *New savings*

The Housing directorate has put forward three saving proposals in the 2021/22 Budget, none of which will have a negative impact on residents or staff:

- Growth reduction in the Specialist Housing Needs team
- Anticipated reduction in the No Recourse to Public Fund caseload
- Decommissioning of the high cost temporary accommodation scheme in Barnet.

### *Existing savings*

Looking at last year's budget, there were two proposals for achieving savings in 2021/22 which could impact on specific groups – in both cases the impact is positive:

- Reducing usage of private sector provision within temporary accommodation:

Acquiring a further 100 properties for use as temporary accommodation to reduce dependency (and associated high costs) of using private sector provision. Households in temporary accommodation are more likely to be those with protected characteristics, such as women, those with a disability and BME. Securing good quality accommodation within the borough will reduce some of the associated disadvantages of being housed in temporary accommodation and have a positive impact on residents overall

- Offer more permanent housing to families in temporary accommodation:

The proposal aims to increase permanent housing allocations to homeless families by 70 households, helping to reduce the number of residents in temporary accommodation. Every household moved from temporary to permanent accommodation will generate a saving, and this will also have a positive impact on these households due to higher quality, stable accommodation.

## **d) People Directorate – Children, Employment & Skills**

### *New savings*

This year's budget for 2021/22 sets out nine savings proposals, most of which have no impact on residents. This includes reducing the Remand budget and growth funding for Violence Against Women and Girls in line with demand, efficiencies across the service, and small savings in libraries (deleting a vacant post and a reduction in the budget for new stock).

There are, however, two proposals which will impact specific groups with protected characteristics:

- Short Breaks Efficiencies

Short breaks support children, and the families of children with severe and complex special educational needs and disabilities. These breaks enable the child to participate in fun, interesting and safe activities, whilst providing the parents and families with a much-needed break from their regular caring duties.

It is anticipated that, through reviewing the commissioning arrangements, we will be able to achieve the same, or better quality outcomes for children and families using these short breaks at a reduced cost.

Whilst there are no direct legal issues as a result of this change (as we are reviewing the commissioning activity whilst maintaining the same level of service), the Council will be mindful of the duties under the Children's Act 1989 (amended 2004). Specific regard will be paid to the short breaks duty and the Breaks for Carers of Disabled Children duties in the 2011 Regulations.

Regular co-production and SEND Parent Forum meetings are held between the council and service users, and these have remained well attended during

COVID (virtual meetings held). Dialogue will continue through these channels and the council will carry out direct consultation with any affected families once a further feasibility of options has been undertaken. All users have an allocated social worker who can support them in considering options.

The impact of this proposal will be mitigated by reviewing the impact on families directly affected within 6 months of implementation; the lessons learned from these reviews will inform future commissioning.

- Investment in the House Project as a permanent service in Islington

The proposal is based on investment in 'The House Project', an initiative for care-experienced young people who are keen to live independently in their own home from the ages of 17-18 years old and onwards, and who have been assessed by social workers as being capable of doing so safely, contingent on the right preparation and support.

The House Project is positioned to deliver savings to the Council as the cost of placing young people in their own Council property with support from the House Project team is generally cheaper than the cost of foster care and other semi-independent placements. A successful pilot of the House project has been undertaken with two groups of young people, and this proposal will continue this project on an ongoing basis. This proposal will benefit young people - a recent evaluation report from the University of York (looking at House projects nationwide) highlighted improved wellbeing, autonomy, and integration among young people taking part in these projects.

#### *Existing savings*

Previously approved savings within Children, Employment & Skills which were identified as having a potential impact on protected characteristic groups are

- Demand management for children's social care and new commissioning strategy for children looked after

The savings are a mixture of embedding new practice model alongside lower caseloads to provide intensive intervention with the ultimate aim of reducing re-referrals and preventing children from becoming looked after. Much of our effort, focus and expenditure is on a very small cohort of children and young people who are especially vulnerable and whose lives involve a high level of complexity and risk.

Our work with these children, young people and their families is fundamentally geared to reducing inequality by working intensively with them to improve their outcomes including enabling more families to stay together and fewer children needing to come into the council's care. This has a positive impact on young people and a saving on the children's service placement budget.

A review of commissioning arrangements will also identify efficiencies in this budget with no negative impact on service delivery.

- Review of the Early Help 0 to 19 Service

A review of the council's early help service that will ensure continued high quality and joined-up provision at a reduced budget that delivers against government expectations, is consistent with research and evidence on best practice, and supports children and families early and in ways that best meet their needs, supporting positive and sustained outcomes, preventing escalation of need.

- Play and Youth Provision

Changes to commissioning and contracts in ways that preserve the availability or scope of play and youth services.

The proposed savings have been designed to protect the quality and range of our front-line services and it is not anticipated that the majority of savings will have any adverse impact on children and young people.

## **e) People Directorate – Adult Social Care**

### *New savings*

Proposals set out in this year's budget build upon the approach set out last year. A move to a strength based approach in Adult Social Care will shift the emphasis from the current default position of higher levels of care towards people being assessed based on their strengths and accessing more support in the community. Proposals for support around Mental Health, Learning Disabilities, and Housing support all look to achieve savings through this approach.

