



Integrated Impact Assessment Interim Report

Local Plan Review

Full Council draft June 2019



June 2019

Full Council draft IIA June 2019

Disclaimer

The draft Integrated Impact Assessment will likely be subject to minor amendments before submission to refine the narrative throughout the document, ensure the baseline data is up to date and address issues of consistency with regard to format. The broader narrative will remain unchanged and the Regulation 19 Local Plan policies and alternatives to those policies, Site Allocations and Bunhill and Clerkenwell Area Action Plan have all been subject to consideration and assessment.

If there are changes made to the Local Plan post full council and pre-submission which warrant assessment then these will also be considered by the Integrated Impact Assessment as part of the iterative nature of assessment.

NON TECHNICAL SUMMARY

TO BE COMPLETED

Full Council draft IIA June 2019

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1 Introduction

The Islington Local Plan

1.1 The London Borough of Islington (LBI) is preparing a new Local Plan for the borough to cover the period 2020 to 2035. This iteration of Islington's Local Plan is made up of four Development Plan Documents:

- 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.
- Site Allocations – this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
- 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.
- North London Waste Plan - 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.

Figure 1.1: Islington Planning Framework



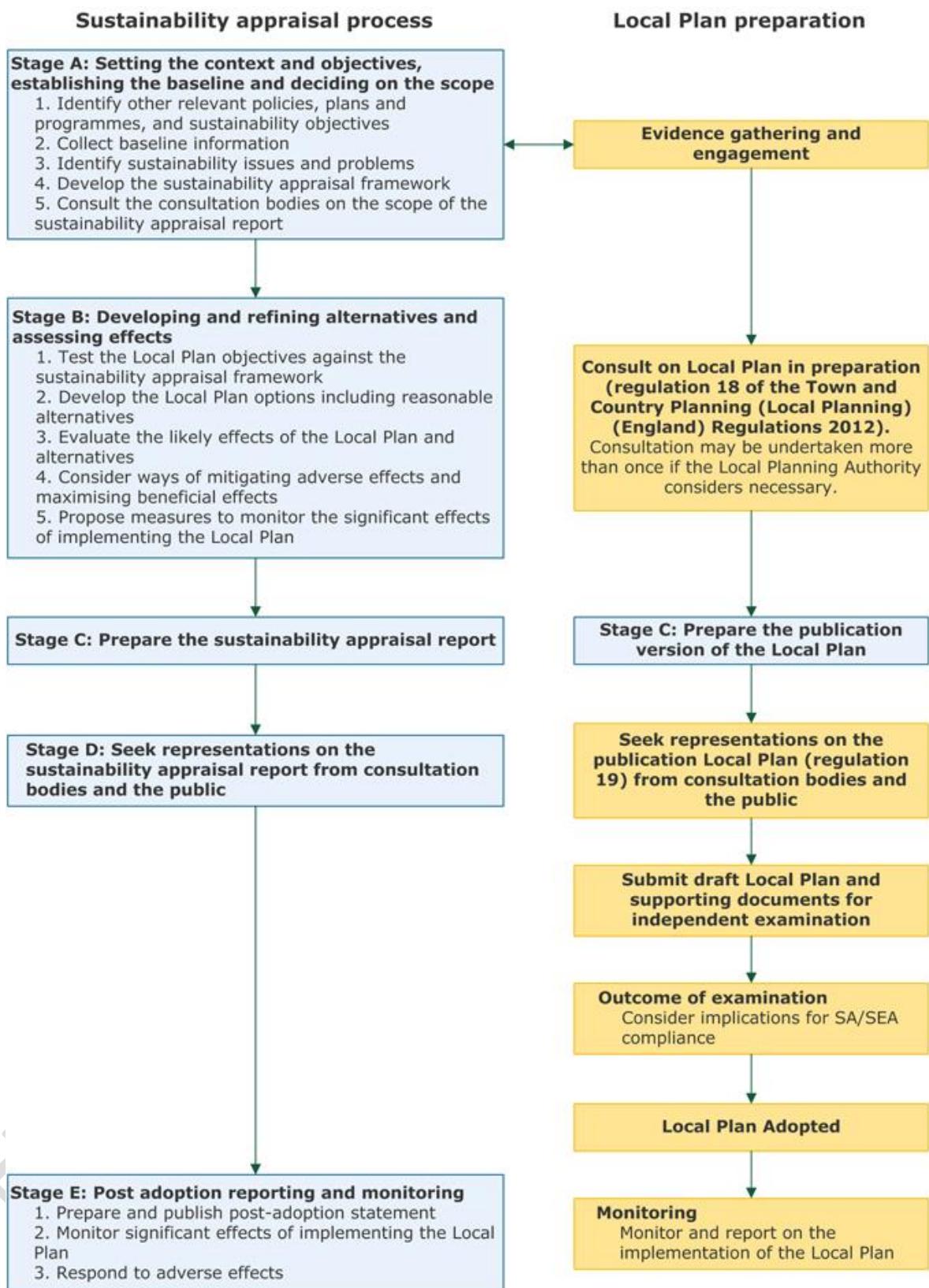
2 The approach to IIA

- 2.1 The IIA brings together into a single framework a number of assessments of the social, environmental and economic impact of planning policies, incorporating: the statutory requirements of Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). Habitats Regulation Assessment (HRA) will be undertaken as a parallel process to the IIA, with findings of the HRA screening integrated into the IIA as appropriate. The IIA approach therefore addresses all of the Council's legal duties to carry out comprehensive assessments of the plan and its proposed policies within one integrated process.
- 2.2 Integrating the assessments in this way ensures a comprehensive assessment to inform development of plan policies. As many of the issues considered overlap in practice an integrated approach will produce better recommendations and outcomes. The IIA will be carried out as an iterative process that considers the impacts of emerging policies and proposes policy alterations or mitigation for any adverse impacts that are identified. The IIA will follow the prescribed structure for the SA process (Figure 1) as the basis of the framework while incorporating the requirements of the Equalities Impact Assessment (EqIA) and the Health Impact Assessment (HIA).

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 2.3 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan. When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.
- 2.4 Sustainability Appraisals should be carried out in accordance with Government Guidance: A Practical Guide to the SEA Directive (ODPM, 2005) and the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.
- 2.5 The methodology used for the IIA process for the Islington Local Plan review is based on the SA process. The key stages and tasks for the SA process, and their relationship with the Local Plan process, are set out in Figures 1 below.

Figure 2.1: The Sustainability Appraisal Process



2.6 Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope has been undertaken and resulted in the Scoping Report.

2.7 The Scoping Report is the initial stage in the IIA process. The scoping stage of the process identified relevant plans, policies and programmes that informs the IIA and Local Plan; identified baseline information; identified key sustainability issues and problems; and proposed an IIA framework consisting of sustainability objectives and indicators, against which the Local Plan is assessed as it evolves. It is important to note that IIA is an iterative and on-going process, which has been in train from the start of the Local Plan review. Stages and tasks in the IIA process may be revisited and updated or revised, to take account of updated or new evidence as well as consultation responses.

2.8 The draft Scoping Report for IIA was published in October 2016 and subject to public consultation. The consultation ran alongside the scope of the Local Plan Review - October 2016 to January 2017.

2.9 Under the Environmental Assessment of Plans and Programmes Regulations (2004), three statutory consultation bodies with environmental responsibilities were consulted on the scope and level of detail of the information included in the draft Scoping Report:

- Environment Agency
- Historic England
- Natural England

2.10 Because the IIA has a broader scope than environmental issues, as well as consulting with the statutory bodies the draft Scoping Report was also published to invite wider feedback from the general public and other interested stakeholders to inform the IIA process. Alongside responses from the three statutory consultees nine other responses were received. Those consultation responses informed changes made to the draft Scoping Report, which was published as a Final Scoping Report in February 2017.

2.11 This document reports the 'developing and refining alternatives and assessing effects' stage (Stage B) of the IIA. As set out in Planning Practice Guidance (PPG), the purpose of the developing and refining stage is to evaluate the likely significant effects of the draft Local Plan, to test the draft Local Plan objectives, policies and sites against the IIA framework objectives and to test reasonable alternatives before the draft Local Plan is submitted for examination.

Alternatives

2.12 A key part of Stage B of the SA process is the consideration of reasonable alternatives to policy options, the effects of which should be evaluated. Only the consideration of reasonable alternatives is necessary. It is unnecessary to consider an unrealistic alternative. Also not every plan issue needs an alternative. Sometimes there may be only one approach to an issue with no possibility of having no policy as an option. For example heritage is a policy area supported by existing legislation and designations which provide a significant framework within which there is little scope to identify a reasonable alternative policy approach.

2.13 Other policy issues may also be constrained by other policy frameworks, for example meeting housing need is required by national policy and a target is set out in the London Plan which significantly restricts the policy options; not meeting these targets could be considered

unreasonable. Indeed this approach is corroborated by the Inspectors Report on the Local Plan for the London Borough of Hounslow 31st July 2015), which states:

"London has a two-tier planning system in which the London Plan and the Local Plan are both part of the Development Plan. The London Plan sets out the broad strategy for the city as well as some more detailed provisions. It includes key policy requirements and the Local Plan is required to be in general conformity with it. This limits the scope for the consideration of alternative strategies on matters such as: the supply of housing (for which the London Plan sets a target for the Borough); the location of employment (for which the London Plan identifies some locations and employment types to be provided or protected); and the hierarchy of town centres..."

Para 39 of London Borough of Hounslow Local Plan Inspectors Report then states:

"For these reasons the preparation of the Local Plan and the requisite sustainability appraisal explicitly only explored policy options where the opportunity for proposing reasonable alternatives to national and regional policy existed, whether to meet local objectives or to respond to local distinctiveness."

2.14 The SA has taken this into account and identified various alternatives. Some alternatives were considered but then discounted and not assessed; the basis for these discounted alternatives is discussed in section 3. The reasonable alternatives assessed are:

1. Removing the approach to preventing waste of housing supply
2. Use of Mayors threshold approach to affordable housing
3. Imposing a higher trigger of 3 to 9 net additional units for affordable housing small sites contributions
4. Using national accessibility standards instead of local standards to deliver high quality housing
5. Taking a less restrictive approach to purpose built student accommodation
6. Taking a less restrictive approach to Houses in Multiple Occupation
7. Taking a less restrictive approach to Purpose built private rented sector
8. Retention of primary and secondary frontages policy approach
9. Removal of the specific percentage threshold to protect Special Shopping Areas
10. Having no approach to control concentrations of hot food take-aways and betting shops
11. Taking a less restrictive approach to visitors accommodation
12. Removal of requirement for any minor developments to connect to a heat network
13. Having a criteria approach to building heights
14. Taking a less specific approach to maximising employment floorspace in Bunhill and Clerkenwell AAP

2.15 Alternatives were assessed in comparison to the preferred policy approach against the effect on the framework rather than scored in silo. This enables a more straightforward determination of the effect of the alternative and whether it is preferable to the preferred policy approach. A commentary on the comparison with the preferred policy approach is provided in section 3.

Sustainability Framework

2.16 For the policies the appraisal identifies and evaluates the likely significant effects on the baseline, drawing on the issues identified in the Scoping Report. Effects are predicted on the framework objectives. 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.

- 2.17 Where possible as part of the assessment account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for secondary, cumulative and synergistic effects are also considered (as required by the SEA Directive and SEA regulations). Consideration of the potential cumulative effects of the Local Plan is set out in section 3.
- 2.18 The Sustainability Framework is set out in table x below and the full framework with related 'prompt' questions is set out in appendix x. 'Prompt' questions are used to frame the appraisal of policies against each objective. Further detail on how the framework was derived was published in the Scoping Report and the Framework incorporates recommended changes including those made by statutory consultees, through consultation.

Table x: Islington Local Plan Sustainability Framework

TOPIC	IIA Objective
BUILT ENVIRONMENT	1. Promote a high quality, inclusive, safe and sustainable built environment
USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure
HERITAGE	3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.
LIVEABLE NEIGHBOURHOODS	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles
AFFORDABLE HOUSING	5. Ensure that all residents have access to good quality, well-located, affordable housing
INCLUSION AND EQUALITY	6. Promote social inclusion, equality, diversity and community cohesion
HEALTH AND WELLBEING	7. Improve the health and wellbeing of the population and reduce health inequalities
ECONOMIC GROWTH	8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes
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
OPEN SPACE / ACCESSIBLE	10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional
BIODIVERSITY	11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.
CLIMATE CHANGE	12. Reduce contribution to climate change and enhance community resilience to climate change impacts.
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
NATURAL RESOURCES	14. Maximise protection and enhancement of natural resources including water, land and air

- 2.19 Policies have been assessed by section (eg Thriving Communities, Inclusive Economy). The matrix identifies the effects considered; either significant or minor effect and whether they negative or positive.
- 2.20 Where, if any, negative effects are identified any potential measures to mitigate against those negative impacts have been proposed. Where improvements are identified to strengthen the positive effects of plan policies, these have been identified and incorporated into the plan draft where appropriate. However the SA identifies very little mitigation/positive improvements based on the preferred policy approach. Table xx sets out the scoring system used to record potential effects.

Table x: Framework scoring system

Score	Description	Symbol
Significant positive	The proposed policy/site/alternative has a significant positive impact on the achievement of the objective	++
Minor positive	The proposed policy/site/alternative has a minor positive impact on the achievement of the objective	+
Neutral	The proposed policy/site/alternative does not have any effect on the objectives	0
Minor Negative	The proposed policy/site/alternative has a minor negative impact on the achievement of the objective	-
Significant Negative	The proposed policy/site/alternative has a significant negative impact on the achievement of the objective	--

- 2.21 It is important to note that IIA is an iterative and on-going process, and therefore stages and tasks in the IIA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses. The iterative nature of policy drafting running concurrently with sustainability assessment over a number of years means that every single policy decision and discussion cannot be effectively recorded in terms of how they have influenced every aspect of policy and SA development. The SA identifies very little mitigation/positive improvements based on the preferred policy approach. Where possible the iterative nature of the policy development process and the influence that the concurrent SA process has had with regard to this process has been recorded in section 3.
- 2.22 The presentation of the Site Allocations appraisal set out in appendix x has used a reduced set of appraisal criteria as some of the IIA objectives have little or no effect for many of the sites. Table x below sets out which of the assessment objectives are not presented. Every site allocation has been assessed and assessed against the full framework however so the full framework has been taken into account in the assessment of sites. A bespoke reference is included in the commentary for the limited number of sites where an objective is effected which is not present in the assessment table. A summary of the findings of the site appraisal are set out in section 3. The full sites assessment are set out in appendix 5a.

Table x: Objective presentation summary for site allocations appraisal

IIA Objective	Included or bespoke presentation in Site Allocations Assessment	Consideration / commentary
1. Promote a high quality, inclusive, safe and sustainable built environment	Included in assessment table	The effect that a site allocation has on promoting high quality built environment should be part of the presentation of the assessment as development considerations form a part of the site allocation.
2. Ensure efficient use of land, buildings and infrastructure	Included in assessment table	The effect that a site allocation has on ensuring the efficient use of land should be part of the presentation of the assessment as the land use is integral to a site allocation.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	Included in assessment table	The effect that a site allocation has on conserving and enhancing the significance of a heritage asset should be part of the presentation of the assessment as it will be relevant to some site allocations.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	Included in assessment table	The effect that a site allocation has on promoting liveable neighbourhoods should be part of the presentation of the assessment as land use is integral to a site allocation and presents the opportunity to improve access to essential services, facilities and amenities.
5. Ensure that all residents have access to good quality, well-located, affordable housing	Included in assessment table	The effect that a site allocation has on affordable housing and housing quality should be part of the presentation of the assessment as the land use is integral to a site allocation.
6. Promote social inclusion, equality, diversity and community cohesion	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on inclusion, equality, diversity and community cohesion will be presented on a bespoke basis and included where relevant in the assessment table. At the plan level equality permeates through all policy in the Local Plan and is considered as part of the equalities impact assessment.
7. Improve the health and wellbeing of the population and reduce health inequalities	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on health inequality will be presented on a bespoke basis and included where relevant in the assessment table. At the plan level health and wellbeing permeates through all policy in the Local Plan and is considered as part of the Health Impact Assessment.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	Included in assessment table	The effect that a site allocation has on fostering economic growth should be part of the presentation of the assessment as land use is integral to a site allocation and presents the opportunity to increase employment.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on minimising the need to travel will be presented on a bespoke basis and included where relevant in the assessment table.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on protecting and enhancing open spaces that are high quality will be presented on a bespoke basis and included where relevant in the assessment table.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on creating, protecting and enhancing suitable wildlife habitats that are high quality will be presented on a bespoke basis and included where relevant in the assessment table.

12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on reducing contribution to climate change and enhancing community resilience to climate change impacts, will be presented on a bespoke basis and included where relevant in the assessment table.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on promoting resource efficiency will be presented on a bespoke basis and included where relevant in the assessment table.
14. Maximise protection and enhancement of natural resources including water, land and air	Bespoke presentation (where necessary) in general site commentary	The effect that a site allocation has on maximising protection and enhancement of natural resources will be presented on a bespoke basis and included where relevant in the assessment table.

2.23 The Site Allocations have been subject to a separate bespoke sequential assessment, using the outputs of Islington's Strategic Flood Risk Assessment (SFRA). While Islington is located in Flood Risk Zone 1, which means there is low risk of fluvial flooding, the SFRA demonstrates that there are areas of surface water flood risk across the borough and these must be taken into account when deciding on the appropriateness of a site location. The full sequential test assessment is included in appendix 5b.

Health Impact Assessment (HIA)

2.24 Camden and Islington Public Health have undertaken a Health Impact Assessment of the Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft (November 2018). They have assessed the draft plan in the context of the wider determinants of health, using a framework described in the London Healthy Urban Development Unit's "Rapid Health Impact Assessment Tool".

2.25 Health Impact Assessment (HIA) is a systematic approach to predicting the magnitude and significance of the potential health and wellbeing impacts, both positive and negative, of new plans and projects. The approach ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. HIA is particularly concerned with the distribution of effects within a population (as different groups are likely to be affected in different ways) and therefore looks at how health and social inequalities might be reduced or widened by a proposed plan or project.

2.26 While HIA is not a statutory requirement of the Local Plan preparation process, the physical environment is shaped by planning decisions which can facilitate or deter a healthy lifestyle, affect the quality and safety of the environment, encourage or discourage employment and training opportunities, enhance or impair social networks, and nurture or neglect opportunities for a rich community life. A HIA identifies actions that can enhance positive effects on health, reduce or eliminate negative effects, and reduce health and social inequalities that may arise through planning decisions. It considers how and to what extent proposed policies are likely to affect the health of people in Islington and recommends changes to improve outcomes.

2.27 The NHS London Healthy Urban Development Unit (HUDU) has developed a Rapid Health Impact Assessment Tool (April 2017). It is designed to rapidly assess the likely health impacts of development plans and proposals, including planning frameworks and masterplans for large areas,

regeneration and estate renewal programmes and outline and detailed planning applications. HUDU advise that it should be used prospectively, at the earliest possible stage during plan preparation or prior to the submission of a planning application, to inform the design, layout and composition of a development proposal.

2.28 The assessment matrix identifies eleven topics or broad determinants that make up the tool:

- Housing quality and design;
- Access to health care and other social infrastructure;
- Access to open space and nature;
- Air quality, noise and neighbourhood amenity;
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to healthy food;
- Access to work and training;
- Social cohesion and lifetime neighbourhoods;
- Minimising the use of resources; and
- Climate change;

Under each topic, the tool identifies examples of planning issues which are likely to influence health and wellbeing and also provides supporting information and references. The topics listed have been adapted by Camden and Islington Public Health as part of the assessment to better reflect the local context in Islington. All policies described in the Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft (November 2018) were cross-analysed against these determinants, taking into account available evidence and best practice from elsewhere, to identify where policies could be strengthened, and the entire plan analysed against the determinants to ensure that the draft Local Plan addresses all of the determinants (gap analysis).

2.29 Health impacts may be short-term or temporary, related to construction or longer-term, related to the operation and maintenance of a development and may particularly affect vulnerable or priority groups of the population. Where an impact is identified, actions should be recommended to mitigate a negative impact or enhance or secure a positive impact.

2.30 The results of the exercise are discussed in Sections 3 and 4 of this report and the completed tool is enclosed at Appendix 6a.

Equalities Impact Assessment (EqIA)

2.31 The Equality Act 2010 and Public Sector Equality Duty requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not share it.

2.32 An Equalities Impact Assessment (EqIA) is a way of measuring the potential impacts (both positive and negative) that a policy, function or service may have on the key protected characteristics covered by the Equality Duty and on Human Rights. The EqIA process supports decent decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups.

- 2.33 The results of the exercise are discussed in Section 3 of this report and the full assessment is enclosed at Appendix 7.

Habitats Regulations Assessment

- 2.34 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The Directive seeks to provide legal protection of habitats and species that are of European significance. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. HRA for the Local Plan review will be undertaken during the production of the Local Plan and the findings will be taken into account in the IIA where relevant.
- 2.35 A screening assessment was undertaken for the Islington Core Strategy in 2011 which did not identify any significant effects. The Core Strategy report was taken as the basis and updated the screening assessment, covering stage 1 of HRA assessment process.
- 2.36 The full assessment is enclosed at Appendix 8

Background: Scoping Report summary

- 2.37 This section summarises the Scoping Report and process undertaken. This Scoping Report represented the first stage of the Integrated Impact Assessment (IIA) of the review of the Local Plan. The first scoping stage of the process identified:
- the relevant plans, policies and programmes which informed the IIA and the Local Plan;
 - identified baseline information;
 - identified key sustainability issues and problems;
 - proposed an IIA framework consisting of sustainability objectives and indicators, against which the Local Plan is assessed.
- 2.38 The Scoping Report underwent public consultation for a five week period from 7 October 2016 to 11 November 2016. The statutory SEA bodies (Natural England, Historic England, and the Environment Agency) were directly consulted as well as notification to the council's wider consultation database and the document was made publically available on Council's website.
- 2.39 In addition to welcoming general comments, the Draft Scoping Report explicitly sought views on four areas:
- Are there any other relevant plans, policies, programmes or strategies, in addition to those listed, that are likely to affect or influence the Local Plan?
 - Do you have access to any further baseline data that should be included? Are there any errors in the baseline data presented?
 - Do you consider that the key issues for environment, health and equality have been identified?
 - Do you consider that the integrated impact assessment objectives and indicators proposed in the Framework are suitable in the context of Islington?
- 2.40 A total of 12 responses were received. A summary of the responses and how the Scoping Report was updated to take account of the comments received is included at Appendix B.

Baseline Information

- 2.41 The baseline information originally contained in the scoping report published in 2017 has been updated. This detail is set out in the section below.

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3 Baseline Information

Baseline information on the current conditions in Islington has been collected as a starting point to predict and monitor effects and to help identify the sustainability, health and equalities issues and ways of taking them into account. This section presents an overview of the baseline information that is considered to be of most relevance to the Local Plan. There is a great deal of available information and demographic and statistical indicators that could be listed, but as stated in SEA guidance the level of information should be relevant and appropriate to the spatial scale of the plan.

The baseline information has been collected under a number of subtopics to establish the current context from an economic, environmental and social perspective. The baseline topics and issues listed are intended to correlate as closely as possible with those listed in Annex 1 of the SEA Directive:

- Biodiversity
- Population
- Human health
- Fauna
- Flora
- Soil
- Water
- Air
- Climatic factors
- Material assets
- Cultural heritage
- Landscape

There will inevitably be a degree of interrelationship between the issues, and the baseline also includes matters related to the HIA and EqIA aspects of the IIA. This information on historic and likely future trends (where available) will assist in identifying existing problems and opportunities that could be considered in the Local Plan review as well as informing the development of the IIA objectives. The baseline information also provides the starting point from which to assess the potential effects of alternative proposals for the Local Plan in the subsequent stages of the IIA process, and the baseline for future monitoring following the adoption of the Local Plan.

Analysis of the baseline data shows that there is a fairly comprehensive data set around social, economic and environmental conditions in the borough. Data gaps remain regarding the amount of private open space in the borough with further evidence expected. Additional evidence of Characterisation and Outdoor Sport and Recreation will also help to inform the Regulation 19 version of the plan.

ENVIRONMENTAL CHARACTERISTICS

Climatic factors

Weather

Available scientific evidence supports the current understanding that global warming causes climate change. If global emissions of greenhouse gases due to human activity continue at today's levels, then average global temperatures could rise by 4°C by as early as 2060 and up to 6°C by the end of this century. This has an adverse impact on weather patterns including rainfall intensities and frequencies, and extreme weather events.

For London, extreme summer temperatures are projected to increase, with daily summer maximum temperatures to increase from 34.4 degrees Celsius (1961-1990) to 37.2 degrees Celsius (2041-206) for the central percentiles of probability.¹ Rainfall intensity is also projected to increase, with 5 day winter rainfall accumulation to increase from 56.1mm (1961-1990) to 62.5mm (2041-2060).

For London, most climate change impacts will be felt through the increase of extreme weather events such as heatwaves and floods.² High temperatures will be more acutely felt in inner-London, due to the Urban Heat Island and the temperature difference of up to 12 degrees when compared with London Heathrow during a summer day and up to 6 degrees in a summer night.³

Contribution to climate change

Islington's carbon dioxide emissions have been in decline, and are well below the national average per capita, and in recent years slightly below the London average.⁴

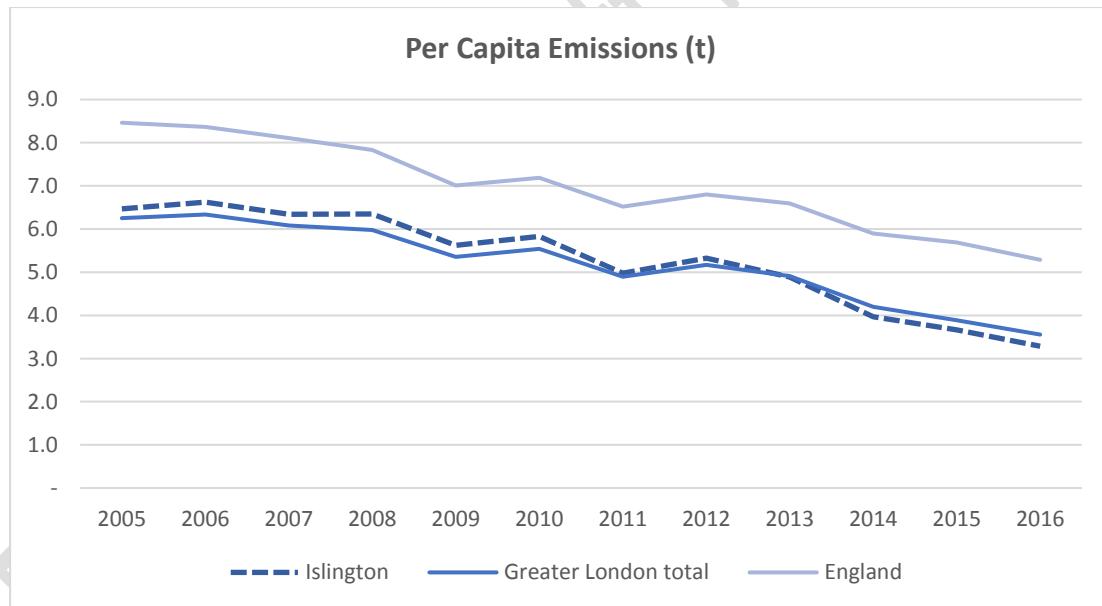


Figure 3: Carbon Emissions per Capita for Islington, London and England 2005-2016

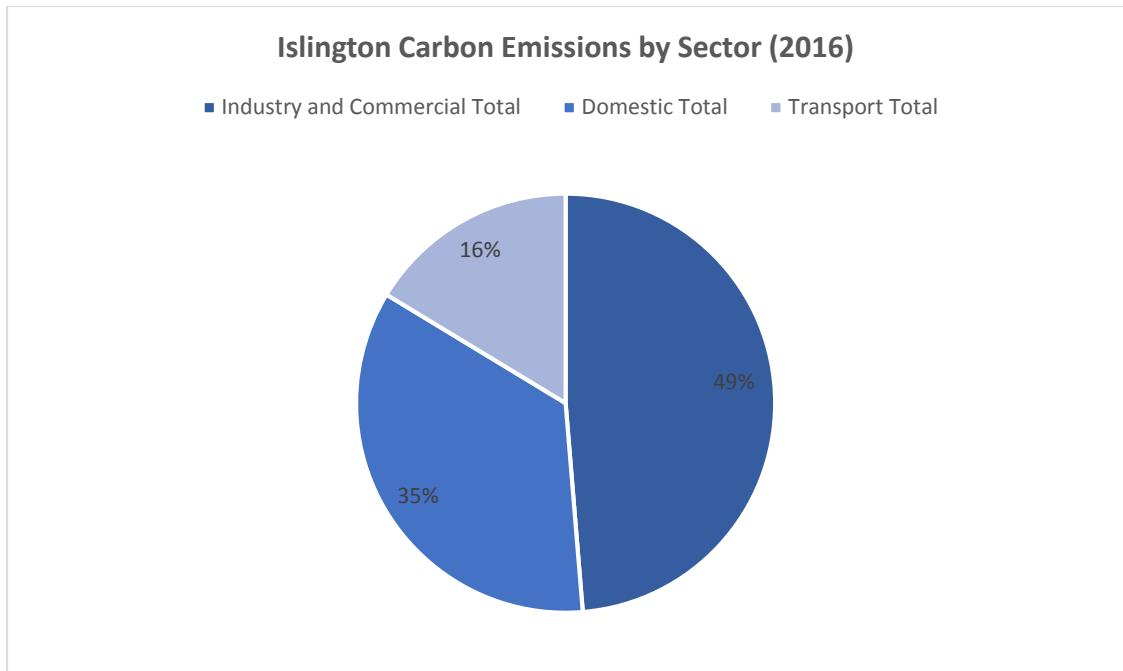


Figure 4: Islington Carbon Emissions by Sector for 2016.⁵

Pollution - Air quality, noise

Periodical assessments undertaken by the local authority as required by the Environment Act 1995, found that in Islington objectives for NO₂, and PM10 were not going to be achieved. Subsequently, an Air Quality Management Area (AQMA) for the entire borough was declared in 2003 and has been retained since.

The 2008 ambient air quality directive (2008/50/EC) sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). As well as having direct effects, these pollutants can combine in the atmosphere to form ozone, a harmful air pollutant (and potent greenhouse gas) which can be transported great distances by weather systems. Many large cities in England and Wales have consistently exceeded the limit value for NO₂, and in central London many road-side locations have exceeded the hourly limit for NO₂. Furthermore, some parts of London have exceeded the daily limit value for PM10.

Vehicle emissions are the cause of 48% of NOx emissions and 54% of PM10 emissions in central London.⁶ Royal College of Physicians, in 2016, reported that inhaling particulates causes around 29,000 deaths in the UK per year, which, on recent evidence, may rise to around 40,000 deaths when also considering nitrogen dioxide exposure.⁷ In Islington specifically, major roads are the main contributor to NOx concentrations; non-exhaust emissions (brake and tyre wear) account for the largest proportion of PM2.5 and PM10 emissions⁸

In 2016, 6.7% of Islington's mortalities were attributed to particulate air pollution in comparison to 6.4% for London region and 5.3 for England. Islington ranks as the joint 5th highest among London's boroughs.⁹

There are higher concentrations of air pollutants around busy roads (see figures: 5,6,7), and 34 of Islington's 45 primary schools and 5 of its 9 secondary schools recorded concentrations of NO₂ above the EU limit of 40 µg/m³ in 2013.¹⁰

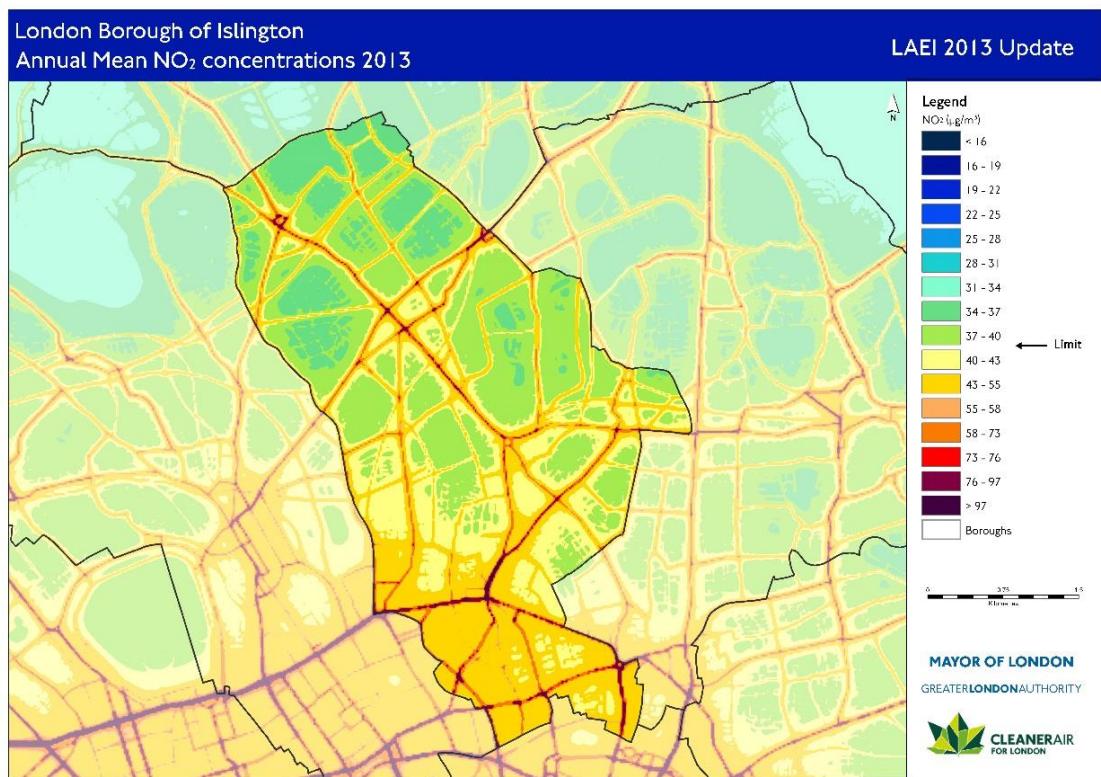


Figure 5: Islington Annual Mean NO₂ Concentrations 2013¹¹

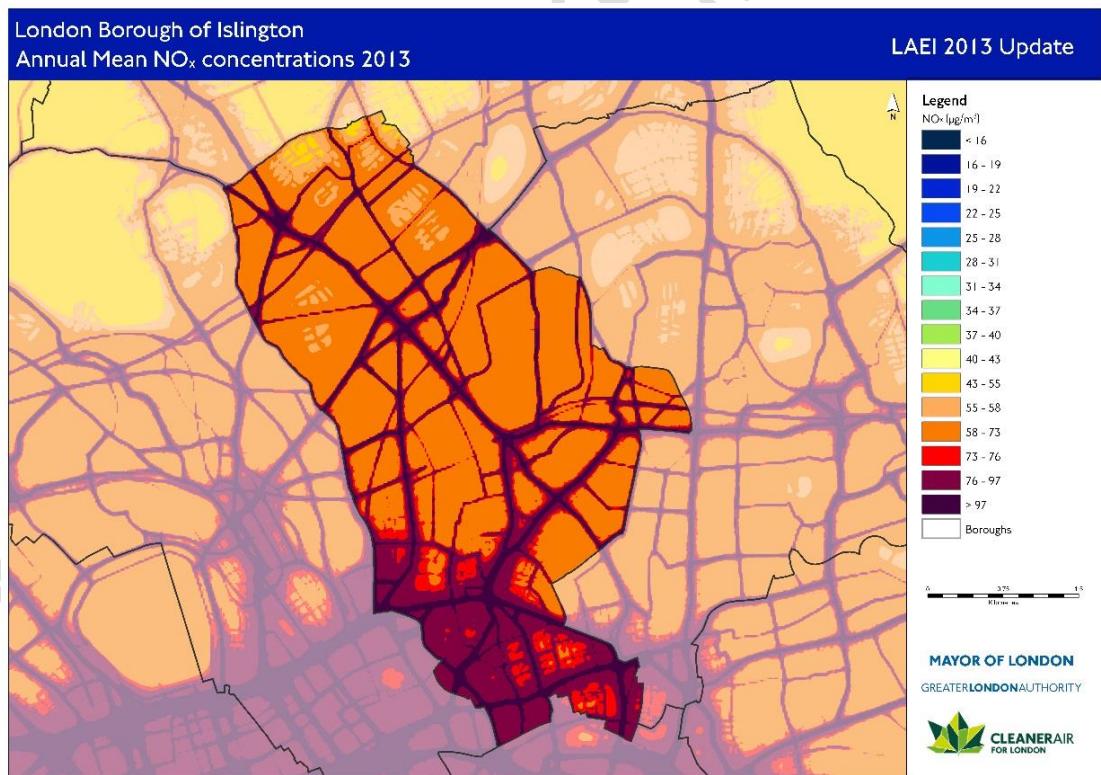


Figure 6: Islington Annual Mean NO_x Concentrations 2013¹²

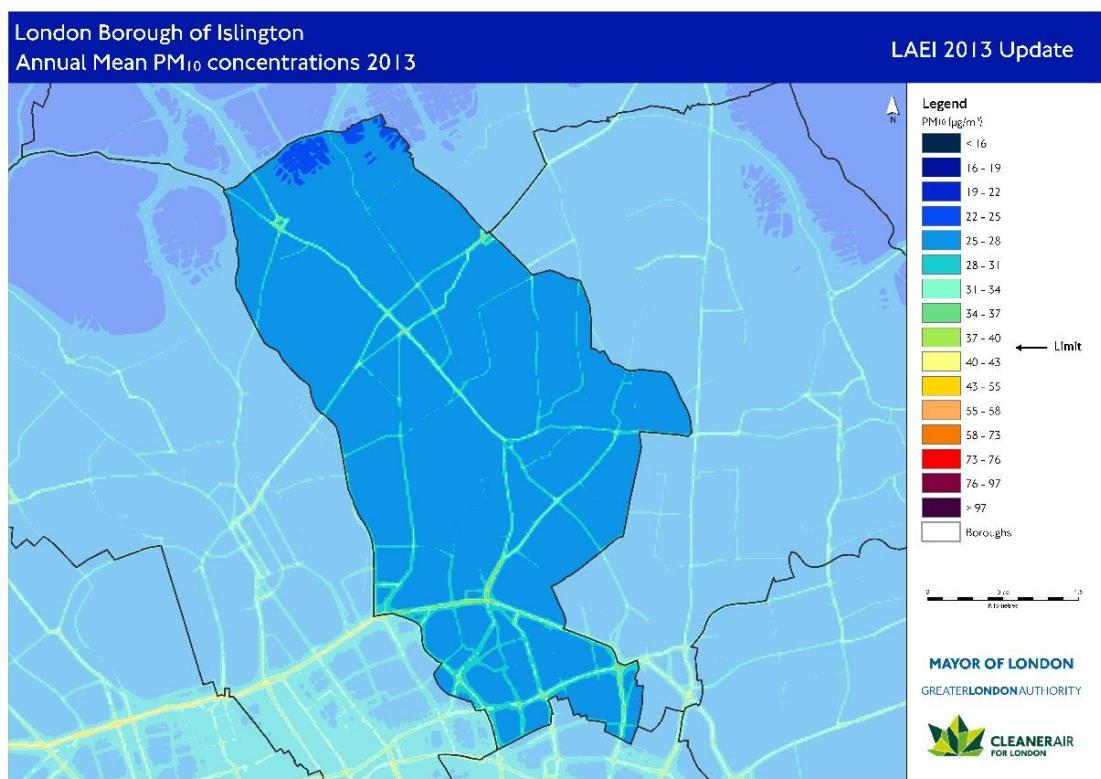


Figure 7: Islington Annual Mean PM10 Concentrations 2013¹³

Air quality and climate change

Warmer temperatures and more frequent hot sunny days lead to an increase in ground level ozone (O₃) concentrations, which is formed by reactions of sunlight with NOx. O₃ is an irritant and can exacerbate pre-existing respiratory and cardiovascular conditions. Air quality is affected by many weather-related factors, such as temperature, wind dispersion and humidity, which are all affected by a changing climate. Therefore, climate change has the potential to worsen air quality conditions in the borough.

Noise

According to 2011 statistics, 16.8% of Islington's population, compared to an average of 11.5% of London total, is exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime. This ranks Islington the 6th highest London borough in term of noise levels. The percentage increases during night time to 20.7% with exposure to 55dB(A) or more.¹⁴ When ranked by complaints about noise, Islington is third among London's boroughs with a rate of 36.9% in 2015/16.¹⁵ A survey of Islington residents undertaken in 2011 identified road traffic, sirens, human noise and construction noise as the most noticeable noise when out and about in Islington.¹⁶

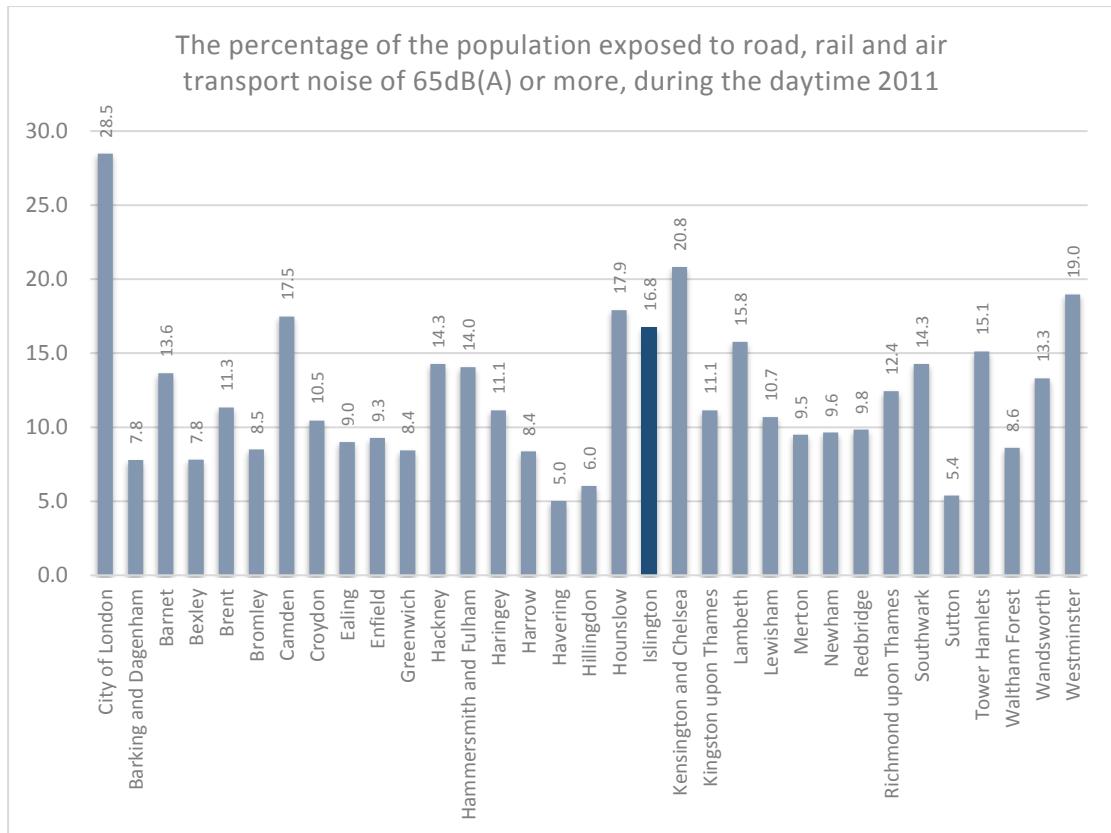
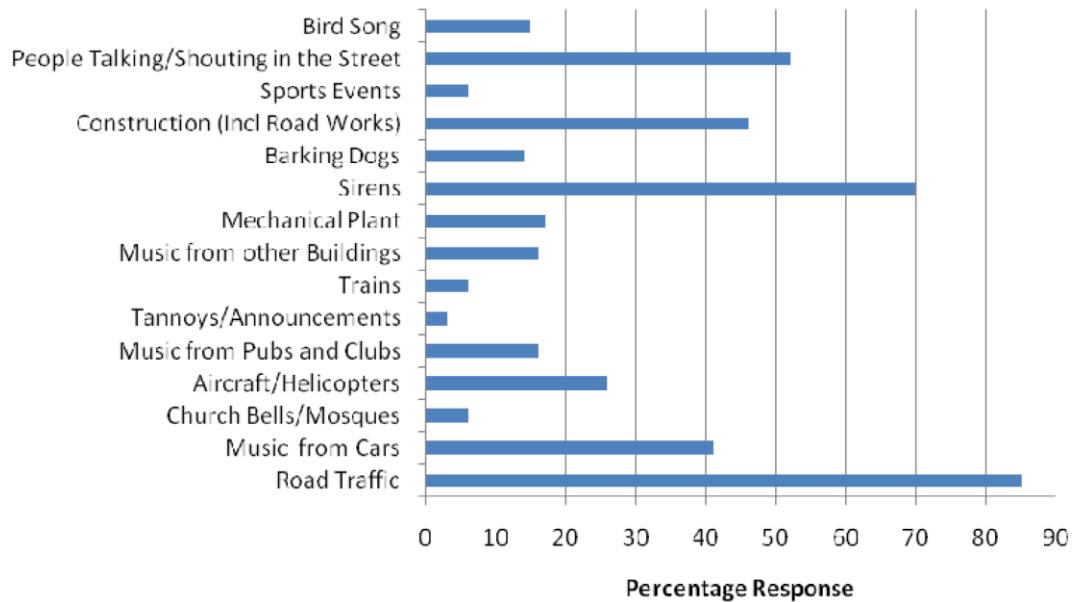


Figure 8: The percentage of population exposed to transport noise by boroughs, 2011

Noises Noticed Out and About



9: Percentage of respondents noticing noise when out and about in Islington

Figure

Vibration

Road traffic, and particularly heavy vehicles, are a significant source of vibration in Islington. Vibration can affect people's health as well as damage structures and buildings, which is of particular

concern in sensitive areas that have high levels of architectural, historical or amenity value (such as conservation areas, listed buildings, green spaces and high streets).¹⁷

Flood risk and water management

Islington is situated on higher ground in the central district of London, with a ridgeline running from the north to north west of the borough, and the majority of surface water flows from north to south.

The Regents Canal crosses Islington but for the most part is within a tunnel from Colebrook Row to Muriel Street; a distance of 886m. There are a number of natural springs at the foot of the hill that rises to the north of Finsbury, which includes Sadler's Well, London Spa, and Clerkenwell. They were originally used for water supply and later supplemented by the 'New River' waterway bringing water from the River Lea in Hertfordshire to Finsbury.

Ordinary Water Courses

Islington has no 'critical' ordinary watercourses. The New River falls under the responsibility of Thames Water and the Regents Canal is the responsibility of the Canal and River Trust. The SFRA states that ordinary watercourses within the Borough pose a minimal threat of flooding.¹⁸

Groundwater Flooding

Islington is underlain by gravel deposits (Boyn Hill formation and Hackney Gravel formation) to the south and east, which overlay an impermeable clay layer beneath. This may contribute to localised flooding events after periods of prolonged rain due to water being released from the gravels, because of the impermeable layer of clay preventing the rainfall percolating through.

Surface Water Flooding

The dominant flooding mechanism in Islington is pluvial flooding (surface water flooding). There are currently no Environment Agency defined Critical Drainage Areas (CDAs), however the Islington Surface Water Management Plan (SWMP) identified three CDAs within LBI which are defined in the SWMP as: "A discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure." This means that the location of an area within a CDA indicates that it is within a catchment area which contributes to a flooding hotspot. Surface water management in CDAs should be a particular focus of new developments.

Figure 10 shows that the majority of the Borough is located within a CDA identified in the SWMP – including the northern section up to Highbury, and the western strip along Liverpool Road down to the southern boundary. There is also an area of the south eastern corner of the Borough included in a CDA. Any development in areas of previously undeveloped land in LBI is likely to have a negative impact on surface water flood risk in LBI by reducing the potential for infiltration of runoff, unless appropriate surface water management is incorporated into the development to reduce the runoff from site post-development.

The SWMP also identifies eight Local Flood Risk Zones (LFRZ) (figure 10). The Risk from Surface Water Flooding is divided into three categories according to the Annual Exceedance Probability, 1 in 30 year (3.33% AEP), 1 in 100 year (1% AEP) and 1 in 1,000 year (0.1% AEP).

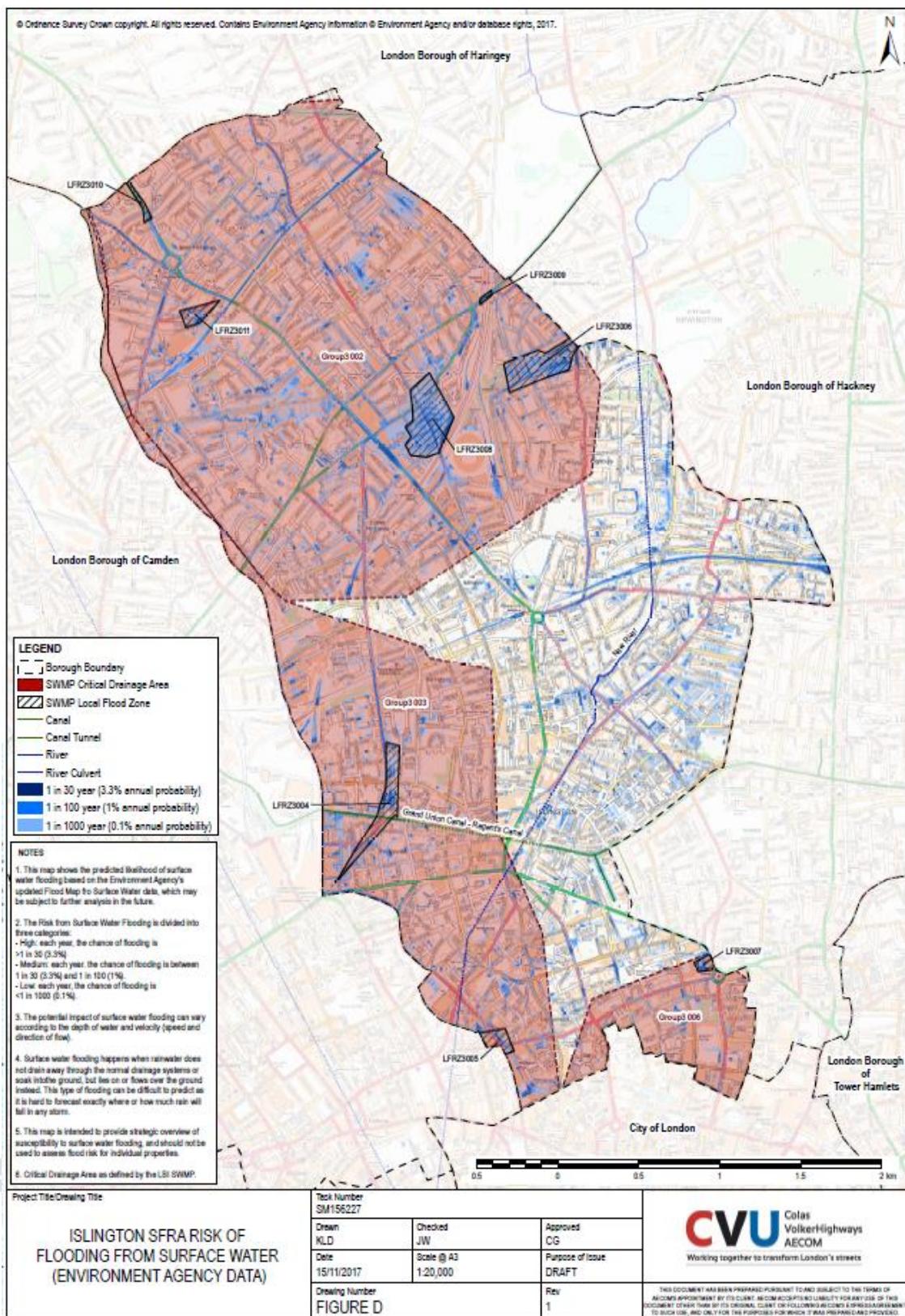


Figure 10: Local Flood Risk Zones and Critical Drainage Areas for Islington

Groundwater source protection zones (SPZs)

Groundwater source protection zones (SPZs) are areas of influence around groundwater sources used for public drinking. The purpose of an SPZ is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon drinking water abstraction¹⁹. There are three groundwater SPZs within Islington. One covers much of the southern half of the borough and is classed as a Zone II - Outer Protection Zone (defined as 400 day travel time to the source). There are two smaller SPZs within this area that are classed as Zone I - Inner Protection Zones (defined as 50 days travel time to the source). In addition, there are groundwater sources within the London Boroughs of Hackney and Haringey whose SPZs fall partly within Islington.

Water quality

Under the Water Framework Directive²⁰, The Regent's Canal (Lower Section) is classified as a heavily modified water body which currently achieves a 'moderate status'. The significant water management issue for this section of the canal is attributed to the physical modification of the water body. Draft actions and measures that would help reach 'good' status include improving the management of riparian vegetation and planting to create more diverse habitats, sedimentation management strategy and re-naturalising banks where possible.

Diffuse water pollution from urban runoff is an issue for water quality in the borough and more widely across London. As diffuse water pollution is caused by various sources, it is often hard to identify the cause. In urban areas generally, diffuse water pollution includes: pollutants from car parks and transport; heavy metals and pollutants washed from roofs; animal faeces.

Natural resources

Water consumption

As a London borough, Islington falls within the Thames Basin catchment (also known as the Thames Water's London Resource Zone), which is an area classified as being under 'severe water stress'. The Thames basin is one of the most intensively uses water resource systems in the world, with supply mainly consisting of 80% of surface water and 20% by groundwater.

Currently the average Londoner consumes 167 litres of water a day (l/d) which is above the England and Wales average of 148 l/d. In some dry years, London's consumption of water outstrips available supply.

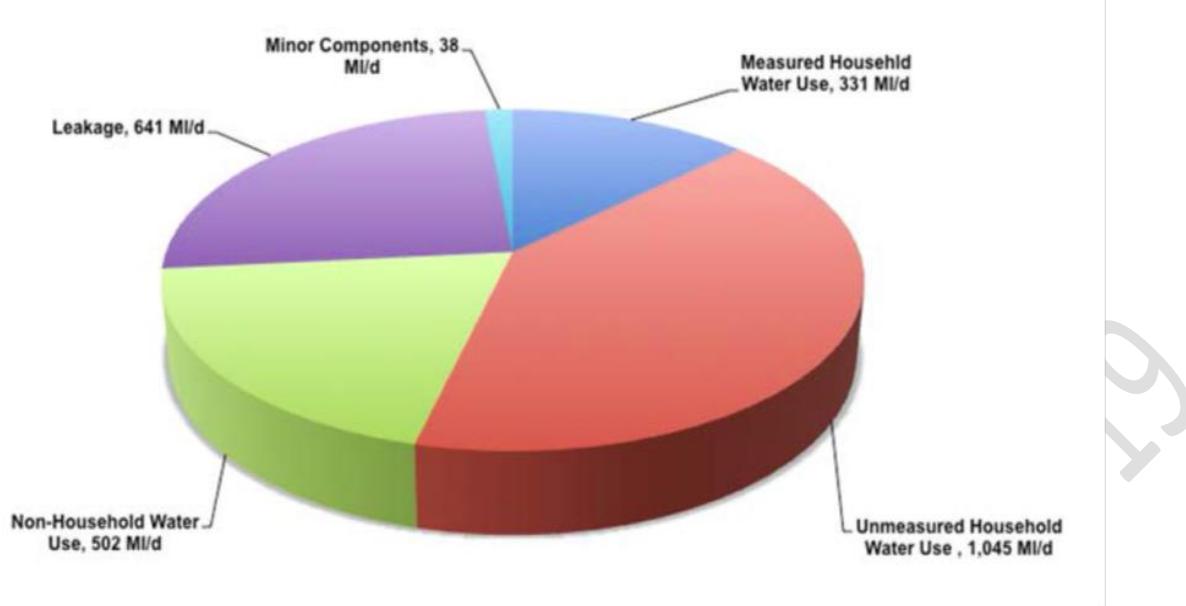


Figure 11: Water demand (Thames Basin) by component²¹

Projections for population growth in London and in the wider south-east will mean that new strategic water resources will be required. Thames Water forecast that overall household water demand will increase by 250Ml/d between 2015 and 2040.²²

The need for this is exacerbated by the climate change predictions of more sporadic and intense rainfall and a higher likelihood of droughts, as well as the need to protect the water environment following Water Framework Directive requirements. Figure 12 below shows the forecasted gap between supply and demand in London by 2040

There is a link between inefficient water use and carbon emissions. Currently, water use accounts for 27% of all carbon emissions from homes.