Tailoring support according to strengths will have a positive impact in not making people dependent, however, there is a risk that service users and their families will perceive this as a reduced offer. To mitigate this, all care will be discussed and agreed with the service user and their family / carer to ensure it meets needs.

Looking in more detail at the proposals set out in this budget, those that could potentially impact on groups with protected characteristics are as follows:

- Mental Health Demand Management

Statutory Mental Health Services in Islington are overseen by Camden and Islington NHS Foundation Trust (CandI). An agreement exists between CandI and LBI as part of the agreement, a number of statutory functions like assessments, reviews, safeguarding etc. are undertaken by CandI.

There were 25,526 adults diagnosed with depression, anxiety or both registered with an Islington GP practice in 2018 and 3,834 adults with a Serious Mental Illness (SMI) (such as bipolar disorder or psychosis).

In Islington, people with Common Mental Illness (CMI) and Serious Mental Illness (SMI) have significantly higher rates of inpatient admissions than the total population. In Islington, 6,380 people are on Employment Support Allowance due to a mental illness, this is 53% of all claimants. People with an SMI are twice as likely to have at least one other diagnosed Long Term Conditions (LTC) as people who don't have an SMI. More than one third of people with CMI and nearly half of people with SMI are smokers (34% and 48% respectively) compared to the general population (23%).

As part of this saving plan, those service users under the acute division and having a diagnosis of SMI will be the focus as part of this review work. Prevention Concordat for Better Mental Health 2017 suggested that services should focus on prevention, facilitating a universal response and promoting good wellbeing. This is in line with the five year forward view for mental health.

As part of this saving plan, there are two pathways as outlined below:

1) Demand Management: savings will be made by working within the strengths-based model and reviewing service users as outlined below to move through the accommodation pathway within Islington i.e. from high cost residential care, to lower level support living to own self-contained flat and so on. The step-down process will result in the savings and avoid service users getting stuck in placements for a large number of years.

2) Review of service users based out of area with care packages will be reviewed on a six-monthly basis using the strengths-based practice model by checking:

- Can the service user be transferred back into accommodation within the borough of Islington where care and support can be offered locally with a view of increasing independence?
- Can the care package be reduced with the service user moving to a least restrictive model i.e. step down from 24 hrs to supported living?
- Can the cost of the care package be negotiated/reduced with the current provider where it is deemed appropriate for longer term placements and the service user cannot be moved due to clinical/forensic concern?

Those in age range between 40-69, women, those who recognise themselves as LGBT+, individuals with a disability and individuals from ethnic groups are more likely to suffer from mental health symptoms.

These groups will not be negatively impacted by the proposed change, as each person's support offer will be tailored to their strengths and need. Any change in the level of support offered will be based on need, what is in the borough and based on a robust review.

Regular review of service provision will be undertaken by analysing data of how many reviews have taken place, how many have moved into the borough and how many have stepped down. Additionally, engagement will be held with staff and managers about the process and service users to understand their wishes and needs.

- Transformation of Operational Social Work Teams

The current customer journey involves an initial assessment with Contact Islington, referral through to Urgent Response before further referral through to long-term teams. Each stage involves an assessment process. There are currently too many hand-offs between teams in the ASC department which means that we assess people multiple times before providing a care package.

The council are reviewing and streamlining the process to make the customer journey experience smoother, with the focus on assessing people at the first point of contact, resolving issues and signposting to other agencies where appropriate. This will reduce the number of people referred through to urgent response and subsequently reduces the size of the urgent response team.

An end-to-end review and streamlining of the pathway identified a number of potential savings from posts in the Urgent Response, Safeguarding, Community Placement Review, and the North and South Locality Community Teams (NLCT/SLCT).

These savings relate to the staffing establishment in those areas and this proposal will look to reduce the total staffing establishment/budget of all teams in scope by 10% (a total of £0.366m across six posts). Our current expectation is that the entirety of this saving can be made by deleting existing vacant budgeted posts meaning that all staff currently in a position, would remain in that position after this review. As a result there will be no negative impacts on any of the protected characteristic groups.

The impact of this proposal monitored the transformation programme benefits through the KPI Tracker, Independent Quality Assurance Monitoring Panels, Transformation programme board and other governance routes.

- Assistive Technology Transformation

Assistive technology (AT) is any item, piece of equipment or software that is used to increase, maintain or improve an individual's ability to perform daily tasks or to communicate, learn and live independent fulfilling, and productive lives.

The development of the current in-House Telecare service will enable the service to utilise the full range of technology available in the market, in a person centred and strength-based way. This will lead to the telecare service being able to offer increased independence, choice and quality of life for

people who require social care, reducing the need for domiciliary and residential care, while also potentially increasing the possibility of timely hospital discharge.

Savings will be achieved through care package reduction and by avoiding unnecessary increases to future care package costs. Service users are currently older people and those with disabilities. Engagement with service users and stakeholders has been undertaken with an online survey completed by over 200 current and potential service users, as well as a telephone service user survey, practitioner focus groups and internal and external stakeholder interviews such as with CandI NHS and Healthwatch. It is expected that the transformation will have a positive impact by improving the offer of care for residents with disabilities who receive care and support at home. The outcome of this will enable people to live more independently at home, and live happier lives. No negative or discriminatory impacts expected.

The impacts of this proposal will be monitored by the introduction of a benefits framework and quality assurance process to regularly monitor and oversee impact and issues arising following implementation. The introduction of a quality assurance framework and a method of measuring the financial and non-financial benefits of AT will enable the service to truly demonstrate its impact

- Learning Disability Reviews

This proposal aims to achieve a saving through a review of support for adults with learning disabilities.

This proposal relates to adults with learning disabilities over the age of 18 years that Islington Council has social care responsibility for. This responsibility arises because these individuals have been assessed by a social worker to have a need for care and support, which is eligible to be funded under the Care Act (2014) and Islington Council, has a duty to meet that need.

The proposal will seek to achieve reductions in the cost of existing care, while at the same time improving health and social care outcomes for these individuals by undertaking a review of their needs. Reviews will take place of people living in care homes (residential and nursing), supported living and community settings and will focus on maximising access to local resources, supporting pathways to employment, promoting independence and supporting skills development and recovery.

This model of assessment and support planning is called Strengths Based Practice. This is a collaborative process between the person supported by services and those supporting them, allowing them to work together to determine an outcome that draws on the person's strengths and assets.



In many cases this is more cost effective as it draws on resources already available in the community (e.g. those provided by voluntary, community and faith based groups or by friends, neighbours and families). It is not about cutting services and the intention of the review is not to save money but to improve the person's health and wellbeing.

However, the reality is that some people may currently be receiving services, which are not meeting their needs as effectively as possible and in some cases may be increasing dependency rather than promoting independence. These reviews are an opportunity to unlock that potential. Therefore, for some individuals this may cost less to the Council, creating a saving. For others however, costs may increase as a result of a review related to an increase in the need for social care support.

The review programme will be delivered in partnership with the commissioning and brokerage teams to ensure that as well as service provision meeting individual needs they also represent value for money. A schedule of reviews has been drawn up to ensure that everybody currently receiving care will be reviewed by a social worker. This is in line with the expectations of Adult Social Care set out in the Care Act (2014).

This proposal also seeks to deliver savings by undertaking learning disability reviews collaboratively across North Central London (NCL) authorities and by negotiating better deals with common providers. This approach will be supported by embedding the national learning disability pricing tool called the Care Cube Calculator (CCC), which sets out what is a fair price to pay for comparable care settings.

Consultation will be required with families of those with learning difficulties/ disabilities whose placements are being reviewed. The impact of this proposal will be monitored by analysing data of reviews and through Care Package Panel Meetings alongside discussions with staff and managers on the process as well as service user's wishes and needs.

- Recommissioning of the 'low support' Housing Related Support services

The Council commissions a range of supported housing, where housing is provided alongside support or supervision to help people live as independently as possible in the community. Services are arranged into three levels of support – high support (24/7 support staff), medium support (support staff on-site every week day) and low support (less intensive visiting staff support). Our low support covers 118 units of accommodation, or 23% of our total of 515 units.

A review undertaken of our low support supported housing services found that our spending in this area is of limited benefit to our residents and does not represent good value for money. The council and providers believe that

residents would be better served living independently, with tenancy support provided should the need arise. Individual assessments carried out by current providers will determine the ongoing accommodation and support needs of each tenant currently residing in these supported housing units.

The intention of these assessments is not about cutting services or saving money but to provide the best outcomes for residents. Indeed a small number of residents will be referred into higher support housing services; these residents have already been identified and are being referred to these alternative sites. In other instances, should the current provider, landlord, housing colleagues and commissioners agree that a resident is able to live independently, they will be supported to do so. This will result in a saving to the council. This support will include tailored support from a move-on coordinator situated in the Council's Housing department and access to the council's Resident Support Scheme. In this way it is not expected that the saving will negatively impact on groups with protected characteristics, but to ensure this is the case further information from providers has been requested and an updated Equalities Assessment will be undertaken.

- Review and reduce the floating support service

The Housing Related Support (HRS) budget funds a range of supported accommodation services and the floating support service. A review of this service, has identified a number of efficiencies arising as a result of duplication of activities, with areas of duplication with other services provided by Islington Council and Housing Associations. The service will also improve its strengths based approach, equipping residents to independently manage their tenancies more quickly than is the current case.

The service works with up to 700 residents at any one time. Residents access the service via a variety of avenues and have a range of needs – though their primary needs in accessing the service relate to housing related support.

Service users include a small portion of young people and residents with a Learning Disability, residents with substance misuse needs, residents with mental health needs and residents with physical health issues. Any changes in support for people with learning disabilities will be risk assessed by a social worker in advance. Consultation with families about changes in support would also be required.

We will work with the provider to ensure that people are supported to understand the changes; including via the provision of accessible information. We will also work closely to ensure that there continues to be access to tenancy sustainment support services through the range of services available in Islington. Residents who require floating support will be able to receive it from our current providers or via similar tenancy sustainment services provided by the Council and Housing Associations.

- Review of Charging Policy (introduction of administration fee)

Currently all residents can arrange care through Islington Council. The Care Act (2014) allows the council to charge an administration fee on those residents using non-residential services that have the mental capacity to make the arrangements themselves who are full cost payers (capital in excess of £23,250). In these circumstances the local authority may apply an administration fee to cover its costs.