Figure 12: Forecasted gap between supply and demand in London²³

Water resource zone	2011	2015	2020	2025	2030	2035	2040
London	18.8	-59.4	-132.7	-213.1	-291.7	-361.1	-415.9
Swindon and Oxfordshire	37.34	27.08	-0.14	-12.05	-21.30	-26.70	-32.66
Slough, Wycombe and Aylesbury	21.47	11.57	7.93	4.89	0.77	-2.60	-6.09
Guildford	6.85	0.85	0.06	-1.14	-2.14	-2.85	-3.80
Henley	5.32	5.14	4.76	4.31	3.80	3.26	2.67
Kennet Valley	41.25	26.05	21.68	16.38	11.41	7.84	5.49

Note the data are in Ml/d with deficits shown in bold red.

Waste and recycling

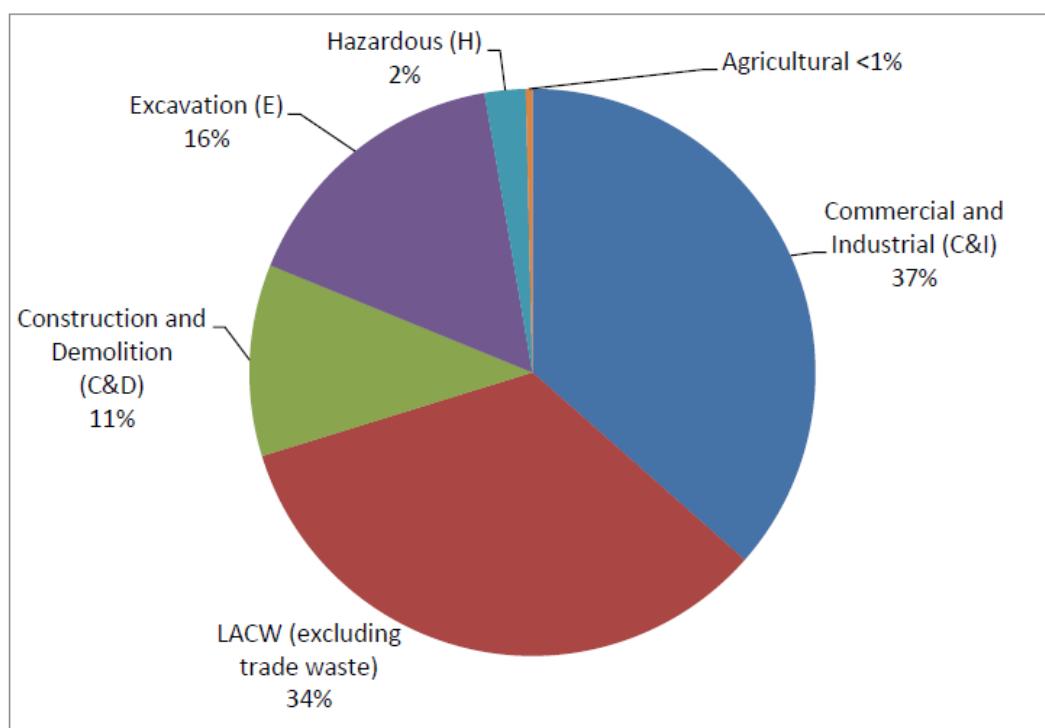
Waste

Islington contains one waste facility in the borough (household reuse and recycling centre and waste transfer station) located at Hornsey Road. Islington falls within the North London Waste Authority

area comprising seven London boroughs (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest).

Quarterly residual household waste rates (excluding waste sent for recycling, composting or reuse) for Islington between April 2014 and June 2014 were 105kg/household, the 2nd lowest of the London borough's behind the City of London Corporation.²⁴

In 2013, waste arising from the construction, repair, maintenance and demolition of buildings and structures accounts for 27% of North London's waste, represented by the Construction and Demolition (11%) and excavation (16%) streams shown in figure 13 below.²⁵ The contribution of non-domestic sectors to North London's waste streams is significant, and can broadly be represented by the non-local authority collected waste streams making up approximately 66% of waste (note: some LA collected waste is non-domestic trade waste and hazardous waste is a sub category of all waste streams).



Source: Environment Agency Waste Data Interrogator, 2013; Defra WasteDataFlow.

Figure 13: Proportion of North London Waste in Each Waste Stream in 2013

Recycling

Household waste recycling rates for Islington were 32 % for 2016/17, an increase from 29% in 2015/16.²⁶ Islington recycling rates ranks the second among London Inner Boroughs and the 19th in London in general, however, it is slightly below the London average of 33% and notably below the national average of 44% for 2016/17.²⁷

Soil and geology

Topography

Islington is situated on higher ground in the central district of London, with a ridgeline running from the north to north west of the borough. The LiDAR Topographic Survey Map (see figure 14) shows that the north of the Borough falls from a high point of 100mAOD near St Aloysius College towards a

low point close to the Emirates stadium, and then rises back up to a ridge line at Highbury. This ridge line runs to the east of the A1, continuing in a southerly direction to Pentonville, before descending through Finsbury to the low point at Farringdon Station of 7mAOD. On the west boundary of the Borough towards Tufnell Park there is another localised high point centred on Hilldrop Road.

Soils

There are two soilscapes found in the borough - base-rich loamy and clayey soils are found in the north-western half of the borough and loamy soils with naturally high groundwater are found in the south-eastern half.²⁸

Geology

Islington is largely underlain by London Clay which varies in thickness from approximately 15 to 65 metres.²⁹ There are smaller areas to the south east of the borough underlain by younger riverine deposits including the Taplow Terrace (eastern edge between Newington Green and Clerkenwell) and Boyne Hill Terrace (lower Holloway to Finsbury).

The chalk layer is the major aquifer for the Thames region with the clay overlain providing a protective layer, however contamination can occur through deep disturbance such as boreholes (piercing a hole through the clay into the aquifer).

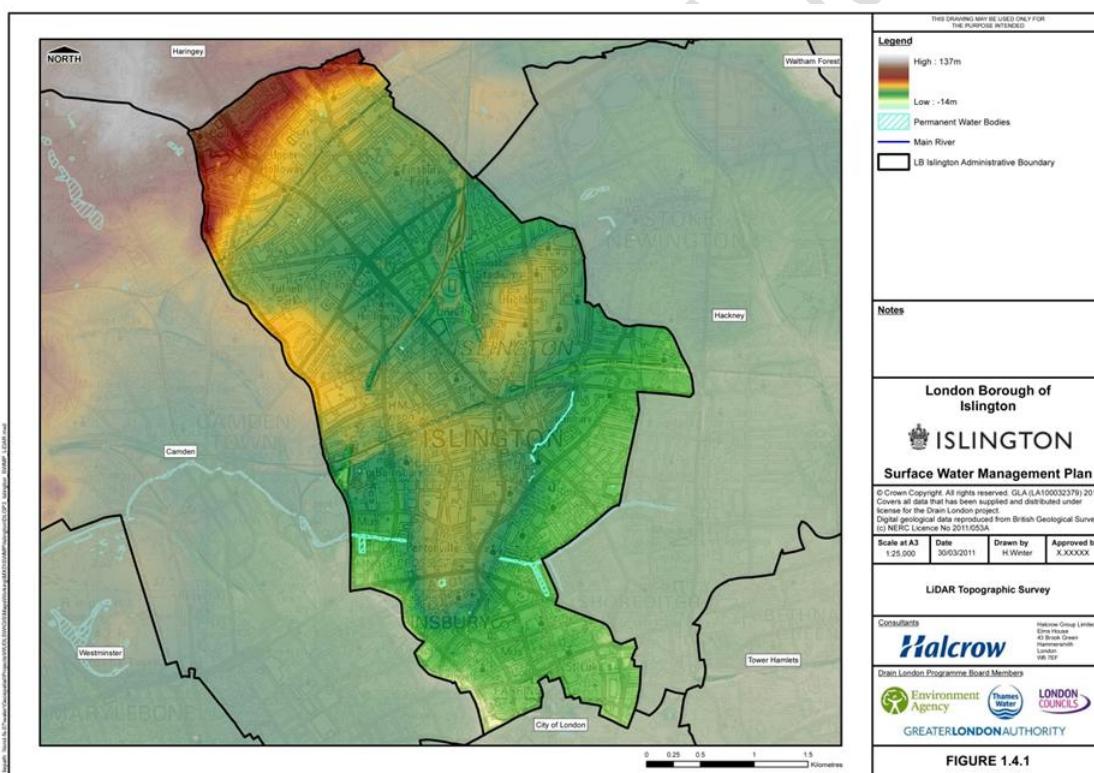


Figure 14: Topography in the borough ranging from high (red) to low (pale green)

Geodiversity

Islington contains one site identified as a potential Locally Important Geological Site (LIGS) – Finsbury Gravel, near Spa Green Sadler’s Wells which contains Finsbury Gravels approximately 2m thick.³⁰. Caledonian Park is chosen as a Site of Geological Interest (SGI) on account that it was, for a short time, a brickfield where interesting fossils, 50 million years old were found.³¹

Land contamination

There are three bands of sites of potential concern for contamination in Islington, with 30 sites in the ‘High’ rating, 183 in the ‘Medium’ rating and 1,051 sites in the ‘low’ rating.³² The map below shows the relatively even distribution of sites across the borough, with some clear linear areas following rail lines.

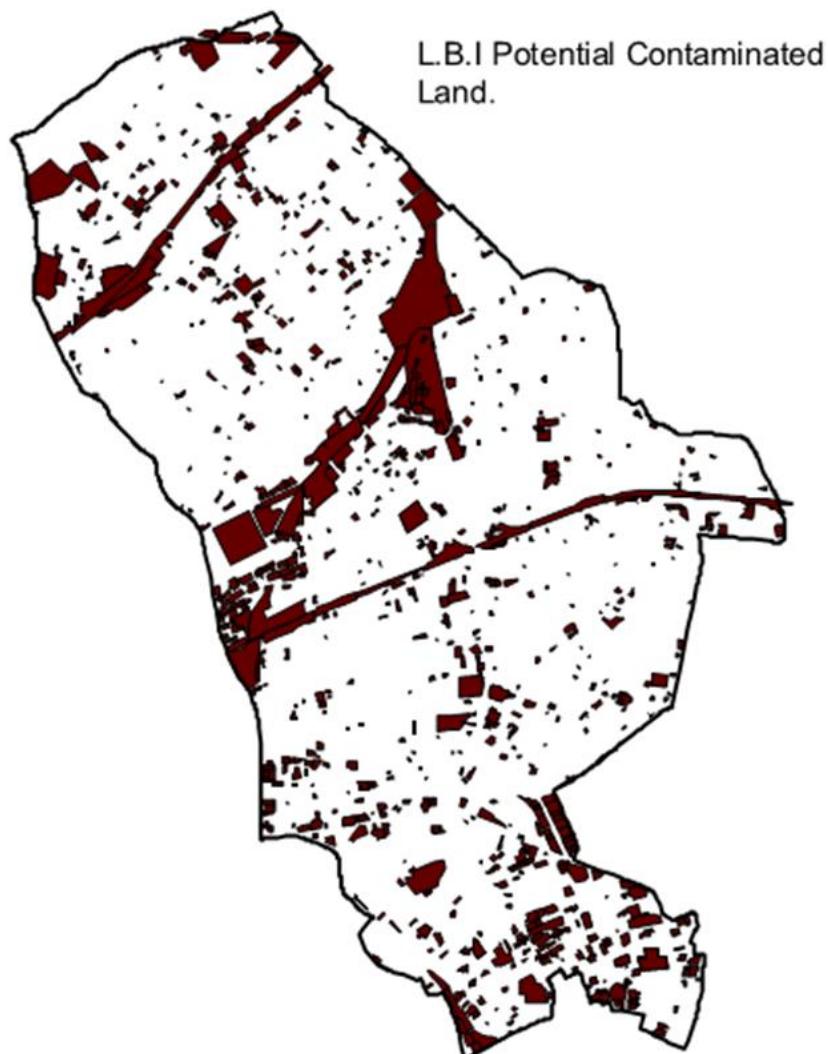


Figure 15: Distribution of potentially contaminated land

Biodiversity, flora and fauna

Islington’s biodiversity includes a number of rarities and nationally important species. Examples include at least four native black poplar trees, one of Britain’s rarest native timber trees; the first recorded sighting in Britain of *Lasius emarginatus*, an ant species usually found in Europe; the red data book species *Nomada lathburiana*, a cuckoo bee which is a species of conservation concern; and the first breeding colony in Britain of the long-tailed blue, a rare migrant species of butterfly.

Railway side land and brownfield sites make up some of largest semi-natural habitat in Islington.³³ Significant development pressure has led to loss of biodiversity in these areas, forming the largest habitat loss in Islington in recent years.³⁴ As a result, species in these areas have declined including nationally rare species such as the black redstart, which has been subsequently lost from the borough.

In 2016, a rare species of orchid called the ‘green-winged orchid’ was identified as growing on a green roof in Islington. This site is the only known occurrence of the species in central London.

Habitats present in Islington which are covered by London targets or regional action plans include: acid grassland, woodland, orchards, built structures, canals, churchyards and cemeteries, parks and urban green spaces, private gardens, reed beds and standing water.

Statutory designations

Islington does not contain any internationally designated nature conservation sites such as Natura 2000 /Ramsar sites or Sites of Special Scientific Interest (SSSI). Within a 15km radius of Islington, there are the following sites:

- Lee Valley Park Ramsar site and SPA
- Epping Forest SAC
- Richmond Park SAC
- Wimbledon Common SAC

Islington is not located within the green belt and does not contain any designated Areas of Outstanding Natural Beauty (AONBs. The Borough has three statutory Local Nature Reserves: Gillespie Park, Barnsbury Wood and the Parkland Walk.

Sites of Importance to Nature Conservation

Islington contains three Sites of Importance for Nature Conservation (SINCs) of Metropolitan grade, 13 SINCs of Borough Importance - Grade 1, and 36 SINCs of Borough Importance -Grade 2³⁵. Islington’s SINCs are predominately parks, but also include cemeteries, church yards, school grounds, the Regents Canal, housing estates and rail side land. Further evidence on biodiversity is expected to become available to inform the Regulation 19 draft of the Local Plan.

Open space

Amongst London boroughs, Islington has the lowest amount of open space per head of population³⁶. This low amount of open space per head of population will be amplified as Islington’s population continues to rise, increasing the pressure and demand on existing provision. Islington currently manages 3.84sqm of open space per resident³⁷.

In Barnsbury, Clerkenwell, Hillrise and St Mary’s Wards, fewer than 20% of homes have good access to a local, small or pocket park. The only Wards in which more than 50% of homes have this access are Finsbury Park and Highbury West. The only significant open space in Islington is Highbury Fields, although Finsbury Park sits immediately to the north east of the borough boundary .

The amount (in area) of open space managed by the council and that is publicly accessible has marginally increased over the past decade. There is limited data with regard to open spaces not publicly accessible and under council management. Additional public open space at Navigator Square has been added, with potential further spaces due to come forward.

A large proportion of Islington's open space is privately managed, with gardens contributing significantly. Studies show that garden composition has changed significantly in recent years, including loss of mature planting and other soft landscaping such as lawns, attributed to changes in garden design and management and the impact of urban creep (such as building extensions, outbuildings, basements, driveways and other hard surfacing).³⁸

Food growing

There is approximately 20,000sqm of food growing space within Islington. This equates to 6,000sqm of allotments, 9,000sqm of community gardens and 4,750sqm of food growing space on other land (such as schools, estates, community land)³⁹.

Cultural heritage and townscape

Islington is a densely built inner London borough with a rich heritage of buildings and spaces. The densely developed nature of the borough is based on buildings of eclectic and diverse architecture and age. The spatial development pattern established in the 19th century is still largely intact, with busy mixed use town centres at key junctions and arranged along the main north-south routes through the borough complemented by smaller local centres interspersed amongst largely residential neighbourhoods.⁴⁰

The majority of the borough's land area is covered by established residential neighbourhoods with traditional street patterns and low to medium building heights interspersed with open block development and medium to tall building heights typical of mid-century redevelopment. The majority of the borough's historic town centres and shopping streets are composed of predominantly low and medium rise buildings, with heights generally increasing towards the core of the centres and massing arranged along the street frontages in narrow plots.

The south of the borough is within the Central Activities Zone (CAZ) and the central, high density employment dominated areas of Clerkenwell, King's Cross and Old Street/City Road. All of these areas are characterised by traditional street patterns with predominantly medium building heights, although the latter has two clusters of tall buildings at the City Road Basin and Old Street roundabout.

Heritage Assets

There are 41 Conservation Areas in Islington⁴¹, covering an area of 567.58 hectares (or 38% of the borough), as well as 1,000s of Listed⁴² and Locally Listed Buildings⁴³ spread across the borough. All conservation areas have Design Guidelines, while some have appraisals and Management Plans.

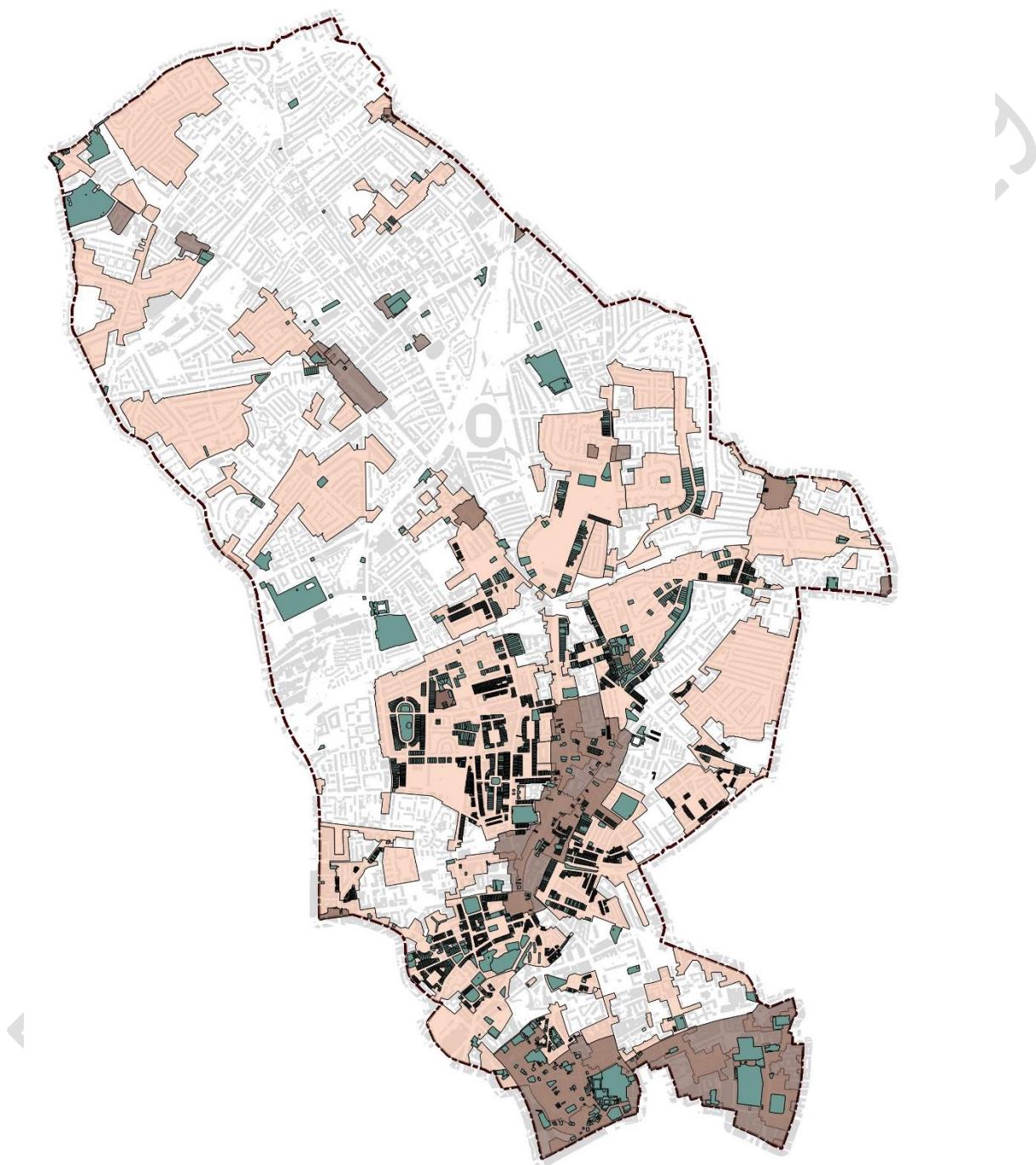
Islington has 19 Archaeological Priority Areas (APAs) concentrated around the south and middle of the borough. During the Roman, medieval, and later periods, archaeological evidence indicates the borough's use for activities such as burial of the dead, quarrying, and the disposal of the city's waste.

To the north of this area the archaeological evidence suggests that the borough was mainly open land, with Islington village the only significant settlement throughout the medieval and post-medieval periods.

The Archaeological Priority Areas are currently under review by Historic England's Greater London Archaeological Advisory Service (GLAAS) as part of a long-term commitment to review and update London's APAs. The review uses evidence held in the Greater London Historic Environment Record (GLHER) in order to provide a sound evidence base for Local Plan reviews. The review is expected before publication of the regulation 19 draft Local Plan.

Islington contains one Registered Park and Garden – Bunhill Fields Burial Ground, a non-conformist burial ground dating from the 1660s. This is a designation identified by Historic England for the heritage value of a park or garden.

Islington contains two Scheduled Monuments, St. John's Gate and the Nunnery of Mary de Fonte, both located in the south of the borough.



Legend

- Listed Buildings
- Archeological Priority Area
- Conservation Areas

Figure 16: Conservation Areas and Statutory Listed Buildings

Strategic and Local Views

A number of the Mayor of London's strategic views cross Islington. There are also a number of local views, including views from:

- Farringdon Lane / Farringdon Road / Clerkenwell Road to St. Paul's Cathedral
- St. John Street to St. Paul's Cathedral
- Angel to St. Paul's Cathedral
- Archway Road to St. Paul's Cathedral
- Archway Bridge to St. Paul's Cathedral
- Amwell Street to St. Paul's Cathedral
- Dartmouth Park Hill to St. Paul's Cathedral
- Pentonville Road to St. Pancras Chambers and Station

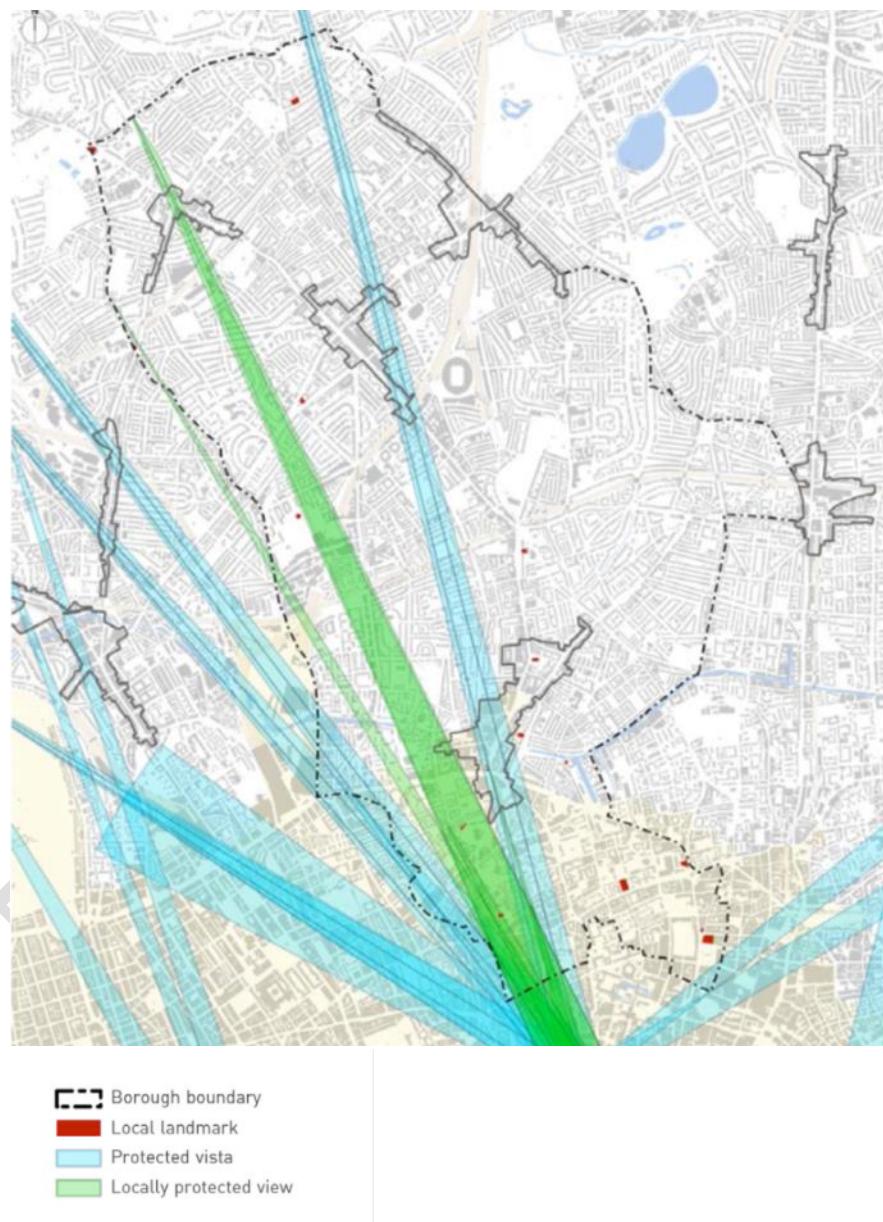


Figure 17: Protected vistas and locally protected views that occur/ pass through Islington

Heritage at Risk – Listed Buildings, Places of Worship and Conservation Areas

Islington has 23 listed buildings or places of worship on the 2018 Heritage at Risk Register⁴⁴. Historic England categorises these assets by condition and priority for action. There are four condition categories: Very bad, Poor, Fair or Good. For buildings and structures and places of worship, six priority categories are used as an indication of trend and as a means of prioritising action. The categorisations for priority action are:

- A: Immediate risk of further rapid deterioration or loss of fabric; no solution agreed
- B: Immediate risk of further rapid deterioration or loss of fabric; solution agreed but not yet implemented
- C: Slow decay; no solution agreed
- D: Slow decay; solution agreed but not yet implemented
- E: Under repair or in fair to good repair, but no user identified; or under threat of vacancy with no obvious new user (applicable only to buildings capable of beneficial use)
- F: Repair scheme in progress and (where applicable) end use or user identified; or functionally redundant buildings with new use agreed but not yet implemented.

Of Islington's 23 assets at risk, Historic England categorises 16 as 'poor' condition; of these, two are ranked Priority A. Two assets are ranked as 'very bad' condition; of these, one is ranked Priority A for intervention. Most of the at-risk assets (72%) are Priority C.

The majority of Islington's heritage assets at risk are at risk of 'slow decay' and have no solution such as repair works or proposed occupation and use in place. The Local Plan Review, through its policies on land use and heritage issues, can act as an enabler of development taking into consideration the condition of heritage assets, particularly those on the HARR, alongside all other relevant planning and material considerations.¹¹ 11 conservation areas are on the Heritage at Risk Register, which accounts for 26% of the borough's total. Conservation area trends are categorised as:

- deteriorating significantly
- deteriorating
- no significant change
- improving
- improving significantly
- unknown

Six conservation areas are categorised as 'deteriorating', the second worst of four categories. The remaining five are all categorised as 'no significant change'.

Infrastructure

Energy infrastructure capacity / vulnerability at London level

The London Infrastructure 2050 report states that London's population is expected to reach 11 million by 2050, a 37% increase from 2011.⁴⁵ How London responds to the challenge of supplying the necessary infrastructure is a city, if not region wide issue and cannot be dealt with at borough level.

The report warns that “recent rates of infrastructure investment in London do not appear to have been sufficient for the long-term needs of London’s economy, particularly when viewed in the international context.”⁴⁶

Some of the report’s findings are summarised below:

“The total energy demand is expected to increase moderately (up by 20 per cent by 2050). If we are to meet our climate change targets, there will need to be a significant shift away from domestic gas consumption (down by 60-70 per cent) to electricity (up by 140-200 per cent). More local energy production will be needed to provide greater resilience.”

From as early as 2016, demand for water is predicted to exceed vital supply. Thames Water projects a 10 per cent deficit in London by 2025 rising to 21 per cent by 2040. A variety of demand and supply-side measures will be required, alongside the greening of the urban environment, as a counter balance to the city’s increasing development.

Green infrastructure needs to be regarded as infrastructure in its own right, assisting with flood protection, water storage and recycling, and providing shade, new pedestrian and cycling routes as well as space for recreation and biodiversity.⁴⁷

Islington must respond to these problems at a borough wide level by using planning policies to secure energy and water efficient buildings and to provide green infrastructure either as part of new development or through using Community Infrastructure Levy and planning obligation receipts to deliver new infrastructure both ‘hard’ and ‘green’, to ensure that the uplift in land values from development are used to deliver public goods.

Emergency services

There is one operational police station in Islington, on Tolpuddle Street in Angel. Holloway Police station closed in 2017 as part of the Metropolitan Police Service estate rationalisation plan. There are two more police stations in close proximity to the borough boundary.

There are two fire stations in the borough, Islington Fire Station on Upper Street in the middle of the borough and Holloway Fire Station on Hornsey Road in the north of the borough. Clerkenwell Fire Station in the south of the borough was closed in January 2014.

Prisons

There is one operational prison in Islington –HMP Pentonville. HMP Holloway was closed by the government in July 2016 and is due to be sold as part of the Ministry of Justice’s estate rationalisation programme.

Railways and access to stations

Islington is served by and includes stations on London Underground, London Overground and national rail networks. Islington is very well connected to central and south west London via the London underground and is connected radially to north, southeast, east and west London via the Overground.

Kings Cross / St Pancras London underground and national railway station is within the borough of Camden but is located mere metres west of the Islington borough boundary, meaning Islington is functionally connected to the East Coast mainline for connectivity to the north of England and Scotland, and Eurostar international services.

However, step-free access to railway services for wheelchair users is deficient, with no fully step-free accessible stations in the borough, and ramp access needed to board trains at the three stations with step-free access to the platform.

Figure 18: Step-free access at Islington underground, overground and railway stations

Station	Lines	Step-free access
Old Street	Northern, national	No
Angel	Northern	No
Finsbury Park	Victoria, Piccadilly, national	Step free interchange between north-north & south-south Victoria and Piccadilly
Highbury & Islington	Victoria, Overground, national	There is step free access to the overground platforms, but ramps to trains. Step free interchange between Victoria line north bound and Great Northern north bound, and also between the south bound platforms but not between north and south
Caledonian Road	Piccadilly	Yes, street to train
Arsenal	Piccadilly	No
Holloway Road	Piccadilly	No
Farringdon	Circle, Metropolitan, Hammersmith & City, national, Crossrail from 2018	Yes , street to platform
Caledonian Road & Barnsbury	Overground	Yes, street to platform
Drayton Park	National	No
Essex Road	National	No
Canonbury	Overground	Yes, street to train
Upper Holloway	Overground	Yes, street to platform

Transport and mobility

Car ownership

Islington has the lowest rate of car ownership in London (not including the City of London); Department for Transport statistics show just under 36,000 cars licensed in Islington⁴⁸.

At a London-wide level, TfL data shows a strong correlation between income and car ownership. Car ownership rises steadily with income amongst households with incomes of up to £75k a year.

Beyond this point, car ownership flattens out at 80% no matter how much further income increases, therefore a fifth of higher income London households choose not to have a car.⁴⁹ These figures are not available at a disaggregated borough-level.

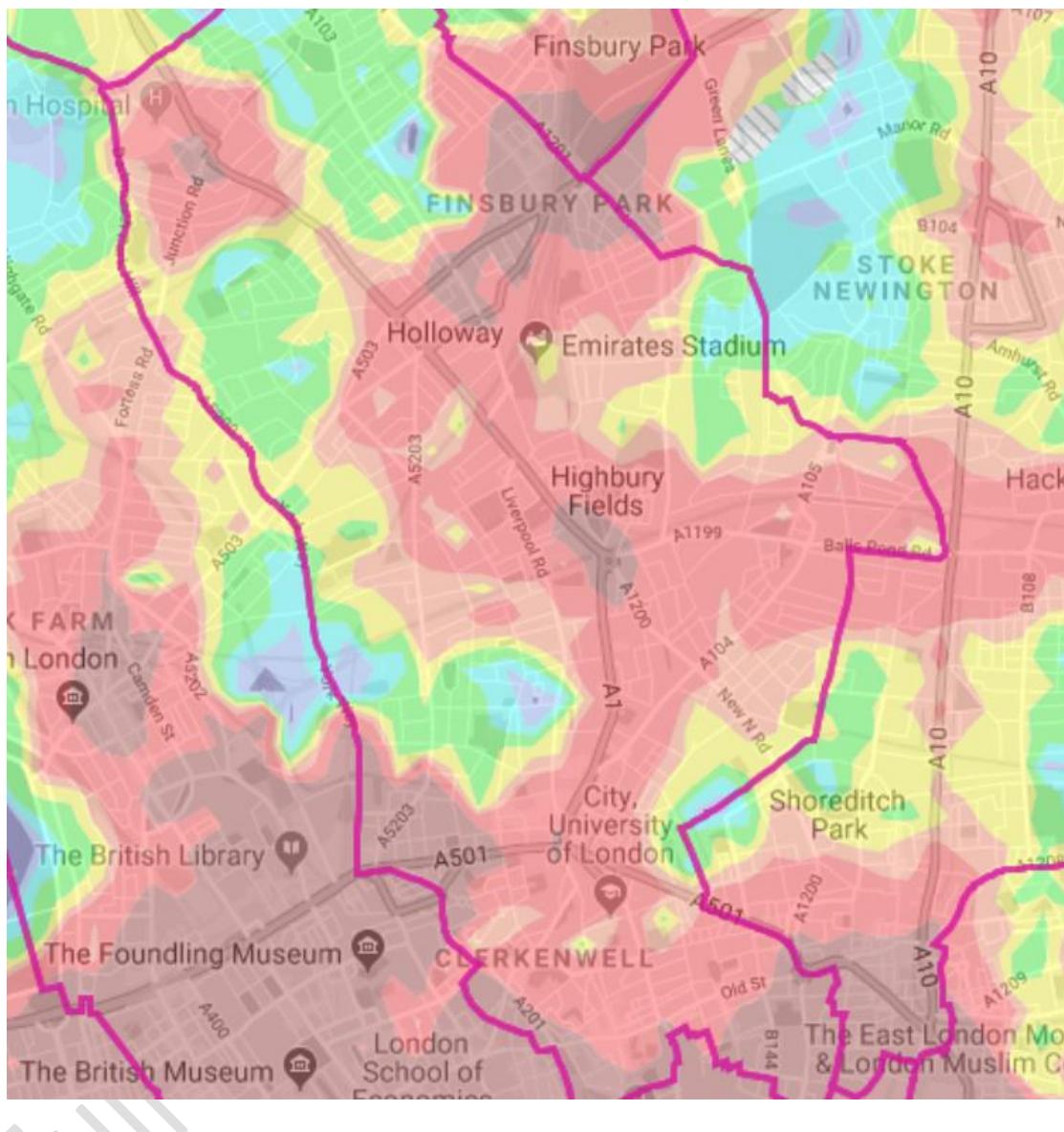
Looking long-term, the prevalence of young drivers has decreased across London. The proportion of young London residents, aged 17 to 19 years, with full car driving licences has fallen from 35% in 1991 to 16% in 2011, and adults under 35 are less likely to hold a driving licence than their predecessors. Two thirds of Londoners who do not own a car do not hold a licence.⁵⁰

Due to its highly dense population and small area, Islington has a very high car density, with 24.2 cars per hectare according to Q1 2018 vehicle licensing statistics⁵¹ ranking fourth in London despite having the lowest rate of ownership. Only Hammersmith and Fulham, Lambeth and Kensington & Chelsea rank higher.. Therefore, the challenge of accommodating large amounts of development

without the negative effects of car usage on road congestion, carbon emissions and public space will continue to be as relevant as ever.

Public Transport Accessibility Level (PTAL)

Islington has overall excellent PTAL assessments, but with very small pockets of lower accessibility at PTAL 1 to 2. The map below shows the borough wide picture.



Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)	Borough Boundaries
------------------------	--------------------

Figure

19: PTAL in Islington⁵²

Road congestion

Despite very low car ownership amongst residents, Islington suffers from high levels of road congestion. Transport for London's (TfL's) 'Network of Interest' shows that Islington roads have the 11th highest total annual vehicle delays (in terms of minutes per km) in London in 2014/15.⁵³ This would likely be even worse with higher car ownership levels in Islington.

Traffic flows

Figure 20 shows that Islington has the second lowest amount of motor vehicle traffic, measured in millions of kilometres travelled, which since 1993 has followed the inner London trend gradually downwards.

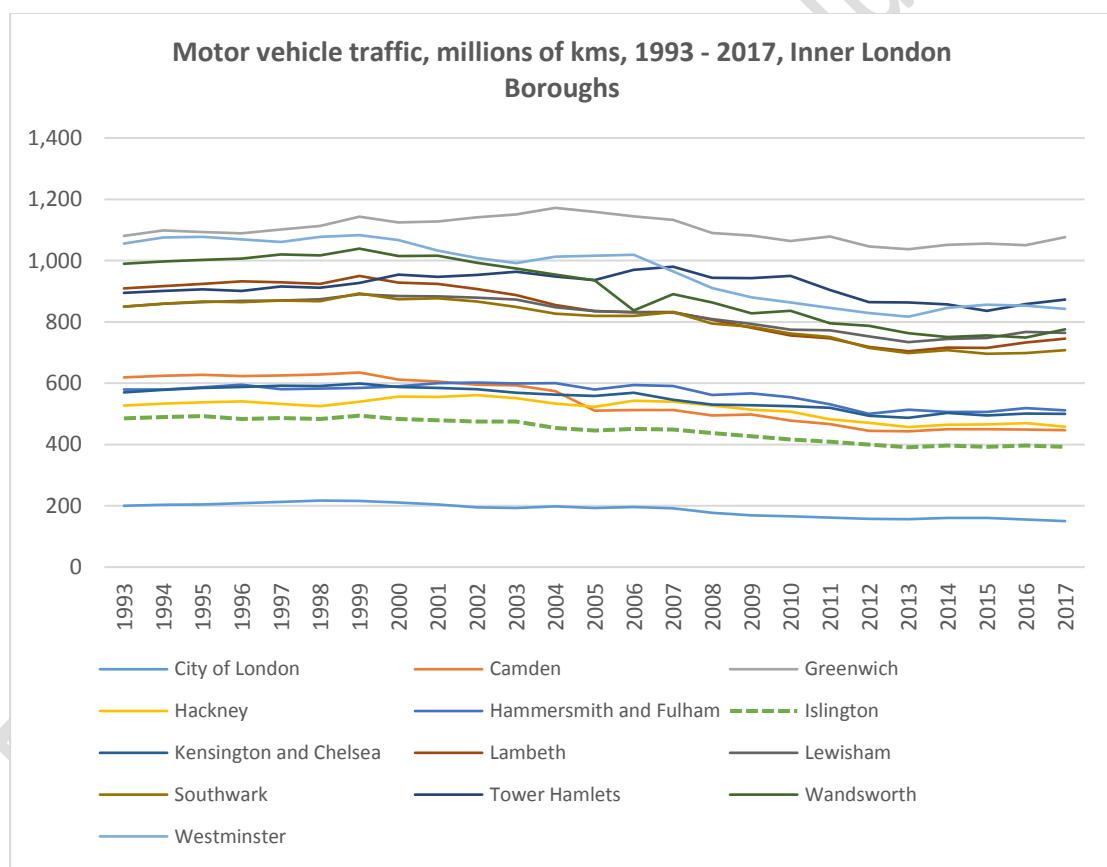


Figure 20: Motor vehicle traffic, millions of kms, 1993-2017, Inner London Boroughs⁵⁴

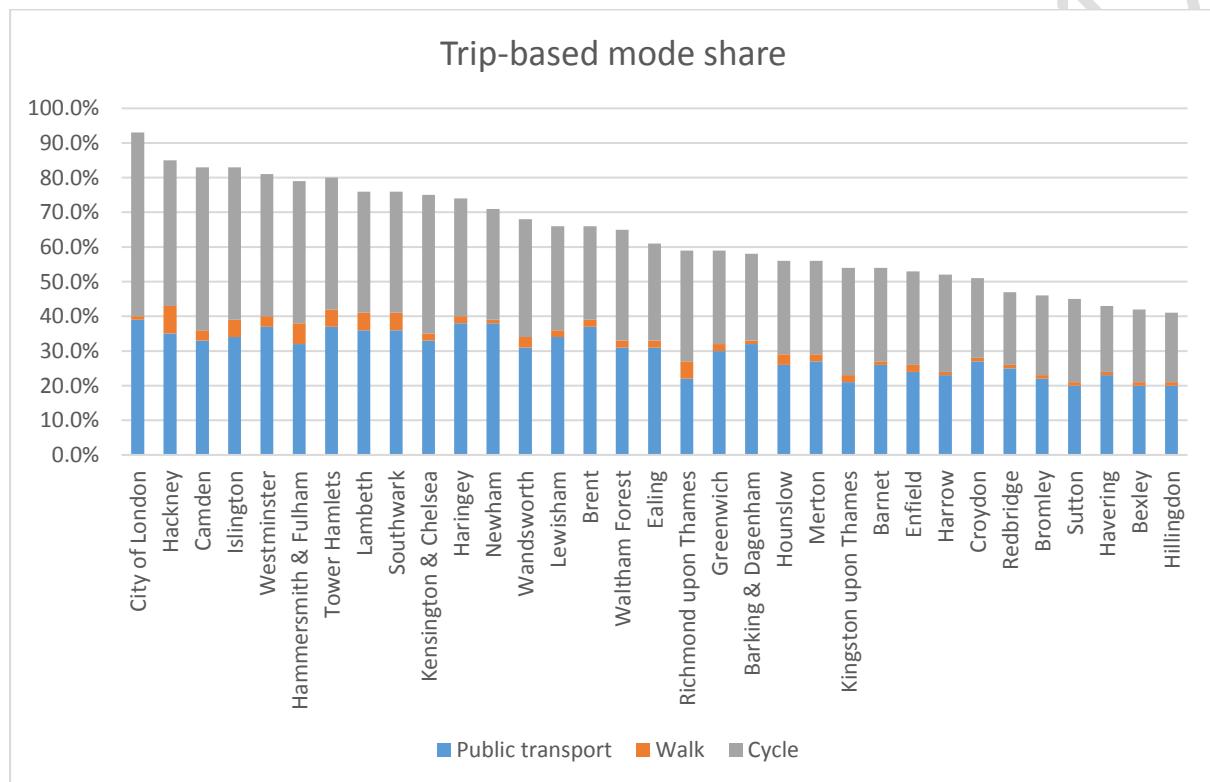
Overall mode share – all trips

The trip-based mode share for active and sustainable mode of transport demonstrates that Islington has higher cycling and overall mode share than the average for Inner London boroughs, although both walking and public transport mode shares are lower than the average. This reflects the compact

nature of the borough and existing connectivity. The table below shows the three years average 2015 to 2018 trip-based mode share in Islington, with Inner London averages for comparison.

*Figure 21: Trip-based mode share for active, efficient and sustainable modes, Islington and Inner London (average), LTDS 3 year average, 2015/16-2017/18.*⁵⁵

	Public transport	Walk	Cycle	Total
Islington	34.0%	5.0%	44.0%	82.0%
Average of inner boroughs ¹	34.6%	6.2%	36.1%	76.8%



*Figure 22: Trip-based mode share for active, efficient and sustainable modes, by borough of residence, LTDS 3 year average, 2015/16-2017/18.*⁵⁶

Journeys to work by walking and cycling

9.6% of journeys to work originating in Islington are by bicycle⁵⁷. This is second in London only to Hackney (14.6%) and has more than doubled since 2001. Some Islington wards are higher than the borough average, with Mildmay at 13.25%, St George's 11.4%, Highbury East 12.9% and Highbury West 10.2%. As a borough on the edge of central London with a relatively flat topography, there should be scope to improve these figures even more, with road safety improvements such as vehicle/cycle segregation and the promotion of quiet and cleaner routes for walking and cycling.
Road safety – rate of KSIs

¹ Data for individual boroughs were extracted from Travel in London Report 10. data for total inner London calculated manually as an average of inner London boroughs. See attached excel file.

Overall road safety in terms of the rate of people killed or seriously injured (KSIs) on London's roads has improved in the long term, down 39% in 2017 against a 2005-2009 baseline.⁵⁸ The number of KSIs in Islington declined from 227 in 2001 to 125 in 2017, as shown in the chart below.

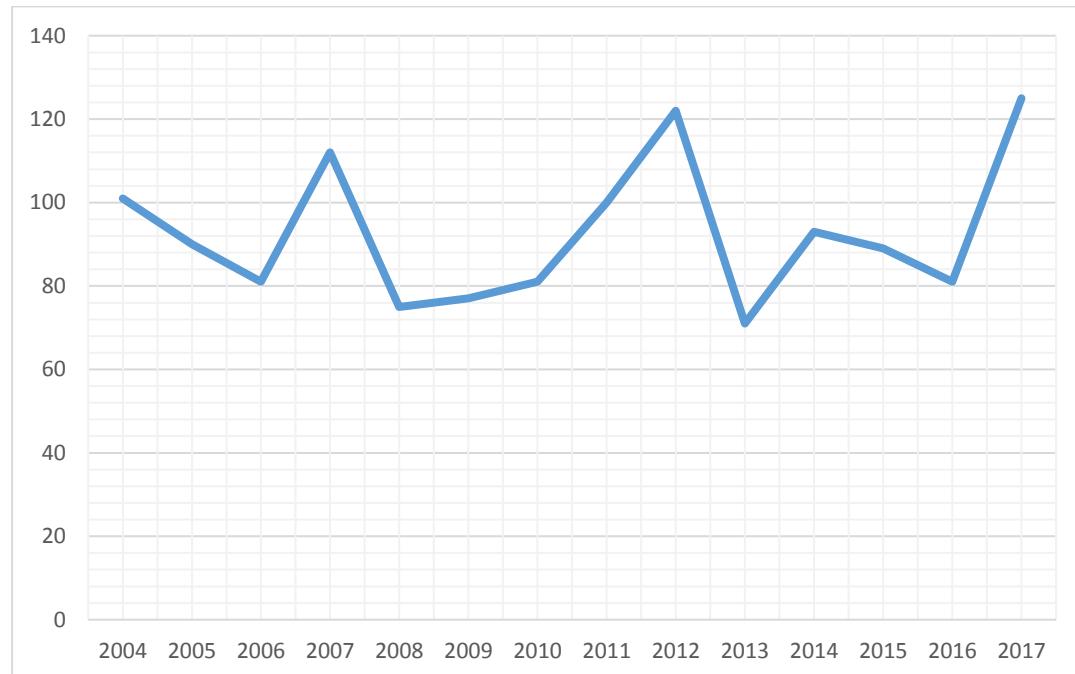


Figure 23: Killed or Seriously Injured (KSI) Islington⁵⁹

At a London level, pedestrian KSI rates are 10% lower in 2017 than the 2005-2009 average. Cyclist KSI rates are 7% lower in 2017 than the 2005-2009 average. However, this latter reduction should be seen in the context of a considerable increase in cycling over a number of years. The number of journeys cycled in London has more than doubled since 2000 to 720,000 journeys cycled each day⁶⁰.

Socioeconomic CHARACTERISTICS

Overview

Islington is an inner city borough bordering the City of London and the London Boroughs of Hackney, Haringey and Camden. It is the third smallest local authority area in the entire UK. and the latest population projections⁶¹ show that, in 2017, Islington is the most densely populated borough in the UK. The borough has experienced significant population growth in recent years, outpacing the growth of London overall.

Islington is a borough of contrasts, with the 8th highest average (£778,290) and (£615,000) median house prices in London in 2017⁶². However, Islington also has significant deprivation, with 15% of Lower Super Output Areas in the most 10% deprived in the country. Islington is the 5th most deprived borough in London, the 13th most deprived overall in England according to the rank of average rank.⁶³

The borough extends to the edge of the City of London to the south, and 70% of Islington's employment is concentrated in two wards within London's Central Activities Zone (CAZ)⁶⁴. The area around Old Street roundabout makes up a significant proportion of the City Fringe/Tech City Opportunity Area, which is identified by the Greater London Authority (GLA) as having significant development capacity to support London's financial and business services and also a diverse cluster of digital-creative business growth.

The centre and north of the borough are more mixed-uses/residential in nature, providing a transition between central London and its suburban hinterland to the north. Angel and Nag's Head town centres perform important retail and leisure functions and are supplemented by Finsbury Park and Archway district centres in addition to the Vale Royal/Brewery Road industrial area and a number of smaller business clusters.

Population

Population by age and sex

Islington's estimated population in 2017 was 235,370⁶⁵, compared to the recorded population of 206,639 from the 2011 census. Islington's population is 51% male and 49 % female. This is projected to be 52% male, 48% female by 2036.⁶⁶

Islington has a young population, with an average age of 34.8, significantly less than the national average of 40.1 for the 2017 estimates and only very marginally higher than the Inner London average of 34.7.⁶⁷ 2017 population projections⁶⁸ shows that 30% of people are younger than 25 years old, while 83% are younger than 55; this aligns almost exactly with the Inner London average. By 2036, Islington figures are projected to decrease to 27% and 78% respectively, which suggests an ageing population with lower mortality rates. .

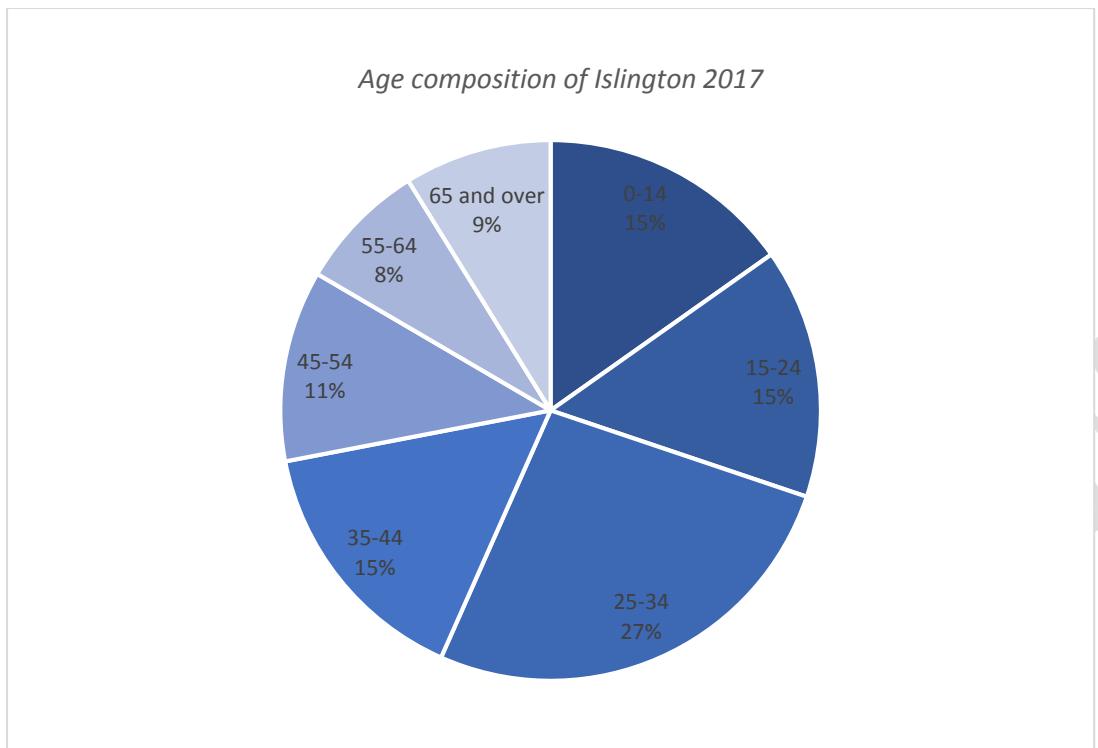


Figure 24: Age composition of Islington 2017⁶⁹

Population by ethnic group and country of birth

The borough has a diverse population, with a large number of Black and Minority Ethnic (BAME) residents. Data shows that the proportion of BAME residents in the borough has increased in recent years, from 24.6% in 2001 to 31.8% in Census 2011; population projections show a further small increase to 32.3% by 2017. Although this is more than double the proportion of recent BAME population figures for the UK as a whole (14% from Census 2011), it is still significantly less than the proportion of BAME residents across London (43% from 2017 projections)⁷⁰.

36.6% of Islington's population as per 2015 projections was born abroad. This compares to Inner London and Greater London averages of 40.1% and 36.6% respectively.⁷¹ The largest migrant country of birth in Islington was Ireland, comprising 2.8% of the population.⁷²

Household size and composition

GLA 2017 household projections based on borough-level capped household formation show an average household size of 2.22 people for the 2017 estimates. The projections show this figure falling to 2.08 people per household by 2036.⁷³

The GLA's 2017-based central trend projections - the most up-to-date household projections currently available - show that single-person households dominate in Islington, comprising 37% of all households for the 2017 estimate. Couples with children comprise 22% and couples with no children follow with 19%.⁷⁴

The proportion of children under 15 years old is below the national average but higher than the London average as per 2015 statistics.⁷⁵ In regards to the proportion of population aged 65 and over, Islington has lower percentage than both the London and national average.⁷⁶. A direct implication of having a relatively lower proportion of children and older people is a higher population of working

age people. In Islington, three quarters of residents are of working age, which is slightly higher than the London average (73.6%) and significantly higher than the national one (63.3%).⁷⁷

However, despite that, the population overall is expected to increase and the GLA's 2017 projections suggest there will be an additional 4,600 children and young people aged 17 and under, and an additional 11,800 people aged 65 and over in Islington by 2036.

Population density

Islington's population density of 155.6 people per hectare is the highest in London. The borough's area is only 14.86 square kilometres, the smallest in London other than the City of London Corporation. It is 41% more densely populated than even the inner London average of 111 people per hectare. Islington's overall population density masks variation within the borough, with St Peter's the most densely populated ward in Islington at 187.5 people per hectare followed by Finsbury Park and Mildmay wards at 181.4 and 175.9 people per hectare respectively. The most dramatic increase in density was in St Peter's ward from 146.4 people per hectare in 2011 to 187.5 in 2018 followed by Highbury West ward which increased from 139.5 people per hectare in 2011 to 172.9 in 2018.⁷⁸

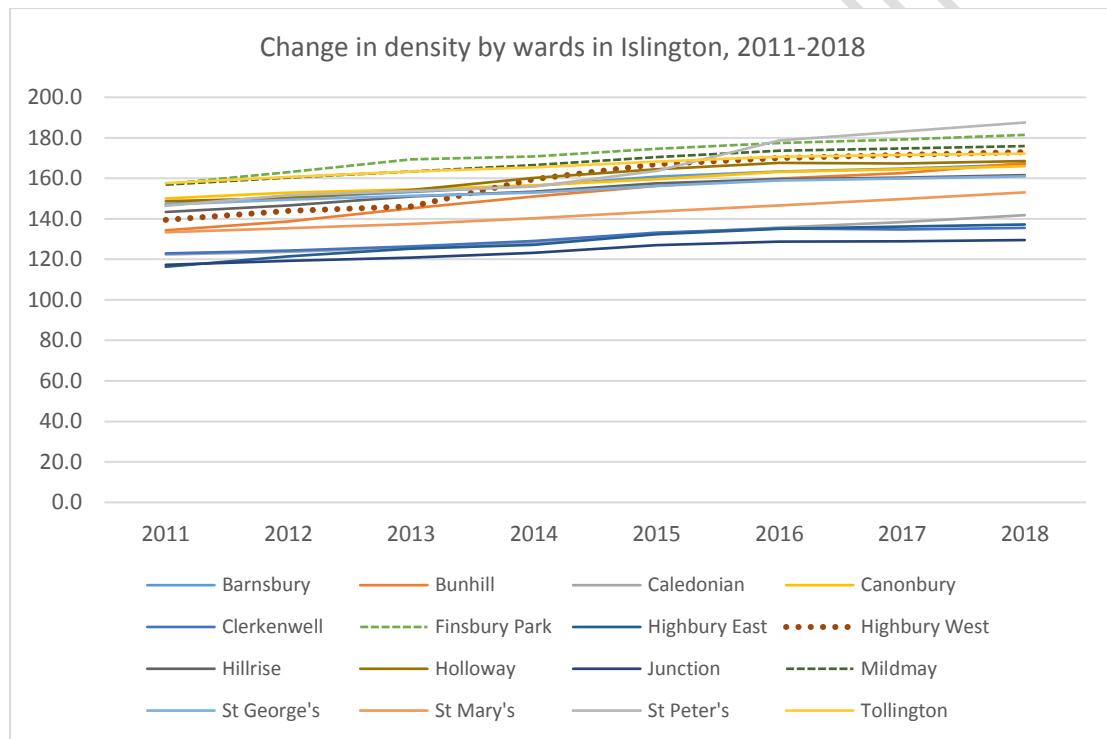


Figure 25: change of densities in Islington's wards between 2011 and 2018

Population growth

Islington's population is projected to grow to approximately 243,579 by 2021 and 272,682 by 2036. As the borough is already the most densely populated in England, this will present significant challenges in terms of accommodating sustainable housing and employment growth, protecting and expanding open spaces and social and community infrastructure, promoting resilience to climate change and minimising the borough's impacts on the environment.

The Borough's population grew by 13.9 between 2011 and 2017 based on 2016 GLA housing-led projection, against a London average of 8.4. In fact, Islington had the second fastest rate of growth

among London's boroughs over the 2011-2017 period alongside Westminster and just behind Tower Hamlets.⁷⁹

Islington has a very high population turnover, as approximately 20% of residents enter and leave the borough each year, one of London's most mobile populations. High housing costs and an unstable and insecure private rented sector is a significant obstacle to households remaining in the borough if they require larger or better housing.

Household projections

There were 106,182 households in Islington in 2017, a figure that is projected to increase to 130,991 households by 2036⁸⁰. Based on long term migration trends, the projection for 2036 is lower at 122,011 households.⁸¹

Health and Wellbeing

Spatial planning can have a significant impact on the health and wellbeing of communities through influencing and shaping the wider determinants of health:

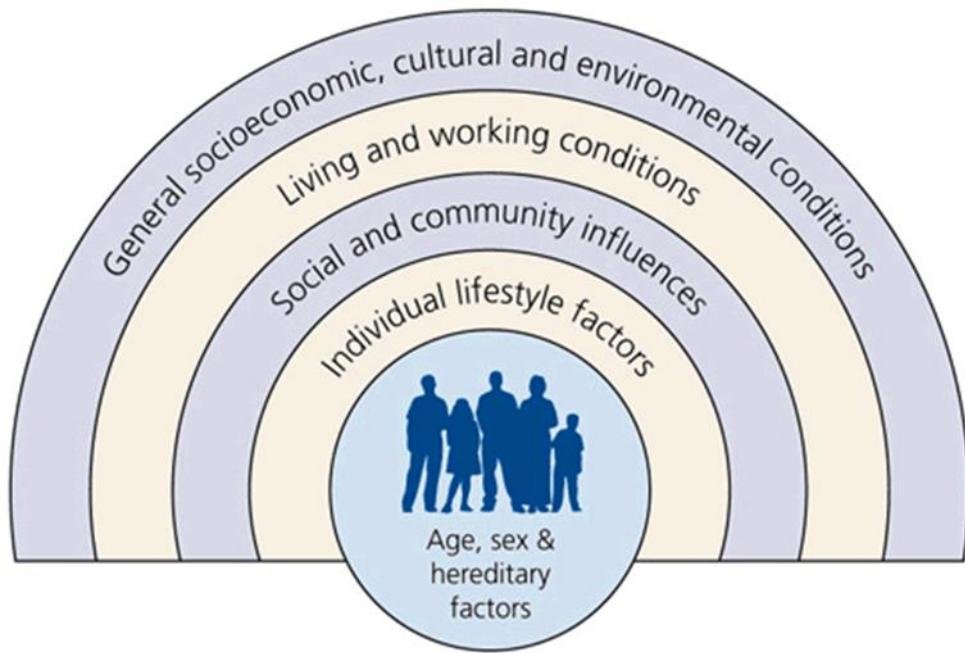


Figure 26: Wider determinants of health (Dahlgren and Whitehead, 1992)

The wider determinants of health have been described as 'the causes of the causes'. They include the social, economic and environmental conditions that influence the health of individuals and populations through the conditions of daily life and the structural influences upon them, themselves shaped by the distribution of resources. As well as spatial planning influencing land uses for health services for when people are ill, it shapes the distribution of services that protect from and prevent illness, including education, employment, and leisure uses. Additionally, it can shape an environment that facilitates social interaction and encourages physical activity and other healthy behaviours.

Health Services in Islington

There are 34 GP practices in the borough, with 134 full time equivalent GPs, equivalent to one GP for every 1,882 registered patients. This is better than the London average where there is one GP for

every 2,252 registered patients, and England where there is one GP for every 2,094 registered patients.⁸²

There are two acute hospitals serving the population of Islington: The Whittington Hospital at Archway, which generally serves the north of the borough and also serves part of Haringey's population, and University College London Hospital which, although located in Camden, provides acute services for residents in the south of Islington, as well as Camden and Westminster patients.

Community health care in Islington is provided by Whittington Health, and delivered from a variety of settings including health centres, children's centres, and in people's homes.

Mental health care in Islington is provided by Camden and Islington NHS Foundation Trust, with inpatient facilities at Highgate and St Pancras (both located in Camden) and a variety of community settings across both Camden and Islington.

Islington currently hosts Moorfields Eye Hospital, a specialist hospital serving a wider national and international population, but the hospital has plans to relocate to a site near King's Cross in Camden.

Deprivation

According to the 2015 Indices of Deprivation, Islington is the 24th most deprived local authority area in England by rank of average score. In terms of income deprivation affecting children it is ranked as the 3rd most deprived local authority area in England, and it is the 5th most deprived area with regards to income deprivation affecting the elderly⁸³.

Deprivation is associated with the increased use of health services. Research in east London found that there were more GP consultations among more socially deprived groups, and that an individual aged 50 years in the most deprived quintile nationally consults at the same higher rate as someone aged 70 years in the least deprived quintile.⁸⁴

Public Health data from 2011 shows that, in 2011, one in six adults aged 18 to 74 (28,000 people) registered with an Islington GP had at least one long-term condition, and one-third of those (9,200) were diagnosed with at least two long-term conditions.⁸⁵ Prevalence of two or more diagnosed conditions is spatially uneven, and ranges from a crude rate of 23.4 people per 1,000 population to 185.7 per 1,000 at small area level (see figure 27 below). The prevalence of long-term conditions is set to continue to increase in Islington as the population ages.⁸⁶

Census 2011 figures show that 15.7% of Islington residents had some kind of limiting long term illness or disability. Of those, 51% reported their day-to-day activities being 'limited a lot' and 49% 'limited a little'. The London average was 14.1%, and Islington's figure was the fourth-highest in London. Six percent of Islington residents reported having 'bad or very bad health' in the 2011 census.

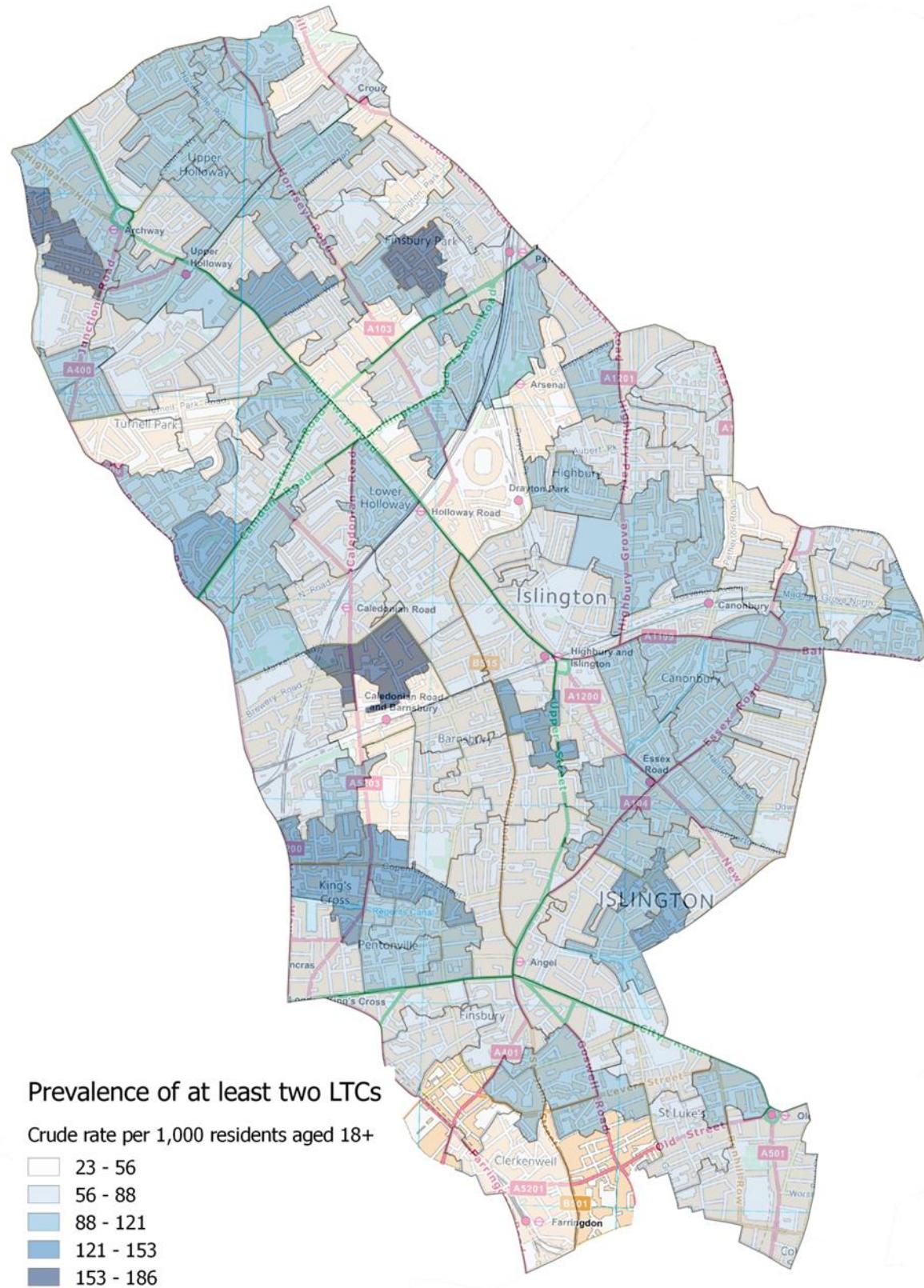


Figure 27: Crude rate of two or more long-term conditions in Islington registered patients aged 18 and over by lower super output area, Islington, 2011⁸⁷

Life expectancy

Life expectancy at birth in Islington was 79.4yrs (males) and 83.2yrs (females) for the period 2015-2017.⁸⁸ Islington ranks 8th among London boroughs for male life expectancy at birth and 6th for female life expectancy. For the healthy life expectancy which refers to the average number of years a person would expect to live in a good health, these percentages drop down to 60.4 for males and 61.8 for females in comparison to the London region average of 63.9 (male) and 64.6 (female).⁸⁹

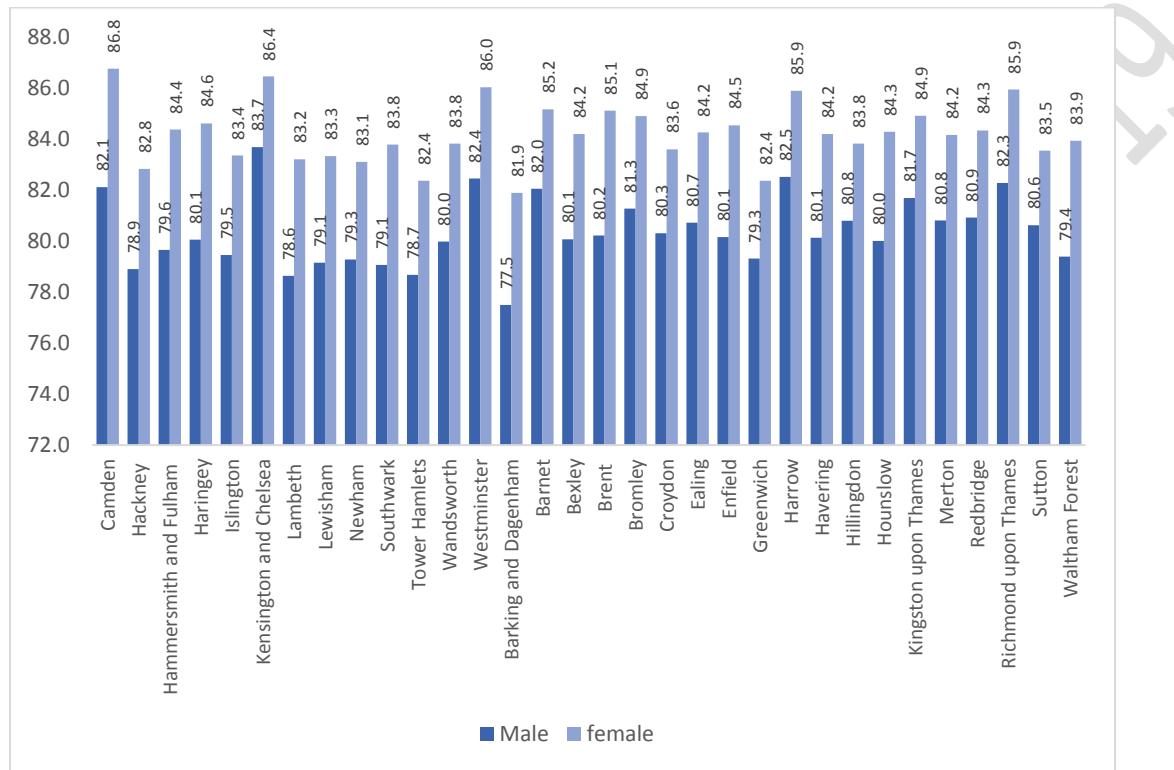


Figure 28: Life expectancy in London's Boroughs 2014-2016

The slope index of inequality is a measure of inequality within local authorities, and represents the difference in life expectancy at birth between the 10% most deprived areas of that local authority and the 10% least deprived areas. In Islington, a male born in 2015-17 in the most deprived areas can expect to live 6.8 fewer years than a male born in the least deprived areas. A female born in the 10% most deprived areas in 2015-17 could expect to live 3.7 fewer years than a female born in the 10% least deprived areas of Islington⁹⁰. The Slope Index of Inequality is one of the Mayor's Inequalities Strategy indicators (see below).

Major causes of death in Islington

The number of mortalities in Islington from causes considered preventable was 874 in 2015-2017 split into 539 men and 335 women⁹¹. Cancer, Cardiovascular disease (CVD), and respiratory disease remain the leading causes of premature deaths (deaths in people aged under 75 years) and deaths in all ages in Islington, although death rates are declining across the population as a result of improvements in the diagnosis and treatment of these diseases, and people living longer.⁹²

Between 2015 and 2017 there were 332 premature deaths from cancer in Islington that are considered preventable, a rate of 95.3 per 100,000 residents, which is higher than both England and London at 78 and 71.6 respectively.⁹³

There were 192 premature deaths from cardiovascular disease between 2015 and 2017, a rate of 54.5 per 100,000: higher than London and England.⁹⁴

There were 67 premature deaths from respiratory diseases in Islington between 2015 and 2017, a rate of 21 per 100,000 which was statistically higher than both London and England.⁹⁵

Taking account of contributory causes to death, at national level dementia was the third highest cause in 2015 in men and the highest in women, occurring mainly in the older age groups. Healthy eating, physical activity, and social connectedness are important factors in maintaining quality of life for people with dementia⁹⁶.

Among young adult and middle-aged men and women, suicide and accidental injuries are statistically significant causes of death.

Mental health and wellbeing

Mental health problems are very common, affecting approximately one in four adults every year and one in ten children or young people at any time. Mental illness is commonly unreported to health services and hence often not diagnosed, or treated. Some common mental conditions such as mild depression or anxiety can self-resolve over time, so a diagnosis may not be appropriate in some cases.

One-in six adults in Islington (32,200) have been diagnosed in primary care with one or more mental health conditions, including common mental health disorders (CMD), serious mental illness (SMI) or dementia. Taking comorbidities into account (i.e. people with more than one mental health diagnosis), this means that there are about 44,000 separate diagnoses in Islington. There are also about 1,500 children and young people under 18 in treatment for mental health conditions in Islington.⁹⁷

In addition to the numbers already diagnosed, it is estimated that a significant proportion of mental health conditions go undiagnosed: among adults, there are an estimated 16,000 undiagnosed mental health conditions among Islington adults and 1,760 among Islington children and young people.

Common mental disorders include depression, anxiety and panic disorders. Many people have CMD at some point in their life. In Islington, local data show that 29,900 adults have diagnosed, unresolved depression or anxiety. About a third of people with diagnosed CMD have both depression and anxiety. National data indicate that Islington has the highest diagnosed prevalence of depression in London.

Serious mental illnesses (SMI) include psychotic conditions, such as schizophrenia and bi-polar disorder, and are associated with significant disability, high levels of social exclusion and significantly reduced life expectancy. In 2014-2015, Islington had the second highest diagnosed prevalence of SMI in the country at 1.50% (3,498 people).

The distribution of diagnosed common mental disorder and serious mental disorder are both spatially uneven, with the prevalence of common mental disorder in people aged 18 and over ranging between a crude rate of 53.9 people per 1,000 population to 213.5 per 1,000 at small area level (figure 29). The prevalence of serious mental illness ranges between a crude rate of 1.3/1,000 and 43.4/1,000 (figure 30).

In 2014-2015, 1,030 people were living with diagnosed dementia in Islington, 4.97% of the population aged 65. The prevalence of diagnosed dementia in Islington (0.4% of the whole

population) was significantly lower to the London and England averages which can be explained by the younger age structure of the population locally.

A growing and ageing population in Islington means that Islington expects to see an overall increase in mental health conditions, with an increase in dementia particularly significant in the medium to long term.

Full Council draft IIA June 2019

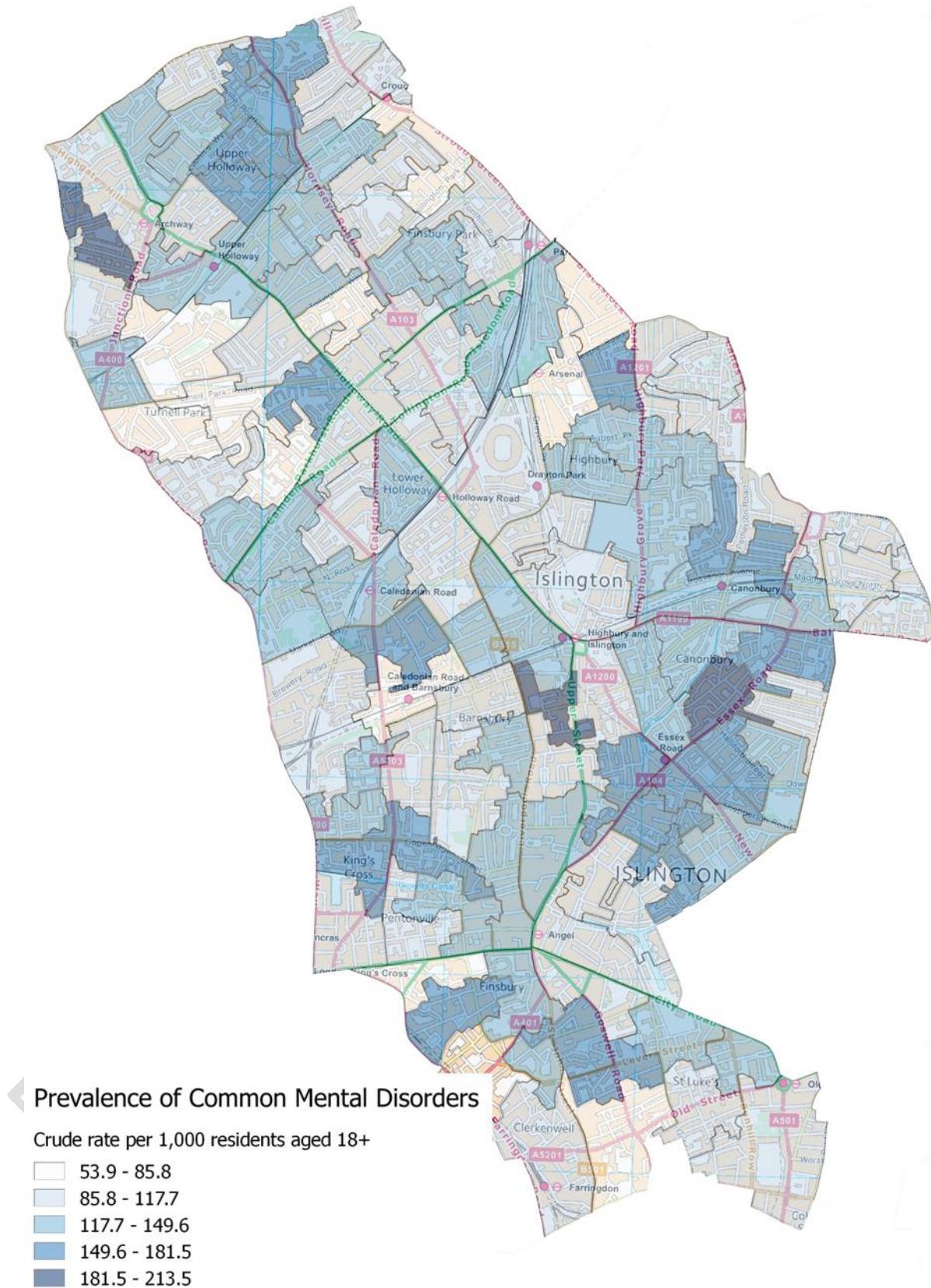


Figure 29: Crude rate of common mental disorders, Islington registered patients aged 18 and over, by lower super output area, Islington, 2011⁹⁸

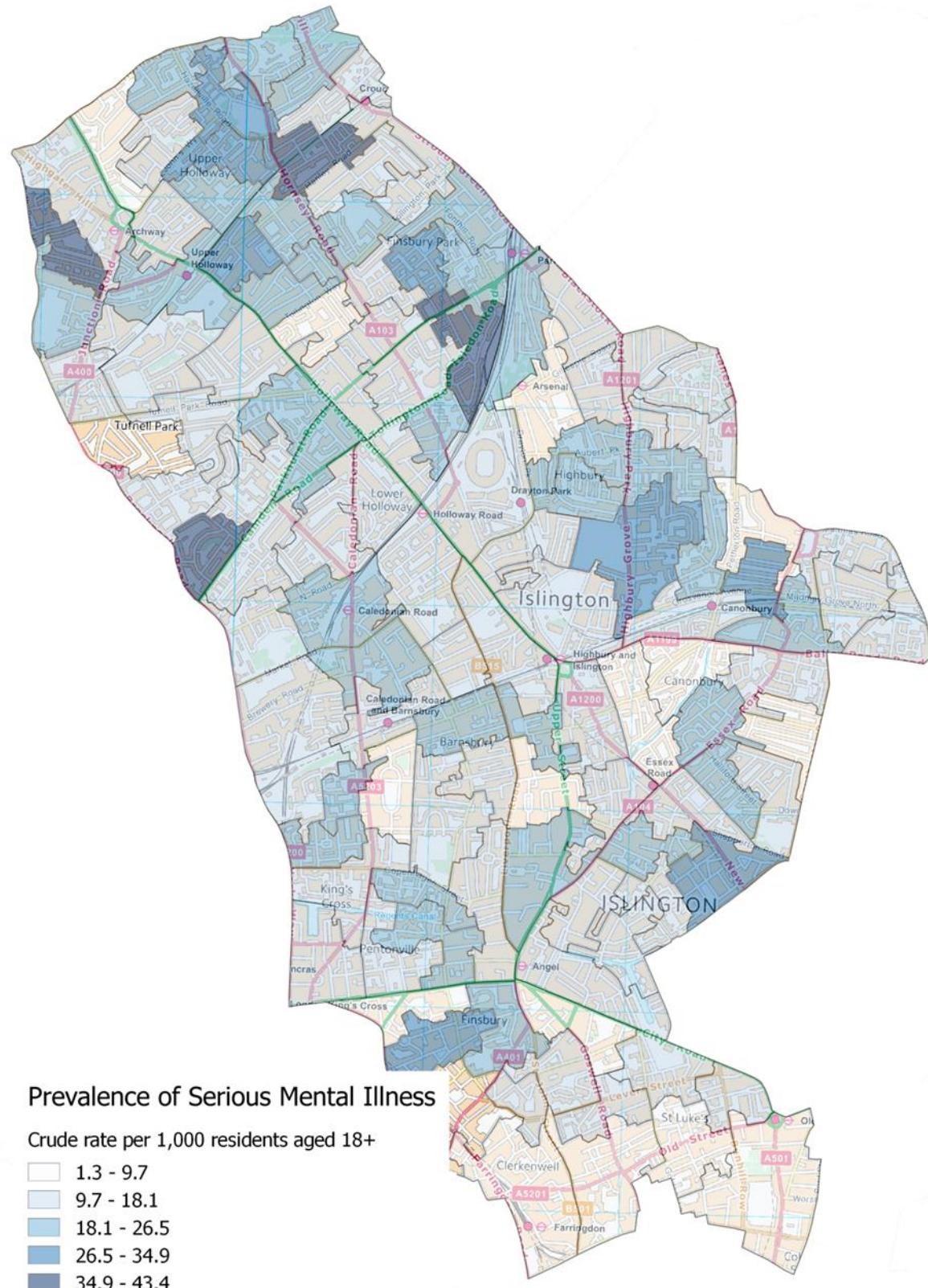


Figure 30: Crude rate of serious mental illness, Islington registered patients aged 18 and over, by lower super output area, Islington, 2011⁹⁹

Mayor's Health Inequalities Strategies Indicators

The first revised Mayor's Health Inequalities Strategy Delivery Plan for 2015 to 2018 was informed by the recommendations in the London Health Commission Inquiry. It identifies 12 indicators that measure health inequalities across London and in each London borough.¹⁰⁰ They are presented here as they will be used at the strategic level to monitor progress:

Indicator 1: Slope index of inequality for life expectancy. As described above, this is a single score representing the gap in life expectancy between the 10% most deprived areas of the borough and the 10% least deprived. Whilst Islington has the lowest gap across all London boroughs in life expectancy between the most and least deprived areas at 2.0 years, the 6.8 year gap for men ranks 15th lowest across London boroughs. The Slope Index of Inequality is driven by inequalities in physical and mental health as shown in figures 27, 29 and 30.

Indicator 2: Healthy life expectancy. Healthy life expectancy is the number of years the average individual might be expected to live in a 'healthy state'. The Islington figure is 60.4 for males and 61.8 for females in comparison to the London region average of 63.9 (male) and 64.6 (female) for the period 2015-201.

Indicator 3: Self-reported wellbeing. London's self-reported wellbeing in terms of life satisfaction, a sense that life is worthwhile and feelings of happiness is lower than other regions in the UK, whilst rates of anxiety are higher. Islington ranks the 6th bottom of all London boroughs in 'happiness' as self-reported, at 7.31 out of 10 on a scale which is lower than the UK average of 7.5 and London average of 7.46 for happiness in 2016/17.¹⁰¹ However, all London boroughs and both the Inner and Outer London averages are all decimal points of greater than 7 and lower than 8.

In addition to the low happiness rating, Islington has the worst 'Worthwhile' rating of all the London boroughs and only six boroughs have a lower 'Satisfaction' score.¹⁰² This may reflect the high stress and pressure of struggling to cope with housing and living costs across all levels of relative deprivation.

Indicator 4: School readiness at age five. Only five London boroughs have a lower percentage of five year olds who meet the 'school ready' criteria, based on children achieving a good level of development at the end of reception. Islington's figure in 2017/18 was 63.8%; the London average was 73.8% and the highest ranked borough was the City of London with 81.3%.¹⁰³

Indicator 5: Educational achievement. This indicator is measured by percentage achieving five or more A* to C grades at GCSE. Islington's figure is 59.9%. This ranks 21st in London, for which the average is 61.8%.¹⁰⁴

Indicator 6: Antenatal late booking. This measure is the percentage of pregnant women first seen after 12 weeks and 6 days of pregnancy as a percentage of live births and is used by public health professionals to estimate access to family health and social care services.

Islington, at 21.8% for 2016/17, ranks as the ninth lowest amongst London Clinical Commissioning Groups, which are not always coterminous with local authority boundaries and sometimes include more than one London borough area. The London average is 25.5% but this masks significant variation between the lowest – Kingston at 9.5% - and the highest, 'West London', at 37.1%.¹⁰⁵.. Using this proxy measure, Islington has 'better' access than the London average to health and social care services.

Indicator 7: Flu vaccination. In 2018/19, 63.5% of people aged 65 and over were covered by the flu vaccination in Islington (7th lowest in London), as were 42.9% of at risk individuals (people from age six months to under 65 years with certain medical conditions) which was 12th lowest in London.¹⁰⁶

Indicator 8: Vulnerable road user risk of fatality or serious injury. This is particularly of concern in Islington due to the high prevalence of vehicles using the borough's roads despite the lowest car ownership in London.

Measured as a rate of vulnerable road user (VRU) risk of being killed or seriously injured (KSI) per billion km travelled, Islington had a statistically similar rate compared with London in 2010-2015. Hackney, Lewisham and Tower Hamlets are all inner London boroughs that had a statistically significant higher VRU KSI in 2010-2015 compared with Islington, with Westminster being the only inner London borough with a significantly lower rate than Islington in 2010-2015.¹⁰⁷

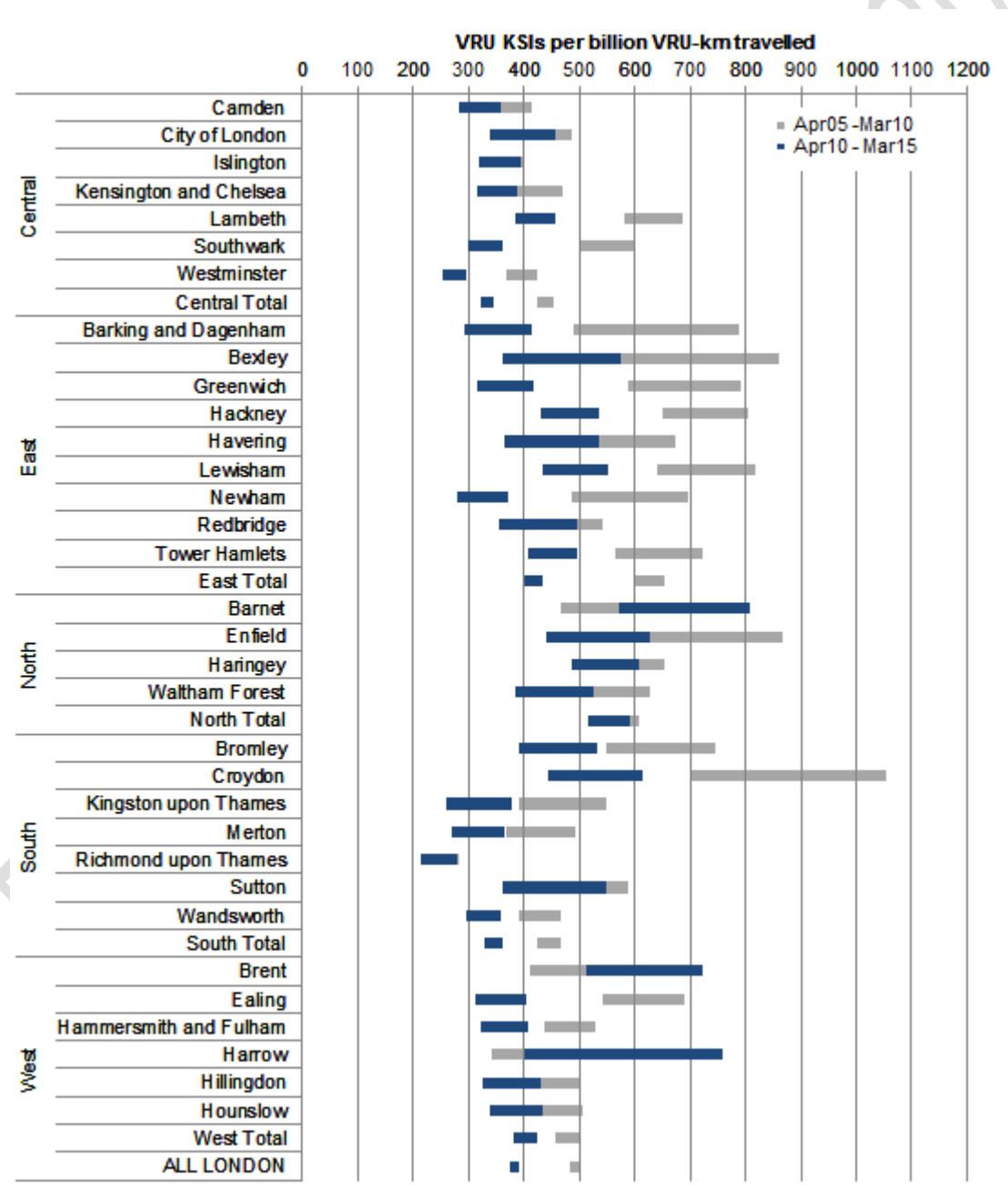


Figure 31: Vulnerable Road User KSIs per billion kilometres travelled

Indicator 9: Homelessness. 223 people were accepted as being homeless and in priority need in Islington in 2017-18. This equates to a rate of 2.06 per 1,000 households, below the London average of 4.24 per 1,000 households. 745 people were in temporary accommodation in the borough in 2017/18, equivalent to 6.90 per 1000 households. The London average was higher at 15.18 per 1000 households¹⁰⁸. The autumn rough sleeping count carried out in Islington in 2018 recorded 43 people sleeping rough, a 59% increase on 2017¹⁰⁹.

Indicator 10: Proportion of employees receiving lower income than the London Living Wage. Low wages are of particular concern in Islington due to its high housing costs. In 2018, 13.3% of employees living in Islington were paid less than the London Living Wage (LLW) of £10.20 per hour. This was the sixth lowest figure of the London boroughs and below the London average of 20.4%¹¹⁰. The high cost of private sector housing, combined with fewer homes for social rent, are likely to be contributory factors in low rates of Islington residents earning below the London Living Wage.

Indicator 11: Unemployment rates. According to Official Labour Market Statistics the unemployment rate for Islington in 2018 was 5.1%, just above the London average of 5% and higher than the Great Britain average of 4.2%.¹¹¹

Indicator 12: Childhood obesity. 23.6% of Year 6 children in Islington were recorded as obese in 2017/18 in comparison to 24.9% in 2016/17, close to the London average of 23.1% and ranking 18th amongst London's boroughs. The 2016/17 London average was 23.6% and the national average was 20%. The rate has declined slightly in Islington from a peak of 24.8% in 2009-10, when it was significantly higher than both the London (21.8%) and England (18.7) averages.¹¹² Access to playspace

There are 276 identified playspaces in Islington, but they are unevenly distributed through the borough, with 27 in St Peter's Ward and 23 in Mildmay Ward but only 13 across Highbury East and West Wards, although Highbury Fields is the borough's largest open green space.

Access to community facilities

There are 57 community facilities across the borough according to a 2012 audit carried out by the council. Community facility in this sense is defined as hire spaces for functions, parties, weddings, dances, church gatherings and similar events; spaces for meetings, lectures, discussion groups etc. indoor youth clubs and playgroup facilities. There is a data gap around community facilities and which, if any, have been opened or closed since 2011.

There is no specific national guidance for how many community facilities are needed per head of population but previous government guidance indicated that around 4,000 people is a necessary catchment area to sustain a community facility. 57 community facilities around the borough equates to 4,129 people per facility based on the GLA's 2017 population estimate of 235,370 Islington residents. However, this will only equal even coverage if the facilities are spread across the borough.

The 2012 audit revealed a good supply of medium sized community facilities but a lack of large ones. It showed that there is a relatively even geographical distribution, with 12 in the north of the borough, 17 in the south, 13 in the east and 15 in the west. However, there are only two youth centres, both situated in the middle of the borough, and one large community centre for the entire north of the borough. There are no wards without any community facilities at all.¹¹³

Housing

Housing tenure and type

Islington's housing stock comprised approximately 101,780 dwellings as of 2016. The largest number of units, 37,500 dwellings, were let by the local authority and housing associations, whilst a further 31,400 dwellings were in the private rented sector. 15,100 dwellings were owned outright, and 15,600 homes were owned with a mortgage.

The private rented sector has grown sharply in recent years, with the number of private rentals increasing by 132.6% in the eight years from 2008 to 2016. In 2008 privately rented dwellings accounted for 17.8% of Islington's housing stock, by 2016 the figure was 31.5%.¹¹⁴ 'Social rented' properties made up 44.3% of all dwellings in 2008, in 2016 this had decreased to 37.6%. Similarly, buying with a mortgage decreased from 24.4% in 2008 to 15.7% in 2016 (see figure 33).

Figure 32: Tenure in Islington 2008 and 2016

Tenure Type	2008	2016
Rented from Local authority / Housing association	33,700	37,500
Private rented	13,500	31,400
Buying with mortgage	18,600	15,600
Owned outright	10,300	15,100
TOTAL	76,100	99,700

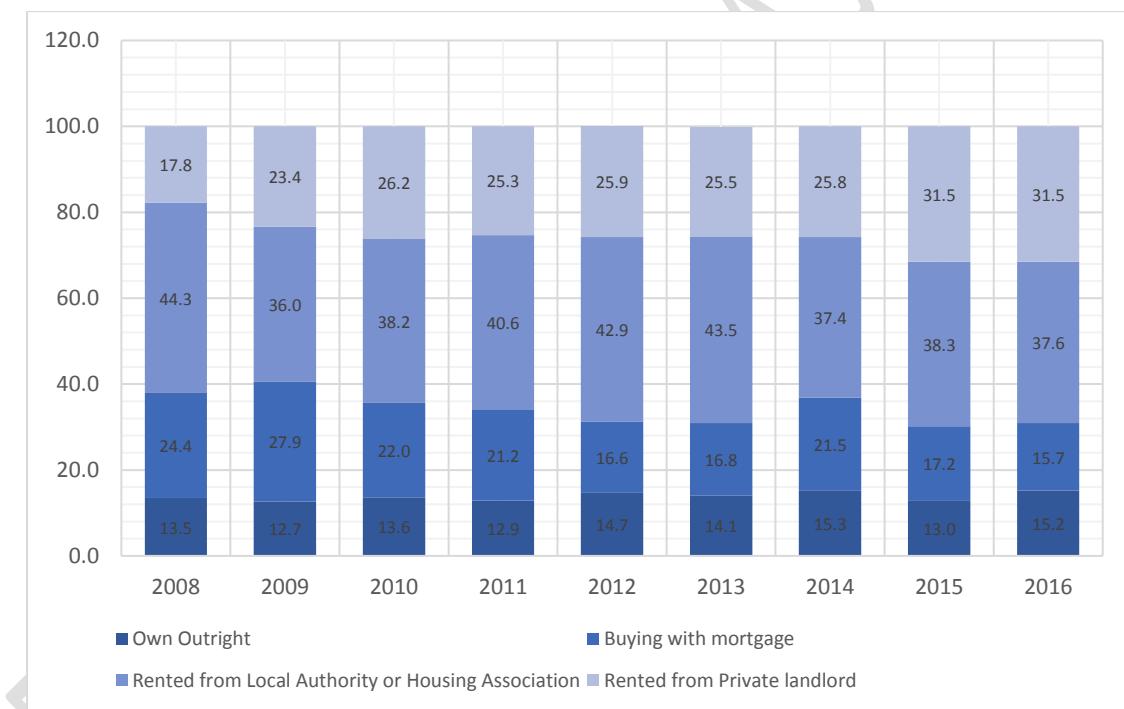


Figure 33: percentage change in tenure in Islington 2008-2016

The addition of 23,600 dwellings to Islington's housing stock over the period 2008-2016 was largely in the private rented tenure. Across London, private rental increased its share of the total stock from 19.3% to 25.6%. Buying with a mortgage decreased in percentage terms from 32.1% to 28.3%, and the percentage of houses rented from a local authority or housing association decreased from 25.9% to 23.2%. Islington's trends are consistent with the London-wide picture except that, whilst there was a decline in the percentage of social rented housing stock, the physical stock of social rented housing increased in the period 2008-2016..¹¹⁵

House prices

Islington remains one of the most expensive London boroughs in which to buy a home. The average property price for Islington in the year to September 2018 was £652,902¹¹⁶, whilst the median house price for the same period was £580,000. Ratio of house price to earnings

The ratio of median property prices to median earnings in Islington rose from 8.93 in 2005 to 16.24 in 2017.¹¹⁷ In concert with high private rents, this means that home ownership is unobtainable for all but those with existing equity or access to a significant amount of capital.

The ratio of lower quartile home prices to lower quartile earnings is similarly large, rising from 9.06 in 2005 to 16.92 in 2017.¹¹⁸ Figure 34 shows ratios of median house prices to earnings from 2005 to 2017 in Inner London boroughs, with Islington following the general trend of a sharp increase following a momentary dip after the 2008 financial crisis, although Islington has not experienced the outlying values of Kensington & Chelsea.

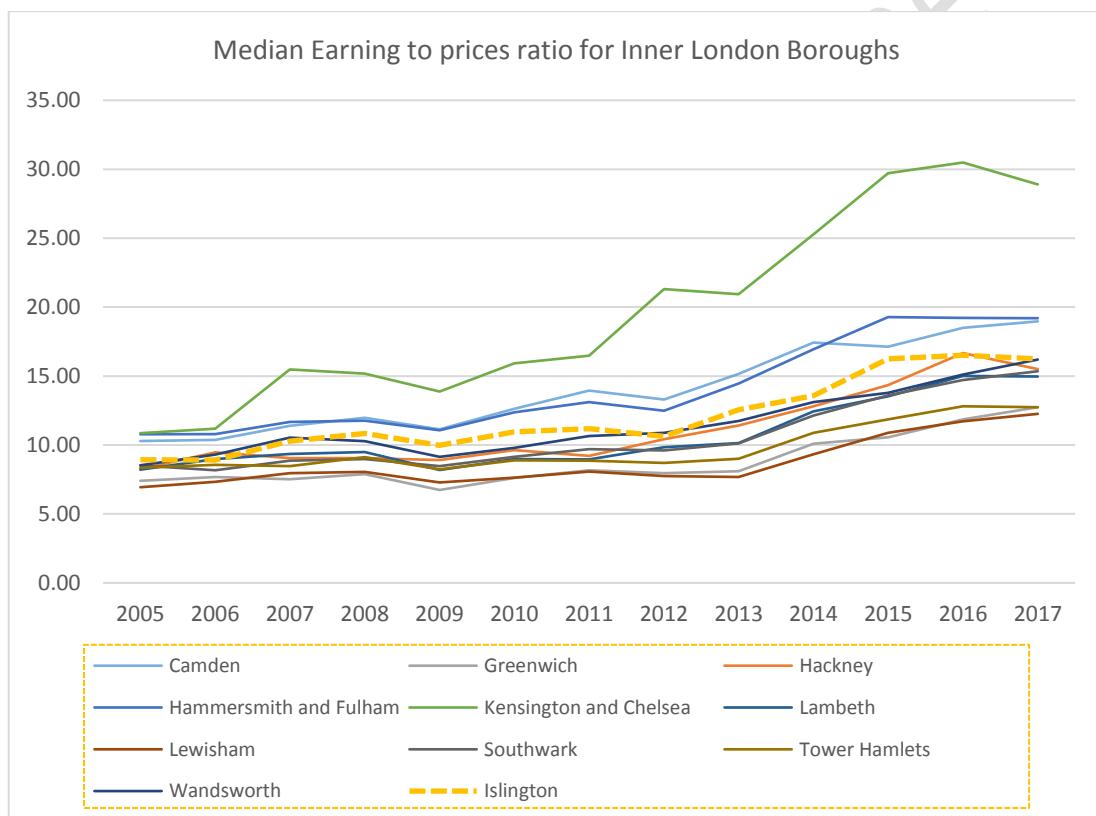


Figure 34: Ratios of Median House Prices to Earnings 2005-2017 for Inner London Boroughs.¹¹⁹

Rents

The number of households in private rented accommodation increased by 85% between 2001 and 2011 (according to Census 2011 data); and the latest ONS figures show that the proportion of private rented accommodation remained almost at the same level in 2013/14 and increased again in 2015 and 2016.

Information from the Valuation Office Agency (VOA) for 2018 shows that Islington has the 5th highest median rent (in £s) for private rented accommodation of all English local authority areas, and the 5th highest lower quartile rent¹²⁰. This suggests that despite the increase in private renting in the

borough, it is an unaffordable option for many. This is clearly illustrated in the following tables which show the borough's average and lower quartile private rent levels as a percentage of its annual median and lower quartile salaries¹²¹:

Figure 35: Average rent as a proportion of gross and net median pay

Annual pay category	Annual pay amount (in £)	Annual rent (in £)	Rent as a percentage of pay
2018 Median Annual Pay (Gross)	37,271	22,848	61%
2018 Median Annual Pay (Net*)	28,727	22,848	80%

*Net pay calculated using <http://www.listentotaxman.com/index.php>; deductions for Income Tax and National Insurance Contributions only; other deductions such as student loan and pension contributions not included

Figure 36: Lower quartile rent as a proportion of gross and net lower quartile pay

Annual pay category	Annual pay amount (in £)	Annual lower quartile rent (in £)	Rent as a percentage of pay
2018 Lower Quartile Pay (Gross)	23,407	17,676	76%
2018 Lower Quartile Pay (Net*)	19,454	17,676	91%

*Net pay calculated using <http://www.listentotaxman.com/index.php>; deductions for Income Tax and National Insurance Contributions only; other deductions such as student loan and pension contributions not included

Number/proportion households needing affordable housing /year

As of 2017 there were 18,033 households on the housing register, a significant increase on the 2010 figure of 8,426 households. The council made 1,100 lettings, representing around 7% of households on the register – roughly one in ten households who are on the register are likely to be housed by the local authority.

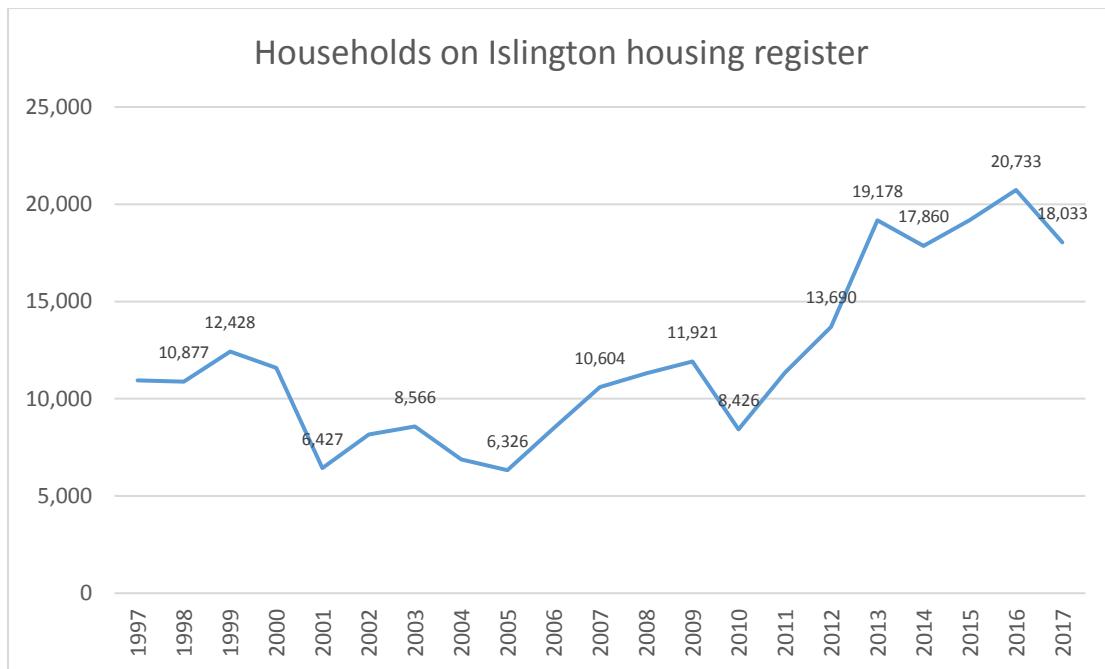


Figure 37: Households on Islington housing register 1997-2017

Number/proportion traveller households needing pitches /year

There are no traveller pitches in Islington. Islington's Draft Gypsy and Traveller Accommodation Assessment (2019) identifies 77 Gypsy and Traveller households residing in bricks and mortar accommodation within the borough. The report suggests that between 3 and 12 pitches are required in Islington to meet the accommodation needs of Gypsy and Traveller households. The report acknowledges that the borough's competing development pressures, lack of vacant sites and very high land values present a barrier to pitch delivery. It is recommended that Islington work closely with neighbouring authorities to ensure that the accommodation needs of Gypsies and Travellers and boat dwellers can be met on a subregional basis. It is also recommended that the council develop a corporate policy to provide negotiated stopping arrangements in agreed locations for temporary use by visiting Gypsies and Travellers, to address unauthorised encampments.

Homelessness decisions and use of temporary accommodation

The number of households determined to be homeless and in priority need in Islington in 2017/18 was the fourth lowest of the London boroughs at 2.06 per 1,000 households. In the same year 745 households were in temporary accommodation organised by the borough, a rate of 6.9 per 1,000 households¹²². 334 of these households were placed in local authority housing or in private accommodation leased by the local authority or a housing association. The rest – 340 households – were in 'other' types of accommodation, including with private landlords¹²³.

Overall housing target

Islington's minimum delivery target in order to contribute to meeting London's objectively assessed housing need is 7,750 dwellings from 2019 to 2029. This is calculated using the overall London-wide minimum target for this period of 649,350 homes based on development capacity, equating to 64,935 dwellings per year. London's actual need is acknowledged to be 66,000 per annum over that period, but the minimum target in the draft London Plan takes into account current realistic capacity for housing development, and boroughs are expected to show how they can augment delivery to

help meet the 66,000 per year requirement. These figures are taken from the draft London Plan which was subject to examination in spring/summer 2019. However, Islington Housing Market Assessment identifies the Full Objective Assessed Need for Housing in Islington to be 23,000 dwellings over the 20-year period 2015-35, equivalent to an average of 1,150 dwellings per year. This includes the Objectively Assessed Need for both Market and Affordable Housing.¹²⁴

Number of new homes completed

In 2015/16, 1,531 dwellings were completed in Islington, exceeding the borough's housing delivery benchmark of 1,264 for that year. Over the past six years there have been a cumulative 8,846 completions, exceeding the cumulative target of 7,104 by 1,742, or 25%.¹²⁵

Between 2010/11 and 2015/16, 1,615 additional affordable homes (comprising rented and shared ownership products) were completed in Islington.¹²⁶

Between 2009/10 and 2015/16 Islington saw a large number of purpose-built student housing units completed, delivering 2,824 total non-self-contained dwellings¹²⁷. Recognising the substantial contribution made by four central London boroughs to meeting London's overall need for student housing – Islington, Camden, Southwark and Tower Hamlets had delivered 57% of all new provision - the 2015 London Plan directed further delivery away from these boroughs.¹²⁸

Islington has one site allocated for student accommodation that does not yet have planning permission. Beyond that site, it is not envisaged that the borough will accommodate any additional student housing in the form of purpose built non-self-contained flats/bedrooms.

Inclusive housing standards

In 2017/18, 36% of all new homes completed met Lifetime Homes standard. This is well below the 100% requirement but it should be noted that where a development involves altering an existing building to create dwellings it may not be feasible to comply with all aspects of the Lifetime Homes standard.

In 2017/18, 3% of all homes completed met wheelchair accessible standards,. Wheelchair accessible homes are not generally required in minor developments, so it is more useful to monitor what percentage of homes delivered in major developments met wheelchair accessible standards. In 2017/18 this figure was 9.7%.

Economy and Employment

Economic performance and employment sector breakdown

The strength of Islington's economy is highlighted in recent data published by GLA Economics, which compares the gross value added (GVA) of London boroughs.¹²⁹ Islington sits in fifth place, behind Westminster, the City of London, Tower Hamlets (home of Canary Wharf) and Camden. The borough had the fifth fastest rate of growth of the London borough's, with its GVA increasing by 91% between 1998 and 2017¹³⁰.

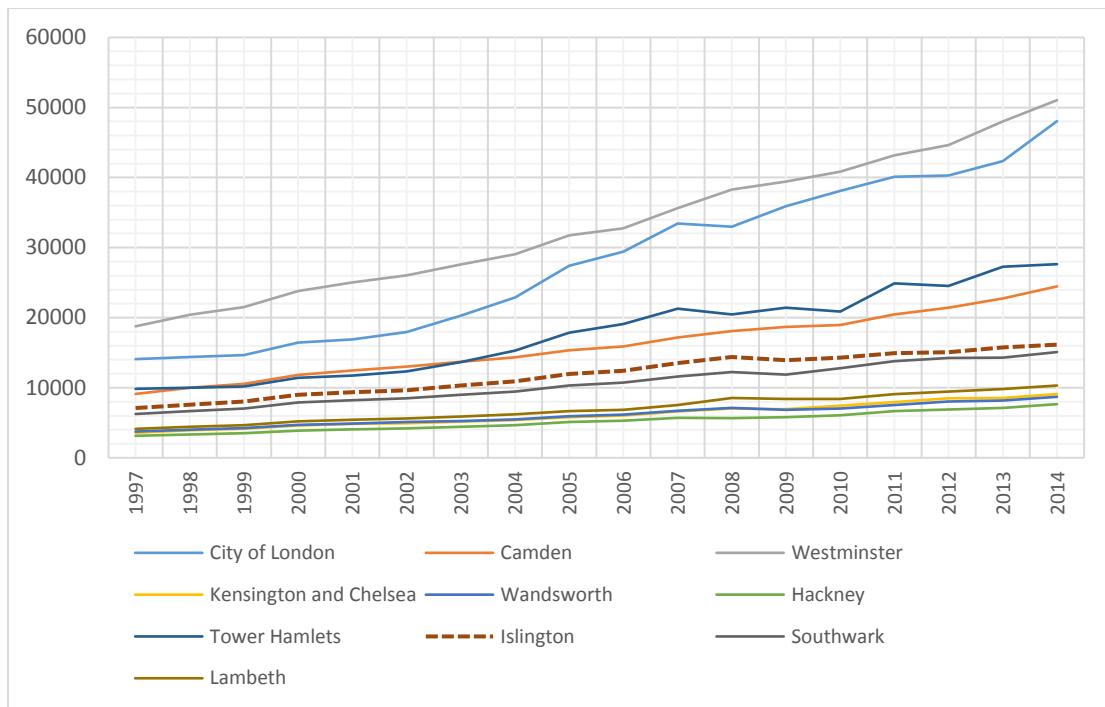


Figure 38: Gross Value Added (Income Approach) by Local Authority in England

Islington is the fifth most competitive locality in the UK, according to the UK Competitiveness Index, 2015 and 2019.¹³¹ The borough has the third highest number of science and technology jobs in London, behind only Camden and Westminster, despite being one of the smallest boroughs.¹³²

Islington's Employment Land Study (2016) notes that more than three quarters of the borough's businesses are classed as micro-businesses, defined in the report as businesses with 0-4 employees (see figure 39). Within this, the Information & Communication and Professional, Scientific and Technical sectors dominate, accounting for 49% of all such enterprises.¹³³ This shows that Islington's micro-businesses are dominated by knowledge-based employment, which is reflected in the borough's above average levels of qualifications (62.7% of Islington residents are educated to degree level or above, compared to the London average of 49.9%¹³⁴). However, as Islington also contains a significant number of residents with lower levels of literacy and numeracy (see Education, Skills and Training section below), it also shows the difficulties that some residents may encounter in accessing many of the jobs that are available.

Figure 39: Comparison of size of firms as a percentage of total number of firms, 2015

Size band	Camden	Hackney	Islington	Lambeth	Southwark
0-4	75.4	83.4	76.1	86.3	75.0
5-9	11.3	9.6	11.3	6.7	11.0
10-19	6.4	4.4	6.4	3.9	6.9
20-49	3.9	1.7	3.7	1.9	3.9
50-99	1.4	0.5	1.2	0.7	1.6
100-249	0.9	0.3	0.7	0.3	0.9
>250	0.6	0.1	0.6	0.3	0.7

Employment (B-use) floorspace

Employment space is not evenly distributed through the Borough, with office stock largely concentrated south of the Pentonville Road/City Road arterial route. This area includes most of the Islington portion of the CAZ, which covers Bunhill and Clerkenwell wards, part of the Angel town centre and part of King's Cross. As well as business activity there is a significant resident population in the CAZ, underlining the growing tension between residential and commercial land uses.