The administration fee will allow choice for the resident of arranging the care themselves or requesting that the council make all the arrangements in the knowledge that an administration fee will be charged.

Those who lack the mental capacity to arrange their own care will not be charged an administration fee, the council will continue to make those arrangements at no cost. We anticipate that the introduction of this fee would achieve additional income.

Over 80% of users would be over the age of 65. These users would benefit due to lower block contracts provided through Islington. Additionally, there are a high number of disabled service users. This will allow more residents with a disability to have care provided through Islington with regular care reviews and lower costs through to block contracts.

A mental capacity assessment will be completed where required so the charge is not raised for those lacking capacity. Additionally, reviews will be carried out on a yearly basis to ensure financial assessments remain correct.

*Existing Savings:*

In addition to the new savings proposals set out above, there are a number of savings proposals set out in the budget last year which potentially impact on specific groups:

- Annual reviews of adult social care packages in line with relevant legislation
- Package of savings through recommissioning of services
- Demand management and better use of residential block provision
- In-house services transformation

These savings will:

- Embed strength-based practice into adult social care ways of working through an intensive programme of reviews ensuring that there is recognition of residents' choices and goals, residents' strengths are the focal point of provision and recognising that people are experts on their own lives. We will also ensure that residents are at the centre of any safeguarding activities as we embed the Making Safeguarding Personal Approach (MSP). MSP will empower residents and ensure that any safeguarding protection plans are realistic and reflect the wishes, strengths and desired outcomes of residents. MSP at its core will ensure a stronger offer on prevention of abuse and

neglect as the input from residents into their own safeguarding arrangements is more likely to lead to a reduction in the likelihood of poor/non-compliance with plans to prevent harm in future.

- Work through an intensive programme of reviews ensuring that there is recognition of residents' choices and goals, residents' strengths are the focal point of provision and recognising that people are experts on their own lives.
- Re-commission certain services and re-invest where there are gaps in provision to ensure early intervention and prevention provision is evidence based.
- Further integrate services, enabling joint-working and partnerships within the council, with the NHS and with the voluntary sector, with these things contributing to better outcomes and experiences for residents. This includes increasing partners' awareness of their statutory responsibilities to prevent harm and abuse and safeguard adults at risk.
- Ensure our behaviour change interventions and programmes are effectively targeted to those residents and population groups where lifestyle-related inequalities are greatest.
- Move towards innovative use of technology to meet people's needs; while promoting safety and prevention of harm.

Although these directly affect residents with protected characteristics (older people and those with a disability), we believe these will deliver positive outcomes for individuals involved. No changes that would adversely impact on an individual's safety or wellbeing are proposed, and so none of the new savings proposals for this year are identified as having a negative cumulative impact on these same groups.

## **f) Public Health**

### *New saving*

There is one new saving which will impact upon one or more specific groups.

- Health Visiting Transformation

This review includes the Family Nurse Partnership (FNP), an intensive home visiting service for teenage mothers, which is offered in place of the universal health visiting service from pregnancy through to the child's second birthday. Family Nurse Partnership is currently commissioned as a separate service from Whittington Health, who provide both FNP and the universal health visiting service.

The review will consider the cost benefits of the FNP service and potential alternative options from the current stand-alone service. FNP is a nationally licensed programme, and we are considering with the providers and the national programme whether to merge FNP into the existing universal service,

or to cease provision of the licensed programme, to be replaced with a bespoke pathway for teenage parents within the universal health visiting offer.

We will also be looking within the main service, at the proportionality of the division of health visiting resource which goes towards universal delivery and to more targeted support to families with other vulnerabilities. Currently there is a disproportionate resource that goes to some young mothers compared to that available to young mothers who choose not to participate in the FNP programme, or to other extremely vulnerable families who do not fit the criteria for inclusion in the programme.

The overall impact would be a rebalancing of resource, which may have a negative impact on a small number of teenage parents, but a positive impact on other families of high vulnerability (with an associated positive impact on those with the protected characteristics of maternity/pregnancy, and females).

The review will also consider the learnings from remote delivery during coronavirus, and scope for future savings in terms of some ongoing remote delivery, whilst maintaining safeguarding and the overall effectiveness and impact of service.

Risk assessments will be undertaken to negate the impact of changes on residents and ensure that we continue to meet all of our duties and responsibilities. The impact of this proposal will be monitored by review of new provision 1 year after implementation of changes and reviewing performance at quarterly contract monitoring.

#### *Existing savings:*

There is an existing saving to redesign our local health improvement and lifestyle services, and change the way we deliver public health behaviour-change programmes. This includes health checks and exercise on referral, through our universal services and other more cost-effective methods.

Changes to NHS Health Checks and weight management services could potentially reduce access for certain high-risk groups, such as people living in areas of high deprivation, people from BME groups and men, who might be less likely to access/use the new offer. To mitigate this risk, we will take the following actions:

- In relation to NHS Health Checks, we will continue to incentivise GPs to proactively target Islington's residents at greatest risk of heart disease.
- We will continue to collect and monitor data on those accessing and using services including people who have experienced harm or neglect, to identify and understand any inequalities in access and outcomes and adapt the

marketing and delivery of services rapidly to address unmet need or areas of risk.

- We will review the local physical activity offer to ensure it has a core focus on reaching and engaging those who are less likely to access wider leisure services.

## **6. Staffing Impacts**

As summarised in section 3, some proposals will have staffing implications. While the significant majority will come from deleting / not recruiting to vacant posts, some proposals will have implications which may include changes to current roles or a potential risk of redundancy (for a very limited number of staff).

The impacts of these proposals on staff with protected characteristics cannot yet be fully determined but as numbers are low and spread across a number of services / types of roles there are unlikely to be any groups disproportionately impacted. Any changes to staffing structure will require consultation with staff unions in accordance with the council's reorganisation policy and procedures.

Our established organisational change process ensures we support all of our staff through this change. Where restructures are proposed we carry out a comprehensive Staffing Impact Assessment that identifies the implications for those with protected characteristics and finds ways to mitigate accordingly.

Where a redundancy situation is possible, we will take a number of steps including:

- not filling vacancies in advance of a restructure so as many opportunities as possible are available to our existing staff
- using our redeployment process to help staff at risk find suitable alternative employment within the council
- considering alternative options to redundancy such as early retirement, flexible working or other 'working differently' options.
- stress management support and counselling services will be offered to staff through the Employee Assist Programme to help them cope with the additional pressures that structural change may bring.

We have an ongoing commitment to making Islington an employer of choice and are Timewise accredited, supporting flexible working opportunities available where possible, including condensed hours, flexible start and end times and part time working.

The Council is committed to a workforce that is representative of the borough at all levels and will continue to look for new ways to improve progression routes for staff and equip them to be senior managers of the future. We will continue to promote our staff equality forums as a way of engaging with staff and working together to continually improve their experience of working in Islington.

## **7. Human Rights and Safeguarding**

### **Human Rights**

It is unlawful for the council to act in a way that is incompatible with a European Convention right (unless the council could not have acted differently as a result of a statutory provision).

An interference with a qualified right (e.g. the right to respect for private and family life) is not unlawful if the council acts in accordance with the law and the interference is necessary in a democratic society.

In deciding whether the interference is necessary, the law applies a proportionality test, including whether a fair balance has been struck between the rights of the individual and the interests of the community.

### **Safeguarding**

#### **Implications for safeguarding in Adult Social Care**

Proposals outlined in this document build on the Council's work on Making Safeguarding Personal (MSP). MSP is enshrined in the Care Act (2014) and the Pan London Safeguarding Adults Policies and Procedures.

MSP puts the person at risk of harm or abuse at the centre of decisions and actions about them. Just like the Strengths Based Practice approach for general social work activities, MSP respects that adults often bring ideas and solutions which will work best for them and the outcomes they need support in achieving.

This means that safeguarding adults continues to be integral in the work we are undertaking to really embed strengths-based practice. Ensuring vulnerable adults are safe and focusing on wellbeing is a core element of strengths-based practice and ensures there is consistency in approach whether we are working with a vulnerable person on a support plan or a safeguarding plan.

#### **Implications for safeguarding in Children's Services**

Safeguarding children is about protecting them from maltreatment, preventing their health and development being impaired, ensuring that they grow up in environments which provide safe and effective care and taking action to enable all children to have the best outcomes.

The mitigation identified for each proposal reduces very significantly the risk of poor safeguarding practice. The council's mitigation should include not adopting any policy where safeguarding practice is adversely affected.

The proposals put forward have been tested against effective safeguarding practice. A broad range of quality assurance measures are already in place and will continue to be monitored and responded to robustly.

## **8. Monitoring**

Whilst the overall assessment is that there is not a cumulative negative impact on any group as a result of the savings proposals, there is a need to continue to monitor this. Each individual proposal will continue to be reviewed and updated as required. Consultation will be carried out where required to seek the views of residents and service users. The lead officer for each proposal will be responsible for ensuring that equality considerations remain at the forefront of decision making as each of these proposals are progressed.



**Public Sector Equality Duty**

Section 149 of the Equality Act 2010 provides that:

- (1) A public authority must, in the exercise of its functions, have due regard to the need to —
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to —
  - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
  - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to —
  - (a) tackle prejudice, and
  - (b) promote understanding.
- (6) Compliance with the duties in this section may involve treating some persons more favorably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.
- (7) The relevant protected characteristics are —
  - age

- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

(a) a breach of an equality clause or rule;

(b) a breach of a non-discrimination rule.

(9) Schedule 18 (exceptions) has effect.

## **Appendix G: Annual Pay Policy Statement 2021/2022 in Accordance with the Localism Act 2011**

### **1. Chief Officer Pay scales**

The council's Chief Officers as defined in the Localism Act are its Chief Executive, senior officers reporting to the Chief Executive (Corporate Directors) and senior officers reporting to the Corporate Directors.

The council's Chief Executive is paid on a spot salary. This is currently £190,087 per annum and represents the figure for the financial year ending 31 March 2021. This is in line with the increase agreed by the Joint Negotiating Committee for Chief Executives of Local Authorities at 2.75%.

Chief Officers, as defined in the Localism Act, are paid on the council's Chief Officer pay scale. This salary scale which comprises five separate salary bands is locally determined.

Percentage increases in cost of living are applied in line with the national pay negotiations of the Joint Negotiating Committee (JNC) for Chief Officers of Local Authorities or the National Joint Council for Local Government Services.