The vast majority of the employment floorspace in Islington is located in areas designated in the Local Plan as 'key areas'. In recent years, Islington has lost a significant amount of B-use floorspace from the key areas (49,690 sqm between 2015/16 and 2017/18). At the same time the borough has recorded significant job increases. This shows that there has been an increase in employment density at a borough wide level.

The table below shows the net gain in B uses in Islington between 2005 and 2015. It shows that there was a persistent net loss in B2 and B8 over that period. There was also a net loss in B1 use since 2011 with the exception of 2015 when there was a slight net gain. Pressure for change of use from employment to residential uses is one of the most significant obstacles to the borough retaining employment floorspace and ensuring that enough is available in the future to accommodate projected jobs growth.

Figure 40: Gains/losses in B use floorspace 2005-2015 by use¹³⁵

	Number of schemes	Net change B1, Sq.m	Net change B2, Sq.m	Net change B8, Sq.m
2005	91	9,856	-1,813	-1,466
2006	99	-9,780	-6,100	-24,334
2007	85	-22,372	-12,560	-7,749
2008	103	4,714	-3,589	-8,811
2009	89	43,306	-304	-5,097
2010	74	8,153	-2,090	-1,141
2011	76	-13,231	-2,028	-9,950
2012	83	-4,293	49	-7,607
2013	80	-7,792	-313	-7,407
2014	50	166	0	-2,784
2015	18	2,183	-333	-248
Total	848	10,910	-29,081	-76,594

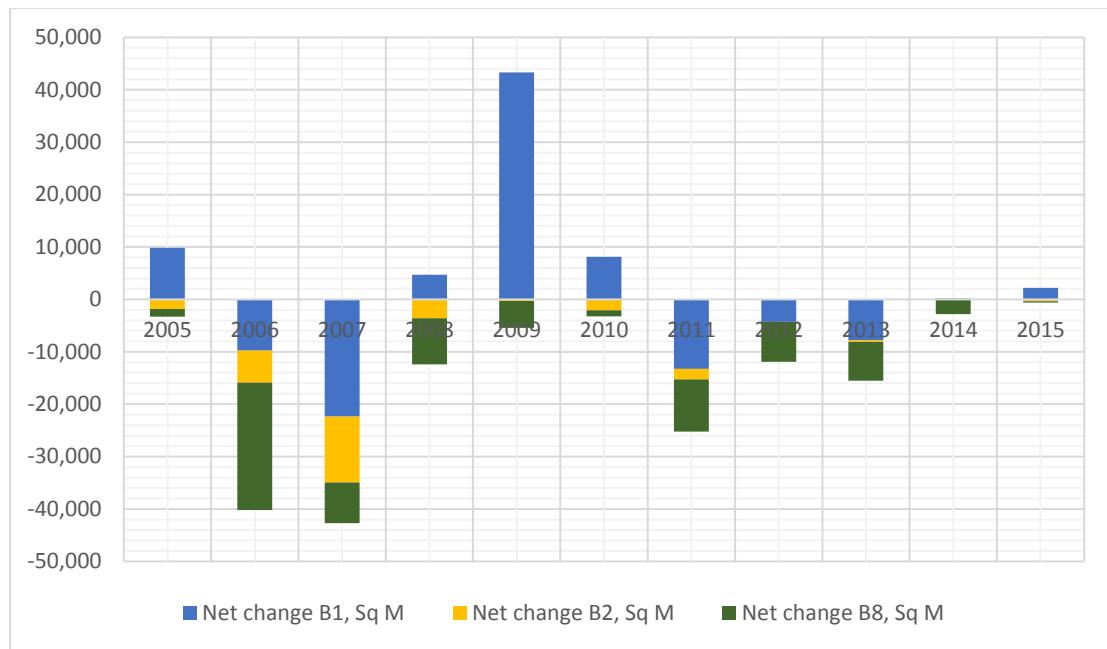


Figure 41: Net change by use class of employment space 2005-2015

Projected employment growth and supply of employment land

The evidence from Islington's Employment Land Study suggests that employment in Islington is projected to increase by 50,500 jobs over the period 2014-2036.¹³⁶ Islington also has a strong net inflow of employees. However current permissions coming through the planning system will generate a loss of some 12,000 sq m of office space, and at present there is no identified pipeline of new office proposals that will come close to meeting the forecast target. The biggest threat to growth therefore is restricted supply caused by potential new office developments being outbid, in terms of land value, by residential development.¹³⁷

What remains of Islington's industrial activity is projected to continue to diminish: there is a forecast loss of employment in industrial sectors equivalent to around 90,000 sq m of floorspace over the period 2014-2036. This is in line with the findings set out in the GLA's Land for Industry and Transport SPG, which designated Islington as a 'restricted transfer' borough.¹³⁸

Education, Skills and Training

Indices of deprivation – education skills and training

Islington has higher than average levels of qualification, compared to London and Great Britain. In 2018, 67.1% of the population aged 16-64 had qualifications equivalent to NVQ4 and above, compared to 53.1% in London and 39.3% across Great Britain. 6.4% of the working age population had no qualifications, compared with 6.6% in London and 7.8% overall in Great Britain.¹³⁹

Proportion of adults with poor literacy and numeracy skills

Data from the 2011 Skills Survey¹⁴⁰ shows that 29.1% of adults in Islington were at 'Level 1' literacy, and 52.6% were 'Level 2' and above, below the national average of 54.7%. 18.3% were at Entry Level 3 or below. 6.3% were at Entry Level 1 and below. For numeracy, 47 % of adults in Islington were only at Entry Level 3 or below in the 2011 data. 26.8% were at Level 1 and 25.7% at Level 2 and above.

‘Entry Levels 1, 2 and 3’ are roughly equivalent to the levels expected of children at various stages of primary school. Almost half the adult population of England and Wales are at these levels.¹⁴¹

The Skills Survey methodology uses the results of the survey which are then modelled to generate estimates on smaller geographical areas, including local authority area. The modelling is based on 2001 Census population data, so should be used with caution. It has not been possible to source more current data, however this data offers an estimate of the relative levels of poor literacy and numeracy amongst adults in Islington.

School capacity by primary and secondary

GLA roll projections suggest that primary schools in Islington will have surplus capacity equivalent to 12% of places from September 2019, rising to 16% by 2023/24. Capacity is low in individual areas, particularly Highbury and Canonbury, but given the surplus across the borough any need for places can be met in neighbouring areas¹⁴²

GLA roll projections at the secondary school level suggest that surplus capacity, which stood at 10% of places in autumn 2018, will fall as low as 3% by the 2023/24 school year but will then start to increase again. Previous projections indicated that demand for places would outstrip supply by 2021/22 but it is now considered that need can be met within the borough’s existing estate for the foreseeable future¹⁴³.

No. of NEET’s (young people Not in Education Employment and Training)

There were 120 ‘NEETS’ in Islington per 2016 figures, accounting for 3.4% of 16-18 year olds. This is higher than the 2015 rate where 2.2% of this population group were not in education, employment or training. However, it is below the Inner London average of 5.7%, the London average of 5.3% and the England average of 6%.¹⁴⁴ These are the latest figures available disaggregated to a local authority level.

Early years’ provision

Islington has 117 nurseries and 16 children’s centres, including council-run and privately funded facilities.¹⁴⁵ All three and four year olds are entitled to receive 570 hours free early education per year, nationally. This is usually taken as 15 hours per week over 38 weeks but some providers will allow fewer hours per week over a greater number of weeks per year. Some 3-4 year olds are entitled to an additional 570 hours free childcare per year, dependent on their parents’ meeting criteria based on employment status, income and nationality¹⁴⁶.

Similarly, free childcare / early years education is available for two year olds on a means tested basis, assessed on a number of criteria including eligibility for free school meals, Working Tax Credit or being in receipt of income-based Jobseekers’ Allowance, income-related Employment and Support Allowance or an annual pre-tax income of below £16,190.¹⁴⁷

Access to free early years’ education can be vital in allowing parents to continue working whilst they have young children, if they want or need to. Lack of free or affordable childcare is one of the biggest obstacles to work, or increasing earnings through working more hours, for some households, particularly single-parents.

Deprivation

Average household income (Median income)

Data for household income modelled to a borough level is not freely available, although a 2012 report by Jones Lang LaSalle reported that 20% of Islington households have a household income of under £20,000 per year, while 11.4% of households have an income of over £75,000 and 4.4% over £100,000 per annum.¹⁴⁸ This illustrates the extreme polarities in wealth across such a small area of London. The report uses CACI Paycheck data to model household incomes based on sources of household composition and individual earnings from ONS and other sources.

The same report shows the geographical disparities in modelled household income in the borough, in 2012:

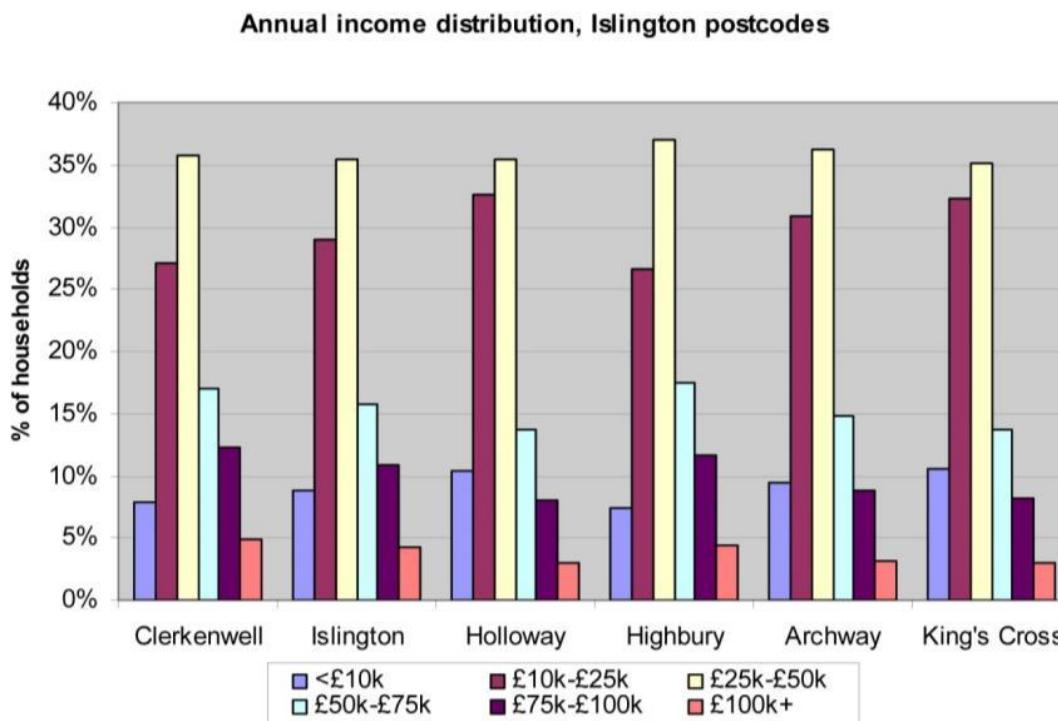


Figure 42: Annual income distribution, Islington postcodes, 2012

No. of super output areas within 10% most deprived in England and other IMD findings

14.6% of Islington's Lower Super Output Areas were in the 10% most deprived nationally in the 2015 Indices of Multiple Deprivation. This ranks 61st in England, out of 326 local authorities (where 1 is the most deprived, 326 the least).

Using the 'extent' measure in the IMD, which weights for population living in the most deprived 30% of areas, Islington ranks 26th most deprived, reflecting that many LSOAs in Islington will be outside the most deprived decile but within the next two. Looking at the rank of where the average LSOA ranks across all 32,844 LSOAs in England, Islington sits 13th most deprived in the country when ranking the average rank.

Claimant count unemployment rate and economic inactivity

Islington has a slightly higher than average unemployment by the claimant count, at 3% of the population aged 16-64, in May 2019. This compares to an average of 2.7% at both the London and Great Britain levels¹⁴⁹.

34,600 people were classed as 'economically inactive' between January 2018 and December 2018, accounting for 19.7% of Islington's population aged 16-64. Of these people, 14,800 (42.8%) were students, 5,900 (17.1%) were 'looking after family/home' and 5,800 (16.9%) were 'long term sick'.¹⁵⁰ In fact, Islington ranks 8th among London's boroughs in terms of the percentage of economically inactive people due to long-term sickness.

Employment rates in Islington vary to some extent by ethnicity with people in the 'ethnic minority UK-born' group having the lowest employment rates at 54.8% and the highest economic inactivity rates at 39.4%. People in the 'ethnic minority-not UK born' group have an employment rate of 67.2% and an economic inactivity rate of 27.5. White UK-born and not UK-born residents have the lowest economic inactivity rates at 14.4% (see figure 43).

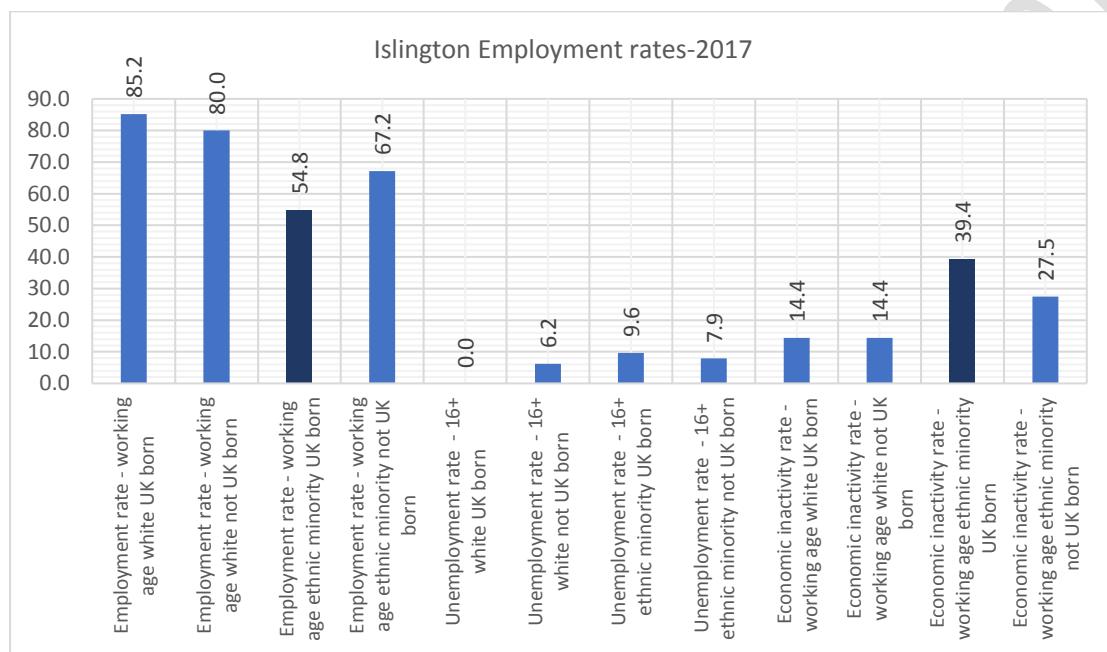


Figure 43: Employment rates by ethnicity in Islington 2017 (Note: data for unemployment rates for white UK-born group was not available). The chart was collated from ONS statistical data.¹⁵¹

Households with children in families on key benefits

31.1% of all children in Islington were classified as living in low income families in 2016, defined as families in receipt of less than 60% of the median income. This compares to an average of 19.3% for London, and 17.2% in England and Wales.¹⁵²

Islington is particularly deprived according to the Income Deprivation Affecting Children Index (IDACI) and Income Deprivation Affecting Old People Index (IDAOP).¹⁵³ Ranking the average rank of LSOAs shows Islington as the second most deprived authority in England, behind only Tower Hamlets according to IDACI measures. Islington also ranks the fourth-most deprived nationally according to IDAOP measures.¹⁵⁴

Crime

Levels of crime in Islington

General crime rates in Islington have been falling consistently over the past fifteen years, in line with the trends for inner London and England and Wales as a whole, although rates in the borough are significantly higher than for the rest of England - see figure 44. The highest rates of recorded

offences for 2016/17 are associated with Theft and Handling and Violence Against the Person - see figure 45.

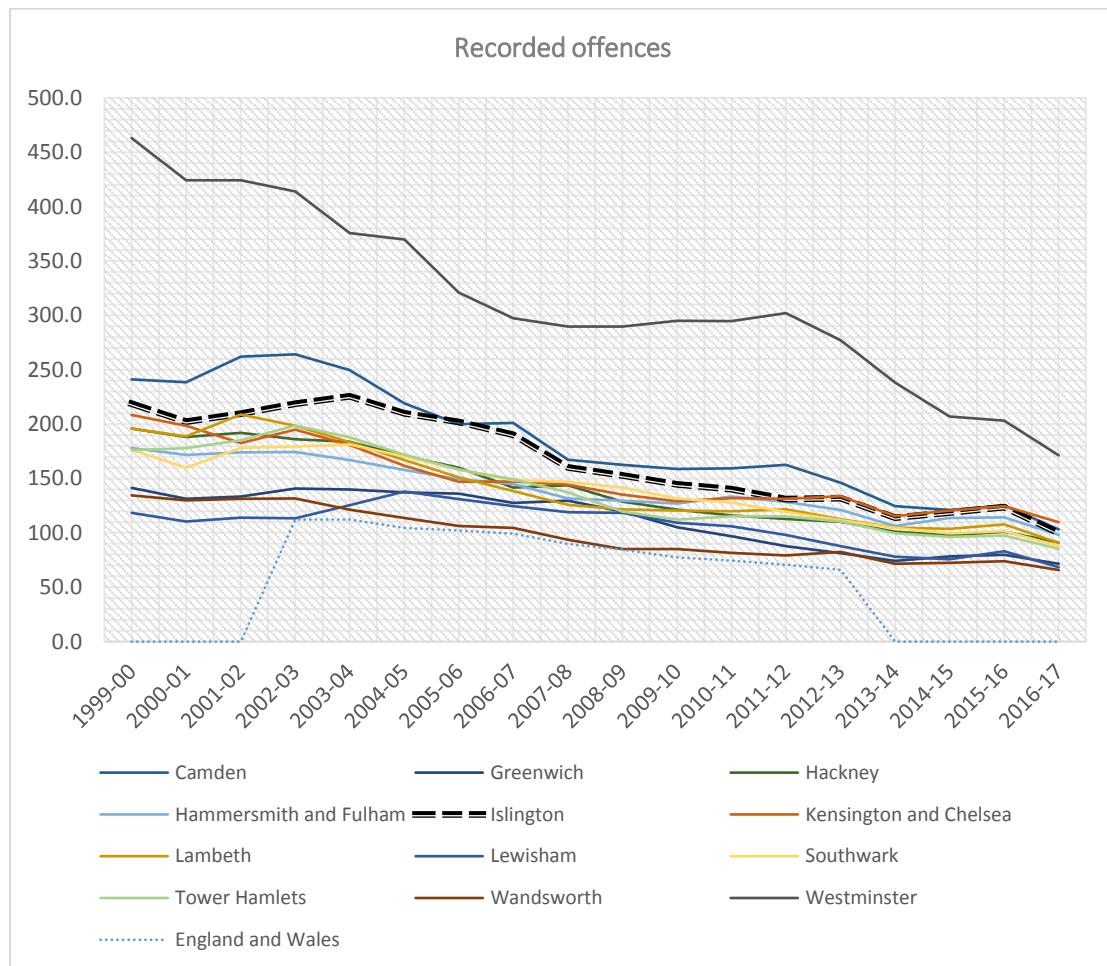


Figure 44: All recorded offences, 1999/00 to 2016/17, data for England & Wales was only available between 2001 and 2014.¹⁵⁵

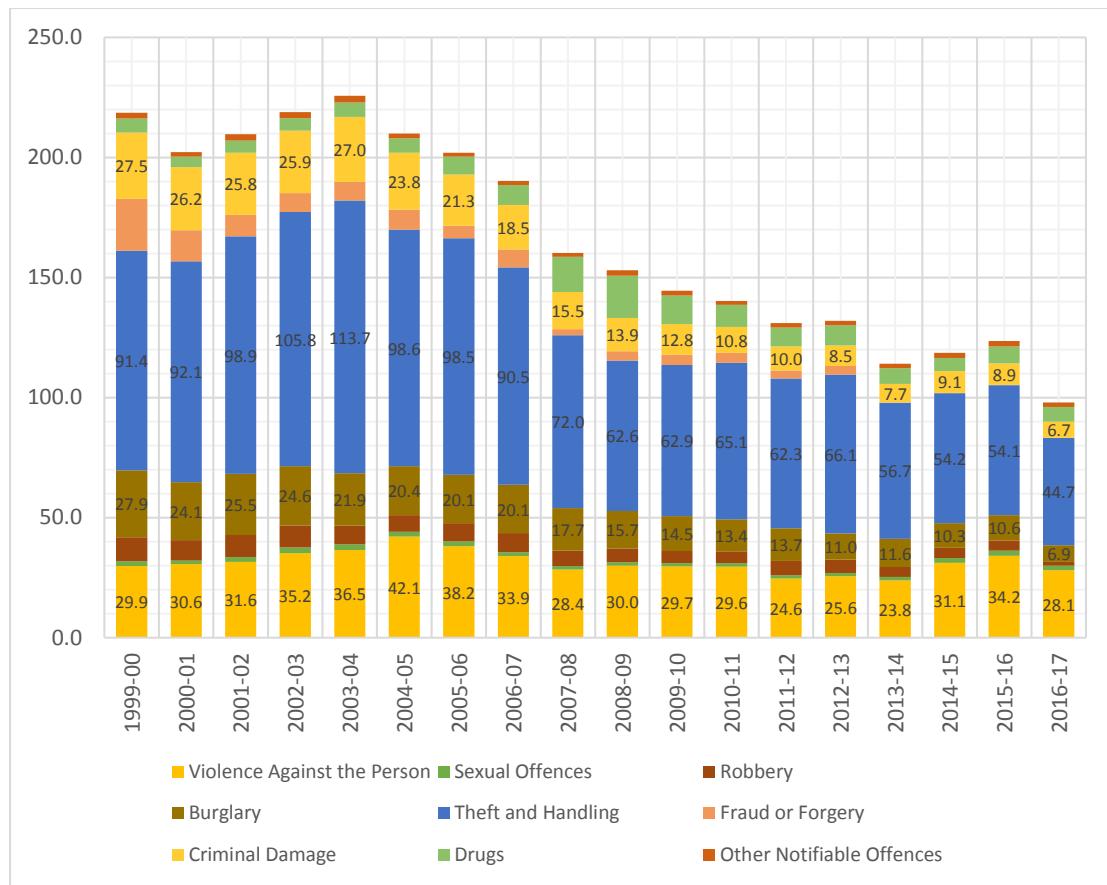


Figure 45: All recorded offences in Islington, 1999/00 to 2016/17, by type of offence

The distribution of crime also varies from one location to another. As figure 46 below indicates, the recorded level of residential burglary is particularly high in the north of the borough, while Finsbury Park is identified as one of the main areas for the sale and purchase of illegal drugs. Youth issues are seen to be most pronounced in the Caledonian Road and Mildmay areas, while robbery and theft tend to take place in central locations. There are also some areas that experience high levels of different crime types.¹⁵⁶

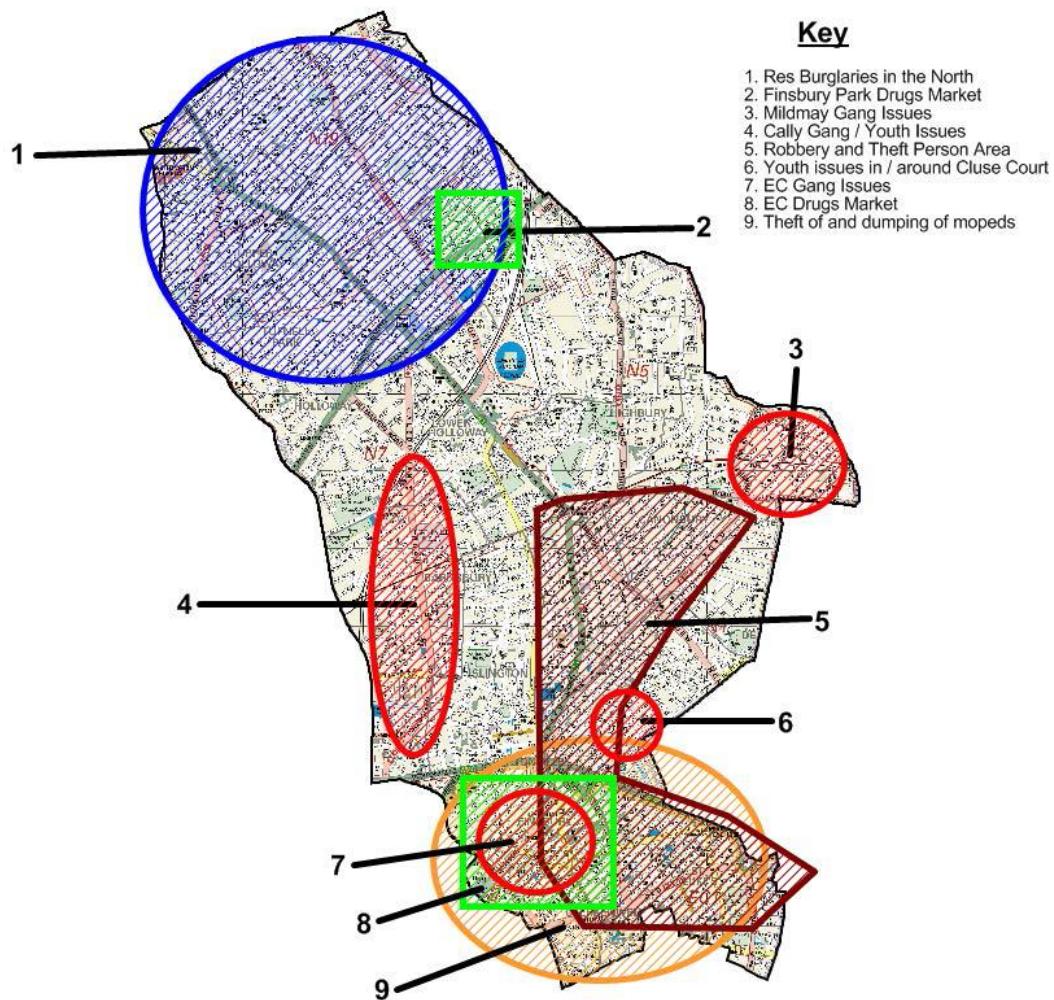


Figure 46: Distribution of crime in Islington ¹⁵⁷

Violent crime in Islington

Records on the rate of violence against the person show that Islington has tracked the Metropolitan Police area and Inner London area rates in terms of trend but has remained above average. Overall recorded violent crime per 1,000 people in Islington in 2016/17 was down to 28.1 offences, from 34.2 in 2015/16. This remains above the 23.8 rate per 1,000 people achieved in 2013/14.

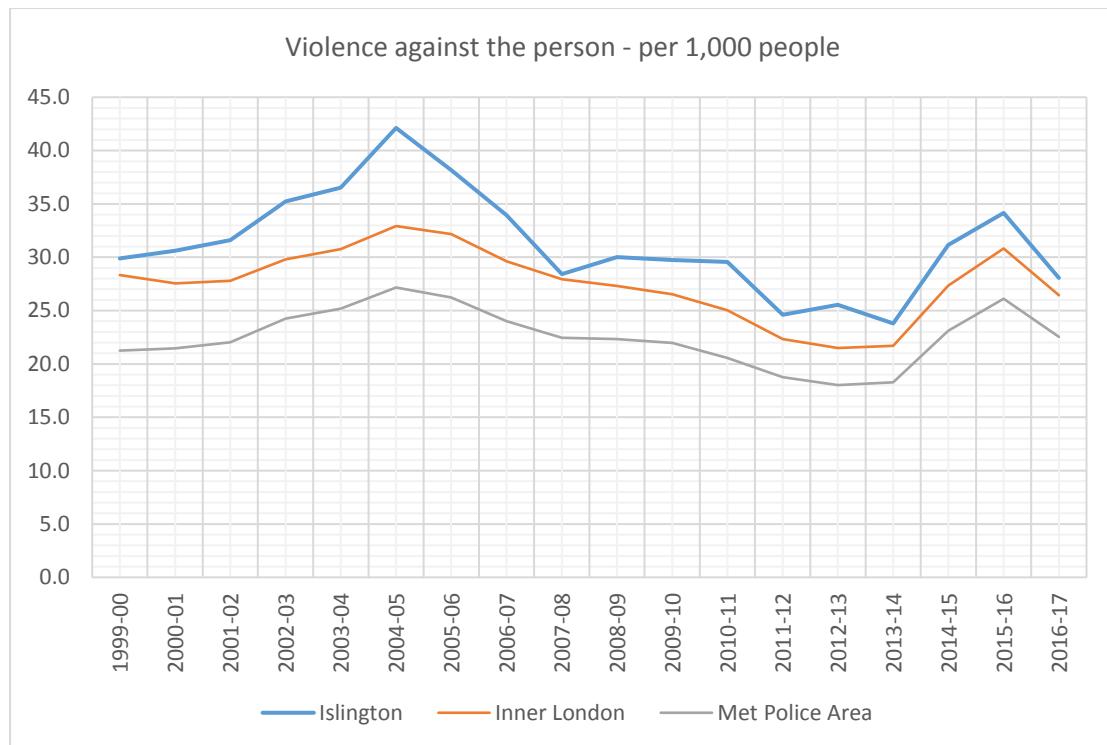


Figure 47: Violence against the person 1990/00 to 2016/17¹⁵⁸

Fear of crime

According to the Islington Crime Survey 2016, overall feelings of safety in the borough were high, with 98% feeling some degree of safety during the day and 81% at night. Respondents in the youngest age group (16 to 24 years) were most likely to say they felt safe during the day but less safe at night (26% in comparison with 16% and 18% for other age groups). These figures are not evenly distributed around the borough; it varies across wards. The highest percentage was in Highbury West where 98% of people feel safe day and night in comparison to Holloway where 57% of people feel safe day and night - see figure 49.

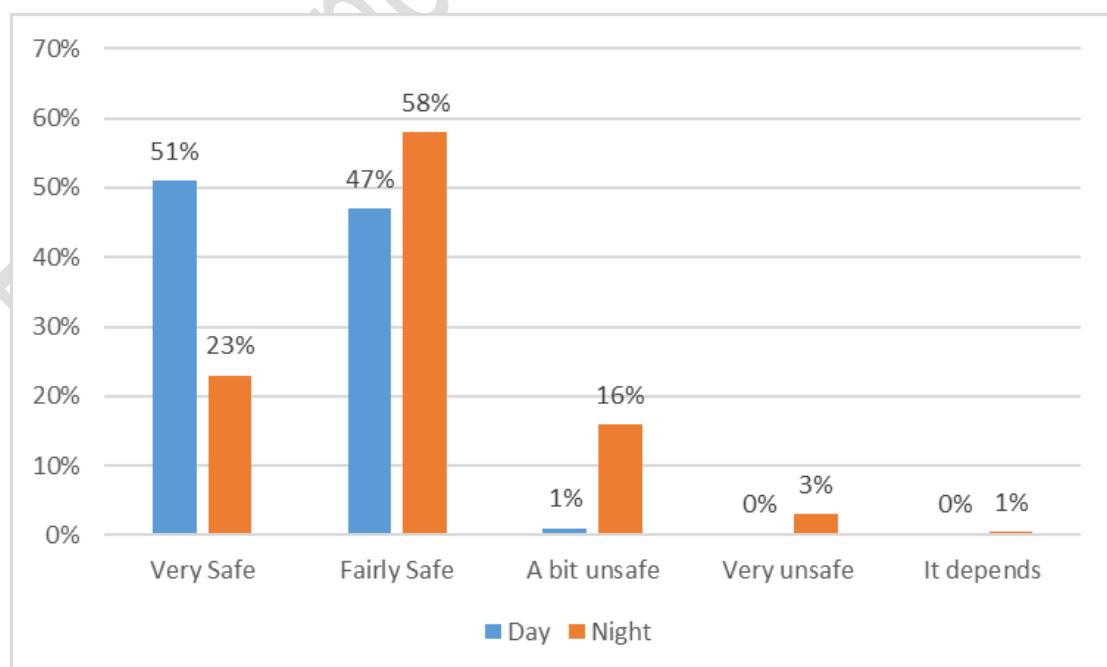


Figure 48: Feelings of safety, Islington residents¹⁵⁹

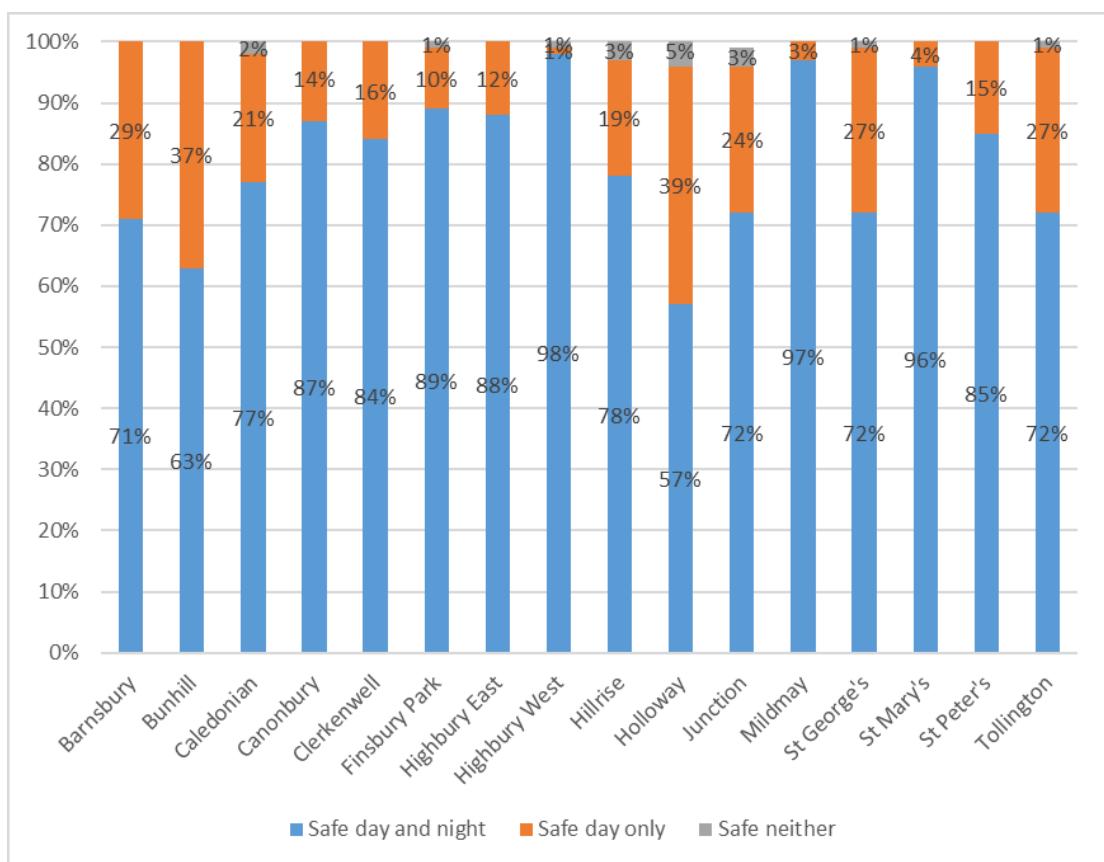


Figure 49: Feelings of safety by ward¹⁶⁰

Concern about crime by age, gender, ethnicity

Islington Crime Survey 2016 also shows that concerns about crimes vary by age, gender, economic status, length of stay in the borough, tenure and ethnicity. Similar proportions of women and men considered crime to be a major problem (13% and 12% respectively) despite the fact that women were more likely to be victims of crime and were more concerned about their neighbourhood more generally.¹⁶¹ Only 6% of the private rent residents considered crime as a major problem in comparison to 16% and 17% in public rent and home owner tenures respectively (see graph below).

Full Council draft IIA 2019

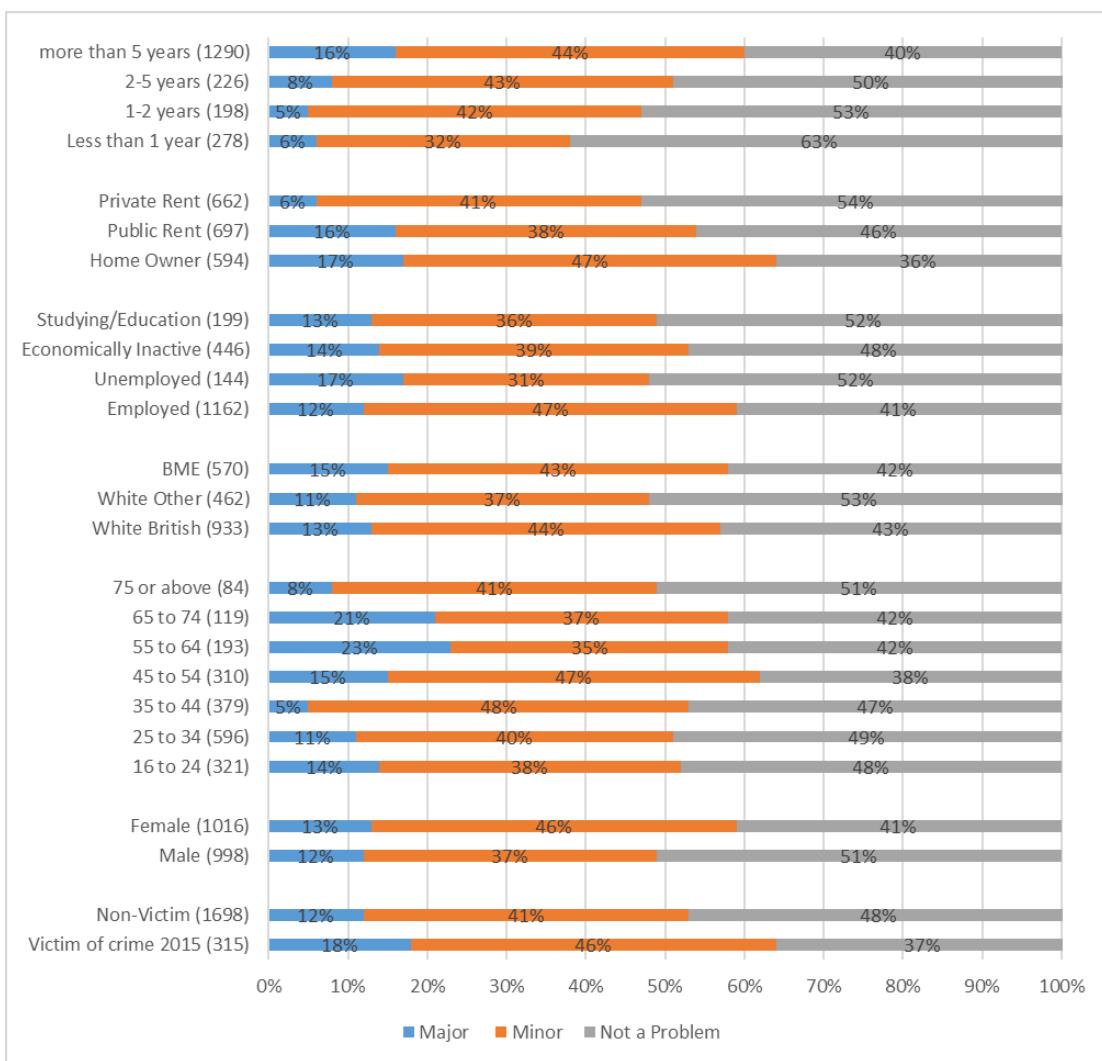


Figure 50: Neighbourhood concerns: Crime¹⁶²

Retail and Town Centres

Vacancy in town centres and designated frontages

Islington Retail and Leisure Study 2017, the latest for which figures are available, shows a mixed picture for town centre vacancies. Angel Town Centre had a low vacancy rate of 6.48% in July 2016, as recorded by Experian Goad.¹⁶³ This rate is below the national average of 11.9% and the average of 8.2% retail vacancy rates for major and district town centres in London which shows that the centre is performing well in this term.¹⁶⁴

By Town Centre	Floorspace	A1	A2	B1	D2	Total
Angel	Gross	7	0	0	0	7
	Loss	92	0	724	0	816
	Net	-85	0	-724	0	-809
Nag's Head	Gross	115	0	0	0	115
	Loss	518	15	176	0	709
	Net	-403	-15	-176	0	-594
Finsbury Park	Gross	0	0	0	0	0
	Loss	152	52	0	0	204
	Net	-152	-52	0	0	-204
Archway	Gross	0	225	0	0	225
	Loss	45	0	1,781	0	1,826
	Net	-45	225	-1,781	0	-1,601
Major Town Centre Total	Gross	122	225	0	0	347
	Loss	807	67	2,681	0	3,555
	Net	-685	158	-2,681	0	-3,208
Source: Development Monitoring System (CdpSmart), ER, LBI, March, 2016						
Note: Floorspace is in Gross Internal Area						

Figure 51: Net gains/losses of A1, A2, B1 and D2 use classes by area, 2014/15

Archway town centre suffered from 10.69% vacancy as recorded by Experian Goad, showing its relative lack of appeal compared to other higher profile centres closer to the CAZ. Nag's Head and Finsbury Park showed 8.62% and 8.5% vacancy rates respectively.¹⁶⁵ This shows that all the designated town centres in Islington, with the exception of Angel, have higher retail vacancy rates in comparison to the average of London's town centres of the same classification.

Whilst low vacancy rates compared to the national average may indicate strong demand for retail space, competing pressures for higher value development will mean that in order to preserve the cultural and economic function of town centres, the Local Plan will have to consider ways to protect retail space in a way that still allows a diverse range of uses across the borough.

Local Plan Consultations

The following consultation has been undertaken on the Local Plan to date.

The Regulation 18 consultation on the Scope of the Review document (which included a ‘Call for Sites’ exercise to inform a review of site allocations) ran for a period of 13 weeks between Monday 28 November 2016 and Monday 27 February 2017. In total, 36 email / letter responses were received, 60 survey responses (including partial completions) and 24 ‘call for sites’ responses were received.

The Regulation 18 consultation on the Direction of Travel document ran for a period of 6 weeks between Monday 12 February and Monday 26 March 2018. In total, 375 individuals/organisations responded to the consultation. A total of 527 responses were received from these respondents (as some respondents commented on multiple sites); 500 responses were related to specific sites, whereas 27 responses were related to general matters, including suggestions for new sites, queries on previously deallocated sites, or requests to kept informed of the progress of the plan.

The Regulation 18 consultation on the above documents ran for a period of 8 weeks between Tuesday 20 November 2018 and Monday 14 January 2019. In total, 201 email / letter responses were received. In addition, 656 ‘set responses’ were received in relation to Tileyard Studios.

Further detail on these consultations is set out in the Local Plan Regulation 19 Consultation Statement.

4 Assessment of Local Plan

Introduction

4.1 This section sets out key findings from the assessments undertaken on the Local Plan incorporating results of EqIA and HIA. Further detail is set out in the accompanying appendices. The section is structured as follows:

- Assessment of likely effects of Local Plan Objectives
- Assessment of likely effects of Local Plan Area Spatial Strategies
- Assessment of likely effects of Local Plan Policies including alternative policies
- Assessment of likely effects of Local Plan Site Allocations

Assessment of likely effects of Local Plan objectives

4.2 The following section sets out in full the seven Local Plan objectives contained in Section 1 of the Local Plan followed by the conclusions of the assessment with mitigation identified where relevant. The assessment also includes the key points identified by the EqIA and HIA.

4.3 The Islington Local Plan is underpinned by a clear vision:

To make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.

Objective 1: Homes - Delivering decent and genuinely affordable homes for all

4.4 There is a pressing need to reduce inequality and the negative consequences of relative poverty in Islington, so that every person has the same opportunity to reach their potential. Islington is a very polarised place of rising inequality and high levels of poverty, where wealthy and deprived areas are in close proximity throughout the borough. Those who are poorest are most likely to experience poor physical and mental health, have lower educational attainment, and be engaged in or be a victim of crime.

4.5 Maximising the delivery of genuinely affordable housing of a high quality is a key aspect of the Local Plan, which will help tackle inequality in the borough and improve quality of life for residents.

4.6 Evidence suggests a significant need for genuinely affordable housing, which means homes that people can live in without spending very high proportions of their incomes on housing costs.

Results of Assessment of Likely Effects of Objective 1: Homes

4.7 The assessment identified that there will be a significant positive effect on IIA Objective 5: Affordable Housing and IIA Objective 6: Inclusion as it identifies as a key aspect of the Local Plan the significant need to deliver genuinely affordable housing in order to reduce inequality. It will also have a significant positive effect on IIA Objective 7: Health as the LP objective aims to deliver high quality housing which will help improve the mental and physical health and wellbeing of residents.

Objective 2: Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living

- 4.8 The council strives to make Islington somewhere where everyone, regardless of skills, experience or background, can truly and meaningfully share in and shape the success of an area. To deliver this, an economy needs to be inclusive and must work for everyone, working from the bottom up rather than 'trickle down' from the top, providing new employment opportunities for all sections of the borough's residents.
- 4.9 The council is currently developing its overarching strategy for delivering an inclusive economy. An inclusive economy is not just beneficial to the borough's disadvantaged residents on an individual level. By reducing social inequality, it enables more cohesive and resilient local communities. A diverse local economy that contains a broad range and mix of sectors and businesses at varying scales is more resilient than an economy dominated by a few sectors. It is also better able to withstand an economic downturn. Economic diversity adds to the character of the borough making it a more attractive and interesting place to live and work. A diverse ecosystem of small locally owned businesses can rapidly respond to consumer need while offering experiences that can't be replicated through e-commerce.
- 4.10 Provision of affordable workspace and suitable space for a range of businesses, including SMEs, is key to delivering an inclusive economy, as this is a tangible mechanism to open up the local economy to those who would otherwise find it difficult or impossible to access. Provision of student bursaries, funded by new student accommodation, also offer opportunities to tackle the root cause of worklessness and give young people the opportunity to develop skills and learning.

Results of Assessment of Likely Effects of Objective 2: Jobs and Money

- 4.11 The Local Plan objective 2: Jobs and Money will have a significant positive effect on IIA objectives 6 and 8 as it is focused on delivering an inclusive economy which improves opportunities for Islington residents making it a place where everyone can regardless of their skills or background share in the shape and success of the borough. The Local Plan objective will also have a minor positive effect on IIA objective 9 as it aims to deliver an increasingly inclusive economy with the creation of jobs and space including affordable space for businesses locally which depending on if Islington residents take advantage of these opportunities can help to minimise their need to travel further afield to find employment; this will also help to potentially reduce transport emissions which is positive for IIA objective 12. If Islington residents take advantage of these opportunities then this objective will also help to reduce poverty and improve mental and physical health and wellbeing which is positive for IIA objective 7.

Objective 3: Safety - Creating a safe and cohesive borough for all

4.12 Islington is a vibrant place for people to live, work, visit or pass through. Safety and the feeling/perception of safety can be a key determinant for how vibrant and successful a place is. The council wants people to be safe and feel secure on its streets and within its open spaces. The creation and maintenance of mixed and balanced communities will be a key part of ensuring safety; this depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities.

4.13 Safety relates to crime and anti-social behaviour, but also other considerations such as use of transport infrastructure and the public realm. Designing out crime is a key planning principle, which incorporates a number of design techniques to limit incidences of crime; this includes increases in natural surveillance and designing space so it is conducive to positive behaviour

4.14 Risks of physical harm, for example, from perceived danger in the public realm where pedestrians, cyclist and vehicles all operate in close proximity to one another. Without clear delineation of routes for different modes of transport, the risk of accidents and collisions increases.

Results of Assessment of Likely Effects of Objective 3: Safety - Creating a safe and cohesive borough for all

4.15 Objective 3 will have a significant positive effect on the IIA objectives, in particular those relating to social and environmental impacts because it aims to make the borough a more liveable place by improving peoples safety both in the public realm and at home. This has a positive effect (minor and significant depending on the objective) for IIA objectives 1, 4, 6, 7, 9, 10 and 12. Improving public safety will encourage people to make more active and sustainable travel choices which benefit both the IIA health objectives and minimising the need to travel objectives. It will also encourage people to use public open spaces more which again has health benefits for people. The IIA also has objectives to create and maintain mixed and balanced communities which are strong and cohesive; and this Local Plan objective is positive in that respect recognising the importance of integrating new developments into existing communities.

Objective 4: Children and Young People - Making Islington the best place for all young people to grow up

4.16 The Local Plan aims to deliver development that is adaptable and usable for people of all ages. The importance of ensuring that children and young people have access to the right facilities as they grow cannot be overstated. Ensuring a child friendly environment for children and young people ensures that they get the best start in life, and will enable them to achieve their full potential.

4.17 Planning is an important tool to facilitate this, whether through protection and provision of social infrastructure such as schools, libraries and community centres; protection of a range of spaces of all shapes and sizes, both soft and hard landscaped, where play and activity can occur; or by ensuring good quality housing with enough space for children and young people to lead healthy lives.

Results of Assessment of Likely Effects of Objective 4: Children and Young People - Making Islington the best place for all young people to grow up

4.18 Objective 4 will have a significant positive effect on the social IIA objectives as providing the right facilities for children to grow and develop will also benefit everyone

where it is designed to be adaptable and usable for people of all ages not just children therefore improving everyone's access to services. The same principle applies for high quality housing and open spaces, the benefits which will be felt by everyone.

Objective 5: Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all

- 4.19 The quality of Islington's places and spaces support the borough's diverse communities and its commercial, cultural and social life. The success of any development depends largely on how it relates and contributes to its context. There are no sites within the borough that are so large or so detached from their surroundings that the context can be ignored. It must also be recognised that a site's context is dynamic, constantly evolving with time and use and any new development must be sufficiently resilient to, and capable of flexing with, that change. All planning applications must take into account the wider physical, social, economic, cultural, historic and green infrastructure; identifying the opportunities and challenges each presents.
- 4.20 This is not just individual buildings but the wider neighbourhood, public realm, transport and associated social infrastructure. An inclusive place should facilitate social cohesion and community stability, avoiding the need for unwanted or premature moves. It should also support the local economy, enabling service providers to benefit from the patronage of the whole community.
- 4.21 The creation and maintenance of mixed and balanced communities depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities. The way in which a site connects with and 'stitches into' its surroundings, and how it might be developed to improve those, or create new, connections is a vital part of the assessment of new development. Those connections might be for pedestrians, bikes, wildlife, visual links, way-finding, sunlight and or drainage; improving the site's amenity and its contribution to the amenity of the area. Each should be carefully considered to deliver safe, inclusive, functional and efficient routes.
- 4.22 An inclusive place features socially inclusive neighbourhoods without barriers, which enables a range of users to access spaces and interact within them. For example, developments should increase rather than reduce permeability; residential and commercial developments should not be gated. This will enhance the dignity of individuals, supporting their use and enjoyment of facilities on their own terms. To that end design proposals that separate users and deliver an inferior experience, on the basis of a person's age, disability, race, gender, wealth, or any other characteristic, will be resisted.
- 4.23 Places and spaces must be designed with diversity in mind, so that they are convenient and enjoyable for all to use; addressing the specific and potentially conflicting physical, sensory, cognitive and social needs of people protected by current equalities legislation. This will ensure that barriers are designed out and flexibility built in, avoiding the need for awkward and or unsightly adaptations. The provision of accessible, essential and appropriate services to support a development will allow independent use and contribute to the cohesion and sustainability of the community.
- 4.24 The success of inclusive design will often be affected as much by its management as by its physical form. However, shortcomings in the latter frequently place unreasonable and unsustainable demands on the former. All development must resolve issues in physical form rather than any reliance on future management arrangements.
- 4.25 Attention should also be given to the quality of spaces around or between buildings; determining their social, environmental, historical, cultural and aesthetic value, whilst connecting, reflecting and enhancing the structures and spaces they link.

- 4.26 Islington has the second lowest proportion of green space (as a proportion of overall land), and the second lowest amount of open space, of any local authority in the country. As a small but densely populated borough, green and open space is highly valued but under continued pressure in light of housing, population and employment growth. Planning has a key role in balancing the pressures of development with the need to provide a high quality green infrastructure to meet the needs of Islington's communities.
- 4.27 Provision of green and open space provides multiple benefits. It is extremely important for residents' health and wellbeing. It provides space for recreation and play, supporting the development of a child-friendly borough. It can also act as a space for mental relief and a place to escape; parts of the borough experience issues with overcrowded housing, therefore the availability of green and open spaces – however small – can be an important resource for these residents. In addition, it protects and enhances biodiversity, lessens flood risk, improves air quality and helps with mitigating the impact of climate change
- 4.28 Development should continue to make efficient use of land and fully integrate with, and relate positively to, its immediate neighbours and locality. This principle ensures that regard is had to the historic environment whilst enabling sensible evolution of character and facilitating new development.
- 4.29 Planning has a significant role to play in minimising the borough's contribution to climate change and ensuring that the impacts of climate change can be effectively mitigated. Climate change impacts are increasingly affecting the day-to-day lives of people who live in, work in and visit Islington. From the Urban Heat Island effect to extreme winter temperatures, this threatens the health and wellbeing of these people and also the physical fabric of the borough which makes it a place where people want to be.
- 4.30 The approach to tackling climate change is multi-faceted, including provision of more green infrastructure, ensuring buildings are designed sustainably and promoting less polluting modes of transport, in particular walking, cycling and public transport.

Results of Assessment of Objective 5: Likely Effects of Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all

- 4.31 Objective 5 will have a significant positive effect on almost all IIA objectives in particular those relating to the social and environmental issues with particular significant positive effects in relation to creating an inclusive place, encouraging provision of green infrastructure and recognising its importance, increasing permeability, making accessibility more convenient and ensuring the efficient use of land. This is also positive for encouraging people to lead healthier and more active lives and make more sustainable transport choices and may encourage people to patronise local businesses and services.
- 4.32 Objective 5 will also have a positive effect on the historic environment as it recognises that all planning applications must consider the wider context encouraging development which integrates into its surroundings, and relating positively to its immediate neighbours which in the context of heritage is important. This is also important to ensure new developments integrate into existing communities and makes contributions to mitigating climate change. In this respect the objective recognises the important multi-faceted role that planning has in reducing the borough's contribution to climate change and ensuring the impacts of climate change are effectively mitigated.

Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives

- 4.33 Spatial planning can positively influence the wider determinants of health by shaping a healthier environment for people of all ages, abilities and backgrounds across the borough, from ensuring every child has the best start in life to creating healthy, inclusive environments for older and disabled people.
- 4.34 This includes facilitating active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; increased urban greening and open space and safe places for active play and food growing, and is accessible by walking, cycling and public transport.
- 4.35 Tackling inequality and poverty can also have a significant impact on health and wellbeing. Islington has wealthy and deprived areas located cheek by jowl throughout the borough. Those who are poorest are also most likely to experience poor physical and mental health, lower educational attainment, and be engaged in or be a victim of crime. Islington residents experience poorer physical and mental health that results in early deaths from cancer and circulatory disease, caused in large part due to deprivation across all Islington wards coupled with unhealthy lifestyle choices and poor access to the right services at the right time. Deprivation is the main risk factor for early death and poor health in Islington.
- 4.36 At the same time, life expectancy is increasing overall, meaning that some people are living longer but in poor health with more long-term physical and mental health conditions and an increase in the number of people living with dementia. This requires the creation of a healthy environment that contributes towards preventing ill-health, but also one where people are supported to live independently, for longer, in their community. Planning can help to create social, civic spaces which increases interaction of people from all walks of life. This can help address issues of loneliness and social isolation which affect certain residents, and which can have a detrimental impact on health and wellbeing, particularly mental health.

Results of Assessment of Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives

- 4.37 Objective 6 has specific significant positive effects on the IIA objectives the wider determinants of health. It aims to shape a healthier environment for all by affecting the; pattern of development, urban design, access to local services and facilities; increased urban greening and open space and safe places for active play and food growing, and accessibility by walking, cycling and public transport which will all have significant positive effects in terms of the IIA objectives. There may also be indirect benefits through urban greening and biodiversity which can also benefit peoples' health.
- 4.38 The **HIA** recommended that the draft Local Plan should be clear that the health of Londoners is, to a large extent, determined by the environment in which they live. The Council considers that whilst the role of planning is important in addressing and improving the environment within which people live it is also important to acknowledge that the choices people make are not always in response to the environment within which they live and are influenced by a wider range of factors.

Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources

- 4.39 Planning delivers holistic benefits and considers issues over the long-term. Proper planning can help to identify and mitigate issues, thereby saving money and resources in future,

building resilience. The examples of this are numerous, whether requiring energy efficiency measures to address fuel poverty, which saves families £100s and may lessen chances of them requiring support services in future; or by ensuring that hot food takeaways are not opened up near schools, contributing to reduced level of childhood obesity which has knock on benefits for health spending amongst other things.

- 4.40 To be truly proactive and contribute fully to ensuring efficiency of resources will require further improvements in those policy areas where we are already doing well, and developing effective solutions for policy areas which are currently not delivering as they should be.

Results of Assessment of Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources

- 4.41 The Local plan objective has fewer direct impacts than other Local plan objectives given its related to service delivery rather than issues related to development. Fundamentally the assessment could be positive across all IIA objectives as the assessment recognises that further improvements are possible where the council is already doing well and where it could do better. The assessment identifies some examples of the holistic benefits that a well-run planning service delivers including energy efficiency which reduce home energy bills which will help to reduce inequality.

Mitigation considered for Assessment of Objectives

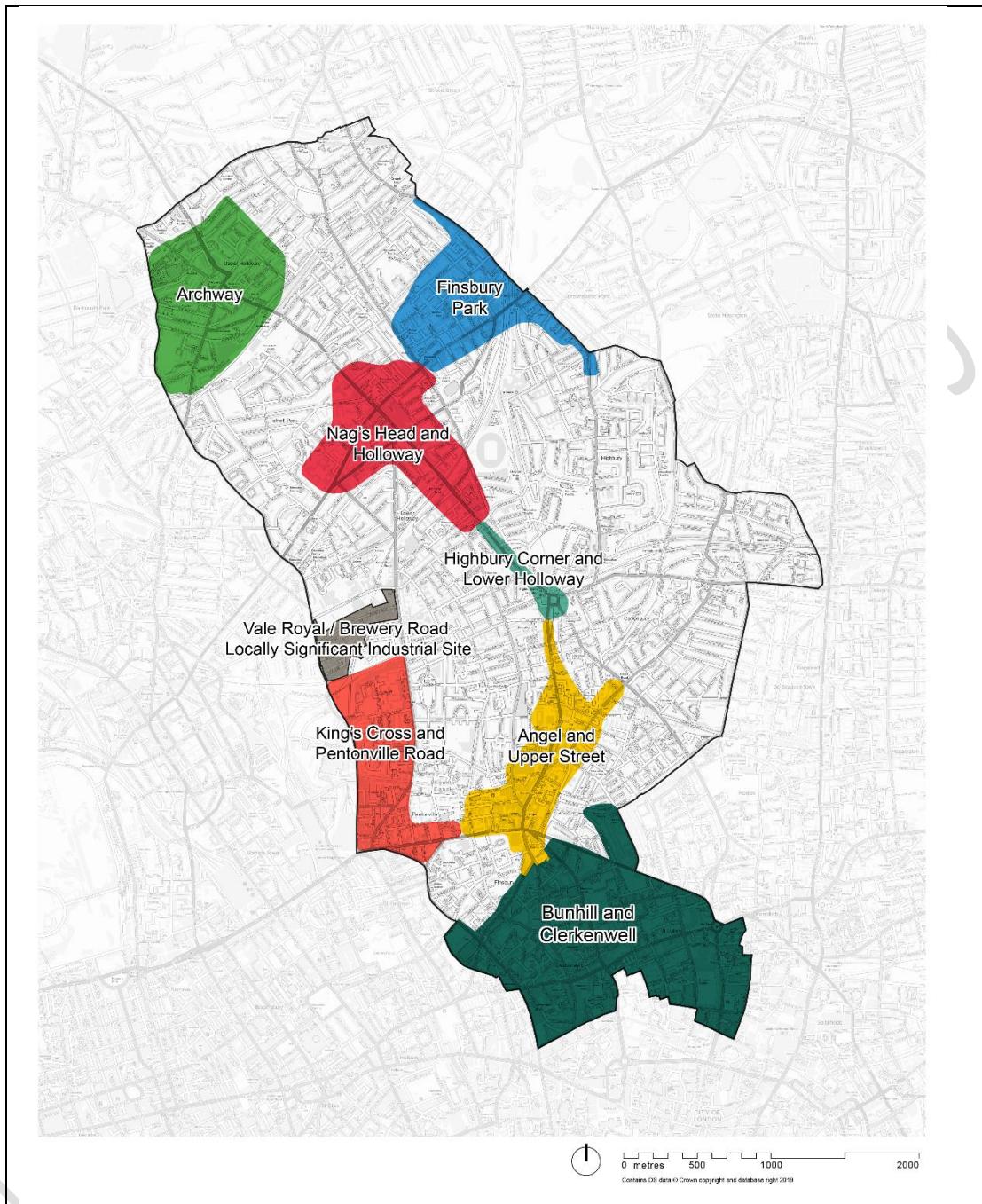
- 4.42 Assessment of the objectives did not identify any negative impacts. The objectives are the stated aim of the Council and whilst there maybe a number of ways the objectives could be improved these are considered within the rest of plan.
- 4.43 The **HIA** recommended that the draft Local Plan should be clear that the National Planning Policy Framework supports local planning policies that consider the health and wellbeing of the population citing the reference in paragraph 1.8 of the Regulation 18 Local Plan. The Council considered that this section is setting out the context within which the Local Plan is to consider from a procedural point of view the NPPF therefore it is not necessary to reference in this paragraph the support the NPPF provides to considering health and wellbeing needs of the population. The **HIA** also recommended that the draft Local Plan should highlight the inequalities in life expectancy between the most and least deprived areas of Islington in order to encourage a focus on health and wellbeing particularly in the most deprived areas. The Council considers that the detail set out in paragraph 1.54 highlights this issue clearly.

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 x.x: Map showing Area Spatial Strategies





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. 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.

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 26 specific sites allocated outside the spatial strategy areas identified under 'Other Important Sites', which have been subject to assessment therefore site specific opportunities have been considered.

The following highlights the basis for growth in each of the spatial strategy areas:

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 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.

There are six spatial strategies (BC3 to BC8) within the Bunhill and Clerkenwell AAP which together cover the whole of the area. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The SA considered that all six areas are 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 within the Central Activities Zone. The following specific positive effects were identified for each spatial area.

The SA of **policy BC3** 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. Policy BC3 also had a specific positive effect against the economic growth objective because of specific reference to the Moorfields site helping reinforce the policy position set out in policy B2.

The SA of **policy BC4** 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. Policy BC3 also had a specific positive effect against the economic growth objective because of 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. 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 SA of **policy BC5** has a specific positive effect against the objective related to the built environment with specific references to integration and linking of high quality neighbouring public space such as Clerkenwell Green which is an expression of Local Plan policies T1 and T4. 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 SA of **policy BC6** did not highlight any specific positive effects in addition to helping implement the plan policies.

The SA of **policy BC7** 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 SA of **policy BC8** identified a positive effect on 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 Spatial Policy **SP2: Kings Cross** 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.

For most of Sustainability Assessment objectives there is no effect against policy SP2. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy SP2 highlighted the following:

- The objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an areas where growth and change is expected to occur within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.
- There is also a minor positive effect for Policy SP2 on 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.

- There is a 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.
- There is 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 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.

The Vale Royal Locally Significant Industrial Site (LSIS) has been identified as a spatial strategy area (SP3) 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.

For most of Sustainability Assessment objectives there is no effect against policy SP3. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy SP3 highlighted the following:

- There is a minor positive effect against the objective for the built environment and heritage for policy SP3 as 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.
- There is a minor positive against the objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an area where growth and change is expected to occur within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.
- There is a minor positive effect for policy SP2 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.

Policy SP4: 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.

For most of Sustainability Assessment objectives there is no effect against policy SP4. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy SP4 highlighted the following:

- There is a minor positive against the objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an area where growth and change is expected to occur within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.
- There is a minor positive effect for policy SP4 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.

SP5 Nag's Head is an important retail area and 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.

For most of Sustainability Assessment objectives there is no effect against policy SP4. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy S5 highlighted the following:

- There is a minor positive against the objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an area where growth and change is expected to occur within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.
- 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.
- Whilst there is no effect identified against objective 5 access to housing for policy SP5 it is noted that SP5 includes reference to Holloway Prison, considered a key site which will help meet identified housing need in the borough. Holloway Prison is also assessed as site allocation NH7.
- There is a minor positive against the objective for protection and enhancement of open spaces with Policy SP5 having a positive effect with the potential delivery of new public open space as part of site allocation NH1 which would improve public accessibility to public open space

SP6 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.

For most of Sustainability Assessment objectives there is no effect against policy SP4. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy S6 highlighted the following:

- There is a minor positive against the objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an area where growth and change is expected to occur within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.
- 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.

SP7 Archway should support the commercial function of the area, 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.

For most of Sustainability Assessment objectives there is no effect against policy SP4. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy S7 highlighted the following:

- There is a minor positive against the objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an area where growth and change is expected to occur within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.
- The SA identifies that SP7 identifies support for Archway town centres role as a cultural quarter but does not add to Local Plan policies R1 and R10.

SP8 Highbury and Islington station is the focal point of the Highbury Corner and Lower Holloway Spatial Strategy area with existing business uses and cultural uses protected.

For most of Sustainability Assessment objectives there is no effect against policy SP4. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. The Sustainability Assessment of spatial strategy S7 highlighted the following:

- There is a minor positive against the objective for efficient use of land where the Sustainability Assessment considered the area to be the most appropriate location for development, being an area where growth and change is expected to occur

within the plan period. The area is located in close proximity to key infrastructure such as public transport hubs and located on key commercial routes.

- There is a minor positive effect for policy SP8 against the objective for 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.
- 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.

Assessment of likely effects of Local Plan Policies including alternative policies

Policy: PLAN1: Site appraisal, design principles and process was introduced at Regulation 19 draft Local Plan, elevating previously drafted supporting text of the November 2018 Reg 18 draft. The policy 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.

The approach to design in regulation 18 draft incorporated a section on site appraisal and design process with references to policy throughout the document. Early drafts of the Local Plan objectives contained a section with the four key development principles; contextual, connected, inclusive and sustainable but these were redrafted following further consideration of the plan objectives and alignment with the Council's Corporate Plan objectives. Whilst the assessment of the objectives did not highlight the lack of design focus within the Local Plan, further consideration has highlighted the absence of firm policy to enable detailed assessment of design and consideration of key issues such as amenity. A new policy was developed for regulation 19 draft of the Local Plan in response to these further considerations.

Overall Policy PLAN1 will have a significant positive effect, contributing a positive effect to almost all of the sustainability framework objectives. The full assessment is set out in appendix 4: table x and set out below are the key points.

The **contextual principle** ensures that 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. This would include reflecting heritage assets. The policy focuses on the four development principles which will ensure delivery of inclusive, connected, contextual and sustainable development.

The **connected principle**, 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 also help to ensure access to various services and facilities through considering permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings, improve safety and promote positive social contact, behaviours and community cohesion and encourage modal shift to more sustainable modes of transport. Improving access to services can also help contribute to addressing inequality.

The **inclusive principle** ensures the Policy supports other Local Plan policies and responds 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 which can support and respond to economic as well as social needs. The inclusive principle also 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.

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.

In addition 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.

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.

For the full Sustainability Appraisal assessment see the tables in the following appendices:

- See appendix 4a: Table x: Policy PLAN1

Thriving Communities

Housing Policies (policies H1 to H5)

The following housing policies have been assessed in the same Sustainability Appraisal table:

- 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

For the full Sustainability Appraisal assessment see the tables in the following appendices:

- See appendix 4a: Table x: Thriving Communities: Appraisal of Policies H1 to H5
- See appendix 3: Table x: Alternative

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 on 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 **HIA** recommended that the Local Plan could be strengthened by stating that the communal / public spaces around residential developments should encourage residents to interact with the wider world by providing safe, pleasant spaces where people can interact. The Council considered this was unnecessary as there are a range of policies, stemming from the vision and objectives, that encourage mixed and balanced communities (particularly in terms of open spaces), for example H4, H5 and G1.

No alternatives were considered for policy H1 and no mitigation or enhancements were identified.

Policy H2: New and existing conventional

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 through providing a mix of housing sizes informed by evidence of need and optimises 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. 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.

The **HIA** recommended that Policy H2D should specifically state that all new and converted conventional residential development should meet the housing tenure priorities in Table 3.2 in addition to house size. The Council considers this unnecessary; with policy H3 Part H covering tenure split requirements.

Alternative to Policy H2: New and existing conventional housing

A reasonable alternative was considered for policy H2, specifically part H of the policy which 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 alternative policy would not include this requirement.

The impact of the alternative was considered by the **Sustainability Appraisal** to be overall minor negative with less certainty that units will be occupied. This would have the effect of units not contributing towards meeting the boroughs housing need. Also it was considered detrimental to social cohesion with increased potential for vacant units not contributing to the wider community.

Policy H3: Genuinely Affordable Housing

The **Sustainability Appraisal** of Policy H3 considered it would have a significant positive effect on delivering 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.

The **EqIA** identified that policy H3 will significantly benefit groups on low incomes who can be made up by certain groups with protected characteristics. The assessment noted however that whilst the impact is positive the delivery of affordable housing is constrained by viability and cannot provide for everyone's need including some with protected characteristics. The EqIA also identified the benefits of reducing overcrowding through maximising the supply of affordable housing – overcrowding can have severe impacts on mental health due to increased stress. It can be partly reduced by building more homes and building high quality homes

The **HIA** recommended that the local plan should give more clarity on what the Council considers “genuinely affordable” in relation to housing. The Council agrees and has included a definition in the regulation 19 draft of the Local Plan.

Alternatives to Policy H3: Genuinely Affordable Housing

Two reasonable alternatives to Policy H3 were considered:

- Using the Mayor’s ‘threshold’ approach to securing on-site affordable housing and
- Imposing a higher trigger of 3 to 9 net additional units for affordable housing small sites contributions.

The Mayor’s ‘threshold’ approach is set out in policy H6 of the draft London Plan and would require major development proposals to provide a minimum of 35% affordable housing (or 50% on public sector or industrial land) and meet other criteria; this approach means that only an early stage review mechanism would be imposed. Proposals which do not meet the minimum threshold or other criteria must provide viability evidence to determine the maximum amount of affordable

housing that can be provided; and will be subject to various review mechanisms including a late stage review.

The alternative was considered negative when judged against the preferred H3 approach principally because it would deliver less affordable housing even though it is viable to do more, and therefore contribute less to meeting the borough's identified housing needs. This is not considered acceptable, given the level of housing need and the limited amount of housing land in the borough which necessitates that each site delivers the maximum amount of affordable housing which the viability evidence suggests is deliverable. As well as the negative effects on affordable housing delivery, other negative effects were assessed on poverty, health and community cohesion. The alternative would allow for site specific viability evidence to be provided in more circumstances, which introduces more flexibility, but it would likely result in the delivery of less affordable housing because there was less scope for review and a lower threshold to start with. Further, not having clear site specific requirements also leads to more speculation in the land market and ultimately leads to inflated land values, which in turn results in less affordable housing.

The small sites contribution alternative policy would impose a higher trigger of 3 to 9 net additional units for affordable housing small sites contributions. The trigger in Policy H3I is set at 1 additional unit.

The principal impact is lower affordable housing financial contributions, and therefore the alternative would contribute less to meeting the boroughs identified housing needs. This would have negative effects on affordable housing delivery, poverty, health and community cohesion. It is considered to result in less contributions towards affordable housing simple because development of between 1 and 2 additional units would not have to contribute. In addition it may dis-incentivise higher density development (as 1 or 2 unit schemes may be preferred due to the non-imposition of contributions) which could lead to under-optimisation of land and a negative impact on ensuring the efficient use of land.

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 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.

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 – all which have a significant impact to improve health and wellbeing. The **EqIA** identified the direct benefits of policy H4 for disabled people and other protected groups who will also benefit from access improvements including parents/carers and older people.

Alternative to Policy H4: Delivering High Quality Housing

The alternative to Policy H4 would apply the 2015 National Technical Housing Standard without additional local design standards. The assessment considered this negative with impacts on a number of objectives with the most significant effect on the quality of housing which would not adequately meet the diverse needs of Islington's population. 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. 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. Ensuring the delivery of private outdoor space can have positive impacts on health and wellbeing, help meet the needs of families with children. Noise impacts are mitigated through alternatives which would mitigate noise impacts but still deliver private space.

Policy H5: Private Outdoor Space

Policy H5 is considered to have a minor positive effect by the **Sustainability Appraisal** as it helps improve diversity of housing, improves amenity and has positive impacts on 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. 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.

The **EqlA** identified the positive effects of policy H5 private outdoor space includes a requirement to step-free and level access to the private outdoor space which will benefit various protected groups including, young, old, mothers and disabled groups and help ensure the space is usable. The EqlA also identified the positive effect on various groups with protected characteristics of ensuring access to communal space is not restricted on the basis of the tenure of residential units.

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 H7: Meeting the needs of vulnerable older people
- Policy H8: Self build and custom build housing
- Policy H9: Supported housing
- Policy H10: Houses in Multiple Occupation (HMOs)
- Policy H11: Purpose built private rented sector
- Policy H12: Gypsy and Traveller accommodation

For the full Sustainability Appraisal assessment see the tables in the following appendices:

- See appendix 4a: Table x: Thriving Communities: Assessment of Policies H6 to H12
- See appendix 3: Table x: alternative to policy H6 and H10

Policy H6: Purpose built student accommodation and alternative

Policy H10: Houses in Multiple Occupation (HMOs) and alternative

Policy H6 and H10 are considered together because the assessment results in similar overall negative impacts 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 on 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 **EqlA** considered the possible positive impact on protected groups from policies H6 and H10 as they may restrict delivery of large scale HMO and purpose built student accommodation thereby potentially increasing conventional housing which would increase the quantity of affordable housing for these groups. Whilst HMO are sometimes considered an affordable form of housing this is a

'traditional' small scale form of HMO as opposed to large scale HMO which are considered expensive. Smaller scale HMO – 'traditional bedsits' - do provide affordable accommodation for BAME and other lower income groups who may need to use such accommodation where they cannot access social forms of housing. Despite the overall restrictive policy approach the overall effect is considered more likely neutral given the small quantity of this type of accommodation that has actually been delivered.

The **Sustainability Appraisal** for both policy approach and alternatives to 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 – 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. So the alternatives to policies H6 and H10 which provide more of these types of housing would have a bigger negative impact on the **Sustainability Appraisal** objectives than the chosen policy approach. The assessment also considered these alternatives 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 approach to H6 and H10 cannot be ruled out because of the London Plan – a far stricter policy approach was originally considered. So the preferred approach mitigates against the London Plan by requiring a firm assessment of applications to reduce the negative effects of these accommodations coming forward through reducing the likelihood of development and setting criteria to ensure quality where it does.

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 **EqlA** also identifies the issue and considers it neutral. 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 on the inclusion objective. This is also considered in light of the support that older people have for remaining in their own homes and living independently although it is noted that this is an assumption. 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 build housing

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. 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 on social cohesion as it protects existing supported housing and supports the provision of new supported housing. 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

The Sustainability Appraisal considers that the principal 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. 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.

Alternative to Policy H11: Purpose built private rented sector

An alternative to Policy H11 was considered which will have similar effect as policies H6 and H10 and would take a more supportive approach to Private Rented Sector (PRS) more in line with the London Plan. Similar to the assessments of H6 and H10 the **Sustainability Appraisal** considers the impact would have a bigger negative effect than the proposed policy position which takes a more restrictive approach. In particular for PRS the negative effect would be the increased negative impact on provision of genuinely affordable housing [effect explained above].

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 Council's 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. The **EqIA** also considers the approach positive identifying gypsy and travellers protected status. The EqIA references the policy context which recognises that the shortage of vacant sites, very high land values and the pressure to meet significant need for conventional housing and business floorspace (amongst other uses) - mean there will be significant challenges to meeting Gypsy and Traveller need. Despite this context the outcome is judged to be positive at this stage.

Thriving Communities: Social and Community Infrastructure

The following social policies have been assessed in the same Sustainability Appraisal table:

- Policy SC1: Social and Community Infrastructure
- Policy SC2: Play Space
- Policy SC3: Health Impact Assessment
- Policy SC4: Promoting Social Value

For the full Sustainability Appraisal assessment see the tables in the following appendices:

- See appendix 4a: Table x: Thriving Communities: Assessment of Policies H6 to H12

Policy SC1: Social and Community Infrastructure

Policy SC1 will have a significant positive effect on the social objectives of the **Sustainability Appraisal** as it will ensure that both new social and community infrastructure 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 justified both through tests of market demand and community need. This should mean that the range of community facilities necessary for the 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'.

New social and community infrastructure will be built in an accessible location which is convenient to the users and the design will be 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. For these factors in particular the **EqIA** considered social and community policies are entirely positive for all groups with protected characteristics

The **HIA** made a number of recommendations to Policy SC1:

The **HIA** recommended that the Local Plan could be strengthened by adding a direct reference to the North London Partners Strategic Estates Strategy and the Haringey and Islington Wellbeing Partnership's strategic estates strategy. The Council does not consider including these references is necessary for the Local Plan.

The **HIA** recommended that where developers include proposals for new, relocated, or loss of primary or secondary health care premises, the Local Plan should require the developer to show evidence of engagement with the NHS Islington Clinical Commissioning Group and the relevant NHS Health Trust. The Council agrees and will make a suitable amendment to the Regulation 19 Local Plan.

The **HIA** also recommended that the list of facility types in paragraph 3.144 should include both post-16 education and childcare facilities as social infrastructure which the Council has accepted.

No reasonable alternatives were identified for the policy.

Policy SC2: Play Space

Policy SC2 will ensure playspace is provided in all major developments and playable public space is provided in all development. This will have a positive effect helping create high quality development which provides families with convenient access encouraging healthy and active lifestyles for children. Where proposals are for a loss replacement space is provided. The Regulation 18 draft of Local Plan included reference to loss of play space where it was robustly demonstrated the space is no longer required ie potentially no replacement. The previous iteration of the assessment noted this and it was removed as part of the Regulation 19 Local Plan.

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.

However the **HIA** made two recommendations on HIA. It recommended that the policy could be strengthened by requiring a screening assessment at pre-application stage for major developments in order for the findings to influence the design at an early stage. It also recommended that the draft Local Plan clarifies that health impact assessments should be proportionate to the size of the development and not limited to access to health services. The Council will make amendments in the Regulation 19 Local Plan to reflect both recommendations.

Policy SC4: Promoting Social Value

Policy SC4 has no effect on 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.

Mitigation for Thriving Communities Section

The **Sustainability Appraisal** has identified the issue around land supply and delivery of housing and affordable housing the only negative effect for the policies in this section. 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. The issue relates to restricting use of land for large scale HMO and Student Accommodation and to a lesser extent Private Sector Rental accommodation. The policy position is to restrict the development of this accommodation within the context of the London Plan and the assessment considers that the mitigation already exists in policy and cannot be improved. The assessment of alternatives for large scale HMO and Student Accommodation identified the increased negative outcomes therefore the alternatives were discounted.

Inclusive Economy

The following business related policies have been considered in the same Sustainability Appraisal table:

- B1: Delivering Business Floorspace
- B2: New Business Floorspace
- B3: Existing Business Floorspace
- B4: Affordable Workspace
- B5: Jobs and Training Opportunities

For the full Sustainability Appraisal assessment see the tables in the following appendices:

- See appendix 4b: Table x: Inclusive Economy: Assessment of Policies B1 to B5
- See appendix 3: alternatives to policy B2: New Business Floorspace

B1: Delivering Business Floorspace & B2: New Business Floorspace

Policy B1 and policy B2 are considered 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 on the efficient use of land and meeting needs 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. 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. 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.

The **EqIA** considers that employment policies are likely to have positive impact for all equalities groups with no neutral or negative impacts identified with particular positive benefits for those protected groups who may be on low incomes. The Local Plan aims to deliver an inclusive economy. No negative or neutral impacts have been identified. The approach is likely to have a greater beneficial impact on those on low incomes including various groups with protected characteristics as some of the policies are seeking to address inequalities. BAME groups for example have greater proportion of people who have no qualifications and face barriers to employment as well as disabled people. Child poverty is closely linked to unemployment - just over a quarter (35.3%) of Islington children live in households where no one is in employment and children growing up in BAME households in Islington are more likely to be living in poverty in comparison to white children. Providing a range of employment in the borough can help to reduce unemployment and increase

opportunities for all protected groups eg disabled people who traditionally face greater barriers to employment.

The **HIA** recommended that the draft Local Plan should be strengthened by requiring developers to consider workplace health in the design of workplaces. The Council considers that health is a fundamental part of the Draft Plan and it is embedded within the vision and objectives and is a key consideration in a number of policies. Therefore it was not considered necessary to include a general reference under policy B2.

Alternatives to Policy B2: New Business Floorspace

Various alternatives were considered for the approach to business space.

The alternative to Policy B2 part A 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 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 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 employment use 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.

A policy alternative to B2 part C was considered in regard to intensification of industrial floorspace in LSIS but discounted as unreasonable. The alternative stems from the new London Plan policy E7 which supports intensification of industrial activities to deliver additional capacity and to consider whether some industrial activities could be co-located or mixed with residential or other uses. The approach is predicated on a masterplanning exercise which identifies where different uses might be located as part of a plan led approach. The alternative policy would, in principle, seek no net loss of industrial floorspace in LSISs with residential or office the other uses. However the alternative was dismissed as unreasonable given that the London Plan only invites local authorities to consider such an approach, but more strongly highlights the imperative to protect the industrial function of these areas and minimise the introduction of alternative uses which would undermine that function.

B3: Existing Business Floorspace

The **Sustainability Appraisal** considers that Policy B3 has a significant positive effect overall, principally on meeting needs and facilitating 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. 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.

No alternatives were considered reasonable for Policy B3.

B4: Affordable Workspace

Policy B4 requires provision of affordable workspace which the Sustainability Appraisal identifies will have a significant positive effect on 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 in the Borough's most unaffordable locations.

B5: Jobs and Training Opportunities

Policy B5 is considered by the **Sustainability Appraisal** to have a significant positive effect on 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.

Inclusive Economy: Retail policies

The following retail policies have been considered in the same Sustainability Appraisal table:

- R1: Retail, Leisure and Services,
- R2: Primary Shopping Areas
- R3: Islington's Town Centres
- R6: Maintaining and enhancing Islington's unique retail character

For the full Sustainability Appraisal assessment see the tables in the following appendices:

- See appendix 4b: Table x: Inclusive Economy: Assessment of Policies R1, R2, R3 and R6
- See appendix 3: Alternative to Policy R2: Primary Shopping Areas

R1: Retail, Leisure and Services, R2: Primary Shopping Areas, R3: Islington's Town Centres & R6: Maintaining and enhancing Islington's unique retail character

The **Sustainability Appraisal** considers policies R1, R2, R3 and R6 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. This is also positive for the wider economy with town centre uses key drivers in both the local and London economy.

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.

R3: Islington's Town Centres

The Sustainability Appraisal considered the approach to have a significant positive effect focusing appropriately scaled development in terms of size and scale and retail hierarchy but also ensuring high quality development which ensures accessibility, amenity and sustainability considered.

The **EqIA** considers that these retail policies are likely to have a positive impact for all equalities groups with no neutral or negative impacts identified with particular positive benefits for BAME, religious and older people and mothers of children. Through the retail policies the Local Plan seeks to encourage a diverse range of shops across the boroughs town centres and local centres, as well as protect local shops. Having accessible shops will be beneficial to all local residents and workers but will particularly help to cater for the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children. Young people like to congregate in town centres and they support social interaction, they also support employment and training offering flexible entry level jobs for young and old people.

Alternative Policy R2: Primary Shopping Areas

The only alternative considered for these policies relates to Policy R2 and how A1 use class shops are protected in the town centres. The alternative would identify specific primary and secondary frontages within which certain proportions of A1 retail would be protected – similar to the current adopted policy approach. Although it is noted that the NPPF no longer identifies primary and secondary frontages this does not preclude it as a reasonable policy approach. The other alternative considered but discounted was looking at having various different thresholds for percentage levels of A1 retail use protected 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 **Sustainability Appraisal** of the alternative considered that retaining a primary and secondary frontages approach could be less effective at managing competing demands between a wider variety of town centre use classes, as varying degrees of protection is skewed towards A1 uses. Secondary frontages in particular are considered an unnecessary part of a retail hierarchy where evidence suggests flexibility is needed. This could negatively affect town centres ability to thrive and provide retail and services that meets a broad range of residents needs affecting wellbeing. Also the assessment considered primary and secondary frontages are likely to restrict the establishment of a greater amount of non-A1 essential services in the town centre, compared to a PSA. Whilst retaining A1 is important to retain the function of centres, and can have economic benefits in terms of agglomeration of uses, given the current climate in the retail sector, it is considered that the alternative would not strike the right balance in terms of A1 and non-A1 uses and would preclude other businesses which may have economic benefit. Also, by potentially limiting a wider variety of businesses, this could limit the variety and range of different jobs local people can access.

Inclusive Economy, Local retail and specialist retail policies

The following retail policies have been considered and assessed in the same Sustainability Appraisal table:

- R4: Local Shopping Areas
- R5: Dispersed shops
- R7: Markets and SSAs
- R8: Location and concentration of uses:
- R9: Meanwhile/ temporary uses

For the full Sustainability Appraisal assessment see the tables in the following appendices:

See appendix 4b: Table x: Inclusive Economy: Assessment of Policies R4, R5, R7, R8 and R9

See appendix 3 : Table x: alternatives to R2

See appendix 3 : Table x: alternatives to R7

See appendix 3 : Table x: alternatives to R8

R4: Local Shopping Areas

The **Sustainability Appraisal** identifies a significant positive effect on serving the needs and wellbeing of the local residents across local retail catchment areas by striking the right balance of retail, leisure and business uses. The policy incorporates a reduced vacancy and marketing evidence requirement which acknowledges the changing shopping patterns and other leisure functions of LSAs. The agent of change principle will address the need to protect the amenity of residents. This will help 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. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses.

The **EqIA** considers the retail policies are likely to have a positive impact for all equalities groups with no neutral or negative impacts identified with particular positive benefits for BAME, religious and older people and mothers of children. Through the retail policies the Local Plan seeks to encourage a diverse range of shops across the boroughs town centres and local centres, as well as protect local shops. Having accessible shops will be beneficial to all local residents and workers but will particularly help to cater for the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children. Young people like to congregate in town centres and they 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, therefore policies R4: Local Shopping Areas and R5: Dispersed retail and leisure uses are important and provide a positive impact in this respect. In particular Policy R5 provides specific reference and positive impact to all protected groups but specifically those less mobile through the protection of cafés as a meeting place for communities in more residential areas.

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.

R5: Dispersed shops

The approach will have a significant positive effect on creating liveable neighbourhoods by ensuring that where viable, 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 relevant and assessed as positive by the **Sustainability Appraisal**.

R7: Markets and Specialist Shopping Areas (SSA)

The appraisal identified the approach in Policy R7 would have a significant positive effect on 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 vitality and viability of the rest of town centre.

Alternative to Policy R7: Markets and Specialist Shopping Areas (SSA)

The **Policy alternative to Policy R7** relates to Specialist Shopping Areas only and not markets. The alternative to the policy of having a high percentage threshold to protect these areas as A1 use class is to rely on a qualitative 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.

Overall this alternative was considered by the **Sustainability Appraisal** to have a significant negative effect in particular the impact on economic growth both on the borough and London economies through diminishing of the function of the SSAs. SSAs not only provide a unique retail function 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. The alternative 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.

R8: Location and concentration of uses and the alternative - no quantitative restriction

The approach in Policy R8 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. 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.

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.

The alternative to R8 – no quantitative restriction within certain centres – was considered to have the opposite affect by the **Sustainability Appraisal** and result would be a cumulative undermining of the vitality and viability of these centres. The alternative was considered to have a minor positive effect on employment but this was considered outweighed by negative effects on providing a range of services and impacts on health. 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. Given the nature of these uses and the adverse impacts identified in relation to other IIA objectives, this would not constitute sustainable economic development, particularly due to the potential adverse social impacts, but purely in economic terms they could have a minor positive impact.

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.

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 of the uses. Each of these uses brings about potential negative 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.

R9: Meanwhile/ temporary uses

The Sustainability Appraisal considered that Policy R9 will have a minor positive effect on creating 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.

Inclusive Economy: Culture policies

The following culture policies have been considered and assessed in the same Sustainability Appraisal table:

- R1: ...Culture
- R10: Culture and Night Time Economy (NTE)
- R11: Public Houses

For the full Sustainability Appraisal assessment see the tables in the following appendices:

See appendix 4b: Table x: Inclusive Economy: Assessment of Policies R1, R10 and R11

The **Sustainability Appraisal** considers that Policies R1 and 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. The locations are also the most accessible. 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.

There was an alternative considered which was to have no Cultural Quarters but this was discounted as unrealistic because they are promoted in the London Plan.

The **EqIA** considers that policies for culture are likely to be positive for groups with no negative or neutral impacts identified. Protecting cultural facilities in particular will benefit many groups with protected characteristics where it maintains venues where specific events such as for LGBT groups occur. Policy R10: Culture and night time economy supports the location of new cultural uses in accessible locations; the CAZ or town centres and particularly promotes access via sustainable modes of transport which will benefit those less able to access such as disabled and older people. The policy also seeks to activate the space during daytime hours which will benefit various different groups. Protecting the various cultural spaces such as pubs for example is important for all groups because these provide meeting venues/ night time venues for everybody including groups with protected characteristics such as those with gender reassignment characteristic, or religious or BAME groups. Cultural venues have come under development pressure in recent years with many closing.

R11: Public Houses

The **Sustainability Appraisal** of Policy R11 consider the policy will have a significant positive effect through the protection of pubs which ensures their contribution to diverse, vibrant and economically vibrant town centres and also neighbourhoods outside town centres. They are also important as meeting places/community hubs. This will also help maintain the wider historic and cultural character of the borough.

Inclusive Economy: Visitor Accommodation

The following retail policies have been considered and assessed in the same Sustainability Appraisal table:

- R1: ...Visitor Accommodation
- R12: Visitor Accommodation

See appendix 4b: Table x: Inclusive Economy: Assessment of Policies R1 and R12

See appendix 3x: Table x: Inclusive Economy: Assessment of alternative to visitor accommodation

Policies R1: ...Visitor Accommodation and Policy R12: Visitor Accommodation and alternative more relaxed approach

The **Sustainability Appraisal** considered that the approach set out in Policy R1 and 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. 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.

The reasonable alternative to policy R12 is to allow the development of visitor accommodation in Town Centres and the CAZ, and on allocated sites. The **Sustainability Appraisal** considered that this would reduce the partial mitigation on land supply proposed by policy R12 creating a negative effect on efficient use of land and a negative effect overall.

In regards the impact on built form 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 on economic growth 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 R1 and 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 on the 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.

Overall the reasonable alternative to policy R12 is judged to have a negative effect. Despite the minor positive effect in terms of some additional jobs opportunities, this was judged to not outweigh the increased negative effects on efficient use of land, overall vibrancy of town centres and creation of more inflexible and environmentally intensive accommodation therefore a more restrictive approach has been taken.

Mitigation for Inclusive Economy Section

The Sustainability Appraisal has identified the issue around land supply and delivery of visitor accommodation the only negative effect for the policies in this section. 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. 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 the assessment considers that this effect is already 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. Visitor accommodation also has a negative effect on the environment through energy demand and water use which is mitigated through policy requirements to adhere to environmental standards. The assessment of the alternatives identified the increased negative impact which is why they were discounted.

Green Infrastructure policies

The following green infrastructure policies have been considered in the same Sustainability Appraisal table:

- G1: Green Infrastructure
- G2 Protecting Open Space
- G3 New Public Open Space

See appendix 4c: Table x: Green Infrastructure: Assessment of Policies G1 to G3

Policy G1: Green Infrastructure

The **Sustainability Appraisal** considered Policy G1 is likely to have significant positive effects on biodiversity and wildlife habitat in particular by requiring developers to incorporate as much biodiversity habitat into development as is reasonably possible, this will also have a positive effect on promoting a high quality, inclusive, safe, and sustainable built environment. This in turn will have positive effects on the health and wellbeing of the population by increasing the amount of green open space, plants, trees, green walls and roofs in the urban environment which will improve the air quality and encourage people to participate in more active travel, sport and recreation in the borough. The other main positive effect of the green infrastructure policy is that it will contribute to mitigating the effects of climate change by increasing the vegetation in the urban environment reducing the urban heat island effect and reducing stormwater runoff, and increasing permeable surfaces.

The **HRA** considers the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. The findings of the **HRA** for the Local Plan review found no likely significant impacts from policies or sites allocations in the plan on water resources, air quality and from visitors. Various policies have positive effects related to habitats including G1 which has significant positive effects on biodiversity and wildlife habitat.

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.

Policy G2 Protecting Open Space and Policy G3 New Public Open Space

The **Sustainability Appraisal** considers Policies G2 and G3 will likely have significant positive effects on the health and wellbeing of the population by preserving and creating new open spaces which encourage people to participate in more active travel, sport and recreation in the borough. Creating more open space and increasing biodiversity will also have a minor positive effect on improving the air quality. The policies will also maintain and improve biodiversity.

Policy G2 will likely have a minor 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 generally an essential and highly valued component of local character and distinctiveness contributing to heritage value. They also improve the appearance and functionality of the public realm and support liveable neighbourhoods.

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.

The **EqIA** considers Policy G2 is particularly relevant for groups with protected characteristics, in particular young people, given the concentration of such groups living in social rent on housing estates, and it is considered to have a positive impact given the potential effects are

mitigated through the detailed criteria based approach. The policy intends that the loss of open space on housing estates through redevelopment has to improve the quality of space remaining which should enable access improvements which can benefit disabled people, and young and old people too. A reduction in overall space is permitted where improvements are made and the space remains both functional and useable.

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.

The **Sustainability Appraisal** of G2 and G3 are likely to have significant positive effects on biodiversity by offering high levels of protection to open space in the borough. This will also have a minor positive effect on reducing climate change and impact of climate change by increasing the vegetation in the urban environment and reducing 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.

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.

In addition to the specific points noted above regarding policy G2 the **EqIA** considered Green Infrastructure policies likely to have a positive impact for all groups with protected characteristics in particular disabled groups, older people and the young and children.

Green Infrastructure policies

The following green infrastructure policies have been considered in the same Sustainability Appraisal table:

- G4: Biodiversity, landscape design and trees
- G5: Green roofs and vertical greening

See appendix 4c: Table x: Green Infrastructure: Assessment of Policies G4 and G5

Policy G4: Biodiversity, landscape design and trees

The **Sustainability Appraisal** of Policy G4 considered it will have significant positive effects on 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.

The **EqIA** considered Local Plan Policy G4: Biodiversity, landscape design and trees requires Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions must submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage – part of this strategy considers the inclusivity of the design which will be beneficial for all local residents including all groups with protected characteristics. The supporting text acknowledges the social value of SINCs

for local communities, and recognises parts of Islington are deficient in terms of access to nature. The policy protects access to SINCs by refusing planning permissions for schemes that adversely impact designated SINCs. The approach could seek access improvements where possible although this would likely not mitigate the areas of deficiency in the borough.

The **Sustainability Appraisal** identified that Policy G5 will create and enhance suitable wildlife habitats and protect species and diversity with strong positive effects on 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.

Green roofs may have potential negative effects on heritage assets or the setting of heritage assets eg where a green roof is visible from the street or neighbouring properties but these would be weighed-up during the planning application process to ensure that the historic environment is not impacted significantly therefore on balance the potential negative effect was disregarded.

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

Mitigation for Green Infrastructure Section

The Sustainability Appraisal considered the issue of providing new open space and the efficient use of land and buildings by reducing the amount of land that can be built on. However the effect was considered to be mitigated by the positive effects that open spaces bring in terms of appearance, character, biodiversity, and health and wellbeing therefore was overall neutral.

Sustainable Design

Policies S1 to S5

The following sustainable design policies have been considered:

- S1: Delivering Sustainable Design
- S2: Sustainable Design and Construction
- S3: Sustainable Design Standards
- S4: Minimising greenhouse gas emissions
- S5: Energy infrastructure

See appendix 4c: Table x: Green Infrastructure: Assessment of Policies S1 to S5

See appendix 3x: Table x: Alternative to Policy S5

Policies S1: Delivering Sustainable Design, S2: Sustainable Design and Construction, S3: Sustainable Design Standards, S4: Minimising greenhouse gas emissions and S5: Energy infrastructure

The **Sustainability Appraisal** of Policies S1, S2, S3, S4 and S5 were all considered to have significant positive effects 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; this also helps to reduce fuel poverty. 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. This will also contribute significantly to reducing the contribution to climate change and promote resource efficiency.

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.

Each policy will have specific positive effects; 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.

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 S3 requires demonstration of compliance with various environmental accreditation schemes ensuring development mitigates the impacts of climate change and promotes 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 on providing 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 will reduce the contribution of development in Islington to climate change and enhance community resilience to climate change impacts.

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.

Policies S4 and S5 both have a significant positive effect contributing 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. 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.

Policy S5: Energy Infrastructure alternative

The only alternative considered reasonable to assess in the Sustainable Design section of the Local Plan was the part of policy S5 which removed the requirement for any minor developments to connect to a heat network, regardless of distance.

The **Sustainability Appraisal** considered the main negative effect of the alternative was considered to be 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. It would also cause negative impacts on addressing fuel poverty, increases in air pollution, a reduced contribution to the development of green industries and the promotion of heat networks. Conversely the assessment recognised that 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. However this will not be the case for some larger minor developments which are higher density and also located very close to a heat network – these situations would represent a missed opportunity.

The assessment considered the effect on heritage assets of other low carbon heat sources, such air source heat pumps which can affect the exterior of a building. 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 so it was considered neutral.

Sustainable Design (policies S6 to S10)

The following sustainable design policies have been considered in the same Sustainability Appraisal table:

- 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

See appendix 4c: Table x: Green Infrastructure: Assessment of Policies S6 to S10

The **Sustainability Appraisal** considered Policy S6 will have a positive effect by requiring developments to reduce the potential for overheating and reliance on air conditioning systems, which will therefore contribute to ensuring all housing meets a high standard of energy efficiency and reduce contribution to carbon emissions. This will also help 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.

The **Sustainability Appraisal** 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. 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.

The **Sustainability Appraisal** 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.

The **Sustainability Appraisal** 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 reducing the impacts of climate change and enhancing 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.

The **Sustainability Appraisal** 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 save resources, improve resource efficiency and help to reduce carbon emissions, 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.

The **EqIA** considers that the Sustainable Design policies will likely have a positive impact for all groups with protected characteristics in particular the very young and old who are most at risk of the impacts of climate change. The approach seeks to address the impacts of climate change by managing heat risk, managing surface water run-off and urban greening. This 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.

No alternatives to policies S6 to S10 were considered reasonable.

Mitigation for Sustainable Design Section

The Sustainability Appraisal has not identified any mitigation necessary for this section.

Transport and Public Realm

The following transport and public realm policies have been considered in the same Sustainability Appraisal table:

- T1: Enhancing the public realm and sustainable transport
- T2: Sustainable transport choices
- T3: Car free development
- T4: Public realm
- T5: Delivery, servicing & construction

See appendix 4c: Table x: Transport and Public Realm Policies T1 to T5

The **Sustainability Appraisal** considered 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. 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 positively enhance the liveability of neighbourhoods and improve access through an improved public realm and 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.

The **Sustainability Appraisal** considered Policy T2 has a particular positive benefit 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 "shared space" schemes dangerous and difficult to navigate. The **EqIA** also identifies the positive impact of Policy T2: Sustainable Transport Choices. The Regulation 19 draft Local Plan was revised slightly and whilst it continues to resist the use of shared space it does so making clear that the use of single surface "shared space", which involves the removal of kerbs, will be resisted stating "shared space" must deliver logical, legible, inclusive and safe environments, informed by a contextual appraisal. The approach doesn't rule out shared space but it would need to comply with the criteria and on that basis assessments continued to identify the positive effect.

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.

The **Sustainability Appraisal** considered Policy T3 will have a significant positive effect on 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 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 on the environment by reducing the amount of travel by private cars which will reduce the impact that cars have on air pollution and carbon emissions.

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.

The **Sustainability Appraisal** considered Policy T5 will have a 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 function of a wider area. In particular logistics in relation to LSIS industrial areas are identified. The requirement for Delivery and Servicing Plans also encourages the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips, reduce carbon emissions and contribute to improving air quality and reducing impacts on human health.

The **EqIA** considers that the Public Realm and Transport section is likely to have a broadly positive impact for all groups with protected characteristics with particular benefits for old and young, disabled groups with regards accessibility. The only potential minor negative impact of car free policy is on families with young children or the elderly who may need access to parking facilities close to dwellings despite good public transport accessibility. This should be balanced against the benefits of reduced car use improving air pollution too which would be positive for the young and elderly.

The **EqIA** identifies the positive impact through incentivising sustainable forms of transport such as walking and cycling which will increase physical activity and increased physical activity can have clear benefits for physical and mental health, as well as help to reduce pollution and climate change. The policy approach will also benefit young and old people and recent mothers through improvements to pedestrian crossings/junctions which would improve safety with a consistently designed street environment which is also a positive for older people with street environment cues to aid navigation. More accessible cycle parking standards included at Local Plan appendix 4 will also provide positive impacts for families and people are disabled. Encouraging public transport use is important with buses a key form of transport for people aged 65 and over, and making public transport more available is crucial for those who cannot drive eg the visually impaired disabled. Making the public transport system more accessible is part of this such as step free access to the tube and overground network which is important for disabled people as well as the young and old. Ensuring public realm improvements are safe is important for various groups with protected characteristics. Safety also extends to safety from violence from others as some protected groups may be more likely to be victims of crime than other members of the population.

Mitigation for Transport and Public Realm Section

The Sustainability Appraisal has not identified any mitigation necessary for this section.

Design and Heritage

Policies DH1 to DH5

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 DH2: Heritage assets
- Policy DH3: Building Heights
- Policy DH4: Basement Development

See appendix 4c: Table x: Design and Heritage Policies DH1 to DH5

See appendix 3: Table x: Alternative to Policy DH3: Building Heights

The only reasonable alternative considered and assessed in this section was for policy DH3: Building Heights.

The **Sustainability Appraisal** considered that Policy DH1 has a significant positive effect in particular on 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. The policy notes that high density development can be accommodated throughout the borough, but that the scale of development is dependent on a number of considerations, including design and heritage. The need to protect heritage is recognised but the potential need to evolve character is also identified and particular reference is given the holistic delivery of the Plan objectives. Further to this the policy promotes use of innovative approaches to encourage delivery of plan objectives such as affordable housing for example. The approach to tall buildings further balances protection of local character with promotion of opportunities for development supported by a robust and comprehensive evidence base.

The **Sustainability Appraisal** considered that Policy DH2 will have a significant positive effect in particular through detailed policies which seek the conservation and enhancement of the historic environment, in part through protection of a range of heritage assets. DH2 does note that other Local Plan policy requirements including, inter alia, affordable housing, affordable workspace, inclusive design and sustainability standards, are relevant considerations when determining whether significant harm to an asset is acceptable.

The **Sustainability Appraisal** considered Policy DH3 will have a 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.

The reasonable **alternative DH3: Building Heights** approach is to permit tall buildings solely based on a set of design criteria without locational restrictions. The alternative was considered to have negative effects on local character and distinctiveness, the efficient use of land and possibly heritage and open space.

Use of design criteria alone (without locational and maximum height restrictions for buildings over 30 metres) would not be sufficient to adequately restrict potential tall buildings in 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.

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 does not consider the most appropriate location for development and does not holistically investigate the possibilities and opportunities in relation to transport accessibility, infrastructure and land use.

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.

The alternative is judged to have a negative impact and would be inconsistent with the approach set out in the London Plan.

The **Sustainability Appraisal** considered Policy DH4 would have a minor positive effect on promoting 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. Basements will add little in terms of residential floorspace so are neutral in terms of efficient use of land however the approach makes clear commercial development should be proportionate to the site and its context therefore is considered minor positive. The policy is likely to have positive effects on biodiversity and private open space 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 in the short term by reducing the impact of construction through smaller basements.

The **EqIA** considers that the approach in DH2 regarding heritage is likely to be a positive impact for all groups with protected characteristics although potential negative conflict between protection of heritage assets and accessibility for disabled groups, the young and mothers with children. Policy DH2: Heritage Assets seeks to preserve the boroughs heritage. There can sometimes be a conflict between conservation of heritage assets and inclusion. There could be potential minor negative impacts on equalities groups where special architectural qualities or features which must be preserved prohibit the implementation of improved accessibility standards such as ramps or lifts. This could lead to minor negative impacts on less mobile members of the community, such as the elderly or disabled.

The **EqIA** considers the policy for building heights will have no impact on all groups with protected characteristics. The environmental impact of a tall building is also a consideration where sudden changes in the local microclimate can potentially affect equalities groups; the old and young – but if the criteria cannot be satisfied and the impacts are found to be unacceptable then the building will not be permitted. Finally, the safety and consideration of evacuation plans for tall buildings is an important factor in particular for older people who are less mobile and more likely to live alone.

Design and Heritage - policies DH6 to DH8

The following design and heritage policies have been considered in the same sustainability appraisal table:

- Policy DH5: Agent of change, noise and vibration
- Policy DH6: Advertisements
- Policy DH7: Shopfronts
- Policy DH8: Public Art

See appendix 4c: Table x: Design and Heritage Policies DH6 to DH8

The **Sustainability Appraisal** considered Policy DH5 will have a significant positive effect, principally on health and amenity but also the economy and the cultural offer in the borough. 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.

The **EqIA** considers that the Policy for noise aims to mitigate adverse impacts from noise and vibration which can be associated with poor mental health and this will have a positive effect for all groups with protected characteristics.

The **Sustainability Appraisal** considered **Policy DH6** will have neutral effect. DH6 makes clear that advertisements should contribute to a safe and attractive environment; where necessary adverts are considered in context of amenity and public safety under the relevant regulations with particular restrictions and guidance on illuminated advertisements provided in the policy. Overall the effect of the policy on controlling adverts is

considered to be neutral balancing the need to manage negative impacts with probability that proposals will do little enhance the built environment.

The **Sustainability Appraisal** considered **Policy DH7** will have a significant positive effect on inclusive accessibility as it will ensure that shops which are subject to redevelopment install accessible and inclusive shopfronts which will also benefit residents generally. Reference is also made to enhancing natural surveillance which is also important to creating a safer built environment. The approach is also considered to have a positive effect on heritage assets and the wider historic and cultural environment in Islington with small shops an important local characteristic of the borough.

The **Sustainability Appraisal** considered **Policy DH8** to have minor positive effect on people's health and wellbeing through the creation of new public arts by ensuring art/installations are visible and able to be viewed by people. It also has positive effects 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.

Mitigation for Design and Heritage Section

The Sustainability Appraisal has not identified any mitigation necessary for this section.

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 ST2: Waste
- Policy ST3: Telecommunications, communications and utilities equipment
- Policy ST4: Water Infrastructure

See appendix 4c: Table x: Strategic Infrastructure Policies ST1 to ST5

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.

The **Sustainability Appraisal** considered **Policy ST2** positive 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.

The **Sustainability Appraisal** considered Policy ST3 positive 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 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.

The **EqIA** considers that section for Strategic Infrastructure is likely to have a positive impact for all protected characteristic groups as aims to provide the infrastructure necessary for growth. In light of population growth it will be important to provide the necessary infrastructure to meet the needs of existing and future populations. A key piece of work for the Local Plan is the update to the Infrastructure Delivery Plan (IDP). This updates the assessment of the social and physical infrastructure in the borough and will be important in ensuring the needs of all groups with protected characteristics are met. Policy ST1: Infrastructure Planning and Smarter City Approach sets out that the council will work with its partners to meet changing infrastructure needs and requirements over time. The Local Plan recognises the importance of the IDP dataset and will review and update this to support Local Plan in future.

Mitigation for Strategic Infrastructure Section

The Sustainability Appraisal has not identified any mitigation necessary for this section. There are no reasonable alternatives for the policies in this section.

Assessment of likely effects of Bunhill and Clerkenwell AAP

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

The APP has two area-wide policies and six area spatial strategies.

An alternative was considered and assessed for BC1: Prioritising Office Use area-wide policy only. The alternative considered for BC1 would still seek maximisation of office development but would not specify a specific percentage of office required on each scheme. 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 for BC2: Culture, retail and leisure uses was considered but discounted. The alternative would have been not including a policy approach on culture. However the approach is included in the London Plan. Also there is enough flexibility judged to exist in the policy already in relation to cultural development which is encouraged by a sequential approach to locate in the cultural quarter but it does not preclude it locating outside in other areas of the CAZ.

The results of the Sustainability Appraisal of the alternative to BC1 is considered negative in comparison to preferred approach which is considered positive.

The **Sustainability Appraisal** of BC1 considered that the policy approach will have a significant positive effect on 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. 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 affect 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 affect of the BC1 policy approach to have a positive effect on 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.

The **Sustainability Appraisal** of the alternative to BC1 was considered to dilute the quantity of employment space with other uses and have a negative effect on the efficient use of land 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 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.

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 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 negative. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) there is no risk of the alternative approach changing the overall mixed use character of the AAP area during the plan period.

With regards economic growth local evidence currently suggests a significant shortfall in supply of employment land. The alternative will help to address this 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 weaken the local economy 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.

Both the alternative and policy approach will have a positive effect on liveable neighbourhoods providing a mix of uses with the alternative allowing sufficient flexibility to provide sufficient floorspace for different uses on a number of floors. The alternative may mean that more housing and affordable housing will likely be developed. 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.

The **Sustainability Appraisal** of Policy BC2 considered it will have positive effects on 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 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.

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Assessment of likely effects of Local Plan Site Allocations

For the assessment of sites the exact design of future development proposals, such as height, density and massing is unknown and would be subject to planning approval so it is not possible to make a judgment on these factors. Therefore for sites it is not possible to judge the quantum of new business floorspace created or the number of affordable housing units. In addition the type of business floorspace is also not possible to be determined so assumptions have to be made particularly with sites that it will deliver policy objectives.

In line with the methodology all site allocations were assessed with the majority having positive or neutral effect on the sustainability assessment objectives. There were two sites which identified negative effects.

Site Allocation NH10: 45 Hornsey Road and 252 Holloway Road in the Nags Head Spatial Strategy area was identified to have a negative effect on the delivery of affordable housing. This was considered realistic on the basis that the site will be used for student housing because of the legacy of a previous decision on the site. On the positive side the allocation is considered to have a benefit through creating a more liveable neighbourhood and attracting students into the borough. The allocation would also maintain the commercial industrial uses under the railway arches which will help contribute to the boroughs economy.

Site allocation OIS21: Former railway sidings adjacent to Caledonian Road Station is allocated for residential-led, mixed use development including the introduction of retail uses at ground floor level. The station is protected and 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. The principle of development and scale has a negative impact on the Caledonian Road Station which is a grade II listed building and any development over or next to could cause harm.

Alternatives to sites have not been considered. The obvious alternative is to not allocate a site but that is considered unreasonable as it is not under active consideration for any of the sites allocated in the Local Plan.

The **EqIA** considered the site allocations Site allocations deliver on the plan policies which have also been assessed by EqIA therefore the same benefits can be recognised when considering sites. In addition sites will be subject to planning applications which will provide further opportunity for the Council to exercise its function under equalities legislation. For example various broad benefits ranging from benefits to improving public realm which improves access to all including groups with protected characteristics, delivery of employment floorspace which delivers economic benefits to those on low incomes which may include those with protected characteristics and delivery of housing which includes benefits in terms of affordability but also housing quality and access benefits.

Consideration and Assessment of Cumulative Effects

A summary of potential cumulative effects on the sustainability assessment objectives from each group of draft policies in the regulation 19 Local Plan has been considered. None of the sections in the Local Plan are considered to have any negative cumulative effects. The strength and nature of the relationship varies between sections and there is no clear relationship between some policies and individual objectives.

Thriving Communities: taken together 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. 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 particular positive cumulative effect. Meeting needs for certain specific forms of housing; supported housing, older peoples and gypsies and travellers will have no cumulative effect.

Inclusive Economy: taken together as a whole 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 combined 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.

Green Infrastructure and Sustainable Design: combining these sections evidences the significant positive effect these group of policies will have on reducing carbon emissions and reducing the effects of climate change thorough adaptation and mitigation. In addition requirements for open space / public realm and biodiversity improvements will support a healthier population encouraging people to use more sustainable forms of transport.

Public Realm and Transport: overall 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.

Design and heritage and Plan1: taken together demonstrates the positive effects that design and a deisgn led approach will have on improving peoples quality of life and reducing the potential amenity impacts of development.

Site Allocations: Consideration has also been given to the potential for cumulative effects associated with the site allocations. Generally sites taken together 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: Taking the policies and sites together the BCAAP has considerable benefits in delivering growth in terms of both housing but particularly business floorspace. The AAP will also have a positive cumulative effect in relation to sustainability assessment objectives as 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 the clear policy requirement.