All Chief Officers received an increase of 2.75% payable from the 1 April 2020.

The job roles for those paid on the Chief Officer pay scale are evaluated using the Hay Job Evaluation Scheme and the conditions of service are in the main those of the JNC with slight local variations agreed by the council's Audit Committee. Any new or amended posts established at this level will be evaluated on the same basis.

There are no automatic pay increases. Progression through the scale is dependent on performance and achieving service targets agreed by the council.

Table 1 sets out details of the Chief Officer posts paid on the Chief Officer scale effective from 1<sup>st</sup> April 2020 and the pay band which applies to each post.

**Table 1 – Chief Officer Pay Bandings**

Grade	Pay Banding £	Number of points in pay banding including threshold point	Job role
CO1+	141,411-152,022	5	Corporate Director of People
CO1	117,624-141,480	10	Corporate Director of Housing Corporate Director of Environment & Regeneration Corporate Director of Resources Director of Public Health* Director of Learning and Schools
CO2	106,497-120,447	7	Director of Financial Operations and Customer Service Director of Law and Governance Director of Human Resources Director of Finance Director of Public Realm Director of New Build Director of Housing Property Services Director of Safeguarding and Family Support Director of Digital Services Service Director of Strategy & Commissioning Director of Employment, Skills and Culture Director of Youth and Community Services Director Housing Needs and Strategy Director of Adult Social Care Service Director of Planning and Development Service Director of Public Protection Director of Homes and Communities Service Director of Adult Social Care

CO3	89,646-106,029	7	Islington Deputy Director of Public Health* Camden Deputy Director of Public Health* Service Director of Finance
CO4	76,170-92,691	7	Director of Communications and Change

Posts marked with an asterisk (\*) are on NHS terms and conditions following a TUPE transfer, but are indicated for completeness within the band that most closely matches their NHS band grade.

Some senior manager posts which are not Chief Officer Posts for the purposes of the Localism Act are also paid on this salary scale.

Where posts which are required by the Localism Act to be included in this statement are not evaluated on the Chief Officer scale, they will be evaluated on the Greater London Provincial Council Job Evaluation Scheme and paid on the National Joint Council for Local Government Services pay scale (published on the council's website); subject to the requirements of the Transfer of Undertakings (Protection of Employment) Regulations 2006 where applicable. No posts at Chief Officer or equivalent come under this criterion for the financial year 2020/2021.

Full details of the current pay and other remuneration for senior officers together with the organisational structure are published on the council's website. Remuneration information about senior officers is also published annually in accordance with the Accounts and Audit (England) Regulations 2011.

Senior posts which the council shares with another organisation in a shared service or other joint arrangement (e.g. the joint Director of Public Health with the London Borough of Camden) are only included in this statement if the post holders are employed by Islington Council. Some joint post holders (e.g. the joint Head of Internal Audit with the London Borough of Camden) are employed by partners and are not included.

## 2. Pay ratios

The council is committed to tackling income inequality as a means of ensuring a fairer Islington and is setting an example to other local employers by reducing the pay differential between the lowest and highest paid employees.

The council also works with other local employers and its own contractors to ensure that the London Living Wage is the minimum pay to their staff.

The information below describes the pay ratio between the council's highest paid employee (the Chief Executive who is on a salary of £190,087 per annum figure worked out as 1 September 2020) and other staff by reference to the following:

- (i) The numerical difference between the highest and lowest paid employees
- (ii) The mode (most common salary)
- (iii) The median (mid -point between highest and lowest salaries) and
- (iv) The mean average (the total amount of remuneration paid to employees divided by the number of employees)

**Table 2 - Pay Ratios**

<b>Reference Point</b>		<b>Annual Salary</b>	<b>Ratio to highest paid employee salary</b>
i)	lowest paid full time council employee – London Living Wage £10.55 per hour <i>(excluding those on training schemes such as the apprenticeship scheme or work placements)</i>	£19,619	1:9.68
ii)	Most common salary paid to a council employee (the mode)	£26,076	1:7.29
iii)	Mid -point between the highest and lowest salaries (the median)	£33,474	1:5.68
iv)	Average salary (the mean)	£34,188	1:5.56

The Islington Fairness Commission, set up by the council in June 2010 to look into how to make the borough a fairer place, produced its final report in June 2011. This report recommended that the pay ratio between the highest and lowest salaries should be no more than 1:10. This was adopted as policy by the council in its Corporate Strategy. The current pay ratio at 31 March 2020 is 1:9.68. This is below the recommended ratio between the highest and lowest salary (1:10).

\* This ignores election duty fees which may be received by the Chief Executive in their role as returning officer as these do not arise in every year and are variable.

### **3. Recruitment of Chief Officers**

Recruitment to all Chief Officer Posts is covered by the requirements of the council's Officer

Employment Procedure Rules as set out in the Council's Constitution. The appointment of the Chief Executive is subject to the approval of the full Council. The appointment of other Chief Officers is by the Personnel Sub-Committee.