Health Impact Assessment conclusions

Overall the HIA concluded:

'The draft Local Plan is the spatial expression of Islington's corporate plan 2018-2022, Building a fairer Islington. As such, its policies are focused on reducing inequalities in the borough. This Health Impact Assessment has assessed the draft Local Plan against the wider determinants of health: environmental factors that impact on everybody's health and wellbeing.'

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 Council's objectives as set out in the corporate plan are clearly reflected in the draft Local Plan and planning policies respond positively to these objectives.

This Health Impact Assessment has made a number of recommendations which aim to strengthen the draft Local Plan and support its objectives further.'

Habitats Regulations Assessment

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 contribution of Islington's policies or site allocations to any impacts which could be judged minor, but are already mitigated with strong policies included within the Local Plan for example which support more sustainable transport choices and restrict the use of the car, ensure an integrated approach to water management and limit developments contribution to air pollution and improve local air quality as far as possible.

The assessment concluded that the Integrated Impact Assessment of the Local Plan will continue to evaluate the impacts of any further changes to the document.

Conclusions

This section briefly summarises the key conclusions from the report.

The Sustainability Appraisal assessment has identified the range of broadly positive effects that the objectives, spatial policies, policies and site allocations will have on a range of economic, social and environmental factors. The policy appraisal matrices are provided in Appendix x. No significant policy gaps were identified and no significant negative effects were identified which required mitigation. The assessment benefitted from a full draft regulation 18 Local Plan with a fully formed set of policies which is the primary reason significant mitigation was unnecessary.

A number of reasonable alternatives were identified and assessed which confirmed the positive policy approaches which are being taken forward in the Local Plan. The assessment of these alternatives are set out in appendix x.

The assessment of site allocations identified very little negative effect which could not be mitigated. The assessment of the site allocations are set out in appendix x.

The Health Impact Assessment concluded 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.

Next Steps

To be completed

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Appendix 1: Review of relevant plans, policies, programmes and objectives

INTERNATIONAL
UN Framework Convention on Climate Change (1992) and Kyoto Protocol (1997) and Paris Agreement (2015)
UN Convention on the Rights of the Child 1990
Johannesburg Declaration on Sustainable Development (Earth Summit 2002)
UN Sustainable Development Goals (2015)
UN Global Assessment Report on Biodiversity and Ecosystem Services (2019)
EU Directive 79/409/EEC on the Conservation of Wild Birds
EU Directive 92/43/EEC and 97/62/EC on the Conservation of Natural Habitats and of Wild Flora and Fauna
EU Directive 1999/31/EC on the landfill of waste (Landfill Directive)
EU Directive 2000/60/EC Water Framework Directive
EU Directive 2001/42/EC European SEA Directive
EU Directive 2002/49/EC on the Assessment and Management of Environmental Noise
EU Directive 2002/91/EC on the Energy Performance of Buildings
EU Directive 2007/60/EC on the assessment and management of flood risks (Floods Directive)
EU Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe (Air Quality Directive)
EU Directive 2008/98/EC Waste Framework Directive
EU Directive 2012/27/EU on Energy Efficiency
European Spatial Development Perspective (1999)
European Landscape Convention 2000
Mainstreaming sustainable development into EU policies: 2009 Review of the European Union Strategy for Sustainable Development
Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system (2011)
Pan-European 2020 Strategy for Biodiversity (2012)
Proposal for a Decision on a General Union Environment Action Programme to 2020 - Living well within the limits of our planet (EC, 2012)
Living Planet Report 2012 – Biodiversity, biocapacity and better choices

NATIONAL
National Planning Policy Framework (2018)
The Waste Management Plan for England (2013) and National Planning Policy for Waste (2014)
Planning Policy for Traveller Sites (2015)
Planning Practice Guidance
Environmental Assessment of Plan and Programmes Regulations (2004)
Practical Guide to the Strategic Environmental Assessment Directive
Flood Risk Regulations 2009
Conservation of Habitats and Species Regulations 2010
Community Infrastructure Levy (CIL) Regulations 2010 (as amended)
The Town and Country Planning (Local Planning) (England) Regulations 2012
The Neighbourhood Planning (General) Regulations 2012
UK Sustainable Development Strategy: Securing the Future (2005)
The Air Quality Strategy for England, Scotland Wales and Northern Ireland (2007)
Policy Advice Note: Inland Waterways (TCPA and British Waterways, 2009)
A Natural Development (Natural England 2009)
Air Pollution: Action in changing climate (DEFRA 2010)
Noise Policy Statement for England (DEFRA 2010)
Active Travel Strategy – Departments of Health and Transport (2010)
25 Year Environment Plan – Department for Environment, Food and Rural Affairs 2018
Understanding the risks, empowering communities, building resilience: The National Flood and Costal Erosion Risk Management (FCERM) Strategy for England (2011)
The Carbon Plan – delivering our low carbon future (2011)
Creating Growth, Cutting Carbon: making sustainable local transport happen (White Paper, 2011)
Healthy Lives, Healthy People – Department of Health Public Health Strategy (2011)
The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)
UK Post-2010 Biodiversity Framework 2012
Reuniting health with planning: healthier homes, healthier communities (2012)
Planning for Sport: aims and objectives (Sport England, 2014)
Playing Pitch Strategy Guidance (Sport England, 2013)
Assessing needs and opportunities guide for indoor and outdoor sports facilities (Sport England, 2014)
Construction 2025 (2013)
Adapting to climate change: national adaptation programme (2013)
Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013)
Planning sustainable cities for community food growing (2014)

The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning 1 (Historic England, 2015)
Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2 (Historic England, 2015)
The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Historic England, 2015)
Historic England Advice Note 1 Conservation Area Designation, Appraisal and Management (Historic England, 2016)
Historic England Advice Note 4 Tall Buildings (2015)
Easy Access to Historic Buildings (Historic England, 2015)
Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations to historic and traditionally constructed buildings (Historic England, 2011)
Ancient Monuments and Archaeological Areas Act 1979
Planning (Listed Buildings and Conservation Areas) Act 1990
Town and Country Planning Act 1990
Human Rights Act 1998
Planning and Compulsory Purchase Act 2004 (as amended 2008)
Planning and Energy Act 2008
Climate Change Act 2008
Local Democracy, Economic Development and Construction Act 2009
Sustainable Communities Act (as amended 2010)
Flood and Water Management Act 2010
Equality Act 2010
Localism Act 2011
Growth and Infrastructure Act 2013
Deregulation Act 2015
Infrastructure Act 2015
Housing and Planning Act 2016
Neighbourhood Planning Act 2017
REGIONAL
The London Plan: The Spatial Development Strategy for London Consolidated with Alterations Since 2011 (2016) and draft new London Plan showing Minor Suggested Changes (August 2018)
The Mayor's Transport Strategy 2018
The Mayor's Economic Development Strategy 2010 and draft Economic Development Strategy (December 2017)
The Mayor's Housing Strategy 2018
Cultural Metropolis: The Mayor's Cultural Strategy – 2012 and Beyond and Mayor of London's

Draft Culture Strategy (March 2018)
London Infrastructure Plan 2050 and 2015 update report
Healthy and Sustainable Food for London: The Mayor's Food Strategy 2006
Equal Life Chances for All: The Mayor's Equality Framework
London Environment Strategy 2018
All London Green Grid
London's Wasted Resource: The Mayor's Municipal Waste Management Strategy 2011
Making Business Sense of Waste: the Mayor's Business Waste Management Strategy 2011
London The Circular Economy Capital: Towards a Circular Economy – Context and Opportunities (LWARB supported by the GLA, 2015)
Better Health for London: Next Steps (2015)
The London Health Inequalities Strategy 2010
Jobs and Growth Plan for London (London Enterprise Panel 2013)
The Mayor's Vision for Cycling 2013
Thames Estuary 2100 Plan (EA, 2012)
Thames River Basin Management Plan (EA, 2015)
London View Management Framework SPG (2012)
All London Green Grid SPG (2012)
Character and Content SPG (2014)
Sustainable Design and Construction SPG (2014)
Town Centres SPG (2014)
Accessible London: Achieving an Inclusive Environment SPG (2014)
Social Infrastructure SPG (2015)
Housing SPG (2016)
CAZ SPG (2016)
Crossrail Funding SPG (2016)
Affordable Housing and Viability (2017)
Culture and Night-Time Economy (2017)
City of London Local Plan (2015) and City Plan 2036 Local Plan Consultation (2018)
Camden Local Plan (2017)
Haringey Local Plan (2017)
Hackney Local Plan (2016) and proposed submission local plan 2033 (November 2018)
LOCAL
Islington Corporate Plan 2018-2022
Islington Looking Forward: Islington Sustainable Community Strategy 2008

Islington Air Quality Strategy 2014-2017
Islington Housing Strategy 2014-2019
Islington's Transport Strategy: Local Implementation Plan 2011 to 2031
Closing the Gap: Tackling Health Inequalities in Islington 2010 – 2030 (Islington Council and NHS Islington)
Islington Children and Young People's Health Strategy 2015 – 2020 (Islington Council and Islington CCG)
Islington's Joint Strategic Needs Assessment (2015)
Islington's Joint Health and Wellbeing Strategy 2017-2020
Towards a Fairer Islington: Our Commitment – Corporate Plan 2015 – 2019
Islington Children and Families Prevention and Early Intervention Strategy 2015 – 2025
Spaces for wildlife, places for people: Islington's Biodiversity Strategy and Action Plan 2010-2013
Islington Conservation Area Guidance
Islington's Voluntary and Community Sector Strategy 2016 – 2020
Islington Strategic Flood Risk Assessment (2018)
Dignity for All: Islington Council's Equality and Diversity Policy (2012)
Closing the Gap: The Final Report of the Islington Fairness Commission 2011
Working Better: The Final Report of the Islington Employment Commission 2015
Islington Youth Crime Strategy 2015
A Future for Us, Fair Future Commission 2018

Appendix 2: Assessment Matrix

TOPIC	IIA Objective	Prompt Questions
BUILT ENV	1. Promote a high quality, inclusive, safe and sustainable built environment	<p>Will the policy...</p> <ul style="list-style-type: none"> ● Secure high quality architecture and urban design that enhances local character and distinctiveness? ● Promote location sensitive density and design? ● Ensure consideration of the spaces between buildings to provide an attractive, functional and sustainable public realm? ● Create robust and adaptable buildings that can respond to change over their life? ● Make the built environment safer and more inclusive? ● Promote an approach to design that places people at the heart of the design process? ● Encourage measures to reduce crime and fear of crime including anti-social behaviour?
USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure	<p>Will the policy...</p> <ul style="list-style-type: none"> ● Optimise use of previously developed land, buildings and existing infrastructure? ● 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? ● Focus development in the most appropriate locations? ● Balance competing demands between land uses to provide for the full range of development needs of the area? ● Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc? ● Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs
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"> ● Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Islington? ● 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? ● Protect views of historically important landmarks and buildings and valued local views? ● Ensure Islington's historic environment contributes to social and cultural life in the borough? ● Successfully balance access and energy efficiency requirements with the conservation and enhancement of heritage assets? ● Encourage management plans to be actively prepared and implemented?

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"> • 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. • Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population? • Improve connections of neighbourhoods with facilities/amenities? • Encourage a vibrant social environment that attracts visitors to the borough while respecting the needs of residents? • Reduce the impacts of noise, vibration and pollution on the public realm? • Support the expansion and enhancement of cultural provision and maximise opportunities for the cultural life of the borough to flourish?
AH	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"> • Ensure all housing is of a good standard, including for energy efficiency? • Increase the supply of affordable housing to meet identified need as far as possible? • Improve the diversity of housing sizes, types, prices and tenures? • Ensure tenures are fully integrated? • Encourage development at an appropriate density, standard, size and mix? • Provide for housing that meets the diverse and changing needs of the population?
INCLUSION	6. Promote social inclusion, equality, diversity and community cohesion	<p>Will the policy...</p> <ul style="list-style-type: none"> • Reduce inequality and the negative consequences of relative poverty? • Reduce social exclusion and ensure that everyone has access to the same opportunities? • Promote fairness, social cohesion and integration? • Promote equity between population groups and those with protected characteristics? • Support active engagement of the wider community in decisions that affect their area? • Encourage active and connected, strong and cohesive community? • Support the delivery of integrated and accessible early years services necessary to ensure that vulnerable children have the best start in life? • Remove barriers to employment and increase the skills of residents? • Improve opportunities and facilities for formal, informal and vocational learning for all ages?
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"> • Improve mental and physical health and wellbeing? • Increase use and ease of access to green spaces for all residents, particularly those with mental and physical health concerns? • Reduce health inequalities? • Reduce the proliferation of activities with negative health externalities? • Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents? • Ensure that the built and natural environments promote health and wellbeing, including by facilitating physical activity and active travel and encouraging social interaction? • Increase food growing opportunities? • Support fully inclusive health, recreation, leisure and sport facilities that meet the needs of the whole community? • Reduce fuel poverty? • Manage noise issues and their effect on individual health? <p>Improve air quality?</p>

ECON 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"> ● Sustain and increase the borough's contribution to the London and national economy? ● Support a range of local businesses of different types and sizes? ● Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive? ● Support the development of green industries and a low carbon economy? ● Widen the opportunities for local residents to access employment, particularly those groups experiencing above average worklessness? ● Provide a range of employment opportunities? ● Tackle barriers to employment, such as affordable childcare and skill levels? ● Provide training and job opportunities for local residents?
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"> ● Improve connectivity both within the borough and to neighbouring boroughs and wider London? ● Encourage a shift to more sustainable forms of travel and away from private vehicle use? ● Reduce the need to travel, especially by car? ● Improve road safety for all, particularly pedestrians and cyclists? ● Improve accessibility of the borough's transport network? ● Provide facilities that will support sustainable transport options? ● Enhance capacity of the transport network? ● Reduce harmful emissions from transport? ● Reduce the negative impacts of servicing and freight?
OPEN SPACE / ACCESSIBLE	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"> ● Protect existing public and private open spaces? ● Contribute to meeting the increasing need for open space? ● Link existing open spaces? ● Prioritise open space in areas of deficiency? ● Improve the quality of open space? ● Promote or improve public accessibility of open space now and in the future? ● Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits? ● Improve inclusive access to a range of open space types to meet local needs?

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"> ● Increase protection and improve opportunities for biodiversity? ● Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority? ● Encourage development that implements strategic and connected green infrastructure? ● Ensure development does not increase flood risk ? ● Protect existing trees and increase tree planting? ● Increase biodiverse green roofs, green walls and soft landscaping? ● Protect the populations of priority species identified in Islington's BAP? ● Maximise opportunities to enhance biodiversity? ● Impact on access to nature? ● Increase green infrastructure and improve connectivity? ● Maximise opportunities for engagement with wildlife, including environmental education? ● Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity? ● Support biodiversity enhancement of The Regents Canal?
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"> ● Improve energy efficiency and carbon emissions associated with buildings and transport? ● Promote the use of low and zero carbon technologies including decentralised energy networks? ● Improve energy security? ● Encourage buildings and places designed to respond to changing conditions? ● Reduce the impact of climate change, including flooding and urban heat island effect? ● Improve the microclimate? ● Reduce greenhouse gas emissions? ● Reduce fuel poverty? ● Provide the necessary infrastructure to support development? ● Steer development to the areas at lowest risk of flooding in the borough?
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"> ● Use local, sustainable materials and resources? ● Promote the use of renewable sustainable energy sources? ● Minimise the use of non-renewable resources? ● Ensure design is appropriate for lifetime of development? ● Support the circular economy? ● Provide opportunities for businesses to benefit from the circular economy? ● Minimise the volume of waste produced in Islington, including construction and deconstruction waste, food and household waste? ● Support the 'Waste Hierarchy'? ● Increase the proportion of waste recycled or composted? ● Provide the right type of infrastructure to deal with residual waste in the most sustainable way?

NATURAL RESOURCE S	14. Maximise protection and enhancement of natural resources including water, land and air	Will the policy... <ul style="list-style-type: none">● Minimise air, water, and soil pollution and their negative impacts on human health?● Improve air quality in line with national and international standards?● Protect surface and groundwater quality?● Promote the sustainable use of water resources?● Prevent soil pollution and restore contaminated land?● Ensure sustainable use and protection of natural resources, including water?● Ensure the necessary water and sewerage infrastructure to service development?
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Full Council draft IIA June 2019

Appendix 3: Summary of consultation on draft Scoping Report

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
1. Environment Agency	<p>Stage A1</p> <p>The following documents should also be included:</p> <ul style="list-style-type: none"> • Thames River Basin Management Plan (2015) • Sustainable Design and Construction SPG (GLA, 2014) • Any up-to-date Strategic Flood Risk Assessment carried out by LBI • Any Surface Water Management Plans or Local Flood Risk Management Strategies published by LBI as part of the Drain London project <p>Stage A2</p> <p>The section on Flood Risk and Water Management will need to be informed by the outputs and recommendations of your Strategic Flood Risk Assessment when available.</p> <p>Water Framework Directive baseline data as an indicator of water quality needs to be referenced in the IIA. This is relevant to the section on Ordinary Watercourses (paragraph 5.18) and the section on Biodiversity, Flora and Fauna (paragraph 5.37 onwards). LBI forms part of the Lower Lee operational river catchment and the London area draining to the Thames so the quality of surface waters and groundwater should not be considered in isolation, LBI should work with neighbouring boroughs to understand the factors affecting water quality. The aim should be to prevent further deterioration and improve the overall water quality of the river catchment. Data is available at https://data.gov.uk/ and http://environment.data.gov.uk/catchment-planning/</p> <p>The Regents Canal (Lower section) is classified under Water Framework Directive as a heavily modified waterbody and currently achieves 'moderate' status. The waterbody summary report for the Regents Canal sets out the waterbody classification, reasons for not achieving good potential</p>	<p>The suggested documents have been added to Stage A1 with the exception of draft local plans and strategies that have not yet been adopted by the council.</p> <p>The council is in the process of commissioning updated SFRA as well producing a LFRMS. These will be used to update the baseline as when available</p> <p>Section 5.25 water quality has been added to the baseline information.</p> <p>Stages A3 and A4 have been updated to take account of the points raised.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>and the (draft) action measures identified to reach good status (which for heavily modified waterbodies is called 'good ecological potential'). Actions identified include improving the management of riparian vegetation and planting to create more diverse habitats, sedimentation management strategy and re-naturalising banks where possible. These are actions which will help the Regents Canal provide better habitats for both aquatic and land-based wildlife.</p> <p>Paragraph 5.25 identifies that Islington lies within the Thames basin catchment. You could also refer to this as Thames Water's London Water Resource Zone.</p> <p>Paragraph 5.26 could say that the average water use in Islington in 2010-11 was 167 litres per head per day (l/h/d) which is above the England and Wales average of 148 l/h/d.</p> <p>The link between inefficient water use and carbon emissions could be mentioned. Current water use accounts for 27% of all carbon emissions from our homes. In London non-households account for 29% of water consumption, this is an area where further water and carbon savings can be made.</p> <p>Stage A3</p> <p>In Paragraphs 6.25 and 6.26 the link between water efficiency and carbon reduction should be mentioned. Whilst there is a strong link between the impacts of climate change on flooding, there are other issues which exacerbate flood risk in Islington and its wider river catchment such as increasing urbanization and lack of capacity in the underground drainage network.</p> <p>Paragraph 6.34 could summarise more fully the factors that contribute to surface water flooding in Islington. The flood risk issue could be significant enough to be a standalone topic within the IIA.</p> <p>Paragraph 6.38 should include recognition of the current WFD status of the Regents Canal and the actions identified to help the waterbody achieve 'good ecological potential.' Increasing the diversity of habitats with new planting and better vegetation management are some of the actions identified, along with naturalizing banks and invasive species management. The green spaces and habitat that exist along the corridors of the Regents Canal should be protected and enhanced and linkages to other green infrastructure maximized.</p>	

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>Stage A4</p> <p>Objective 11: Additional prompt question: 'Will the policy require biodiversity enhancements to the Regents Canal to enable the watercourse to reach good ecological potential by 2027?'</p> <p>Potential indicators:</p> <ul style="list-style-type: none"> • Water Framework Directive status of the Regents Canal. • Number of proposals that have improved habitat on the Regents Canal, if it was possible to obtain data on proposals. <p>Objective 12: Consider whether surface water flood risk warrants its own objective as this an important issue for Islington. Also consider if the number of planning proposals the Lead Local Flood Authority object to on the grounds of flood risk is a helpful indicator (this depends on whether or not this is data that is being collected).</p> <p>Additional prompt question: 'Are allocations or policies aiming to steer developments to the areas at lowest risk of flooding in the borough, thereby alleviating the need for further investment in flood risk infrastructure or property level resilience measures?'</p> <p>Objective 13: Additional prompt question 'Does the policy support the 'Waste Hierarchy' as set out in Article 4 of the EU Waste Framework Directive to maximize the reduction and re-use of waste?'</p> <p>Objective 14: Water Framework Directive data on the Regents Canal could be a measure for water quality. The number of properties achieving 105 litres per head per day (as supported by the London Plan policy 5.15 Water Use and Supplies) could also be an indicator for protecting water resources.</p>	
2. Natural England	<p>Stage A4</p> <p>Objective 2: Additional prompt question 'Will the policy 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?'</p>	Stage A4 has been updated to take account of the points raised.

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<ul style="list-style-type: none"> Potential indicator: Increased building density results in a net gain for biodiversity and an increased use of previously unused space for green infrastructure. <p>Objective 7: Additional prompt question 'Will the policy increase use and ease of access to green spaces for all residents but especially those with mental and physical health concerns?'</p> <p>Objective 10: Additional indicator - Green open space and Green Infrastructure linkages lost/gained/improved.</p> <p>Objective 11: Additional prompt questions</p> <ul style="list-style-type: none"> Will the policy ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority? Will the policy encourage development that implements strategic and connected Green Infrastructure? <p>Potential indicators:</p> <ul style="list-style-type: none"> Development results in biodiversity net gain/loss. Development results in increased use of previously unused space for Green Infrastructure. <p>Objective 12: Additional indicator - Proportion of buildings incorporating Green Infrastructure and linkages between Green Infrastructure areas and green open spaces.</p>	
3. Historic England – response 1	<p>Stage A1</p> <p>The following documents should also be included:</p> <ul style="list-style-type: none"> The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning 1 (Historic England, 2015) Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2 (Historic England, 2015) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Historic England, 2015) 	<p>The suggested documents have been added to Stage A1.</p> <p>Additional commentary has been added to Stage A2 to cover the points raised. As suggested, a topic paper will be prepared as part of the plan preparation and will seek to cover any data/evidence gaps that have been outlined as appropriate.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<ul style="list-style-type: none"> • Historic England Advice Note 1 Conservation Area Designation, Appraisal and Management (Historic England, 2016) • Easy Access to Historic Buildings (Historic England, 2015) • Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations to historic and traditionally constructed buildings (Historic England, 2011) • Any conservation area appraisals and management plans <p>Stage A2</p> <p>Paragraph 5.49 onwards is a useful summary, but lacks depth. Should describe the current and future likely state of the historic environment. This can be used to identify sustainability issues, predict and monitor effects and identify alternative solutions. In the absence of a borough-wide characterisation study, a topic paper addressing the historic and built environment of Islington could be prepared. This could address the nature of the typologies within the townscape that are valued and outline the potential threats and opportunities from new development.</p> <p>A map of conservation areas and other designated heritage assets should be included e.g. points indicating the location of listed buildings.</p> <p>HE's Heritage at Risk Register identifies 24 listed buildings and 12 conservation areas that are at risk in Islington. The IIA/SEA should explain the underlying reasons for this so they can be addressed.</p> <p>The boundaries of Islington's Archaeological Priority Areas (APAs) need to be updated. The inadequacy of the current APAs is illustrated by the recent discoveries of important English Civil War defences and human remains alongside Goswell Road. A review of the APAs is programmed for 2018.</p> <p>Stage A4</p> <p>Objectives 1 and 3 are welcomed but the evidence base for the judgements required has to be clear.</p>	Comments regarding Stage A4 are noted and appropriate updates have been made.

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	Objective 3, other indicators should be included, for example: the number of planning decisions allowed where some harm to, or enhancement of, the historic environment has been permitted.	
4. Historic England – response 2	<p>Stage A2</p> <p>Baseline information could be developed further by:</p> <ul style="list-style-type: none"> • Capturing all types of heritage assets, including registered parks and gardens; • Referencing the existing condition of heritage assets in the borough, such as assets held on the Historic England Heritage at Risk Register. • Including an illustration to demonstrate the spatial spread of heritage assets in the borough • Establishing a benchmark which articulates the positive contribution heritage makes to the economic, social and environmental qualities of the borough <p>Stage A4</p> <p>Objective 3: Suggest the ‘prompt’ questions could be expanded in order to assess the effectiveness of policies in delivering a positive impact for the historic environment in terms of:</p> <ul style="list-style-type: none"> • greater enhancement of heritage assets • ensuring assets are brought back into beneficial use, and/or repaired so that their significance is reinstated • management plans are actively prepared and implemented • new assets are identified and appropriately conserved 	Stage A2 and Stage A4 have been updated to take account of the points raised.
5. Canal and River Trust	<p>Stage A1</p> <p>Additional documents to be included:</p> <ul style="list-style-type: none"> • TCPA Policy Advice Note: Inland Waterways (2009) [particularly appendix 1 – ‘Waterway proofing of planning policy at all the different spatial levels’ – and appendix 2 – ‘Development management checklist for waterside developments’] <p>Stage A2</p> <p>Paragraph 5.18 states that the Regent’s Canal is managed by British Waterways. British Waterways became the Canal & River Trust in 2012, and still owns and manages the Regent’s Canal, so we would be grateful if this could be amended.</p>	<p>Suggested changes and additions to A1 and A2 have been integrated.</p> <p>Suggestions regarding energy infrastructure capacity are policy formulation and not considered appropriate for inclusion in this document.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>Paragraphs 5.57-5.61 of the draft refer to energy infrastructure capacity. The Regent's Canal water can be used for heat recovery and cooling purposes, for both residential and/or commercial and industrial buildings.</p> <p>Paragraphs 5.137-5.138 of the draft: we would like to point out that residential moorings form a flexible housing type within the borough, such as those within Battle Bridge Basin, in King's Cross, and there is significant demand for them in London. The Trust is currently preparing a London Mooring Strategy, and we would be happy to meet with you to discuss this when it is ready for further consultation.</p>	
6. Highways England	<p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). In this case M1. Having examined the above documents, we do not offer any comment to this proposal.</p>	Noted.
7. Sport England	<p>The IIA does not set out specific objectives in relation to sport, recreation and leisure but does set out health and wellbeing and open space objectives. Sport, recreation and leisure would have a significant impact upon achieving the outcomes of these objectives therefore Sport England are disappointed that limited reference is made to these throughout the IIA Scoping Report. That said, a prompt question for IIA objection 7 (Health and Wellbeing) does seek support for health, recreation, and sport facilities that meet the needs of the whole community. Also, the prompt questions for objection 10 (open space) do reflect Sport England's planning objectives of Protect, Enhance and Provide which aligns with the principles contained within the NPPF.</p> <p>Sport England considers that Local Authorities should develop Playing Pitch and Built Facility Strategies in order to understand sporting supply and demand within a particular area and also set out recommendations, priorities and action plans to meet current and future sporting demands. This should be a collaborative process with all stakeholders, such as National Governing Bodies for Sport, the Local Authority, Sport England and others, which would result in strategies based on robust and sound assessments that can inform the Local Plan, CIL, management of facilities, health priorities and much more.</p> <p>It is unlikely Sport England would consider a Local Plan robust and sound without these up-to-date strategies. Sport England would be happy to provide further advice on how the Council can</p>	Comments noted. Prompt questions in Stage A4 recognise the role of sport, recreation and leisure facilities in achieving overarching objectives. Suggestions with regard to evidence gathering are noted and will be taken into account during plan preparation.

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England's website.</p>	
8. Thames Water	<p>The list of sustainability objectives should make reference to the provision of water and sewerage infrastructure to service development. It is essential that capacity exists to serve any net increase in demand as a result of development. Where new infrastructure is required this must be in place ahead of development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure forms an integral part of the sustainability appraisal.</p> <p>As part of their five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in the networks and at the treatment works. Thames Water base their investment programmes on development plan allocations which form the clearest picture of the shape of the community. Where infrastructure is not available Thames Water may require an 18-month to three-year lead in time to provide extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.</p> <p>Suggested indicator:</p> <ul style="list-style-type: none"> • Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure / flooding grounds. <p>It is likely that existing water and sewage treatment works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.</p>	<p>Comments noted. Reference to the importance of water and sewerage capacity has been added to Stage A3.</p> <p>For Stage A4, infrastructure provision is covered under Objective 2. Prompt questions have been added regarding sewer capacity/infrastructure as well as flood risk and the suggested indicator included against objective 14.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
9. Health and Safety Executive	<p>We have concluded that we have no representations to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) located in the area of your local plan.</p>	<p>Noted. Further consultation will be undertaken at a later stage in the plan making process.</p>
10. Camden and Islington Public Health	<p>Stage A1</p> <p>Additional documents to be included:</p> <ul style="list-style-type: none"> • Islington's Joint Strategic Needs Assessment (2014) • Islington's Joint Health and Wellbeing Strategy 2014-2020 (consultation draft) <p>Stage A2</p> <p>Public Health submitted detailed comments and suggested amendments to the baseline information. This includes:</p> <ul style="list-style-type: none"> • Section on Pollution – air quality, noise (paragraphs 5.9-5.12 of draft IAA): additional information on deaths in Islington attributable to fine particulate air pollution and nitrogen dioxide provided. • Section on Journeys to work by walking and cycling (para 5.80 of draft) – additional paragraph suggested on how public realm improvements can encourage people to switch from other modes of travel to walking. • Section on Population (paras 5.86-5.97 of draft) – additional paragraph suggested detailing expected population increases in children (under 17) and older people (over 65) in Islington by 2031. • Section on Health (paras 5.98-5.116 of draft) – request heading is changed to Health and wellbeing. Significant additions and amendments suggested for this section to provide more information on: physical and mental health services available in Islington; the impact of deprivation on the demand for health services; the number of Islington residents with at least one long-term condition, limiting long-term illness or disability; life expectancy for Islington residents; major causes of death in Islington, including cancer, cardiovascular disease and respiratory disease; and levels of mental ill health in the borough. Figures provided illustrating 	<p>Suggested changes and additions have been integrated.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>the distribution of two or more long-term conditions in Islington; the prevalence of common mental disorders in the borough; and the prevalence of serious mental illness.</p> <ul style="list-style-type: none"> Section on Mayor's Health Inequalities Strategies Indicators (paras 5.117-5.128 of draft) – additional information provided on Indicators 1, 7, 8, 10, 11 and 12 <p>Stage A3</p> <p>Suggest additional information is included in this section on projected population increases of young people and older people in Islington; the impact a lack of affordable housing can have on health and education attainment; levels of deprivation amongst children and older people in the borough; the potential to encourage walking in the borough; and the number of deaths in Islington that can be attributed to air pollution.</p> <p>Stage A4</p> <p>Objective 4: This objective needs to include health facilities. Recommended indicator: Number of registered patients per full time equivalent GP (available from NHS Digital, the NHS data portal)</p> <p>Objective 6: Reducing inequality requires taking account of children and older people as well as the general population. Recommended indicator: include the Income Deprivation Affecting Children Index (IDACI) and Income Deprivation Affecting Older People Index (IDAOP).</p> <p>Objective 7: Healthy streets are key to improving health and wellbeing, not only encouraging walking and cycling, but also encouraging social interaction.</p> <p>Objective 8: Low pay is a significant factor that drives inequalities. Consider an indicator around the number of local employers paying at least the London Living Wage.</p> <p>Apprenticeship schemes are a valuable resource for developing skills among young people, and the requirement for apprenticeship/training is negotiable in large developments. Potentially an indicator might be the number of apprenticeships taken up in construction schemes.</p>	

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
11. Better Archway Forum	<p>Commends the council on the Baseline Information already gathered and supports the approach of applying tangible prompt questions and potential indicators to proposed policies.</p> <p>Recommends the following improvements or clarifications to the objectives and indicators:</p> <ul style="list-style-type: none"> • Objective 1 - It is important to include the spaces between the buildings as well as the buildings themselves as part of the overall environment we inhabit. Within the Potential Indicators elements such as green chains and pedestrian and cycle routes should be included. • Objectives 1 and 2 - Prompt Questions should also cover the long life, loose fit and low energy of policies. • Objective 3 - Additional Potential Indicators would be to monitor the fabric, use and setting of these sites. • Objective 4 - Ten minutes is the minimum walking time to contribute to fitness and the maximum desirable walking time to local facilities such as stations and the supply of goods and services in an urban area. This could be included in the Prompt Questions and/or the Potential Indicators. • Objective 6 - Potential Indicators - diversity and cohesion are the strengths of urban areas; a measurement of the social mix in blind tenure would be useful. • Objective 8 - the Objective should refer to providing a range of employment opportunities locally, with one Indicator of this being the number of independent traders as these tend to provide this more readily than multiples. A further Indicator would be the availability of goods and services to supply, and accommodation to house, a range of employment. • Objective 9 - Useful Potential Indicators could be the extent to which through traffic HGVs (other than buses) in particular but also other motorists are obliged to use Primary Routes (ie A1, A501 and A503), with local access via the nearest other A-roads, B-roads and local distributors. Since HGVs represent 4% of motor vehicles but are involved in 50% of cyclist deaths a Potential Indicator could be the extent to which cycle paths and highways are segregated and remote from the HGV hierarchy. • Objectives 13 and 14 - Prompt Questions should aim for low consumption overall (in addition to the recycling of what is consumed as currently drafted). • Objective 14 - Potential Indicators - the level of green chains, pedestrian and cycle routes would also be useful measures here. 	<p>Support noted. Suggestions for Stage A4 have been taken into account and additions to prompt questions/indicators made where appropriate.</p> <p>The timetable for the Local Plan review means that EU Directives will remain applicable throughout the process.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	On a more general topic whilst it is clearly useful to consider all appropriate Directives (as outlined in Section 4.1) would Brexit lead to any change in weight ascribed to the EU Directives? Or would they still be considered but adopted where they still form Best Practice for Islington?	
12. Canonbury Society	We think the report is informative and well set out and serves as a useful checklist at the first stage to ensure that any update of the Local Plan identifies, and takes-into-account, all relevant plans, policies and programmes whether local, national or international. Looking through Appendix A, we are impressed by the comprehensive list of legislation and regulation that needs to be checked for relevance. Accordingly, we are supportive of the methodology used for the IIA which is based upon the Sustainability Process as described in the report and we do not have any detailed comments.	Support noted.

Full Council draft IIA

Appendix 2: Assessment of Local Plan Objectives

Full Council draft LIA June 2019

IIA Objective	Objective 1: Homes - Delivering decent and genuinely affordable homes for all	Objective 2: Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living	Objective 3: Safety - Creating a safe and cohesive borough for all	Objective 4: Children and Young People - Making Islington the best place for all young people to grow up	Objective 5: Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all	Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives	Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources	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>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have no effect on this objective.</p> <p>Objective 3 will have a significant positive effect on the IIA objective as it aims to improve peoples safety through designing out crime and improved safety in the public realm.</p> <p>Objective 4 will have a significant positive effect on the IIA objective as it aims to provide the right facilities for children to grow and develop which may benefit everyone where it is designed to be adaptable and usable for people of all ages not just children.</p> <p>Objective 5 will have a significant positive effect on the IIA objective through creating an inclusive place, encouraging provision of green infrastructure, increasing permeability, making accessibility more convenient and ensuring the efficient use of land.</p> <p>Objective 6 will have no effect on this objective.</p> <p>Objective 7 will have no effect on this objective.</p>
2. Ensure efficient use of land, buildings and infrastructure	0	0	0	0	++	0	0	<p>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have no effect on this objective.</p> <p>Objective 3 will have no effect on this objective.</p> <p>Objective 4 will have no effect on this objective.</p> <p>Objective 5 will have a significant positive effect on the IIA objective through encouraging provision of green infrastructure, increasing permeability and ensuring the efficient use of land.</p> <p>Objective 6 will have no effect on this objective.</p> <p>Objective 7 will have no effect on this objective.</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	Objective 1 will have no effect on this objective. Objective 2 will have no effect on this objective. Objective 3 will have no effect on this objective. Objective 4 will have no effect on this objective. Objective 5 will have a significant positive effect on the IIA objective as it makes explicit reference to historic environment and encouraging development which integrates into its surroundings, considering the context and relating positively to its immediate neighbours which in the context of heritage is important. Objective 6 will have no effect on this objective. Objective 7 will have no effect on this objective.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	++	++	++	0	+	Objective 1 will have no effect on this objective. Objective 2 will have no effect on this objective. Objective 3 will have a significant positive effect on the IIA objective as it aims to improve peoples safety through designing out crime and improved safety in the public realm thereby making the borough a more liveable place. Objective 4 will have a significant positive effect on the IIA objective as it aims to protect and provide the right social infrastructure for children and a by-product of this maybe to help improve access for all residents to services. Objective 5 will have a significant positive effect on the IIA objective through creating an inclusive place, encouraging provision of green infrastructure, increasing permeability, making accessibility more convenient and ensuring the efficient use of land. Objective 6 will have no effect on this objective. Objective 7 will have a minor positive effect on this objective is to have a well-run Council which helps to provide the services for residents. Part of being a well-run Council includes the holistic benefits that a well-run planning service delivers.

5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	0	+	0	0	0	Objective 1 will have a significant positive effect on the IIA objective as it identifies that maximising the delivery of genuinely affordable housing of a high quality is a key aspect of the Local Plan in order to meet the significant need. Objective 2 will have no effect on this objective. Objective 3 will have no effect on this objective. Objective 4 will have a minor positive effect on this objective as it recognises the importance that providing good quality housing has for enabling children to get the best start in life. Objective 5 will have no effect on this objective. Objective 6 will have no effect on this objective. Objective 7 will have no effect on this objective.
6. Promote social inclusion, equality, diversity and community cohesion	++	++	++	++	++	0	+	Objective 1 will have a significant positive effect on the IIA objective as it aims to reduce inequality through maximising the delivery of genuinely affordable housing in order to meet the significant need. Objective 2 will have a significant positive effect on this objective as it aims to deliver an inclusive economy which works for everyone and which provides new employment opportunities for all sections of the boroughs residents. Objective 3 will have a significant positive effect on this IIA objective as it aims to create and maintain mixed and balanced communities which are strong and cohesive; the objective recognises the importance of integrating new developments into existing communities. Objective 4 will have a significant positive effect on this IIA objective as it recognises the importance that providing facilities and housing that enables children to get the best start in life. Objective 5 will have a significant positive effect on this IIA objective as it recognises that all planning applications must consider the wider context including social and cultural and that this does not relate to just buildings but the wider neighbourhood. It recognises the importance in order to integrate the new developments into existing communities. Objective 6 will have no effect on this objective. Objective 7 will have a minor positive effect as it recognises the holistic benefits that planning delivers such as energy efficiency which reduce home energy bills which will help to reduce inequality.

7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	++	++	++	++	0	<p>Objective 1 will have a significant positive effect on the IIA objective as it aims to deliver high quality housing which will help improve the mental and physical health and wellbeing of residents.</p> <p>Objective 2 will have a minor positive effect on the IIA objective as it aims to deliver an increasingly inclusive economy with the creation of jobs and space including affordable space for businesses which depending on if Islington residents take advantage of these opportunities can help to reduce poverty and improve mental and physical health and wellbeing.</p> <p>Objective 3 will have a significant positive effect on the IIA objective as it aims to improve peoples safety through designing out crime and improved safety in the public realm thereby making the borough a more liveable place.</p> <p>Objective 4 will have a significant positive effect on this objective as it recognises the importance that providing good quality housing has for enabling children to get the best start in life which will help to improve their health.</p> <p>Objective 5 will have a significant positive effect on the IIA objective as it aims to create a healthier environment through creating an inclusive place, encouraging provision of green infrastructure, increasing permeability and making accessibility more convenient which will all encourage people to lead healthier and more active lives.</p> <p>Objective 6 will have a significant positive effect on the IIA objective as it aims to shape a healthier environment for all by affecting the; pattern of development, urban design, access to local services and facilities; increased urban greening and open space and safe places for active play and food growing, and accessibility by walking, cycling and public transport.</p> <p>Objective 7 will have no effect on this objective.</p>
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8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	++	0	0	+			<p>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have a significant positive effect on this IIA objective for residents as it is focused on delivering an inclusive economy which improves opportunities for making Islington a place where everyone can regardless of their skills or background share in the shape and success of the borough.</p> <p>Objective 3 will have no effect on this objective.</p> <p>Objective 4 will have no effect on this objective.</p> <p>Objective 5 will have a minor positive effect on the IIA objective through creating a more attractive and welcoming place, which may also support the local economy which can encourage people to patronise new businesses and services.</p> <p>Objective 6 will have no effect on this objective.</p> <p>Objective 7 will have no effect on this objective.</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>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have a minor positive effect on the IIA objective as it aims to deliver an increasingly inclusive economy with the creation of jobs and space including affordable space for businesses locally which depending on if Islington residents take advantage of these opportunities can help to minimise their need to travel further afield to find employment.</p> <p>Objective 3 will have a significant positive effect on the IIA objective as it aims to improve peoples safety through designing out crime and improved safety in the public realm thereby making the borough a more liveable place and encouraging people to take more sustainable and active forms of transport rather than drive.</p> <p>Objective 4 will have no effect on this objective.</p> <p>Objective 5 will have a minor positive effect on the IIA objective as it aims to create a healthier environment through creating an inclusive place, encouraging provision of green infrastructure, increasing permeability and making accessibility more convenient which may help encourage people to make more sustainable transport choices.</p> <p>Objective 6 will have a significant positive effect on the IIA objective as it aims to shape a healthier environment for all by affecting the; pattern of development, access to local services and facilities; and accessibility by walking, cycling and public transport.</p> <p>Objective 7 will have no effect on this objective.</p>

10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	++	+	++	++	0	<p>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have no effect on this objective.</p> <p>Objective 3 will have a significant positive effect on the IIA objective as it aims to improve peoples safety through designing out crime and improved safety in both in the public realm and within the boroughs open spaces thereby improving access to open space in the borough.</p> <p>Objective 4 will have a minor positive effect on the IIA objective as it recognises the importance of protecting a range of spaces of all shapes and sizes, not just open spaces so although the emphasis is on children and their access to playspace it maybe beneficial to wider open spaces.</p> <p>Objective 5 will have a significant positive effect on the IIA objective as it aims to create a healthier environment through creating an inclusive place, encouraging the connections between buildings and places which should help to improve the connections with open spaces. The objective recognises the importance of green open space and the multiple benefits that it provides.</p> <p>Objective 6 will have a significant positive effect on the IIA objective and it recognises the positive role that spatial planning can have on influencing wider determinants of health including open space.</p> <p>Objective 7 there no effect</p>
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11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	++	+	++	<p>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have no effect on this objective.</p> <p>Objective 3 will have no effect on this objective.</p> <p>Objective 4 will have no effect on this objective.</p> <p>Objective 5 will have a significant positive effect on this IIA objective as it recognises that all planning applications must consider the wider context including site amenity and wildlife and that this does not relate to just buildings but the wider neighbourhood. It recognises the importance in order to integrate the new developments into existing communities and make the most of improving connections between developments and a sites contribution to amenity. In addition it recognises the importance that planning has in ensuring impacts of climate change are mitigated.</p> <p>Objective 6 will have a minor positive effect on the IIA objective as it recognises the positive role that creating more urban greening can have on health which indirectly can benefit biodiversity.</p> <p>Objective 7 will have a significant positive effect as it recognises the holistic benefits that planning delivers for example ensuring urban greening and green roofs and the contribution these make to health and wellbeing, climate change mitigation and biodiversity.</p>
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12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	+	+	0	++	0	++	<p>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have a minor positive effect on the IIA objective as it aims to deliver an increasingly inclusive economy with the creation of jobs and space including affordable space for businesses locally which depending on if Islington residents take advantage of these opportunities can help to minimise their need to travel further afield to find employment and potentially reduce transport emissions.</p> <p>Objective 3 will have a significant positive effect on the IIA objective as it aims to improve peoples safety through designing out crime and improved safety in the public realm thereby making the borough a more liveable place and encouraging people to take more sustainable and active forms of transport rather than drive and potentially reduce transport emissions.</p> <p>Objective 4 will have no effect on this objective.</p> <p>Objective 5 will have a significant positive effect on this IIA objective as it recognises the important multi-faceted role that planning has in reducing the borough's contribution to climate change and ensuring the impacts of climate change are effectively mitigated.</p> <p>Objective 6 will have no effect on this objective.</p> <p>Objective 7 will have a significant positive effect as it recognises the holistic benefits that planning delivers such as energy efficiency which reduce home energy bills which will help to reduce inequality.</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	++	<p>Objective 1 will have no effect on this objective.</p> <p>Objective 2 will have no effect on this objective.</p> <p>Objective 3 will have no effect on this objective</p> <p>Objective 4 will have no effect on this objective.</p> <p>Objective 5 will have a minor positive effect on this IIA objective as it recognises the important multi-faceted role that planning has in reducing the borough's contribution to climate change and ensuring the impacts of climate change are effectively mitigated which would contribute to promoting use of renewable sources of energy.</p> <p>Objective 6 will have no effect on this objective.</p> <p>Objective 7 will have a significant positive effect as it recognises the holistic benefits that planning delivers such as reducing resource use although this is not referenced.</p>

14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	+	0	++	Objective 1 will have no effect on this objective. Objective 2 will have no effect on this objective. Objective 3 will have no effect on this objective Objective 4 will have no effect on this objective. Objective 5 will have a minor positive effect on this IIA objective as it recognises the multiple benefits that providing open space has including improving air quality. Objective 6 will have no effect on this objective. Objective 7 will have a significant positive effect as it recognises the holistic benefits that planning delivers such protecting and enhancing natural resources although this is not referenced.
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Appendix 3: Assessment of the Policy Alternatives

APPENDIX 3A: THRIVING COMMUNITIES ALTERNATIVES

APPENDIX 3B: INCLUSIVE ECONOMY ALTERNATIVES

APPENDIX 3C: GREEN INFRASTRUCTURE ALTERNATIVES

APPENDIX 3D: SUSTAINABLE DESIGN ALTERNATIVES

APPENDIX 3E: DESIGN AND HERITAGE ALTERNATIVES

APPENDIX 3F: BUNHILL AND CLERKENWELL ALTERNATIVES

APPENDIX 3A: THRIVING COMMUNITIES ALTERNATIVES

Table x: Detailed assessment of Policy alternatives to Policies H2 conventional housing, H3 affordable housing and H4 high quality housing

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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	-	No effect for alternatives to policies H2 and H3. 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.
2. Ensure efficient use of land, buildings and infrastructure	-	-	-	-	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 need. There is a neutral 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. On balance, the alternative would therefore have a minor negative effect. There is a minor negative effect for the policy H3 alternative 2. The alternative may incentivise 1 or 2 unit schemes due to the non-imposition of affordable housing contribution

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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 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. There is a minor negative effect for the policy H4 alternative, regarding optimising the use 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 no second (back-up) lift is provided, they have proven to be less desirable, due to concern 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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	No effect for alternatives to policies H2, H3 and H4.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	0	No effect for alternatives to policies H2, H3 and H4.

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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>No effect for alternative to policy H2.</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.</p> <p>There is a minor negative effect for policy H3 alternative 2. The alternative would result in 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> <p>There is a significant negative effect for the policy H4 alternative. Implementation of the National Technical Housing Standard would provide lesser quality housing and wouldn't 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"> • 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 <p>Lower ceiling heights of 2.3m would adversely affect levels of daylight and sunlight, overheating and ventilation, flexibility and use of a room and the sense of space and general</p>

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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)
					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.
6. Promote social inclusion, equality, diversity and community cohesion	-	-	-	0	<p>There is a minor negative effect for policy H2. Without guarantees on occupancy, units could remain vacant which does not promote social cohesion.</p> <p>A minor negative effect for alternatives to policy H3. The alternatives would deliver less affordable housing than the chosen policy approach, which would do less to reduce poverty and result in less community cohesion.</p> <p>No effect for alternative to policy H4.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	-	-	-	<p>No effect for alternative to policy H2.</p> <p>There is a minor negative effect to the alternatives to policy H3. These alternatives would deliver less affordable housing than the chosen policy approach, 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>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>

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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	No effect for alternatives to policies H2, H3 and H4.
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	No effect for alternatives to policies H2, H3 and H4. Although the alternatives would make less likely units will be occupied (H2); would be likely to deliver less affordable housing (H3) or would result in lower standard housing (H4), all residential units would be car-free regardless.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	No effect for alternatives to policies H2, H3 and H4.
11. Create, protect and enhance	0	0	0	0	No effect for alternatives to policies H2, H3 and H4.

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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)
suitable wildlife habitats wherever possible and protect species and diversity.					
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	-	<p>No effect for alternatives to policies H2 and H3.</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>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource	0	0	0	-	<p>No effect for alternatives to policies H2 and H3.</p> <p>There is a minor negative effect for the policy H4 alternative, regarding ensuring a design 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</p>

IIA Objective	Alternative to Policy H2: New and existing conventional housing	Alternative 1 to Policy H3: Genuinely affordable housing	Alternative 2 to Policy H3: Genuinely affordable housing	Alternative to Policy H4: Delivering high quality housing	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)
use and minimises waste					adaptations may be necessary, rather than considering meeting a range of occupier needs from the outset.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	No effect for alternatives to policies H2, H3 and H4.

Table x: Detailed assessment of Policy alternatives to Policies H6 Purpose-built student accommodation conventional housing, H8: Self build, H10: large HMO and H11 PRS, Policy H11: Purpose Built Private Rented Sector Development

IIA Objective	Alternative to Policy H6: Purpose-built student accommodation	Alternative to Policies H8: Self build, H10: large HMO and H11 PRS	Alternative to Policy H11: Purpose Built Private Rented Sector Development	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	0	No effect for alternatives to policies H6, H8, H10 and H11.
2. Ensure efficient use of land, buildings and infrastructure	-	-	-	There is a minor negative effect for the policy H6, H8, H10 and H11 alternatives. The alternatives would 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 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. Providing these forms of accommodation would therefore not optimise the use of land.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	No effect for alternatives to policies H6, H8, H10 and H11.

IIA Objective	Alternative to Policy H6: Purpose-built student accommodation	Alternative to Policies H8: Self build, H10: large HMO and H11 PRS	Alternative to Policy H11: Purpose Built Private Rented Sector Development	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects, permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	No effect for alternatives to policies H6, H8, H10 and H11.
5. Ensure that all residents have access to good quality, well-located, affordable housing	--	--	--	There is a negative effect for the policy H6, H10 and H11 alternatives. They would likely provide less general affordable housing overall than conventional models of housing; in particular, these alternative models make it more difficult to deliver social rented housing that is effectively integrated within a development. 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.
6. Promote social inclusion, equality, diversity and community cohesion	0	-	0	There is a minor negative effect which is created by these housing models potentially creating communities which are more itinerant because they are not designed for long term occupation therefore undermining cohesion.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	-	0	There is a minor negative effect as large-scale HMOs and student accommodation in particular tend to be small in terms of space and do not provide private space reducing ability to meet a range of needs reducing the quality of the accommodation as a home and place of retreat.

IIA Objective	Alternative to Policy H6: Purpose-built student accommodation	Alternative to Policies H8: Self build, H10: large HMO and H11 PRS	Alternative to Policy H11: Purpose Built Private Rented Sector Development	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects, permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0		0	No effect for alternatives to policies H6, H8, H10 and H11.
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	No effect for alternatives to policies H6, H8, H10 and H11.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	No effect for alternatives to policies H6, H8, H10 and H11.
11. Create, protect and enhance suitable wildlife habitats wherever possible	0	0	0	No effect for alternatives to policies H6, H8, H10 and H11.

IIA Objective	Alternative to Policy H6: Purpose-built student accommodation	Alternative to Policies H8: Self build, H10: large HMO and H11 PRS	Alternative to Policy H11: Purpose Built Private Rented Sector Development	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects, permanent / temporary effects)
and protect species and diversity.				
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	No effect for alternatives to policies H6, H8, H10 and 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	<p>No effect for alternative to policy H11</p> <p>There is a significant negative effect for the policy H6 and H10 alternatives. Due to their design, student accommodation and large-scale HMOs may be less able to respond to changing needs (such as accommodated families), and would therefore require potentially considerable resource to renovate the design to meet needs.</p>
14. Maximise protection and enhancement of natural resources	0		0	No effect for alternatives to policies H6, H10 and H11.

IIA Objective	Alternative to Policy H6: Purpose-built student accommodation	Alternative to Policies H8: Self build, H10: large HMO and H11 PRS	Alternative to Policy H11: Purpose Built Private Rented Sector Development	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects, permanent / temporary effects)
including water, land and air				

Inclusive Economy Policy Alternatives

Table x: Detailed assessment of Policy alternative to Policy R2: Retain primary and secondary frontages

IIA Objective	Policy alternative to Policy R2 : Retain primary and secondary frontages	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	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.
2. Ensure efficient use of land, buildings and infrastructure	-	There is a minor negative effect for the alternative to policy R2. 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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	No effect for alternative to policy R2.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	-	There is a minor negative effect for the policy alternative. Primary and secondary retail frontages could negatively 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.

IIA Objective	Policy alternative to Policy R2 : Retain primary and secondary frontages	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	No effect for alternative to policy R2.
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect for alternative to policy R2.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	No effect for alternative to policy R2.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	-	There is a minor negative effect for the alternative to policy R2. Frontages are likely to cover a greater extent of town centres than a PSA, therefore they are likely to limit the number of non-A1 businesses in centres. 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 would not strike the right balance in terms of A1 and non-A1 uses and would preclude other businesses which may have economic benefit. Also, by potentially limiting a wider variety of businesses, this could limit the variety and range of different jobs local people can access.
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 for alternative to policy R2.

IIA Objective	Policy alternative to Policy R2 : Retain primary and secondary frontages	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 for alternative to policy R2.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for alternative to policy R2.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	No effect for alternative to policy R2.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	No effect for alternative to policy R2.
14. Maximise protection and enhancement of natural resources including water, land and air	0	No effect for alternative to policy R2.

Table x: Detailed assessment of Policy alternative to Policy R7: No Specialist Shopping Areas

IIA Objective	Policy alternative to Policy R7 : No Specialist Shopping Areas	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 the policy R7 alternative. In the short term 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.
2. Ensure efficient use of land, buildings and infrastructure	-	There is a minor negative 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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	No effect for alternative to policy R7.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	-	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.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effect for alternative to policy R7.
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect for alternative to policy R7.

IIA Objective	Policy alternative to Policy R7 : No Specialist Shopping Areas	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	No effect for alternative to policy R7.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	--	There could be a significant negative effect of the alternative to policy R7 on the borough and London economy as 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.
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 for alternative to policy R7.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect for alternative to policy R7.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for alternative to policy R7.

IIA Objective	Policy alternative to Policy R7 : No Specialist Shopping Areas	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	No effect for 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	No effect for alternative to policy R7.
14. Maximise protection and enhancement of natural resources including water, land and air	0	No effect for alternative to policy R7.

Table x: Detailed assessment of Alternative to Policy R8: Location and concentration of uses

IIA Objective	Policy alternative to Policy R8: Location and concentration of 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	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.
2. Ensure efficient use of land, buildings and infrastructure	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	No effect for alternative to policy R8.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	-	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.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effect for alternative to policy R8.

IIA Objective	Policy alternative to Policy R8: Location and concentration of 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)
6. Promote social inclusion, equality, diversity and community cohesion	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 money 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	-	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 of 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.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	There is a minor negative 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. Given the nature of these uses and the adverse impacts identified in relation to other IIA objectives, this would not constitute sustainable economic development, particularly due to the potential adverse social impacts, but purely in economic terms they could have a minor positive impact.
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 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	No effect for alternative to policy R8.

IIA Objective	Policy alternative to Policy R8: Location and concentration of 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	No effect for alternative to policy R8.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	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	No effect for alternative to policy R8.
14. Maximise protection and enhancement of natural resources including water, land and air	0	No effect for alternative to policy R8.

Table x: Detailed assessment of Policy alternative to Policy R12: Wider locations for development of visitor accommodation

IIA Objective	Policy alternative to Policy R12 : Wider locations for development of 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	-	There is a minor negative effect for the policy alternative. 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 private amenity space and reduced accessibility requirements which all contributes to less flexible buildings.
2. Ensure efficient use of land, buildings and infrastructure	-	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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	No effect for alternative to policy R12.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	<p>It is considered that on balance there is a neutral effect for 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.</p> <p>Conversely, 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>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 also 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, the alternative is considered to have no effect given the balance of potential positive and negative effects.</p>

IIA Objective	Policy alternative to Policy R12 : Wider locations for development of 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)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effect for alternative to policy R12.
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect for 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.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	No effect for alternative to policy R12.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	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 it could affect delivery of other more economically advantageous land use so on balance it is considered neutral.
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 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.