The starting salary level of such officers is also agreed by the Personnel Sub-Committee. This Personnel Sub-Committee or the Audit Committee (both of which are politically balanced committees responsible for personnel matters) will also agree the starting salary for any other post where the overall remuneration package on new appointment (excluding pension contributions in accordance with the Local Government Pension Scheme regulations) is to exceed £100,000. This ensures that elected councillors are accountable for the salaries of these senior appointments and that they are made in a transparent way without delay to appointment processes.

New entrants to the council are generally appointed to the first point of the pay scale. Only in exceptional circumstances, such as the need to match a candidate's existing salary are appointments made above the first point of the salary scale. All new entrants to the council are placed on a probationary period of six months, regardless of previous local government service, including senior staff. During this time, the new recruit is expected to demonstrate their suitability for their job role. Failure to do so could lead to their appointment being terminated. Employees who successfully complete their probationary period are entitled to a salary increment, if it would otherwise mean that they would have to wait more than twelve months for their next salary increment.

Individuals appointed on an interim basis to cover a vacant Chief Officer post, whether directly employed or engaged through an agency or as a contractor, will normally be paid equivalent to the remuneration of the Chief Officer post they are covering, with an appropriate reduction if they are not undertaking the full responsibilities of the post. The council takes a proactive and stringent approach to ensuring that all arrangements are lawful, follow procurement rules and properly reflect the substance of the relationship between the council and the individual concerned.

#### **4. Pension Arrangements**

All council employees up to 75 years of age and who have a contract for at least three months service have the right to join the Local Government Pension Scheme (LGPS) other than those on NHS terms and conditions. There is however, a right to opt out of the scheme and employees can make their own private pension arrangements.

The LGPS is a contributory scheme, whereby the employee contributes to the scheme from his or her own salary. Employees will contribute 5.5% - 12.5% of their salaries according to the figures set out in table 3 below in 2020/2021. The Government reviews these salary bandings annually.

**Table 3 – Employee Contribution Rates (2020/2021)**

<b>Whole time salary</b>	<b>Employee Contribution Rate (% of salary)</b>
Up to £14,600	5.5
£14,601 to £22,800	5.8
£22,801 to £37,100	6.5
£37,101 to £46,900	6.8
£46,901 to £65,600	8.5
£65,601 to £93,500	9.9
£93,001 to £109,500	10.5
£109,501 to £164,200	11.4
More than £164,201	12.5

Employers' contributions to the LGPS vary to ensure that the benefits under the scheme are properly funded, and are set independently. For full details, visit the LGPS website.

The Council's Flexible Retirement Policy allows employees aged 55 and over who are members of the Local Government Pension Scheme (LGPS) to apply to reduce their working hours or pay grade (stepping down) and to draw pension benefits accrued up until the transfer to flexible retirement.

Where an employee is in receipt of a pension from the council and obtains a job with another local authority or any other employer who participates in the LGPS, they are obliged to notify the council and their pension will then be adjusted so that they are not (with the new job and the pension) drawing more than their original salary.

The NHS scheme is a contributory one and scheme members contribute to the scheme from his or her own salary. Contribution rates from 2015/2016 until 2020/2022 vary from 5% for those on a salary of up to £15,431.99 to 14.5% for employees earning £111,377.00 and over. These rates are subject to review by Government with the employer's contributions also determined by the Government.

Islington Council also has a number of employees who are paid on the Soulbury Committee salary scales. This group is mainly made up of professional Educational Psychologists. They report to the Direct of Learning and Schools in the People Services Department. For the period commencing 1 April 2020 the member pay contribution rate was 7.4% for a salary up to £28,168.99 per annum to 11.7% for a salary over £81,255 per annum.



## 5. Additional Payments

The council recognises that in certain, limited circumstances additional payments may need to be attached to particular posts because of recruitment difficulties or particular employees may need to be remunerated or awarded an additional payment above that of their normal pay scale either for exceptional performance or additional work undertaken. Such payments must be authorised in advance by senior management and details of the nature of and eligibility for those payments which may be made to Chief Officers on the Chief Officer scale are given in table 4 below.

**Table 4 - Allowances**

<b>Type of allowance</b>	<b>Reason for Payment</b>	<b>Eligible Group</b>
Honorarium payments	Undertaking additional work or project	All employees
Market Factor Supplement	To attract and retain employees with specialist skills in a competitive job market.	All employees in posts that are demonstrated to be hard to recruit to in accordance with the council's Market Supplements Policy.

The Corporate Director of People post has a market supplement attached. The amount of this market supplement is fixed.

The Corporate Director of Resources post receives an allowance for statutory duties as the Council's s.151 officer.

Any new honorarium payments to Chief Officers must be agreed by the Chief Executive in consultation with the Chair of the Audit Committee.

Any new market supplement payment which results in the overall remuneration package (excluding pension contributions in accordance with the Local Government Pension Scheme regulations) for a post exceeding £100,000 or which affects a post the overall remuneration package for which already exceeds £100,000 will be approved by the Personnel Sub-Committee or the Audit Committee. Any market supplement which is more than 20% of the evaluated grade for the post, or is more than 15% of the evaluated grade of the post if the number of post available exceeds 15, will also require approval of Personnel Sub-Committee or the Audit Committee.

There are a few other allowances which are payable to designated employees related to their job role, for example on call or standby allowances. Chief Officers do not receive such payments other than those stated above and the council does not make bonus payments to Chief Officers.

Where council officers undertake special duties in relation to the council's election functions, any fees in respect of these duties are paid in addition to their normal remuneration. The rate for these duties is in line with the London Council's Leaders Committee's published Scale of Returning Officers' Fees and Expenses.

Council officers designated as Local Area Liaison Officers to undertake responsibilities under the council's emergency planning Crisis Response Plan in the event of an incident occurring in the borough, may be paid a fixed allowance in respect of this responsibility. See the council's website for further details.

## **6. Hours of work**

The basic full time hours of work for council employees are 35 per week. Employees on grades below that of senior officers, who work more than 35 hours per week may claim overtime for additional hours worked, if authorised.

The minimum basic working week for senior officers is 35 a week and additional hours worked above 35 per week per week attract neither payment in respect of overtime nor time off in lieu. Senior officers are required to undertake reasonable hours of work as necessary to perform the duties of their post. This may involve evening and weekend working.

## **7. Annual and other leave arrangements**

Annual leave plays an important part of the council's commitment to work-life balance. The Chief Executive and senior officers of the council on Chief Officer Pay and conditions are entitled to 27 days annual leave and after five years' continuous local government service a further 5 days. Other employees receive 25 days' annual leave with an additional five days after five years' service. All employees in addition to annual leave receive five privilege days and eight bank holidays per year. Adjustments have been made during the COVID-19 pandemic to allow (by exception) employees who have been unable to take all of their annual leave entitlement because of their work in delivering the council's response to Covid-19 to carry forward up to four weeks (20 working days) to the new financial year (2021/2022). For Chief Officers this will require authorisation from the Corporate Director/ Chief Executive

## **8. Benefits**

To maintain employee engagement, the council recognises, particularly in the current financial climate, that it is important to reward and motivate staff through other non-salaried means. The council promotes a range of benefits which all staff, irrespective of grade, can access. These include childcare vouchers and a tax-free bicycle scheme. There are also a number of discounted benefits which are open to all employees, such as discounted gym membership which is provided at no cost to the council.

## **9. Leaving the Council**

Employees who voluntarily resign from the council are not entitled to a termination payment. Those who volunteer for redundancy under the council's voluntary redundancy scheme receive a payment as set out under the scheme in addition to any other entitlements they may have

Employees who are made redundant are entitled to a redundancy payment based on the statutory redundancy scheme with regards the calculation of the number of week's redundancy pay but, as sanctioned in the Local Government (Early Termination of Employment) Discretionary Compensation Regulations, actual salary is used rather than the statutory maximum of £538 per week.

In exceptional circumstances, the Council may exercise its powers under the above mentioned Regulations and award a discretionary payment to senior staff in line with the council's discretionary termination compensation policy, for those whose employment is terminated by reason of redundancy or in the interests of the efficiency of the service, including early retirement.

The following factors will be taken into account when deciding whether to award a compensatory payment under these Regulations and, if a compensatory payment is made, the amount of that payment:

- Individual financial and other personal circumstances
- The council's interests, including corporate and service imperatives
- The council's fiduciary duty, including its duty to protect the interests of council tax payers and to exercise prudence and propriety
- Overall work record of the employee, including performance, attendance, length of service, level of responsibility and disciplinary record.
- Any other factor relevant to the individual case.

Where a Chief Officer's contract is terminated in the interests of the efficient exercise of the Authority's functions they are contractually entitled to six months' notice or may be paid in lieu of notice where their contract provides for this.

Following the introduction of the Restriction of Public Sector Exit Payments Regulations 2020, a cap on exit payments over £95,000 came into force on 4 November 2020. The Audit Committee agreed a set of recommendations in January for treatment of these restrictions pending further legislation affecting local government employees and the Local Government Pension Scheme.

The Audit Committee (or its Personnel Sub-Committee) will hear representations in respect of the termination of a Corporate Director or Director's employment in accordance with the Officer Employment Procedure Rules

In the case of the Chief Executive, the Audit Committee (or its Personnel Sub-Committee) will approve the early retirement of the post holder and agree the award of any discretionary payments in connection with such retirement or redundancy in line with the policy outlined above. No such discretionary payments were made.

The Audit Committee (or its Personnel Sub-Committee) will also approve any payment funded by the council (excluding pension strain) in line with the policy outlined above to any other

officer which exceeds £100,000. No such payments were made in the financial year 2020-2021. This ensures that elected councillors are accountable for payments made in these circumstances without delay to finalising arrangements.

## **10. Returning to work for the council after leaving**

Employees who leave the council voluntarily without a severance payment are free to apply for jobs that are advertised at their discretion.

Employees who leave the council with a redundancy payment and no enhancement and subsequently apply and are successful for a position within the council must repay any redundancy payment, if the appointment is within a month of their termination date. If the appointment start date is longer than a month the employee can return to work in the position offered but in accordance with the Redundancy Modification Orders, will lose their contractual rights to have their continuous service recognised for all purposes.

Employees who leave the council with an enhanced severance package will not normally be re-employed or engaged under a contract for services for a period of two years.

Employees who leave the council on ill-health retirement with the possibility of a return to work under the Local Government Pension Scheme Regulations or who are granted early retirement will be considered on a case by case basis depending upon the circumstances and having due regard to their termination package.