IIA Objective	Policy alternative to Policy R12 : Wider locations for development of 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)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect for alternative to policy R12.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for 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 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.
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 policy 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.
14. Maximise protection and enhancement of natural resources including water, land and air	-	There is a minor negative effect for the policy 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.

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Sustainable Design Policy Alternatives

Table x: Detailed assessment of Alternative to Policy S5: Energy Infrastructure

IIA Objective	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	No effect for alternative policy S5.
2. Ensure efficient use of land, buildings and infrastructure	-	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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	There is a neutral effect for 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 air source heat pumps which affect the exterior of a building. Therefore, 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.
4. Promote liveable neighbourhoods	0	No effect for alternative.

which support good quality accessible services and sustainable lifestyles		
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>There is a minor negative effect for the policy alternative. 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.</p> <p>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 located very close to a network) may instead opt for gas boilers which could worsen air pollution.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	-	<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	No effect for alternative.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect for alternative.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for alternative.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	-	<p>There is a minor negative effect for the policy alternative. 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,</p>

		leading to missed opportunities to reduce carbon emissions, decarbonise heat, increase energy security, and reduce fuel poverty.
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 policy alternative. 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).
14. Maximise protection and enhancement of natural resources including water, land and air	-	There is a minor negative effect for the policy alternative. 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 air pollution.

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Design and Heritage Policy Alternatives

Table x: Detailed assessment of Alternative to Policy DH3: Building Heights, Criteria-Based approach

IIA Objective	Alternative to Policy DH3: Building Heights Criteria-Based Approach	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 alternative will have a 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.
2. Ensure efficient use of land, buildings and infrastructure	-	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 does not consider the most appropriate location for development and does not holistically investigate the possibilities and opportunities in relation to transport accessibility, infrastructure and land use.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	-	Use of design criteria alone (without locational and maximum height restrictions for buildings over 30 metres) would not be sufficient to adequately restrict potential tall buildings in 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
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	No effect for alternative to Policy DH3.

IIA Objective	Alternative to Policy DH3: Building Heights Criteria- Based Approach	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	No effect for alternative to Policy DH3.
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect for alternative to Policy DH3.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	No effect for alternative to Policy DH3.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	-	No effect for alternative to Policy DH3.
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 for alternative to Policy DH3.

IIA Objective	Alternative to Policy DH3: Building Heights Criteria-Based Approach	Commentary on assessment of likely significant effects of policies <i>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</i>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	-	The alternative 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.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for alternative to Policy DH3.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	No effect for alternative to Policy DH3.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	No effect for alternative to Policy DH3.
14. Maximise protection and enhancement of natural resources including water, land and air	0	No effect for alternative to Policy DH3.

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Bunhill and Clerkenwell Policy Alternatives

Table x: Detailed assessment of Alternative to Policy BC1: Prioritising Office Use

IIA Objective	Alternative to Policy BC1: Prioritising office use	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>The alternative will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment.</p> <p>The alternative requires different mixes of uses to be provided in development in the Bunhill and Clerkenwell Area.</p> <p>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>The alternative will likely have a significant positive effect on the efficient use of land.</p> <p>The alternative 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 within excellent transport routes including to the underground and to Crossrail.</p> <p>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.</p> <p>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 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 negative.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	No effect for alternative to policy BC1.

IIA Objective	Alternative to Policy BC1: Prioritising office use	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 alternative 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.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	<p>The alternative will likely have a neutral effect on the provision of affordable housing.</p> <p>The alternative may mean that more housing and affordable housing will likely be developed. 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.</p>
6. Promote social inclusion, equality, diversity and community cohesion	-	<p>The alternative will lead to minor negative effects in terms of social inclusion, equality, diversity, and community cohesion in comparison to policy BC1.</p> <p>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 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	No effect for alternative.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	-	The alternative will likely have minor negative effect on economic growth, and providing employment opportunities in comparison the policy BC1. With regards economic growth local evidence currently suggests a significant shortfall in supply of employment land. The alternative will help to address this 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 weaken the local economy 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.

IIA Objective	Alternative to Policy BC1: Prioritising office use	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	+	No effect for alternative. It 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	No effect for alternative.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for alternative. Both residential and commercial uses will be required to integrate green infrastructure where possible.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	No effect for alternative.
13. Promote resource efficiency	0	No effect for alternative.

IIA Objective	Alternative to Policy BC1: Prioritising office use	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)
by decoupling waste generation from 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	No effect for alternative.

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Appendix 4: Assessment of Local Plan Policies

APPENDIX 4A: PLAN1 POLICY ASSESSMENT

APPENDIX 4B: AREA SPATIAL STRATEGIES POLICY ASSESSMENT

APPENDIX 4C: THRIVING COMMUNITIES POLICY ASSESSMENTS

APPENDIX 4D: INCLUSIVE ECONOMY POLICY ASSESSMENTS

APPENDIX 4E: GREEN INFRASTRUCTURE POLICY ASSESSMENTS

APPENDIX 4F: SUSTAINABLE DESIGN POLICY ASSESSMENTS

APPENDIX 4G: PUBLIC REALM AND TRANSPORT POLICY ASSESSMENTS

APPENDIX 4H: DESIGN AND HERITAGE POLICY ASSESSMENTS

APPENDIX 4I: STRATEGIC INFRASTRUCTURE POLICY ASSESSMENTS

APPENDIX 4J: BUNHILL AND CLERKENWELL AAP POLICY ASSESSMENTS

APPENDIX 4A: POLICY PLAN1 ASSESSMENT

Table x: Objectives: Assessment of Policies PLAN1

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	++	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 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.
2. Ensure efficient use of land, buildings and infrastructure	++	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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	++	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, 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	++	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.
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	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	++	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, networked, accessible and multi-functional	+	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 must consider the local landscape and natural features, such as topography, trees, boundary treatments, planting and biodiversity.
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.

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)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	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.
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;

APPENDIX 4B: AREA SPATIAL STRATEGIES POLICY ASSESSMENT

Table x: 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	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>There is no effect for policy SP2. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.</p> <p>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>
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.</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 no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is no effect for policy SP2. See response to IIA Objective 1.</p> <p>There is a minor positive effect for policy SP3. The policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	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 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>

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)
				There is no effect for policy SP3. The policy includes specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.
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. Residential uses are specifically restricted in the spatial strategy area, but this is the spatial expression of the plan objectives and other plan policies which are assessed separately, in particular policies B1 and B2.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is no effect for policy SP2. See response to IIA Objective 1.</p> <p>There is no effect for policy SP3. See response to IIA Objective 4.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	0	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is no effect for policy SP2. See response to IIA Objective 1.</p> <p>There is no effect for policy SP3. See response to IIA Objective 4.</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 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 SP2. There is 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. 1.</p> <p>There is a minor positive effect for policy SP3. There is 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..</p>
9. Minimise the need to travel and create accessible, safe and sustainable	0	+	+	There is no effect for policy SP1. See response to IIA Objective 1.

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)
connections and networks by road, public transport, cycling and walking				<p>There is a minor positive effect 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.</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.</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 SP1. See response to IIA Objective 1.</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. See response to IIA Objective 4.</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. See response to IIA Objective 1.</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. See response to IIA Objective 4.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is no effect for policy SP2.</p> <p>There is no effect for policy SP3. See response to IIA Objective 4.</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>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is no effect for policy SP2. See response to IIA Objective 1.</p> <p>There is no effect for policy SP3. See response to IIA Objective 4.</p>
14. Maximise protection and enhancement of natural	0	+	0	There is no effect for policy SP1. See response to IIA Objective 1.

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)
resources including water, land and air				<p>There is 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..</p> <p>There is no effect for policy SP3. See response to IIA Objective 4.</p>

Table x: 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	0	0	0	0	0	<p>There is no effect for Policies SP4, SP5, SP6, SP7 and SP8. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. For example SP4 identifies the opportunity for public realm improvements as part of Crossrail 2 which is an expression of Local Plan policies T1 and T4.</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 infrastructure such as public transport hubs and/or are located on key commercial routes.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and	0	0	0	0	0	<p>There is no effect for Policies SP4, SP5, SP6, SP7 and SP8. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. Where relevant specific heritage assets are identified in the spatial strategies for example SP8 identifies protection of views of local landmark Union Chapel.</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)
cultural environment.						
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. For example SP7 identifies support for Archway town centres role as a cultural quarter but does not add to Local Plan policies R1 and R10.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately. Policy SP5 includes reference to Holloway Prison, considered a key site which will help meet identified housing need in the borough. Holloway Prison is also assessed as site allocation NH7.
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. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.
8. Foster sustainable economic growth and increase employment opportunities	+	+	+	0	+	There is no effect for Policy SP7. 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. 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.

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)
across a range of sectors and business sizes						<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 for policy SP8 Highbury Corner and Lower Holloway which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is specific reference to the importance of BC3 and BC7 to providing office floorspace including reference to the Moorfields site which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</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	<p>There is no effect for Policies SP4, SP5, SP6, SP7 and SP8. The policies include specific requirements, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	0	+	<p>There is no effect for Policies SP4, SP6 and SP7.</p> <p>There is a minor positive for policy SP8 which recognises the important function that Highbury Fields which aims to protect views to and from the open space.</p> <p>Policy SP5 will have a positive effect with the potential delivery of new public open space as part of site allocation NH1 which would improve public accessibility to public 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>

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)
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.
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.

APPENDIX 4C: THRIVING COMMUNITIES POLICY ASSESSMENTS

Table x: Thriving Communities: 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	++	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.</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>There are no effects for policies H3 and H5.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	++	+	++	0	<p>Policy H1 will have significant positive effect. The policy promotes optimal density levels, with specific reference to other Development Plan policies, meaning that optimisation there will be active consideration and balancing of competing demands between land uses. 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 life.</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 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>

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 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.</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.</p> <p>Policy H5 will 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	There are no effects for policies H1 to H5.
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. 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 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	++	++	++	++	+	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

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)
to good quality, well-located, affordable housing						<p>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.</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> <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 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	++	0	+	++	0	<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.</p> <p>Policy H3 will have minor positive effect. 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</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>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>There are no effects for policies H2 and H5</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	+	++	+	<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 improved physical and mental health and wellbeing.</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.</p> <p>Policy H5 will have minor positive effect. It will improve access to outdoor space which improves amenity 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>

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)
						Policy H2 will have no effect.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	0	There are no effects for policies H1 to H5.
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	There are no effects for policies H1 to H5.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	++	<p>Policy H5 will have significant positive effect. 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 and would thereby contribute to delivery of green infrastructure.</p> <p>There are no effects for policies H1 to H4.</p>
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 H1 to H5.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	0	+	0	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

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>of noise and vibration and to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage).</p> <p>There are no effects for policies H2, H3 and H5.</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 enhancement of natural resources including water, land and air	0	0	0	0	0	There are no effects for policies H1 to H5.

Table x: Thriving Communities: Assessment of Policies H6 to H12

IIA Objective	Policy H6: Purpose-built student accommoda-tion	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuildin-g	Policy H9: Supporte-d Housing	Policy H10: Houses in Multiple Occupation (HMOs) [large scale HMO]	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommoda-tion	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	0	0	0	There are no effects for policies H6 to H12. 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; the external context.
2. Ensure efficient use of land, buildings and infrastructure	-	-	0	0	-	-	0	There is a minor negative effect for the policies H6, H7, H10 and H11. The policies 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 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. Policy H8, H9 and H12 have no 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	0	0	No effect for the policies H6 to H12.
4. Promote liveable neighbourhoods which support good quality	0	0	0	0	0	0	0	No effect for the 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) [large scale HMO]	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)
accessible services and sustainable lifestyles								
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	+	+	-	-	0	<p>There is a minor negative effect for the policy H6, H10 and H11 policies. They would likely provide less genuinely affordable housing overall than conventional models of housing; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. Although 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.</p> <p>There is a minor positive effect assumed for policies H8 and H9.</p> <p>There is no effect for policy H12</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	++	0	0	+	<p>No effect for policies H6, H8, H10 and H11.</p> <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. Although that support has to be assumed given there is no current Council strategy.</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>

IIA Objective	Policy H6: Purpose-built student accommoda-tion	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuildin-g	Policy H9: Supporte-d Housing	Policy H10: Houses in Multiple Occupation (HMOs) [large scale HMO]	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommoda-tion	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 heath inequalities	-	+	0	++	-	0	0	No effect for policies H7, H8, H11 and H12. H9 would have a significant positive effect as it aims to improve peoples' opportunity for independence for those more disadvantaged. Policy H7 would have a minor positive effect as care home accommodation has to demonstrate compliance with various design issues including providing access to communal outdoor space. Policy H6 and H10 are both minor negative as they are 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.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
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 are high quality, networked, accessible and multi-functional	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
11. Create, protect and enhance suitable wildlife habitats	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) [large scale HMO]	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)
wherever possible and protect species and diversity.								
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
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 alternative to policies H7, H8, H9, H10, H11 and H12. 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.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.

Table x: Thriving Communities: Assessment of Policies SC1, SC2 and SC3

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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 playspace 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> <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.</p>
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 buildings as an exception to marketing demand although ensuring community needs are considered remains.</p> <p>Policy SC2 requires new community infrastructure to be built in accessible locations that are convenient to users and are designed to be inclusive, accessible, flexible and sustainable encouraging the shared use of facilities and community use agreements to maximise use.</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	No effect for policies SC1 and SC2. 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 There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	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 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. Policy SC2 will ensure playspace is both maintained through protecting existing playspace and new playspace provided in all major developments. There is no effect for policy SC3. See assessment against objective 1. There is no effect for policy SC4. See assessment against objective 1.
5. Ensure that all residents have access to good quality, well-located, affordable housing	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.
6. Promote social inclusion, equality, diversity and community cohesion	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.

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 estimated rationalisation for recognised public sector bodies the proposals will be required to evidence community need 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 and where proposals are for a loss replacement space is provided. Regulation 18 draft Local Plan included reference to loss of play space where it was robustly demonstrated the space is no longer required ie no replacement. The assessment noted this and it was removed as part of the regulation 19 Local Plan. The adventure playgrounds in the borough will be protected.</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>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	0	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. 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. 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.</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>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 playspaces and adventure playgrounds and also provide additional playspace where required. This will help enhance and improve quality of open spaces for purposes of play.</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>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	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>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	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>
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	<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>
14. Maximise protection and enhancement of natural resources including water, land and air	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>

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Table x: Inclusive Economy: Assessment of Policies B1 to B5

IIA Objective	B1: Delivering Business Floors pace	B2: New Business Floors pace	B3: Existing Business Floors pace	B4: Affordable Works pace	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	+	0	<p>Policies B1 and B2 will have minor positive effect by encouraging development which primarily supports the existing economic function of an area which will reinforce the economic sustainability of an area may see design which complements 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 references to the Council's Inclusive Design SPD 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 significant positive effect requiring affordable workspace to be of a high standard of amenity for occupiers.</p> <p>B5: has no effect</p>
2. Ensure efficient use of land, buildings and infrastructure	+	++	++	+	0	<p>Policies B1 and B2 will have significant positive effects as 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: The protection of existing business floorspace safeguards older / secondary business stock which is generally more affordable / suitable for occupation by SMEs and 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>B4: will ensure provision of affordable workspace in the most unaffordable parts of the Borough to meet the needs of local businesses. The policy specifies the types of space and locations where affordable workspace is required, helping focus it to the most appropriate locations.</p> <p>B5: has no effect</p>

IIA Objective	B1: Delive ring Busin ess Floors pace	B2: New Busin ess Floors pace	B3: Existi ng Busin ess Floors pace	B4: Afford able Works pace	B5: Jobs and Traini ng Oppor tunitie s	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 policies B1 to B5
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 through protecting existing business floorspace will have a significant effect and particularly help maintain diversity outside the CAZ and town centres helping counter predominantly residential neighbourhoods, promoting economic activity in these locations.</p> <p>B5: No impact 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	There are no effects for policies B1 to B5. Arguably 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.

IIA Objective	B1: Delive ring Busin ess Floors pace	B2: New Busin ess Floors pace	B3: Existi ng Busin ess Floors pace	B4: Afford able Work space	B5: Jobs and Traini ng Oppor tunitie s	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	++	+	+	++	++	<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>B2: The maximisation 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.</p> <p>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 a non-for-profit 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	0	0	0	0	0	There are no effects for policies B1 to B5

IIA Objective	B1: Deliver Business Floors pace	B2: New Business Floors pace	B3: Existi ng Business Floors pace	B4: Afford able Works pace	B5: Jobs and Traini ng Oppor tunitie s	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>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 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>B2: 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 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>B3: 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>B4: 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>B5: 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 level. 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>

IIA Objective	B1: Deliv ing Busin ess Floors pace	B2: New Busin ess Floors pace	B3: Existi ng Busin ess Floors pace	B4: Afford able Works pace	B5: Jobs and Traini ng Oppor tunitie s	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 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.</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 peoples journeys to work albeit to less connected locations.</p> <p>Policies B4 and B5 have no effect.</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

IIA Objective	B1: Delive ring Busin ess Floors pace	B2: New Busin ess Floors pace	B3: Existi ng Busin ess Floors pace	B4: Afford able Works pace	B5: Jobs and Traini ng Oppor tunitie s	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 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>B3, B4 and B5 has not 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	0	0	There are no effects for policies B1 to B5
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	There are no effects for policies B1 to B5

Table x: Inclusive Economy: Assessment of Policies R1 to R3 and R6

IIA Objective	R1: Retail, Leisure and Services,	R2: Primary Shopping Areas	R3: Islington's Town Centres	R6: Maintaining and enhancing Islington's unique retail character	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 R1 and 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. Policy R3 will have a significant positive effect focusing appropriately scaled development in terms of size and scale and retail hierarchy but also ensuring high quality development which ensures accessibility, amenity and sustainability are considered.</p> <p>Policy R6 protects small 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>
2. Ensure efficient use of land, buildings and infrastructure	++	++	++	+	<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 will be a condensed and more focused retail (A1) area. Policy R3 will have a significant positive effect focusing appropriately scaled development in terms of size and scale and retail hierarchy but also ensuring high quality development which ensures accessibility, amenity and sustainability are considered. Smaller retail development outside existing centres will be permitted. Policy R6 optimises the existing urban form of retail centres in the borough with flexibility to amalgamate units being carefully controlled.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	+	<p>No effect for policies R1 to R3. 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>
4. Promote liveable	++	++	++	++	<p>Policies R1, R2, R3 and R6 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</p>

neighbourhoods which support good quality accessible services and sustainable lifestyles					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 R6 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.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	No effect for policies R1 to R3 and R6.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	No effect for policies R1 to R3 and R6.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	0	0	No effect for policies R1 to R3 and R6.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	+	++	Policies R1, R2, R3, and R6 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. 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 achieving the right balance of uses will help provide job opportunities for local residents which may have cumulative and secondary impacts of providing training and tackling worklessness. Policy R6 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 Islingtons economy.
9. Minimise the need to travel and create accessible, safe and sustainable connections and	+	+	+	+	No effect for policies R1 to R3 and R6.

networks by road, public transport, cycling and walking					
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	No effect for policies R1 to R3 and R6.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	No effect for policies R1 to R3 and R6.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	No effect for policies R1 to R3 and R6.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	0	0	0	0	No effect for policies R1 to R3 and R6.

optimises resource use and minimises waste					
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	No effect for policies R1 to R3 and R6.

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Table x: Inclusive Economy: Assessment of Policies R4, R5, R7, R8 and R9

IIA Objective	R4: Local Shopping Areas	R8: Location and concentration of uses	R5: Dispersed shops	R7: Markets and SSAs	R9: Meanwhile/ temporary 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	0	++	<p>Policy R4 will have a minor positive effect as it seeks to protect LSA's 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. The agent of change principle will help protect existing amenity.</p> <p>Policy R8 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 qualitative 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 HFT and BS should make the built environment safer for people's mental and physical health.</p> <p>Policies R5 and R7 will have no effect on this objective.</p> <p>Policy R9 will have a significant positive effect by bringing back into use albeit on a temporary basis the use of buildings and spaces 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.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	0	+	+	++	<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.</p> <p>Policy R8 has no specific effect given there is no specific need for hot food takeaways, betting shops and adult gaming centres.</p> <p>Policy R5 will balance needs by protecting where viable dispersed A1 and A3 premises which are often located in amongst residential areas providing an important local service.</p> <p>Policy R7 will be minor positive as it will help support the vitality and viability of the rest of town centre through protecting both markets and SSAs.</p> <p>Policy R9 will have a significant positive effect through incentivising land owners to provide buildings/spaces for a discounted price for temporary uses which will make use of land which otherwise would remain vacant.</p>

3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	+	+	+	Policies R4, R8, R7 will have no effect Policy R5 will have a minor positive given that dispersed shops can often hold historic significance having been long term features of communities that are part of the character.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	++	+	+	<p>Policy R4 will have a significant positive effect, enabling LSAs to continue to serve the needs and wellbeing of the local residents across local retail catchment areas by striking the right balance of retail, leisure and business uses. Reduced vacancy and marketing evidence acknowledges the changing shopping patterns and other leisure functions of LSAs. The agent of change principle will address the need to protect the amenity of residents.</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 large number 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 local need; and through a cumulative undermining of the vitality and viability of these centres which affect their medium to long term outlook.</p> <p>Policy R5 will have a significant positive effect through ensuring that where viable 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 relevant.</p> <p>Policy R7 will be minor positive as it will help support the vitality and viability of the rest of town centres through protecting both markets and SSAs. Existing and new markets will contribute to the diversity of retail in town centres and the CAZ. SSAs provide a niche retail offer for residents.</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	0	Policies R4, R5, R8, R7 and R9 will have no effect on the provision of affordable housing. Both policy R4 and policy R5 resist residential use.
6. Promote social inclusion, equality,	0	0	0	0	0	Policies R4, R5, R8, R7 and R9 will have no effect

diversity and community cohesion						
7. Improve the health and wellbeing of the population and reduce health inequalities	0	++	0	0	0	<p>Policies R4, R5, R7 and R9 will have no effect</p> <p>R8: 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 well-being. 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 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 businesses uses to enable response to changing retail patterns. Town centres are drivers in the local economy and ensuring space is protected will help meet the needs of businesses.</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 they could have a minor positive impact providing jobs however from a sustainable economic development point of view it is judged to be neutral.</p> <p>Policy R7 will have a significant positive effect 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.</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 connections and networks by road, public transport, cycling and walking	0	0	0	0	0	Policies R4, R5, R7, R8 and R9 will have no effect
10. Protect and enhance open spaces that are high quality,	0	0	0	0	0	Policies R4, R5, R7, R8 and R9 will have no effect

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	Policies R4, R5, R7, R8 and R9 will have no effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	0	Policies R4, R5, R7, R8 and 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	0	Policies R4, R5, R7, R8 and R9 will have no effect
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	Policies R4, R5, R7, R8 and R9 will have no effect

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Table x: Inclusive Economy: Assessment of Policies R1, R10 and R11

IIA Objective	R1: ...Culture	R10: Culture and NTE	R11: Public Houses	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 R1 will have a minor positive effect principally through seeking to support and manage a thriving and safe night time economy. 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. 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 is considered.</p> <p>Policy R11 will no effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	++	+	<p>Policies R1 and 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. The locations are also the most accessible.</p> <p>Policy R11 is considered positive 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>
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 R1 and R10.</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 sustainable lifestyles	++	++	+	<p>Policies R1 and R10 will have a significant positive effect principally through seeking to 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 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 without pressure on the occupier to mitigate adverse impacts for new development. This equally applies to existing residents and their amenity but in both cases draws new attention to the requirement to mitigate the effects of noise, vibration, odour and pollution.</p> <p>Policy R11 supports the protection of pubs will contribute to diverse, vibrant and economically vibrant town centres and aim to sustain these culturally important leisure services and it will also apply to pubs outside town centres.</p>
5. Ensure that all residents have access to good quality, well-	0	0	0	No effect for policies R1, R10 and R11

located, affordable housing				
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	No effect for policies R1, R10 and R11
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	0	No effect for policies R1, R10 and R11
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	++	Policies R1 and 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 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. Policy R11 will protect pubs where viable helping them to the cultural and NTE.
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	No effect for policies R1, R10 and R11
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	No effect for policies R1, R10 and R11
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	No effect for policies R1, R10 and R11
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	No effect for policies R1, R10 and R11

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 effect for policies R1, R10 and R11
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	No effect for policies R1, R10 and R11

Table x: Inclusive Economy: Assessment of Policies R1 and R12

IIA Objective	R1 ...Visitor accommodation	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	-	-	There is a minor negative effect for policy R1 and 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 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.
2. Ensure efficient use of land, buildings and infrastructure	0	0	There is a neutral effect for policy R1 and R12 as it would likely result in 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 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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policies R1 and 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 policies R1 and R12. 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.</p> <p>Conversely, the policy 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>The policy would allow intensification of visitor accommodation on existing hotel sites within Town Centres, which would create more pressure on town centre uses, both existing uses and also 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. Overall, the policy is considered to have no effect given the balance of potential positive and negative effects.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for policies R1 and R12
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for policies R1 and R12
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for policies R1 and R12
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 R1 and R12. It could provide opportunities for employment, particularly 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	No effect for policies R1 and R12

10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policies R1 and R12
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policies R1 and R12
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	-	There is a minor negative effect for the 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	-	There is a minor negative effect for the 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	-	There is a minor negative effect for the policy 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.

Table x: Green Infrastructure: 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>G1 policy will have a minor positive effect on promoting a high quality, inclusive, safe, and sustainable built environment.</p> <p>G2 policy will likely have a minor 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 generally an essential and highly valued component of local character and distinctiveness. They also improve the appearance and functionality of the public realm.</p> <p>G3 will likely 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	0	0	<p>No effects for policy G1 and G2</p> <p>G3 This policy may have minor negative effects 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 therefore is considered neutral.</p>
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>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	0	+	+	<p>No effects for policy G1</p> <p>G2 will have minor 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>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.</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)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	-	No effects for policy G1 and G2 G3 may be minor negative effects on the provision of affordable housing for this policy as it also protects semi private amenity spaces on estate land from development. These spaces could be developed for additional affordable housing. The policy however does allow development on estates provided it maintains the overall level and quality of open space.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	No effects for policy G1, G2 and G3
7. Improve the health and wellbeing of the population and reduce health inequalities	+	++	++	The policy will have minor positive effects on the health and wellbeing of the population by 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. Both G2 and G3 will likely have significant positive effects on the health and wellbeing of the population by preserving open spaces. This will improve the air quality and increase opportunities for active travel, sport and recreation in the borough. 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
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	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)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	+	++	++	<p>This policy is likely to have minor positive effects on open spaces by 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>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>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 protect species and diversity.	++	++	++	<p>This policy is likely to have significant positive effects on biodiversity by requiring developers to incorporate as much biodiversity habitat into development as is reasonably possible.</p> <p>Both G2 and G3 are likely to have significant positive effects on biodiversity by offering high levels of protection to open space in the borough. The preservation of existing open spaces is the most effective strategy for preserving and improving biodiversity value.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	+	+	<p>Minor 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 increasing the vegetation in the urban environment reducing the urban heat island effect. Green walls and roofs also will have a small effect in reducing heat reflected back in to the atmosphere.</p> <p>Both G2 and G3 will have minor positive effects on reducing climate change and impact of climate change. The main positive effect is that by protecting open spaces that help mitigate the effects of climate change by increasing the vegetation in the urban environment reducing the urban heat island effect. The retained vegetation will also have a small effect of adsorbing some carbon dioxide in the atmosphere. Both preserving and providing open space may limit some opportunities for development in highly accessible locations (which has carbon reduction benefits) however this development could occur on other brownfield sites using appropriately high densities.</p>
13. Promote resource efficiency by decoupling	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)
waste generation from 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	+	+	+	<p>The policy will have minor positive effects on natural resources mainly by improving local air quality by the increased amount of vegetation in the urban environment which will help clean the air. The increased green infrastructure will also have some positive effects on water and soil by reducing stormwater runoff, and increasing permeable surfaces.</p> <p>Both G2 and G3 will have a minor positive effects on natural resources mainly by improving local air quality by the increased amount of vegetation in the urban environment which will help clean the air. Preserved and 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 x: Green Infrastructure: 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	++	0	<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.</p> <p>Policy G5 has no effect</p>
2. Ensure efficient use of land, buildings and infrastructure	0	0	Policies G4 and G5 have no effect
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	<p>Policy G4 has no effect</p> <p>Policy G5 may have potential negative effects on the heritage assets or the setting of heritage assets eg where a green roof is visible from the street or neighbouring properties. This may be a particular concern due to the height or shape of roofs. Green roofs however are incorporated subject to other planning considerations, including relevant design and heritage policies and these conflicting policy requirements would have to be weighed-up during the planning application process to ensure that the historic environment is not impacted significantly. Similar considerations for vertical greening. On balance it is was disregarded and considered to be neutral impact.</p>

4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	Policy G4 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. Policy G5 has no effect
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	0	Policies G4 and G5 have no effect
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	Policy S4: The Landscape Design Strategy 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 mental and physical health concerns. This policy will result in some positive effects on objective 7 over the short and long term. Policy S5: Green roofs 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. This policy will result in some limited positive effects on objective 7 over the short and long term.
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 connections and networks by road, public transport, cycling and walking	0	0	Policies G4 and G5 have no effect

10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	0	<p>Policy G4: This policy 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. This policy will result in strong positive effects on objective 10 over the short and long term.</p> <p>Policy G5: This policy has no impact on this objective as it is concerned with green roofs and vertical greening.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	++	++	<p>Policy G4: This policy 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. This policy will result in strong positive effects on objective 11 over the short and long term.</p> <p>Policy S5: This policy 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: 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. This policy will therefore enhance community resilience to climate change impacts with some positive effects on objective 12 over the short and long term.</p> <p>Policy G5: 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 with some positive effects on objective 12 over the short and long term.</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	Policies G4 and G5 have no effect
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	Policies G4 and G5 have no effect

Table x: Sustainable Design: Assessment of Policies S1 to S5

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)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	0	0	0	<p>Policy S1: The strategic policies 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. The policy will therefore contribute to the promotion of a sustainable built environment with some positive effects on objective 1 over the short and long term.</p> <p>Policy S2: The requirement for developments to submit an Adaptive Design Strategy will contribute to the promotion of a sustainable built environment through requiring adaptable buildings that can respond to change over their lifetime. This policy will result in some positive effects on objective 1 over the short and long term.</p> <p>Policy S3, S4 and S5 have no effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	0	0	+	<p>Policy S1 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. This policy also seeks to ensure that developments are designed to be flexible and adaptable to changing requirements over their lifetime.</p> <p>Policy S2: 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>Policy S3 and S4 have no effect.</p> <p>Policy S5 will have a minor positive effect as will where appropriate contribute to the extension of networks and the provision of low-carbon energy infrastructure in the right locations. Heat network connection will reduce the demands on land and buildings for other types of energy infrastructure, such as boilers and CHP plants, and will ensure that low-carbon energy infrastructure is available for a greater number of developments.</p>

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3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	-	0	0	-	0	<p>Policy S1 and S4 includes 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. The policy does, however, seek to balance these competing requirements so that there is no adverse effect on the conservation and enhancement of heritage assets.</p> <p>Policy S4: Developments are required to maximise fabric energy efficiency through building form and specification, which may have a negative impact on historical and architectural building features. The policy also encourages the incorporation of solar PV panels to provide renewable energy, which may have a negative impact on the heritage assets if the roof is visible from the street. The policy does, however, seek to balance these competing requirements so that there is no adverse effect on the conservation and enhancement of heritage assets.</p> <p>Policy S2, S3 and S5 have no effect.</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 and S5 has no effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	++	++	++	++	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 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.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	Policies S1 to S5 have no effect.

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 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 sustainable design standards which will help to reduce fuel poverty. 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.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	+	+	Policy S1 and S4 and S5 will support the development of green industries and a low-carbon economy through its promotion of zero carbon development, the use of low and zero carbon heating options, particularly heat networks and secondary heat sources incorporate on-site renewable energy. The requirement for developments to minimise on-site carbon dioxide emissions in accordance with the energy hierarchy, particularly by supplying energy efficiently and cleanly and incorporating renewable energy, will also support this objective. Policies S2 and S3 will have no effect.
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 that are high quality, networked, accessible and multi-functional	0	++	0	0	0	Policy S1, S3, S4 and S5 have no effect. 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 supports the protection and enhancement of suitable wildlife habitats and encourage development that implements strategic and connected green infrastructure through submission of a Landscape Design Strategy.</p> <p>Policy S3: Developments are required to achieve the highest feasible level of the relevant sustainable design standard, including specific standards relating to Land Use and Ecology. 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.	++	++	++	++	++	<p>Policies S1 and S2 sets out the council's strategic approach to delivering sustainable design with the aim that all buildings in Islington will be zero carbon by 2050 and will develop and extend the borough's heat networks, promote secondary heat sources, contribute to the provision of the necessary energy infrastructure to support development, minimise fuel poverty and enhancing energy security by enabling developments to benefit from local low-carbon energy sources. 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 will reduce the contribution of development in Islington to climate change and enhance community resilience to climate change impacts. This policy will result in strong positive effects on objective 12 over the short and long term.</p> <p>Policies S2 and S3 require development to demonstrate how they directly contribute to reducing Islington's contribution to climate change and promote climate change adaptation and achieve the highest feasible level of the relevant sustainable design standard, such as BREEAM.</p> <p>Policy S4 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.</p> <p>Policy S5 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 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: 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. This policy will result in some positive effects on objective 13 over the short and long term.</p> <p>Policy S4 and S5 will reduce carbon emissions in accordance with the energy hierarchy and support the use of low and zero carbon heating options, which will encourage use of non-renewable resources.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	0	0	<p>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 demonstrate the relevant sustainable design policies have been met.</p> <p>Policies S4 and S5 will have no effect</p>

Table x: Sustainable Design: 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	0	0	0	0	+	<p>Policies S6 to S9 have no effect</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 a 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 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 a Adaptive Design Strategy.</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 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 on this objective as it is concerned with managing heat risk.</p> <p>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. All development should also seek to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people.</p>

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5. Ensure that all residents have access to good quality, well-located, affordable housing	+	0	0	0	+	<p>Policy S6 will have a 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 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
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	0	+	0	<p>Policy S6 will help 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.</p> <p>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. 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>Policy 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>

8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	++	Policies S6, S7, S8 and S9 have no effect Policy 10 will support the development of local green industries that seek to save resources, improve resource efficiency and help to reduce carbon emissions.
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 S6, S7, S8, S9 and S10 have no effect
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional						Policies S6, S7, S8 and S10 will have no effect 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.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	+	+	0	Policy S6, S8 and S10 will have no effect Policy S7 will have a 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. Policy S9 will ensure development is required to adopt 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. Also developments are required to manage surface water runoff through the use of green roofs where possible and maximise biodiverse green roofs.

12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	0	++	++	++	<p>Policy S6 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 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 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 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 decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	++	<p>Policies S6, S7, S8 and S9 have no effect</p> <p>Policy S10 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.</p>

14. Maximise protection and enhancement of natural resources including water, land and air	0	++	0	++	0	<p>Policies S6, S8 and S10 have no effect</p> <p>Policy S7 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 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>
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Table x: Transport and Public Realm: Assessment of Policies T1 to T5

IIA Objective	T1: Enhancin g the public realm and sustainab le transport	T2: Sustainable Transport Choices	T3: Car free developme nt	T4: Public realm	T5: delivery , servicin g & Constru ction	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 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. 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 particular positive benefit 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.</p> <p>Policy T3 will have a positive effect, the impact of car parking on the built environment can be negative, particularly at street level where it reduces the ability to design multi-functional spaces which promote walking and cycling and other activities.</p> <p>Policy T5 requires Delivery and Servicing Plans where there may be an impact on amenity from likely vehicle movements which will have a minor positive effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	++	0	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>T3 will also 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>T4 and T5 have no effect</p>

IIA Objective	T1: Enhancin g the public realm and sustainab le transport	T2: Sustainable Transport Choices	T3: Car free developme nt	T4: Public realm	T5: delivery , servicin g & Constru ction	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	T1, T2, T3 and T5 have no effect Policy T4 considered to have a minor positive in that it is expected to consider the context through appraisal to inform how a development fits within its wider context.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	0	++	0	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 through an improved public realm with permeability and legibility opening up new access routes and connections to existing facilities and services. T3 and T5 have no effect
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	T1 to T5 have no effect
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	T1 to T5 have no effect
7. Improve the health and wellbeing of the population and reduce health inequalities	+	++	+	++	0	T1, T2 and T3 and T4 through enabling and prioritising active travel and use of more sustainable transport modes help promote a healthier life style which will reduce health inequality among the residents. 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. T5 has no effect

IIA Objective	T1: Enhancin g the public realm and sustainab le transport	T2: Sustainable Transport Choices	T3: Car free developme nt	T4: Public realm	T5: delivery , servicin g & Constru ction	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>T1 to T4 will have no effect</p> <p>T5 is minor positive 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 connections and networks by road, public transport, cycling and walking	++	++	+	++	+	<p>Policy 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 T4 will ensure context is considered through appraisal to inform how a development fits within its wider context which will help proposals make the best use of existing infrastructure.</p> <p>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.</p> <p>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. 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.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	+	0	<p>T1 to T5 have no effect</p> <p>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.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	T1 to T5 have no effect

IIA Objective	T1: Enhancin g the public realm and sustainab le transport	T2: Sustainable Transport Choices	T3: Car free developme nt	T4: Public realm	T5: delivery , servicin g & Constru ction	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>Policies T1, T2 and T4 encourages active travel through improvements to the public realm which reduce the need to use fuel-based transport, reduce carbon emissions and improve energy efficiency.</p> <p>Policy T3 will have a significant positive effect through requiring 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 improvements to the public realm will encourage travel by more sustainable modes of transport which will reduce carbon emissions.</p> <p>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. 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 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	+	+	+	+	+	<p>T1 to T5 have minor positive effects through encouraging active travel through improvements to the public realm which reduce the need to use fuel-based transport, a non-renewable resource.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	+	+	<p>T1 to T4 have minor positive effects through encouraging active travel through improvements to the public realm and car free development which reduce the need to use fuel-based transport, which reduce the contribution to air pollution and the consequent impact on human health.</p> <p>Policy T5 requires Delivery and Servicing Plans which will assess the ongoing freight impact of 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 and reduce the contribution to air pollution and the consequent impact on human health.</p>

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Table x: Design and Heritage: Assessment of Policies DH1 to DH2

IIA Objective	Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Policy DH2: Heritage assets	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 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.</p> <p>Policy DH2 will have a significant positive effect. It provides detailed policies which seek the conservation and enhancement of the historic environment, in part through protection of a range of heritage assets. DH2 does note that other Local Plan policy requirements including, inter alia, affordable housing, affordable workspace, inclusive design and sustainability standards, are relevant considerations when determining whether significant harm to an asset is acceptable.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	++	<p>Policy DH1 will have a significant positive effect. Site potential for development and site density levels must be fully optimised, in order to make the best use of the scarce land resource in the borough. The design of development should create a liveable, human scale and massing.</p> <p>Policy DH2 will have a significant positive effect. The optimal use of a site includes consideration of site restrictions, including heritage assets. While the policy does err on protection of assets, it also has flexibility to accommodate change and allow for increases in development opportunities.</p>
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>
4. Promote liveable neighbourhoods which support	+	0	<p>Policy will have a positive effect through ensuring site potential for development and site density levels must be fully 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>

IIA Objective	Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Policy DH2: Heritage assets	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)
good quality accessible services and sustainable lifestyles			There is no effect for policy DH2.
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	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>There is no effect for policy DH2.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	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 policy DH2.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	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> <p>There is no effect for policy DH2.</p>

IIA Objective	Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Policy DH2: Heritage assets	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>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>There is no effect for policy DH2.</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>There are no effects for policies DH1 and DH2.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	<p>Policy DH2 will have a minor positive effect. The policy protects heritage assets including historic open spaces.</p> <p>There is no effect for policy DH1.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect	0	0	<p>There are no effects for policies DH1 and DH2.</p>

IIA Objective	Policy DH1: Fostering innovation and conserving and enhancing the historic environment	Policy DH2: Heritage assets	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)
species and diversity.			
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	<p>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.</p> <p>There is no effect for policy DH2.</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	<p>There are no effects for policies DH1 and DH2.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	<p>There is no effect for policies DH1 and DH2.</p>

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Table x: Design and Heritage: Assessment of Policy DH3

IIA Objective	DH3: Building Heights	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 DH3 will have a 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
2. Ensure efficient use of land, buildings and infrastructure	++	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.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	++	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.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	No effect for policy DH3
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effect for policy DH3
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect for policy DH3
7. Improve the health and wellbeing of the population and reduce health inequalities	0	No effect for policy DH3
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	No effect for policy DH3

9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	<p>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.</p> <p>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	?	<p>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.</p> <p>The policy approach expects proposals to mitigate the individual and cumulative visual, functional and environmental impacts on the surrounding and wider context which could be taken to include open spaces, although not specifically mentioned.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect for policy DH3
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	No effect for policy DH3
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	No effect for policy DH3
14. Maximise protection and enhancement of natural resources including water, land and air	0	No effect for policy DH3

Table x: Design and Heritage: Assessment of Policy DH4: Basement Development

IIA Objective	DH4: Basement Development	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 policy will have a minor positive effect on 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.
2. Ensure efficient use of land, buildings and infrastructure	+	Basements add additional space to existing dwellings but they rarely add additional homes, because of amenity constraints, therefore this is not considered to have an effect in relation to efficient use of residential space. However it is considered minor positive efficient use of land in respect of commercial development as the approach makes clear it should be proportionate to the site and its context and the scale of development should be commensurate to the site context and building design which would potentially permit significant basements subject to other design requirements.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	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.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	No effect for policy DH4
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effects for this policy. Basement development rarely leads to additional homes as the basement space cannot be used for habitable rooms.
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect for policy DH4
7. Improve the health and wellbeing of the population and reduce health inequalities	+	The policy 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.

IIA Objective	DH4: Basement Developm ent	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	No effect for policy DH4
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 for policy DH4
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	This policy 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.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	++	This policy 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	No effect for policy DH4
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	No effect for policy DH4
14. Maximise protection and enhancement of natural	+	The policy 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

IIA Objective	DH4: Basement Development	<p>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>
resources including water, land and air		<p>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>

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Table x: Design and Heritage: Assessment of Policies DH5 to DH8

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertiseme nts	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	+	0	++	+	<p>DH5 will have a 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>DH6 makes clear that advertisements should contribute to a safe and attractive environment; where necessary adverts are considered in context of amenity and public safety under the relevant regulations with particular restrictions and guidance on illuminated advertisements provided in the policy. Overall the effect of the policy on controlling adverts is considered to be neutral balancing the need to manage negative impacts with probability that proposals will do little enhance the built environment.</p> <p>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>DH8 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: Advertiseme nts	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		+		+	<p>DH5 has no effect</p> <p>DH6 will make use of previously developed sites in particular temporary use of sites for shroud advertisements which will have a positive effect on optimising use of land through providing interest in what would otherwise be a blank scaffold whilst a site undergoes redevelopment.</p> <p>DH7 has no effect</p> <p>DH8 has a 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>DH5 has no effect</p> <p>DH6 makes clear advertisements should respect local context, including listed buildings and conservation areas so is considered minor positive.</p> <p>DH7 will have a minor positive effect on heritage assets given that it aims to respect the local street scene, the building and its design detail. Reference to Islington Urban Design Guide is made. In relation to shops converting to residential use retention of the shop fenestration is expected to maintain the streetscene; which all contribute positively to conserving the wider historic and cultural environment in Islington with small shops an important local characteristic of the borough.</p> <p>DH8 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: Advertiseme nts	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>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>DH6, DH7 and DH8 will have no effect</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++				<p>DH5 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>DH6, DH7 and DH8 will have no effect</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect
7. Improve the health and wellbeing of the population and reduce health inequalities	++	0	0	+	<p>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>DH8 may have minor positive effect on peoples health and wellbeing through the creation of new public arts by ensuring art/installations are visible and able to be viewed by people.</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertiseme nts	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	DH5 will support 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. Policies DH6, DH7 and DH8 will have no effect
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
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

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertiseme nts	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)
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
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

Table x: Strategic Infrastructure: Assessment of Policies ST1 to ST4

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommu- nications, communications and utility equipment	ST4: Water Infrastruc- ture	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>Policies ST1 and ST4 have no effect</p> <p>Policy ST2 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 cross references the housing policy H4 which provides more detailed guidance.</p> <p>Policy ST3 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>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utility equipment	ST4: Water 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	++	++	+	++	<p>Policy ST1 will have a 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>Similar to Policy ST1 Policy ST2 will also have a significant positive effect balancing development needs of the borough. 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 as it does not consider infrastructure needs of telecoms which is covered under policy ST1.</p> <p>Policy ST4 will have a 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>
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>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utility equipment	ST4: Water 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)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	0	0	0	<p>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 and the policy will be supported by an evidence base; the updated Infrastructure Delivery Plan.</p> <p>Policies ST2 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	<p>Policies ST1 to ST4 will have no effect</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	0	0	0	<p>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 should help ensure residents have equal opportunities to facilities and services across the borough.</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	0	<p>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 should help fund where necessary improvements to access open spaces and health facilities which will help to support residents needs.</p> <p>Policies ST2 to 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	0	<p>Policies ST1 to ST4 will have no effect</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utility equipment	ST4: Water 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	0	<p>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 should help fund where necessary improvements to the transport network.</p> <p>Policies ST2 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 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	<p>Policies ST1 to ST4 will have no effect</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	0	0	0	<p>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 should help fund where necessary improvements to the climate change infrastructure.</p> <p>Policies ST2 to ST4 will have no effect.</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommu- nications, communica- tions and utility equipment	ST4: Water Infrastruc- ture	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	<p>Policies ST1 and ST3 to ST4 have no effect.</p> <p>Policy ST2 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>
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	++	<p>Policies ST1 to ST3 have no effect.</p> <p>Policy ST4 will have a 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>

APPENDIX 4J: BUNHILL AND CLERKENWELL AAP POLICY ASSESSMENTS

Table x: Bunhill and Clerkenwell AAP: Policy BC1

IIA Objective	BC1 Prioritising Office Use	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>The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment.</p> <p>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>The policy will likely have a significant positive effect on the efficient use of land.</p> <p>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.</p> <p>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.</p> <p>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.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	<p>No significant effects for this policy.</p>

IIA Objective	BC1 Prioritising Office Use	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>No significant effects for this policy.</p> <p>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 significantly affected.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	<p>The alternative will likely have a minor negative effect on the provision of affordable housing.</p> <p>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.</p> <p>However the Council has assessed that it can meet its housing target with this policy in place.</p>
6. Promote social inclusion , equality, diversity and community cohesion	+	<p>The policy will lead to minor positive effects in terms of social inclusion, equality, diversity, and community cohesion.</p> <p>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.</p> <p>The Council has policies whereby new office developments must provide a proportion as affordable workspace. These policies will result in more office development and therefore more affordable workspace.</p> <p>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>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	<p>No significant effects for this policy.</p>

IIA Objective	BC1 Prioritising Office Use	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 policy will likely have significant positive effects on economic growth and providing employment opportunities.</p> <p>The policy will have positive effects on economic growth by providing much needed floorspace for employment uses, in particular office uses.</p> <p>There is high demand in Islington for office floorspace. Demand for employment floorspace is projected to far 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.</p> <p>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.</p> <p>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>
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 significant effects for this policy.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	<p>No significant effects for this policy.</p>

IIA Objective	BC1 Prioritising Office Use	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 significant effects for this policy. Both residential and commercial uses will be required to integrate green infrastructure where possible.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	No significant effects for this policy.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	No significant effects for this policy.

IIA Objective	BC1 Prioritising Office Use	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	No significant effects for this policy.

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Table x: Bunhill and Clerkenwell AAP: Policy BC2

IIA Objective	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	No significant effects for this policy.
2. Ensure efficient use of land, buildings and infrastructure	+	The policy will have positive effects 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	No significant effects for this policy.
4. Promote liveable neighbourhoods which support good quality accessible services	+	The policy will have a positive effect on liveable neighbourhoods. 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.

IIA Objective	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)
and sustainable lifestyles		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.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No significant effects for this policy.
6. Promote social inclusion , equality, diversity and community cohesion	0	No significant effects for this policy.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	This policy will have positive effects 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.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	The policy 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 best locations, and supporting the important economic role these uses play in Bunhill and Clerkenwell and London as a whole. The policy will also result in a more liveable and functional neighbourhoods which will improve the attractiveness of the area.
9. Minimise the need to travel and	0	No significant effects for this policy.

IIA Objective	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)
create accessible, safe and sustainable 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	No significant effects for this policy.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No significant effects for this policy.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	No significant effects for this policy.

IIA Objective	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)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	No significant effects for this policy.
14. Maximise protection and enhancement of natural resources including water, land and air	0	No significant effects for this policy.

Table x: Bunhill and Clerkenwell AAP: Policies BC4 and BC8

IIA Objective	Policy BC4: City Road	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)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>There is no effect for policy BC4. The policy includes requirements related to urban design, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.</p> <p>There is no effect for policy BC8. The policy includes requirements related to urban design, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	<p>There is a minor positive effect for policies BC4 to BC8. 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 within the Central Activities Zone.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	<p>There is no effect for policy BC4. See response to IIA Objective 1.</p> <p>There is a minor positive effect for policy BC8. Preserving heritage assets is the starting point for development in this area, reflecting its uniqueness. There are also specific heritage assets identified for this area.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	<p>There is no effect for policy BC4. See response to IIA Objective 1.</p> <p>There is no effect for policy BC8. See response to IIA Objective 1.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	0	<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>There is no effect for policy BC8. See response to IIA Objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	<p>There is no effect for policy BC4. See response to IIA Objective 1.</p> <p>There is no effect for policy BC8. See response to IIA Objective 1.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	<p>There is no effect for policy BC4. See response to IIA Objective 1.</p> <p>There is no effect for policy BC8. See response to IIA Objective 1.</p>
8. Foster sustainable economic growth and increase employment	0	0	<p>There is a minor positive effect for policy BC4. There is 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.</p>

IIA Objective	Policy BC4: City Road	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)
opportunities across a range of sectors and business sizes			There is no effect for policy BC8. See response to IIA 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	0	There is no effect for policy BC4. See response to IIA Objective 1. There is no effect for policy BC8. See response to IIA Objective 1.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	There is no effect for policy BC4. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space. These criteria reflect plan objectives and other plan policies which are assessed separately, particularly green infrastructure policies in chapter 5 of the Local Plan. There is no effect for policy BC8. See response to IIA Objective 1.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	+	0	There is a minor positive effect for policy BC4. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space, to protect use and function of this space. There is no effect for policy BC8. See response to IIA Objective 1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	There is a minor positive effect for policy BC4. The 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 policy also sets out specific criteria for residential moorings on Regent's Canal, a designated open space. These criteria reflect plan objectives and other plan policies which are assessed separately, particularly green infrastructure policies in chapter 5 of the Local Plan. There is no effect for policy 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	There is no effect for policy BC4. See response to IIA Objective 1. There is no effect for policy BC8. See response to IIA Objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	+	0	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. There is no effect for policy BC8. See response to IIA Objective 1.

IIA Objective	Policy BC4: City Road	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)

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TABLE x: Assessment of Spatial Strategy policies BC3, BC5, BC6 and BC7

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	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	<p>There is no effect for policies BC5, BC6 and BC7. The policy includes requirements related to urban design, are the spatial expression of the plan objectives and other plan policies which are assessed separately. For example BC5 references integration and linking of high quality neighbouring public space such as Clerkenwell Green which is an expression of Local Plan policies T1 and T4.</p> <p>In addition BC3 will have a specific minor positive effect through the environmental improvements identified at Old Street roundabout and related public realm work.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	+	<p>There is a minor positive effect for policies BC3, BC5, BC6 and BC7. 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 within the Central Activities Zone.</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>There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	0	<p>There is no effect for policy BC3, BC5, BC6 and BC7. See response to IIA Objective 1.</p> <p>The policies includes requirements related to liveable neighbourhoods and access to services, for example BC5 references preservation and enhancement of Exmouth market Local Shopping Area, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	+	<p>There is no effect for policies BC3, BC5 and BC6. See response to IIA Objective 1.</p> <p>The redevelopment of Finsbury Leisure Centre referenced in BC7 will have an additional minor positive effect as it will deliver affordable housing. Finsbury Leisure Centre is also assessed as site allocation BC4.</p>
6. Promote social inclusion, equality,	0	0	0	0	<p>There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1. Policy BC5 includes support for the cultural quarter for example.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	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)
diversity and community cohesion					
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	0	+	<p>There is no effect for policy BC3, BC5 and BC6. See response to IIA Objective 1. The policies include requirements related to health and wellbeing, but these are the spatial expression of the plan objectives and other plan policies which are assessed separately.</p> <p>The redevelopment of Finsbury Leisure Centre referenced in BC7 and 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.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	+	<p>There is a minor positive effect for policy BC3 and BC7. There is specific reference to the importance of BC3 and BC7 to providing office floorspace including reference to the Moorfields site which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is no effect for policy BC5 and BC6. See response to IIA 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	0	There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1. There is specific reference to enhancement of public open space at Finsbury Square.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1.

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	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	0	0	There is no effect for policies BC3, BC5, BC6 and BC7. 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		There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air		+	0		There is no effect for policies BC3, BC5, BC6 and BC7. See response to IIA Objective 1.

Appendix 5a: Assessment of Site Allocations

APPENDIX 5A: ASSESSMENT OF SITE ALLOCATIONS

KING'S CROSS AND PENTONVILLE ROAD

IIA Objective / Site	1. HIGH QUALITY ENVIRONMEN	2. EFFICIEN T USE OF	3. HERITAG	4. LIVEABLE NEIGHBO URHOOD	5. HOUSING QUALITY	8. ECONOMI C GROWTH	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)
KC1: King's Cross Triangle Site, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1	0	++	0	+	+	+	<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 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. The allocation makes 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).</p>
KC2: 176-178 York Way, N1 OAZ	0	+	0	0	+	++	<p>KC2 is allocated for business-led, mixed use development.</p> <p>The intensification of business uses is the priority on this site, with an element of residential development also likely to be acceptable.</p>

						The Islington Tall Building Study suggests the north-western part of the 176-178 York Way part of the site 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, and would have positive effects on housing by providing additional homes including provision of affordable housing. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location. The allocation makes efficient use of land by proposing this significant uplift in floorspace.	
KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1	0	0	0	0	0	+	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 a refused planning permission which was refused due to the loss of daylight and sunlight, loss of outlook and sense of enclosure for neighbouring homes. However, it is considered that some uplift of employment floorspace is possible on site resulting in minor positive effects on economic development and no other effects.
KC4: Former York Road Station, 172-174 York Way, N1	+	+	+	0	+	+	KC4 is allocated for business-led development with an element of residential use. 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. There will also be potential for creation of a safer and more inclusive built environment with creation of new public open space. The allocation for business led use will have positive effects on economic growth, and positive effects on housing quality 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 will also have a positive effect reducing the effect on climate change and increased resource efficiency with the potential for this site to support the expansion of the council's decentralised energy network.
KC5: Belle Isle Frontage, land on the east side of York Way	+	+	0	0	0	++	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.

						The Islington Tall Building Study suggests this site would be an appropriate location for a local landmark building of up to 15 storeys (46m). 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.
KC6: 8 All Saints Street, N1 9RJ	0	0	0	0	0	+ KC6 is allocated for retention and reprovision of business floorspace, and potential for limited intensification of business use. Small scale commercial uses at ground floor level. The existing building is an acceptable context building. The allocation will likely have positive effects on economic development by providing additional employment floorspace.
KC7: All Saints Triangle, Caledonian Road, N1 9RR	+	0	0	+	0	+ KC7 is allocated for redevelopment for business use. 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. 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.

VALE ROYAL AND BREWERY ROAD LOCALLY SIGNIFICANT INDUSTRIAL SITE

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, adjacent 196-200 York Way, N7 9AX	+	++	+	0	0	++	<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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR2: 230-238 York Way, N7 9AG	+	++	+	0	0	++	<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 sets out 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 sites 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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

FULL

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR3: Tileyard Studios, Tileyard Road, N7 9AH	+	++	+	0	0	++	<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 sites 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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

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VR4: 20 Tileyard Road, N7 9AH	+	++	+	0	0	++	<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 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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

Full C

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR5: 4 Brandon Road, N7 9AA	+	++	+	0	0	++	<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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

Full Council

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR6: The Fitzpatrick Building, 188 York Way, N7 9AD	+	++	+	0	0	++	<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 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. 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. Business space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any business development on the site will be required to provide jobs and training opportunities for local residents.</p>

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VR7: 43-53 Brewery Road, N7 9QH	+	++	+	0	0	++	<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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR8: 55-61 Brewery Road, N7 9QH	+	++	+	0	0	++	<p>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.</p> <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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any business development on the site will be required to provide jobs and training opportunities for local residents.</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR9: Rebond House, 98-124 Brewery Road, N7 9BG	+	++	+	0	0	++	<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. 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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
VR10: 34 Brandon Road, N7 9AA	+	++	+	0	0	++	<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. 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. The space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy. Any development on the site will be required to provide jobs and training opportunities for local residents.</p>

ANGEL AND UPPER STREET

IA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
AUS1: Royal Bank of Scotland, 42 Islington High Street, N1 8EQ	+	+	0	+	0	+	AUS1 is allocated for intensification of office use with active retail use on the ground floor. 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. 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 Torren Street. This will improve the quality of the town centre environment making it a safer and more inclusive for people.
AUS2: Pride Court, 80-82 White Lion Street, N1 9PF	0	+	0	0	0	+	AUS2 is allocated for intensification of business floor space. 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 positive effect on the overall provision of business floorspace in the borough.
AUS3: Electricity substation, 84-89 White Lion Street, N1 9PF	0	++	0	0	0	++	AUS3 is allocated for further intensification of business floorspace. 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.
AUS4: Land at 90-92 White Lion Street, N1 9PF	+	++	0	0	0	+	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. 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. It will contribute to the provision of business floorspace needed for economic growth. 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.

AUS5: 94 White Lion Street (BSG House), N1 9PF	0	+	0	0	0	+	<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.</p>
AUS6: Sainsbury's, 31-41 Liverpool Road, N1 0RW	+	++	0	+	0	++	<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 should have a 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 improved permeability between White Conduit Street and Tolpuddle Street.</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.</p>
AUS7: 1-7 Torrens Street, EC1V 1NQ	+	+	0	++	0	+	<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.</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.</p>

AUS8: 161-169 Essex Road, N1 2SN	+	0	+	++	0	+	AUS8 is allocated for a mix of retail, culture and leisure uses are considered suitable on this site. 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. 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. The allocation also positively contributes to creating a high quality environment 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.
AUS9: 10-14 White Lion Street, N1 9PD	0	+	0	0	0	++	AUS9 is allocated for intensification of business use. 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. Provision of active frontages helps in creating a better quality environment in the Angel Town centre.
AUS10: 1-9 White Lion Street, N1 9PD	+	+	0	0	0	++	AUS10 is allocated for intensification of business use. 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. Provision of active frontages helps in creating a better quality environment in the Angel Town centre.
AUS11: Collins Theatre, 13-17 Islington Green, N1 2XN	+	0	+	++	0	+	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.

AUS12: Public Carriage Office, 15 Penton Street, N1 9PU	0	++	0	+	+	++	<p>AUS12 is allocated for mixed-use development for re-provision and intensification of business floorspace with an element of residential use.</p> <p>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 element which would help to meet need in the borough.</p>
AUS13: N1 Centre, Parkfield Street, N1	+	+	0	+	0	+	<p>AUS13 is allocated for the protection and enhancement of the open space with some intensification of retail.</p> <p>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. The protection of open space will contribute to liveable neighbourhoods since it provides a publicly accessible space for people in the centre.</p>
AUS14: 46-52 Pentonville Road, N1 9HF	0	0	0	+	0	+	<p>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.</p> <p>The provision of B1a and D1 uses should have a positive impact on the liveability of the area by providing an additional educational facility in the area, as well as further employment opportunities to support economic growth. Given that this allocation is for change of use, there is little or no opportunity for intensifying the use of land.</p>
AUS15: Windsor Street Car Park, N1 8QF	+	+	0	+	++	0	<p>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.</p>

AUS16: Angel Square, EC1V 1NY	+	0	+	+	0	+	AUS16 is allocated for intensification of office use. The allocation protects the business use of the site which positively contributes to economic growth. It seeks improvements to the public realm in the town centre which would make it a more pleasant place to visit. The allocation details a number of heritage designations relevant to the site which should be considered as part of any development proposals.
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NAG'S HEAD AND UPPER HOLLOWAY

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG	++	++	0	++	+	++	<p>NH1 is allocated for retail-led mixed-use development, with provision of improved retail provision (in terms of quantum and quality) as well as new office floorspace; residential accommodation may be acceptable on the upper floors, subject to amenity issues being addressed. 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 is an intensification and 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 opportunity for employment as well as increase 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 public accessibility to public open space. The site represents an opportunity for a more efficient use of land in particular if the amount of car parking is reduced would help meet objectives to reduce peoples use of the car.</p>
NH2: 368-376 Holloway Road (Argos and adjoining shops), N7 6PN	++	+	0	++	+	++	<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 intensification and 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 opportunity for employment as well as increase supply of residential floorspace all of which result in positive effects. The corner location is prominent</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
							and offers a design opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. 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.
NH3: 443-453 Holloway Road, N7 6LJ	+	++	+	0	0	++	<p>NH3 is allocated for intensification of business uses and commercial uses along Holloway Road.</p> <p>The allocation is an intensification and opportunity to increase existing business floorspace in a Priority Employment Location which is considered an appropriate 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 will help create a safer and more sustainable environment where there is currently no active frontage. Will also have no effect on promoting liveable neighbourhoods – the location is unlikely to improve residents connection to facilities and amenities through providing access through the site. Retention of the locally listed buildings is highlighted as a development consideration.</p>
NH4: Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP	++	++	0	+	+	0	<p>NH4 is allocated for residential development subject to the satisfactory resolution of amenity issues to neighbouring residential properties. 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 no effect on economic growth or health related objectives. 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.</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road, N7	++	+	+	0	+	++	NH5 is allocated for mixed use residential and business use. The allocation is for redevelopment of vehicle repair depot and warehouse and represents an intensification of use of the site having a positive effect on optimising use of previously developed land and buildings and will enhance local character and distinctiveness depending on final scheme. The only minor negative effect relates whether it is an appropriate location for residential use as this is a challenging environmental location which suffers from traffic related pollution – given the nature of the borough this is a common issue for many site allocations. This also has a negative effect on improving physical health of population. The site has 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. The development considerations highlight the conservation area designation.
NH6: 11-13 Benwell Road	0	+	0	0	0	+	NH6 is allocated for retention and re-provision of business floorspace. Intensification of the former warehouse in office use will have a positive effect on optimising use of previously developed land and buildings 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 Benwell Road.
NH7: Holloway Prison, Parkhurst Road, N7 0NU	++	+	+	++	++	+	NH7 is allocated for residential-led development with community uses (including a women's centre building), open space and an energy centre. The allocation will have a positive effect in optimising the use of previously developed land and buildings, providing residential and community 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. Depending on the final design, development of this currently closed site will enhance local character and distinctiveness. 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. 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 environmental benefits not identified by this assessment by reducing resource use and reducing the boroughs contribution to climate change with the new energy centre.

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
NH8: 457-463 Holloway Road, N7 6LJ	+	+	++	0	+	++	NH8 is allocated for retention and sensitive refurbishment of this locally listed building to provide employment and residential uses. 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 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.
NH9: Islington Arts Factory, 2 and 2a Parkhurst Road, N7	+	+	+	++	+	++	NH9 is allocated for provision of replacement community floorspace, residential use and 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 distinctiveness and conservation area depending on implementation of the consented scheme. The re-provision of the Islington Arts Factory community facility will have a positive effect on liveable neighbourhoods. The provision of employment floorspace will have a significant 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.
NH10: 45 Hornsey Road and 252 Holloway Road	+	+	0	++	-	+	NH10 is allocated for redevelopment for conventional housing, however, given its location adjacent to LMU, 45 Hornsey Road may be also 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.

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
							The allocation will have a positive effect on optimising use of previously developed land and buildings and is currently used for storage and warehouse so would represent an intensification of the site, although would have a negative effect on delivery of affordable housing. On the basis that the site will be used for student housing the most significant positive effect will be the benefit to liveable neighbourhoods and attracting students into the borough. Although provision of student housing would be to the detriment of provision of affordable housing which would register a negative effect for delivering quality housing. 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.
NH11: Mamma Roma, 377 Holloway Road, N7 0RN	0	+	0	+	0	+	NH11 is allocated for the intensification for business use with replacement warehouse space and other business use above. The allocation is for redevelopment of an existing single storey warehouse and will have a positive effect on optimising use of previously developed land and buildings 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.
NH12: 379-391 Camden Road and 341-345 Holloway Road	++	+	+	++	+	++	NH12 is allocated for reprovision 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. The allocation is an intensification and 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 opportunity for employment as well as increase supply of residential floorspace all 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

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
							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.
NH13: 166-220 Holloway Road	+	+	0	++	0	+	<p>NH13 is allocated for improvements to 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 on optimising use of previously developed land and buildings. Most significant positive effect will be the benefit to 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>
NH14: 236-250 Holloway Road and 29 Hornsey Road	+	+	+	++	0	+	<p>NH14 is allocated for improvements to 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 on optimising use of previously developed land and buildings. Most significant positive effect 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 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 borough. The development considerations highlight the potential impact on the local viewing corridor.</p>

FINSBURY PARK

IIA Objective / Site	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. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	6. ECONOMIC GROWTH	7. CLIMATE CHANGE ADAPTATION	8. SOCIAL INCLUSIVENESS	
FP1: City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street	+	++	0	+	+	++			<p>The site allocation for FP1 aligns with the extant planning permission for two 21 storey towers and 3-10 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 residents 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. The scale of the development may have a detrimental effect on the setting of listed buildings close to the site.</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
FP2: Morris Place/Wells Terrace (including Clifton House)	++	+	0	+	+	++	<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 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. 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. Development could also see the implementation of some small scale green infrastructure such as green roofs and footpath sides. The current building is of poor architectural quality and holds no heritage significance. Development of the site may obscure current views but this would be a minimal impact taking into account the views already obstructed by the City North scheme.</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
FP3: Finsbury Park Station and Island, Seven Sisters Road	++	+	0	+	+	+	<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. 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 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 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. Permeability improvements at the site would promote liveable neighbourhoods by improving 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. 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. The development would optimise the use of previously developed land and provide upgraded space for retail, office and residential uses in a highly accessible location. Redevelopment could improve the aesthetic of the site and achieve some unity in character with the surrounding tall building development sites. There is however some uncertainty around the delivery of this site in particular the over station redevelopment and the allocation recognises this as a long term ambition.</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
FP4: 129-131 & 133 Fonthill Road and 13 Goodwin Street	+	+	0	+	0	++	<p>FP4 site 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 through providing additional opportunity 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. 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). Providing spaces within the same building to complement the SSA function of Fonthill Road will allow the development to accommodate the evolving economic needs of the area. There are no heritage considerations with the site. The development would not only improve the site but Fonthill Road as a whole and thus promote a sustainable town centre that sells and makes. No residential uses are allocated to the site and it is too small to accommodate any without losing commercial and office space.</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
FP5: Conservative Club, 1 Prah Road	++	+	++	+	0	++	<p>FP5 is allocated for Business floorspace, particularly workspace suitable for SMEs. .</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 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. Housing is not proposed on the site and the site is too small to accommodate housing and other town centre uses that require separate cores. Housing could be suitable on site in principle but SME workspace is considered more appropriate. Prioritising delivery of employment space in this town centre location is considered appropriate and helps 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.</p>
FP6: Cyma Service Station, 201A Seven Sisters Road	+	+	+	0	0	++	<p>FP6 site is allocated for redevelopment of the site 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 and long term vacancy of the site. 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. Prioritising delivery of employment space in this town centre location is considered appropriate and helps meet wider needs for employment growth in the borough. Housing is not proposed on the site and the site is too small to accommodate housing and other town centre uses that require separate cores. Housing could be suitable on site in principle but SME workspace is considered more appropriate. .</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
FP7: Holloway Police Station, 284 Hornsey Road	++	+	+	+	++	++	<p>FP7 is allocated for redevelopment of the police station 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. There are no heritage considerations apart from the need to preserve the Alexandra Palace to St Paul's Cathedral viewing corridor. The development will be residential led and provide affordable housing. 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.</p>
FP8: 113-119 Fonthill Road	++	++	+	+	0	++	<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., 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 identified in SP6 which identifies the positive contribution to employment growth that Finsbury Park can make from potential to develop as a satellite location for B use classes which will benefit the economy. The site is identified as having potential for a tall building in this location which would help to visually mediate between the City North development and lower surrounding context heights. Retention of retail on the ground floor will retain Fonthill Road's retail character supporting these services both for residents and the space for business use. There will be no significant impacts to heritage by redeveloping the site but the design should be sympathetic to the adjoining locally listed Edwardian former postal sorting office</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
FP9: 221-233 Seven Sisters Road	++	++	+	++	+	++	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. 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 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 by re-providing upgraded community space that will interact more positively with the street scene. An intensification of retail uses will bolster the range of main town centre uses in a highly accessible location. 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.

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
FP10: Former George Robey Public House, 240 Seven Sisters Road	+	+	+	+	0	+	<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 with more inclusive shop units created. 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 Londons economy and may help 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.</p>
FP11: 139-149 Fonthill Road	++	+	+	++	+	++	<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 setting of the locally listed building 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. There is however a loss of D2 space which sees a decrease in community space and thus decreases the quality of a liveable neighbourhood in this sense. 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. 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>

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
FP12: 179-199 Hornsey Road	+	++	++	+	+	0	FP12 is allocated for mixed use development with the retention of some D1 floorspace where necessary. The provision of residential use at the site is subject to the loss of existing social infrastructure uses being robustly justified... The allocation seeks to optimise the use of the previously developed 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.
FP13: Tesco, 103-115 Stroud Green Road	+	++	0	+	++	0	FP13 is allocated for the re-provision of retail floorspace and D1 uses with scope for residential development at upper levels. 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 and D1 floor space. This would 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.

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
FP14: Andover Estate	+	++	+	++	++	++	FP14 is allocated for residential development with retail, business and community floorspace including affordable workspace and public realm improvements. Development will intensify residential density of the estate and will improve the public realm, increasing connections and permeability and therefore increasing inclusivity. 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. Several heritage considerations will see the protection of the Alexandra Palace to St Paul's Cathedral strategic viewing corridor, and sympathetic development in relation to the Tollington Park Conservation Area and the adjacent to Grade II listed building 260 Hornsey Road. Development will promote the estate as a more liveable neighbourhood, providing new retail and commercial space and a significant amount of affordable workspace (5,159 sqm) that will potentially enable local people to secure business space.
FP15: 216-220 Seven Sisters Road	++	++	+	++	0	++	FP15 is allocated for office/business-led development with retail at ground floor level. 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 identified in SP6 which identifies the positive contribution to employment growth that Finsbury Park can make from potential to develop as a satellite location for B use classes which will benefit the economy. The 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 direct positive impact on promoting a liveable neighbourhood, providing main town centre uses and services for residents.

ARCHWAY

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
ARCH1: Vorley Road/Archway Bus Station, N19	0	++	0	+	++	+	<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, marking a new entrance and creating an internal route through the Archway Centre complex to connect with Junction Road, would promote liveable neighbourhoods by improving residents connection to facilities and amenities. The development considerations point out that there is the potential for a tall building in this location to impact on existing residential development at Girdlestone Estate, which requires an appropriate design response.</p>
ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ	0	+	0	+	0	++	<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, optimise the use of previously developed land and contribute to the economic growth of the borough.</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
ARCH3: Archway Central Methodist Hall, Archway Close, N19 3TD	0	0	+	+	0	+	<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 in to use. There is limited capacity for intensification at the site.</p>
ARCH4: Whittington Hospital Ancillary Buildings, N19	0	0	0	+	+	+	<p>ARCH4 is allocated for the provision of health uses with an element of residential development.</p> <p>The allocation has a cumulative impact on the provision of social infrastructure in the borough. It plays an important role in creating liveable neighbourhoods by providing essential social services and supporting the economy by providing employment opportunities. There is also a provision of residential units which has a positive contribution to the overall housing target.</p>
ARCH5: Archway Campus, Highgate Hill, N19	0	++	0	0	++	0	<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. A level of social infrastructure loss is expected. This may have a negative impact on provision of services for residents – the training and educational opportunity of the former use has moved out of the borough and been consolidated elsewhere in London. So whilst locally there may be an impact this is considered to be outweighed by the opportunity to provide a more local healthcare service therefore a neutral impact has been identified.</p>

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
ARCH6: Job Centre, 1 Elthorne Road , N19 4AL	0	+	0	0	+	+	ARCH6 is allocated for business led mixed-use development, including provision of SME workspace, and 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, 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 effects. The allocation will optimise the use of previously developed land and provide affordable housing as part of any residential element. d
ARCH7: 207A Junction Road, N19 5QA	0	+	0	0	+	0	ARCH7 is allocated for residential development with potential to re-provide the existing D2 use. 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. The allocation also suggests the existing D2 use of the site may be reprovided, which could positively contribute to the vitality of the area. However, this contribution is considered very minimal in this case.
ARCH8: Brookstone House, 4-6 Elthorne Road, N19 4AJ	+	+	0	0	0	+	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. 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.
ARCH9: 724 Holloway Road, N19 3JD	0	+	0	0	0	+	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.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
ARCH10: Elthorne Estate, Archway, N19 4AG	+	+	0	+	++	0	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. In addition, the associated public realm improvements should improve the quality of the local environment making the neighbourhood more liveable.
ARCH11: Dwell House, 619-639 Holloway Road, N19 5SS	0	+	0	+	0	+	ARCH11 is allocated for mixed-use residential/ business/retail development. The allocation is an opportunity to increase retail and residential floorspace and add business 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 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.
ARCH12: 798-804 Holloway Road, N19 3JH	0	0	0	+	0	+	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. The allocation is an opportunity to increase retail and residential floorspace and add business 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 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.

HIGHBURY CORNER AND HOLLOWAY ROAD

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. INFRASTRUCTURE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
HC1: 12, 16-18, 20-22 and 24 Highbury Corner	0	+	0	+	0	+	<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.</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. 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>
HC2: Spring House, 6-38 Holloway Road	0	+	0	+	0	+	<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. Intensification of the site will optimise use of previously developed land. The allocation specifies that the site is adjacent to two conservation areas and near to listed buildings, which must be considered by applicants in drawing up plans for the site. s</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. INFLUENCE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
HC3: Highbury and Islington Station, Holloway Road	++	+	0	++	+	+	<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. There is some uncertainty around the delivery of this site in particular delivery of the office floorspace and the decking over the railway lines.</p>
HC4: Dixon Clark Court, Canonbury Road	+	++	0	+	++	0	<p>HC4 is allocated for additional housing, community space and public realm improvements. 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. It also provides an opportunity for community space and public realm improvements that enhance the quality and liveability of the area.</p>
HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London	+	+	+	+	0	+	<p>HC5 is allocated for mixed use commercial and residential redevelopment. 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. The allocation states that views from Holloway Road of the Union Chapel local landmark should be protected, as they are considered to have a positive impact on the historical character of the built environment. In addition, the development considerations specify that any proposals must be sensitively designed with regards to the adjacent Grade II listed building.</p>

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF	3. INFLUENCE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
HC6: Land adjacent to 40-44 Holloway Road	0	+	0	0	0	+	<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.</p>

OTHER IMPORTANT SITES

IIA Objective / Site	1. HIGH QUALITY	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
OIS1: Leroy House, 436 Essex Road, N1 3QP	+	+	0	0	0	+	<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 and provide more opportunity for residents to access employment in the borough. 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.</p>
OIS2: The Ivories, 6-8 Northampton Street, N1 2HY	0	+	0	0	0	+	<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 in particular the cultural and third sectors and provide more opportunity for residents to access employment in the borough. Intensification of the site will optimise use of previously developed land.</p>
OIS3: Belgravia Workshops, 157-163 Marlborough Road, N19 4NF	0	+	0	+	0	+	<p>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.</p> <p>The allocation will help support economic growth in particular the cultural and third sectors and provide more opportunity for residents to access employment in the borough. Intensification of the site will optimise use of previously developed land.</p>

OIS4: 1 Kingsland Passage and BT Telephone Exchange, Kingsland Green	0	+	0	+	+	+	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. 1 Kingsland Passage has planning permission for 360sqm of additional office floorspace (B1a). The allocation is an opportunity to increase existing 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. The allocation promotes liveable neighbourhoods by requiring improvements to permeability between the site and the neighbouring Burder Close Estate.
OIS5: Bush Industrial Estate, Station Road, N19 5UN	0	+	0	0	0	++	OIS5 is allocated for the retention and intensification for industrial uses (B1c, B2 and B8). Office floorspace will only be acceptable as part of a hybrid workspace scheme. 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.
OIS6: 100 Hornsey Road, N7 7NG	+	+	0	+	++	0	OIS6 is allocated for residential redevelopment with the provision of nursery, open space and public realm improvements. The most significant positive effect of the allocation will be to 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. The allocation promotes liveable neighbourhoods by requiring enhancements to the Hornsey Road streetscene. There are no effects on heritage or economic objectives.
OIS7: Highbury Delivery Office, 2 Hamilton Lane, N5 1SW	0	+	0	0	+	++	OIS7 is allocated for retention and reprovision of business floorspace, an element of residential use may be acceptable. This will have a positive impact on economic growth. An element of residential use may be acceptable which would contribute towards meeting the borough's housing need including affordable housing. The allocation seeks to optimise the use of the site, whilst respecting the constraints placed on development by its backland location.
OIS8: Legard Works, 17a Legard Road	0	0	0	0	0	+	OIS8 is allocated for retention and reprovision of business floorspace, and potential for limited intensification of business use. This will positively contribute to the borough's economic growth.

OIS9: Ladbroke House, 62-66 Highbury Grove	0	0	0	+	0	+	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.
OIS10: Hornsey Road and Grenville Works, 2A Grenville Road	0	+	0	0	0	+	OIS10 is allocated for business-led redevelopment with reprovision and intensification for business use (particularly B1c). The allocation optimises the use of previously developed land and has a positive impact on local economic growth.
OIS11: Park View Estate, Collins Road	+	+	0	+	+	0	OIS11 is allocated for residential development including the provision/improvement of residential amenity space, community floorspace; and public realm improvements. It will positively contribute to housing provision in the borough. The allocation also requires the provision/improvements to residential amenity space, community floorspace and the public realm. This will have a positive impact on both the quality of the Park View Estate creating a safer and more inclusive environment.
OIS12: 202-210 Fairbridge Road	0	+	0	0	+	+	The site has planning permission for mixed use business (B1 and B8) and residential. The allocation of OIS12 aims should the site be subject to further amendments or new applications, for proposals to prioritise intensification of business floorspace. Therefore it positively contributes to economic growth and providing affordable housing provision in the borough.
OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road	0	0	0	++	+	0	OIS13 is allocated for reprovision of the community centre. Residential development may be acceptable on the Ronalds Road frontage of the site. 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.
OIS14: 17-23 Beaumont Rise	+	+	0	+	++	0	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. 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.

OIS15: Athenaeum Court, 94 Highbury New Park	0	+	0	0	+	0	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.
OIS16: Harvist Estate Car Park	+	+	0	+	+	0	OIS16 is allocated for residential development with associated amenity space and improvements to the public realm. This is considered to have a very 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.
OIS17: Hathersage and Besant Courts, Newington Green	+	+	0	+	++	0	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. The allocation requires improvements to the permeability of the site which will improve the quality of the environment creating a safer and more inclusive environment.
OIS18: Wedmore Estate Car Park	+	+	0	0	+	0	OIS18 is allocated for residential development. 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. 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.
OIS19: 25-27 Horsell Road	0	0	0	0	0	+	OIS19 is allocated for intensification of business floorspace prioritised. The allocation aims to protect business floorspace with limited intensification which is positive for economic growth.
OIS20: Vernon Square, Penton Rise	0	0	0	0	0	+	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 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.

OIS21: Former railway sidings adjacent to Caledonian Road Station	0	++	-	0	+	+	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. 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.
OIS22: 114 Balls Pond Road and 1 King Henry's Walk	0	++	0	0	++	0	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.
OIS23: 1 Lowther Road	0	0	0	+	0	0	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. 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. However, the potential for intensification is considered limited due to site constraints and the character of the surrounding area.

OIS24: Pentonville Prison, Caledonian Road	++	+	++	+	++	+	<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 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. 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 concern of the allocation.</p>
OIS25: Charles Simmons House, 3 Margery Street	+	+	0	0	+	0	<p>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 and may improve the immediate environment with landscaping.</p>
OIS26: Amwell Street Water Pumping Station	0	0	+	0	0	0	<p>OIS26 is allocated for conservation of heritage assets and sensitive re-use of existing buildings for residential or office use.</p> <p>The allocation aims to preserve a Grade II listed site which will positively contribute to the historical character of the borough.</p>

BUNHILL AND CLERKENWELL

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	6. ECONOMIC GROWTH	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)
BC1: City Barbican Thistle Hotel, Central Street, EC1V 8DS	+	0	0	0	0	+	<p>BC1 is allocated for refurbishment or redevelopment of the existing buildings for office-led mixed use development. Reprovision 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 positive effect on the economic growth of the borough. Retaining the hotel will also 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>
BC2: City Forum, 250 City Road, EC1V 2PU	+	0	0	0	++	++	<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 significant positive effects on a number of criteria, but in particular on housing and economic growth by providing a large number of new homes, affordable homes and a significant quantum of office floorspace. This allocation will have positive effects on housing and economic development by ensuring any amendments maximise affordable housing and affordable workspace. In addition the allocation will have a 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.</p>
BC3: Islington Boat Club, 16-	+	+	0	+	+	0	BC3 is allocated for refurbishment of boat club facilities and provision of residential units.

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34 Graham Street, N1 8JX							Refurbishment of the boat club will have 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 allocation represents a more efficient use of land by providing new housing on the site which at present only has the boat club. Improved public access to the basin is also a feature of the allocation.
BC4: Finsbury Leisure Centre, EC1V 3PU	+	+	0	++	++	0	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. The proposal will therefore 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 scheme will have environmental benefits not identified by this assessment by reducing resource use and reducing the boroughs contribution to climate change with the new energy centre. There will be positive effects on the local environment with an improved public realm and access to improved sports facilities which will have health benefits.
BC5: London College of Fashion Golden Lane Campus	0	+	0	0	0	++	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. This allocation will have significant positive effects on economic development by providing employment (office) floorspace in an appropriate location in the CAZ. The allocation presents an opportunity to optimise the use of previously developed buildings as well as some currently 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 Islington's residents needs. The allocation details designations relevant to the site which much be

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							considered carefully in development proposals, including its locally listed status and location within the St. Luke's conservation area.
BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street, EC1V 9NH	+	+	0	+	++	0	BC6 is allocated for residential development. The site has planning permission for the construction of 55 new homes, a community centre (D1 use), two flexible A1/A2 use units and the provision of a new amenity space. There will be significant positive effects on housing by providing 55 additional homes, 70% of which will be affordable. The development will have positive effects on liveable neighbourhoods and the local environment by maximising passive surveillance and a number of improvements to the public realm and access.
BC7: 198-208 Old Street (petrol station), EC1V 9FR	+	+	+	+	0	+	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. This allocation will improve the environment, make more efficient use of land, and make more liveable neighbourhoods as the petrol station provides a poor quality urban environment with large areas of hard standing and large areas of unattractive advertising signage and lighting. The allocation will have positive effects on economic development by providing business / employment uses which will benefit economic growth.
BC8: Old Street roundabout area, EC1V 9NR	++	0	0	0	0	0	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. The allocation will have significant positive effects on the local environment by improving the area for walking and cycling and by reducing the impacts of traffic including noise and air pollution. The improvements will also make it easier to enter and exit the station including providing step free access.
BC9: Inmarsat, 99 City Road (east of	0	++	0	0	0	+	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.

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roundabout), EC1Y 1BJ							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. This allocation will have positive effects on economic growth by providing employment (office) floorspace with floorspace for smaller businesses encouraged.
BC10: 254-262 Old Street (east of roundabout), EC1Y [comprises 250-254 Old Street; Albert House, 256 Old Street; and Golden Bee Bar, 262-264 Old Street], EC1Y 1BJ	+	++	0	+	0	+	BC10 is allocated for office led development with potential for retail, leisure or other active uses at ground floor level. Islington's Tall Building Study suggests that Albert House has potential to be redeveloped for a local landmark building of up to 11 commercial storeys (46m). Development should consider retention of 262 Old Street (the pub on the corner). This allocation will have positive effects on economic growth by providing employment (office) floorspace. There are also likely positive effects on the local environment as refurbishment or redevelopment presents an opportunity to substantially improve the quality of the local environment. Albert house offers a poor frontage to the street. 250-254 Old Street is a poor quality building with a large area of hard standing in the frontage and its redevelopment would have positive effects on the local environment and also could make more efficient use of the land as it is much smaller than the predominant building heights of the area. The allocation supports retention of the pub on the corner which adds character to the frontage and contributes to creating a vibrant social environment.
BC11: Longbow House, 14-20 Chiswell Street, EC1Y 4TW	0	0	+	0	0	+	BC11 is allocated for redevelopment of the site to provide a new, high quality building incorporating commercial office uses. This allocation will have positive effects on economic growth by providing employment (office) floorspace. The allocations also identifies the importance of the local heritage.
BC12: Cass Business School, 106 Bunhill Row, EC1Y 8TZ	0	0	0	+	0	+	BC12 is allocated for limited intensification of education floorspace. This will have positive effects on improving access to educational services which will support wider economic growth. 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.

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BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage, EC1Y 8TE	+	++	0	0	+	+	<p>BC13 allocated 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.</p> <p>This 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 positive effects on housing and economic growth through the development of employment floorspace, other commercial uses including retail, restaurant and hotel, and homes.</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. The removal of car parking will have sustainability benefits and contribute to wider strategic aims to encourage more sustainable forms for transport. The scheme will also create a safer and more inclusive environment by introducing active frontages and activity to this currently largely empty site.</p>
BC14: Peabody Whitecross Estate, Roscoe Street, EC1Y 8SX	+	+	0	+	+	0	<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 positive effects on housing by providing new homes (4 family homes is feasible). The allocation will also have positive effects on the local environment and create a safer and more inclusive neighbourhood by improving the open space and providing areas for sports and play. The allocation will make more efficient use of land by improving amenity spaces into multi-function open spaces.</p>
BC15: Richard Cledesley School, 99 Golden Lane, EC1Y 0TZ	0	+	0	0	++	+	<p>The allocation is for redevelopment of the former Richard Cledesley 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 will have positive effects on economic growth by providing a small amount of affordable workspace. The scheme makes efficient use of land by providing all of this along with additional D1 school floorspace on site. The residential building is a taller building (10 storeys on a 4 storey podium).</p>

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BC16: 36-43 Great Sutton Street (Berry Street), EC1V 0AB	0	0	+	0	0	+	BC16 is allocated for refurbishment or extension of the existing building to provide office development. As such the only likely effect of this allocation is positive effects on economic development by providing additional employment floorspace. The allocation also notes the various heritage constraints including location within a tier 1 Archaeological Priority Area.
BC17: Caxton House, 2 Farringdon Road, EC1M 3HN	+	0	0	+	0	++	Formerly in office and retail use, buildings were demolished to facilitate Elizabeth Line (Crossrail) construction works. 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. The allocation will have a significant positive effect on economic growth by providing additional better quality office and retail floorspace. The allocation will also have positive effects on the local environment and liveable neighbourhoods 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.
BC18: Cardinal Tower, 2A, 4-12 Farringdon Road and 48-50 Cowcross Street, EC1M 3HP	+	0	0	+	0	++	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 17,466 sqm of office floorspace and 1,050 sqm of ground floor retail floorspace. The site is being redeveloped as part of the Elizabeth Line (Crossrail) project. The allocation will have significant positive effects on economic growth by providing additional quality office floorspace. The allocation will also have positive effects on the local environment and liveable neighbourhoods 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.
BC19: Farringdon	+	0	0	0	0	+	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

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Place, 20 Farringdon Road, EC1M 3NH							effect of this allocation is positive effects on economic growth by providing additional employment floorspace and an improved and more inclusive public realm.
BC20: Lincoln Place, 50 Farringdon Road, EC1M 3NH	+	0	0	0	0	+	BC20 is allocated for intensification of business use with improved pedestrian connections to Turnmill Street and Farringdon Station. Due to the high existing use value and numerous site constraints the most likely scenario is a refurbishment of the existing building. Therefore there are minimal likely effects. The most likely effect is positive on economic growth by providing improved standard office accommodation. Should the site be redeveloped there may be positive effects on creating a high quality public realm by improving connections to the station.
BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street, Islington, London EC1M 5PQ	+	+	0	0	0	+	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. The allocation will likely have positive effects on the local environment and make better use of the land by developing an unsightly ground level car park into a quality contextual building with active uses on the ground floor. The allocation will also have positive effects on economic growth by providing a large amount of office floorspace as well as retail and leisure on the ground floor.
BC22: Vine Street Bridge, EC1R 3AU	++	+	0	+	0	0	BC22 is allocated for conversion of the bridge from carriageway space to public open space which would provide much needed green open space in the area, improve the local environment and help create a more liveable neighbourhood.
BC23: Sycamore House, 5 Sycamore Street, EC1Y 0SR	+	0	0	0	0	+	BC23 is allocated for the intensification of office use, which will provide positive effects on economic growth by providing more employment floorspace. The consented scheme will also have a positive effect on the local environment by replacing a building with a poor appearance with a high quality design. The new building will also improve the appearance

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							and be more contextual to the conservation area, albeit not enough to justify a positive effect in this assessment (the existing building is at best neutral to the conservation area).
BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue, EC1R 4RN	+	+	+	+	+	0	BC24 is allocated for residential led development and to include some reprovision of social infrastructure/ community use. This would have positive effects on housing quality by providing additional good quality homes and provision of services for residents. Affordable housing would be provided as part of the development of the site. The allocation should have positive effects on the historic environment 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 much to local character and identity.
BC25: Mount Pleasant Post Office, 45 Rosebery Avenue, EC1R 4TN	+	+	0	+	++	+	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. Development should have significant positive effects on housing by providing a significant number of new homes including affordable housing, as well as positive effects on economic growth with provision of office and retail floorspace. DevelopmentThe should also have positive effects on liveable neighbourhoods by providing community floorspace, and will improve the local environment by improving connectivity and walkability with public routes through the site.
BC26: 68-86 Farringdon Road (NCP carpark), EC1R 0BD	+	+	0	+	0	+	The site has planning permission for the demolition of the existing building and redevelopment to provide 4,242 sqm of office floorspace (B1), a hotel (C1) 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, and, alongside a

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							<p>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. It also replaces a multi storey car park which is housed in an unattractive building resulting in positive effects on the local environment (through replacement with a quality building with active frontages), and the environment by removing car parking and therefore reducing private car use. Provision of public open space would improve access for residents and development of the site as a whole would provide a safer, more permeable and inclusive site with links to the surrounding neighbourhood which previously did not exist.</p>
BC27: Finsbury Health Centre and Pine Street Day Centre, EC1R 0LP	+	0	++	++	0	0	<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 historic environment, 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 will have positive effects on the local environment, as the building is valued locally for its community and medical role in providing an essential service as well as its architecture.</p>
BC28: Angel Gate, Goswell Road, EC1V 2PT	+	+	0	0	0	++	<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 an uninspiring and dated office development and its replacement offers an opportunity for better urban design and architecture. Redevelopment will also have minor positive effects on the efficient use of land because the current layout with large areas of ground</p>

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							level road circulation space is inefficient. 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.
BC29: Taylor House, 88 Rosebery Avenue, EC1R 4QU	0	+	0	0	0	++	<p>BC29 is allocated for redevelopment for office use, subject to justifying the loss of social infrastructure. Mixed-use office/D1 development may also be acceptable where retention of social infrastructure use is required on site.</p> <p>This allocation will have positive effects on economic growth by providing employment floorspace in an appropriate location. The allocation presents an opportunity to optimise the use of previously developed buildings. 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.</p>
BC30: Telfer House, 27 Lever Street, EC1V 3QX	0	+	0	0	+	0	<p>BC30 is allocated for residential development with landscaping and associated works. The site has planning permission for the construction of 38 residential units. The allocation should have positive effects on housing provision by providing new residential units, including affordable housing. The allocation would also make more efficient use of land compared to the current low rise and relatively inefficient layout.</p>
BC31: Travis Perkins, 7 Garrett Street, EC1Y 0TY	0	+	+	0	0	+	<p>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.</p> <p>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.</p>
BC32: Monmouth House, 58-64	0	+	0	0	0	++	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

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City Road, EC1Y 2AE							significant positive effects on economic growth by providing a significant amount of office floorspace as well as retail uses. The allocation makes clear the proximity to heritage assets.
BC33: Oliver House, 51-53 City Road, EC1Y 1AU	0	0	+	0	0	+	BC33 is allocated for refurbishment or intensification of office use. It will have positive effects on economic growth by providing employment (office) floorspace. The development site is adjacent to the Wesley's Chapel complex, which contains both Grade I and II listed buildings. Development will need to be designed to conserve or enhance the setting of the listed buildings which is noted in the development considerations.
BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street, EC2Y 9AR	+	+	0	0	0	++	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 significant quantum for office floorspace and will have positive effects on economic growth. This site has been identified by the Islington Tall Buildings Study as suitable for a District Landmark building of up to 26 office storeys (106m), which would extend the Moorgate Cluster of tall buildings. This taller building will have positive effects on the efficient use of land. Provision of active commercial units at ground floor will have a positive effect on creating a more vibrant and inclusive social environment that provides services to city workers.
BC35: Finsbury Tower, 103-105 Bunhill Row, EC1Y 8LZ	0	+	0	0	++	++	BC35 is allocated for intensification of office use. The proposed redevelopment and extension of the Finsbury Tower will result in significant positive effects on economic growth by providing a large quantum of employment floorspace. The planning consent also has significant positive effects on housing delivery by providing 25 affordable housing units. The development will make efficient use of land by extending upward and achieving high densities.
BC36: London Metropolitan Archives and Finsbury Business Centre	0	0	0	+	0	+	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. The allocation makes reference to expanding the cultural space as well as ensuring it is not affected by development which will have a positive impact on maintaining and enhancing this service for public access.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street, EC1	+	+	0	0	++	0	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. 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.
BC38: Moorfields Eye Hospital, City Road, EC1V 2PD	0	+	+	+	0	++	BC38 is allocated to deliver a very substantial quantum of B1 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 B1 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 A1, A3 and/or A4 uses on the ground floor will be sought as part of any future development proposal and a proportion will be affordable retail units. 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. 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 similar 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. Redevelopment must retain key historic buildings fronting City Road therefore the allocation will have minor positive effects on the historic environment. The significant increase in development on the site will ensure efficient use of the land with other positive effects including new public open space and high quality public

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
							realm which will improve permeability and create a safer and more inclusive environment. Increased retail and leisure floorspace will also help provide more services for residents and create a more socially vibrant environment for visitors to the borough. The possibility of creating an element of social infrastructure such as health hub will provide essential service for residents improving access locally.
BC39: Laser House, 132-140 Goswell Road, EC1V 7DY	0	0	0	0	0	+	BC39 is allocated for intensification of business use. This allocation will have positive effects on economic growth by providing employment (office) floorspace.
BC40: The Pentagon, 48 Chiswell Street, EC1Y 4XX	0	0	0	0	0	+	BC40 is allocated for intensification of office floorspace. This allocation will have positive effects on economic growth by providing employment (office) floorspace.
BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 [Shoreditch County Court] & 21-23 Leonard Street, EC2	0	+	0	+	0	+	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. The proposed development will add to economic growth by enhancing the quality of education offered whilst facilitating the expansion of 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 allocation itself is considered to have neutral effects on the historic environment however the planning application would have negative effects as it would result in the loss of the school's former sixth form block which is considered to make a positive contribution to the character and appearance of the Bunhill Fields / Finsbury Square Conservation Area, and the proposed office block is considered to result in harm to the character and

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
							appearance of the conservation area and a minor degree of harm to the setting of listed buildings (County Court and the main School building).
BC42: Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road, EC1	0	++	0	+	0	+	BC42 is allocated for office use with retail at ground floor level. The current use is predominantly a ground level car park and also had 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 better use. It will have positive effects on economic development by providing employment (office) floorspace and a small positive impact on providing an active frontage and retail space increasing provision of services for residents.
BC43: Easy Hotel, 80-86 Old Street, EC1V 9AZ	0	0	0	0	0	+	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 reprofiling of existing quantum of hotel floorspace 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 greater positive impact as it would meet the identified need set out in the Employment Study.
BC44: Crown House 108 Aldersgate Street, EC1A 4JN	0	0	0	0	0	+	BC44 is allocated for intensification of office floorspace. This allocation will have positive effects on economic growth by providing employment (office) floorspace.
BC45: 27 Goswell Road, EC1M 7AJ	0	0	0	0	0	+	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.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
BC46: City, University of London, 10 Northampton Square, EC1V 0HB	+	+	+	+	0	+	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. 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. 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.
BC47: Braithwaite House and Quaker Court, Bunhill Row, EC1Y 8NE	0	+	0	0	+	0	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 2 storeys to Quaker Court and constructing a new block adjacent to Braithwaite House. Possible landscaping improvements to Quaker Gardens. The allocation will have positive effects on housing by providing 38 new homes including affordable housing.
BC48: Castle House, 37-45 Paul Street, EC2A 4JU and Fitzroy House, 13-17 Epworth Street, EC2A 4DL and 1-15 Clerc Street, EC2A 4UY	0	0	0	0	0	+	BC48 is allocated for intensification of office use. This allocation will have positive effects on economic development by providing employment (office) floorspace with potential for additional floorspace. In addition introducing active frontages will help to contribute to creating a safer and more inclusive environment.
BC49: Building adjacent to railway lines	+	0	0	0	0	+	BC49 is allocated for intensification of business use particularly B1(c) industrial uses. The building is a former escalator workshop and has an industrial appearance with no external

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOOD	5. HOUSING QUALITY	8. ECONOMIC GROWTH	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)
and opposite 18-20 Farringdon Lane, EC1R							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. This allocation will have positive effects on economic growth by providing employment floorspace.
BC50: Queen Mary University, Charterhouse Square Campus, EC1M 6BQ	+	0	+	+	0	+	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 (B1a) and research space (B1b) linked to overarching higher education, medical, and/or research uses. 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. 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.
BC51: Italia Conti School, 23 Goswell Road, EC1M 7AJ	0	0	0	+	0	+	BC51 is allocated for retention of D1 use unless the loss of D1 use can be robustly justified in which case office development may be suitable in this location. Therefore potentially the allocation will have a positive effect on economic growth and if community user it retained then it will be positive for provision of services for residents. .

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Appendix 5b: Sequential flood risk consideration of site allocations

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Site Allocations – Flood Risk Sequential Test

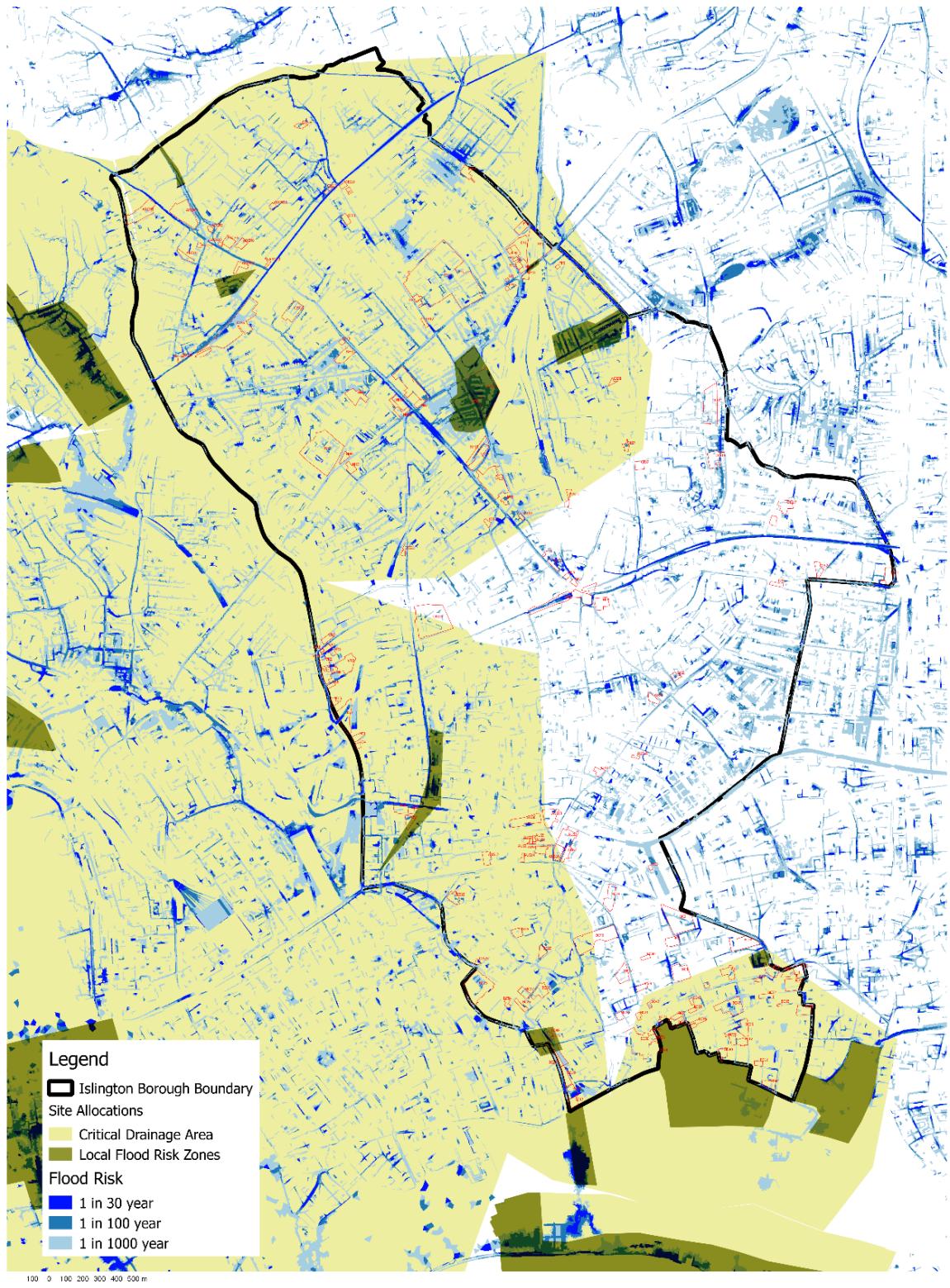
The NPPF requires all plans to apply a sequential, risk-based approach to the location of development, taking into account the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding. The aim of the sequential test is to steer new development away from areas at risk of flooding to areas with the lowest risk of flooding, and to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. As a result, the application of the sequential test will help to ensure that development can be delivered safely and sustainably, avoiding proposals that are inappropriate on flood risk grounds.

A sequential test has been applied, using the outputs of Islington's Strategic Flood Risk Assessment (SFRA), to each of the sites allocated as part of the Islington's Local Plan Site Allocations. While Islington is located in Flood Risk Zone 1, which means there is low risk of fluvial flooding, the SFRA demonstrates that there are areas of surface water flood risk across the borough and these must be taken into account when deciding on the appropriateness of a site location.

The matrix below displays the surface water flood risk for each of Islington's site allocations and indicates whether the level of risk is deemed to be acceptable. The level of surface water flood risk has been assessed using the Environment Agency's Risk of Flooding from Surface Water Dataset, which provides an indication of the broad areas likely to be at risk of surface water flooding, and data from Islington's Surface Water Management Plan (SWMP). The SWMP indicates that more than half of the Borough is located within one of Islington's three Critical Drainage Areas, as identified by Islington's SWMP. The SWMP also identified eight Local Flood Risk Zones (LFRZ) within the Islington borough boundary, all of which are located within one of the three CDAs.

The SWMP defines a CDA as “a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure.” A LFRZ is identified in the SWMP as “discrete areas of flooding that do not exceed the national criteria for a ‘Flood Risk Area’ but still affect houses, businesses or infrastructure. A LFRZ is defined as the actual spatial extent of predicted flooding in a single location.” A specific development within a CDA is not necessarily at higher risk from surface water flooding compared to a development outside of a CDA. However, the location of a development within a CDA indicates that it is within a catchment area which contributes to the flooding of a LFRZ.

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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?
Vorley Road/Archway Bus Station, N19	ARCH1							N/A	Yes
4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ	ARCH2							N/A	Yes
Archway Central Methodist Hall, Archway Close, N19 3TD	ARCH3							N/A	Yes
Whittington Hospital Ancillary Buildings, N19	ARCH4							N/A	Yes
Archway Campus, Highgate Hill, N19	ARCH5							N/A	Yes
Job Centre, 1 Elthorne Road, N19 4AL	ARCH6							N/A	Yes
207A Junction Road, N19 5QA	ARCH7							N/A	Yes
Brookstone House, 4-6 Elthorne Road, N19 4AJ	ARCH8							N/A	Yes
724 Holloway Road, N19 3JD	ARCH9							N/A	Yes

8 All Saints Street, N1 9RJ	KC6							N/A	Yes
All Saints Triangle, Caledonian Rd, Kings Cross, London N1 9RR	KC7						Half of site in LFRZ.	Redevelopment to include improvements to existing open space	Yes
Royal Bank of Scotland, 42 Islington High Street, N1 8EQ	AUS1						Some EA RoFSW High Risk Areas. Majority of site has no EA RoFSW flood risk.	Development to include public realm improvements.	Yes
Pride Court, 80-82 White Lion Street, N1 9PF	AUS2							N/A	Yes
Electricity substation, 84-89 White Lion Street, N1 9PF	AUS3							N/A	Yes
Land at 90-92 White Lion Street, N1 9PF	AUS4							N/A	Yes
94 White Lion Street (BSG House), N1 9PF	AUS5							N/A	Yes
Sainsbury's, 31-41 Liverpool Road, N1 0RW	AUS6							N/A	Yes
1-7 Torrens Street, EC1V 1NQ	AUS7						Site partially in CDA.	N/A	Yes
161-169 Essex Road, N1 2SN	AUS8							N/A	Yes
10-14 White Lion Street, N1 9PD	AUS9							N/A	Yes
1-9 White Lion Street, N1 9PD	AUS10							N/A	Yes
Collins Theatre, 13-17 Islington Green, N1 2XN	AUS11							N/A	Yes
Public Carriage Office, 15 Penton Street, N1 9PU	AUS12							N/A	Yes
N1 Centre, Parkfield Street, N1	AUS13						Site partially in CDA. Small EA RoFSW High Risk Area. Majority of site has	Development to include protection and enhancement of existing open space.	Yes

							no EA RoFSW flood risk.		
46-52 Pentonville Road, N1 9HF	AUS14							N/A	Yes
Windsor Street Car Park, N1 8QF	AUS15							N/A	Yes
Angel Square, EC1V 1NY	AUS16						Over half of site in CDA. Very small EA RoFSW High Risk Area on north eastern boundary. Majority of site has no EA RoFSW flood risk.	N/A	Yes
City Barbican Thistle Hotel, Central Street, EC1V 8DS	BC1							N/A	Yes
City Forum, 250 City Road, EC1V 2PU	BC2							N/A	Yes
Islington Boat Club, 16-34 Graham Street, N1 8JX	BC3							N/A	Yes
Finsbury Leisure Centre, EC1V 3PU	BC4						Site boundary in CDA.	N/A	Yes
London College of Fashion, Golden Lane	BC5							N/A	Yes
Redbrick Estate: Vibast Centre, garages and car park, Old Street, EC1V 9NH	BC6							N/A	Yes
198-208 Old Street (petrol station), EC1V 9FR	BC7							N/A	Yes
Old Street roundabout area, EC1V 9NR	BC8						Very small EA RoFSW High Risk Area on southern boundary. Majority of site has no EA RoFSW flood risk.	Development to include new open space and public realm improvements.	Yes

							Small area of north of site in LFRZ.		
Inmarsat, 99 City Road (east of roundabout), EC1Y 1BJ	BC9						N/A		Yes
254-262 Old Street (east of roundabout), EC1Y [comprises 250-254 Old Street; Albert House, 256 Old Street; and Golden Bee Bar, 262-264 Old Street], EC1Y 1BJ	BC10						Part of site in CDA.	N/A	Yes
Longbow House, 14-20 Chiswell Street, EC1Y 4TW	BC11						N/A		Yes
Cass Business School, 106 Bunhill Row, EC1Y 8TZ	BC12						N/A		Yes
Car park at 11 Shire House, Whitbread Centre, Lamb's Passage, EC1Y 8TE	BC13						N/A		Yes
Peabody Whitecross Estate, Roscoe Street, EC1Y 8SX	BC14						N/A		Yes
Richard Cledesley School, Golden Lane, EC1Y 0TJ	BC15						N/A		Yes
36-43 Great Sutton Street (Berry Street), EC1V 0AB	BC16						N/A		Yes
Caxton House, 2 Farringdon Road, EC1M 3HN	BC17						N/A		Yes
Cardinal Tower / Crossrail over-site, EC1M 3HS	BC18						Approximately a third of site includes EA RoFSW High Risk Area. Approximately half of site has no EA RoFSW flood risk.	N/A	Yes
Farringdon Place, 20 Farringdon Road, EC1M 3NH	BC19						N/A		Yes
Lincoln Place, 50 Farringdon Road, EC1M 3NH	BC20						Northern part of site in LFRZ.	N/A	Yes

Legend

- █ SWMP Critical Drainage Area (CDA)
- █ SWMP Local Flood Risk Zone (LFRZ)
- █ EA RoFSW High Risk Area - 1 in 30 year (3.3% annual probability)
- █ EA RoFSW Medium Risk Area- 1 in 100 year (1% annual probability)
- █ EA RoFSW Low Risk Area- 1 in 1000 year (0.1% annual probability)

The above matrix demonstrates that the level of flood risk for each of the 157 allocated sites is deemed to be acceptable following the application of the sequential test. While the majority of the allocated sites are located within a CDA, only 10 are located in a LFRZ. As explained above, 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. Overall, the matrix demonstrates that the majority of the allocated sites include a EA RoFSW Low Risk Area, with 49 sites including Low Risk Areas only (no Medium or High Risk Areas) and 58 sites including no EA RoFSW identified risk of surface water flooding at all. 22 sites include a Medium Risk Area only (no High Risk Areas) and just 28 sites include a High Risk Area. Furthermore, the majority of the sites that include EA RoFSW areas only include small areas of low, medium or high risk areas. For the majority of the 28 sites that include EA RoFSW High Risk Areas, the high risk area only covers a small area of the site. Charles Simmons House and Cardinal Tower are the only sites including larger high risk areas relative to size of the site, with approximately a third of the site including high risk areas. For each of these sites, however, the high risk areas cover less than half of the site. The Harvist Estate also contains some EA RoFSW High Risk Areas and is located in a LFRZ. The flood risk to each of these sites can, however, be successfully managed and mitigated in accordance with the requirements set out below.

The first step in applying the sequential test is to consider whether there are opportunities to locate the allocated sites, with any level of surface water flood risk, in alternative locations in the borough with no or lower flood risk. Wider sustainable development objectives, including the delivery of affordable housing and employment floorspace, alongside the constrained nature of Islington and development pressure mean, however, that there are no alternative locations where the sites can be located. These wider sustainable development objectives outweigh the risk of flooding in these areas, and as a result, it is not possible for the allocated sites at risk of surface water flooding to be located in areas of the borough that are at lower risk. Furthermore, as over half of the borough is within a CDA, opportunities to locate sites outside of a CDA are limited. The council is satisfied, however, that based on the above matrix the flood risk to the majority of the allocated sites is low, and that the level of risk in relation to the few sites that do coincide with areas of greater surface water flood risk can be successfully managed using appropriate flood risk management and mitigation measures (set out below). These measures will ensure that the potential developments proposed by these site allocations will be safe from flood risk for its lifetime, taking climate change into consideration. Furthermore, such measures will also serve to reduce the impact that a development has on flooding in the wider area, particularly the impact that a development located in a CDA has on flooding in LFRZs.

Appropriate flood risk management and mitigation measures are recommended for all of the allocated sites, and will ensure that any surface water flood risk to the development is minimised to an acceptable level. Proposals coming forward for development in the future as a result of the site allocations will be required to submit a site-specific Flood Risk Assessment (FRA), where required in accordance with Policy S8: Flood Risk Management, demonstrating how flood risk will be managed and mitigated to ensure the development is safe from flooding and the impacts of climate change for its lifetime. This will include assessment of appropriate flood proof design and construction methods, including sufficient flood resilient/resistant measures where required, and the incorporation of Sustainable Urban Drainage Systems (SUDS) where possible. Such measures will be particularly important in relation to the site allocations that include EA RoFSW High Risk Areas, and sites located within a LFRZ. In addition, proposed developments will be required to achieve the drainage requirements set out in Policy S9: Integrated Water Management and Sustainable Drainage, in order to reduce surface water runoff rates and volumes. Surface water generated by the site must be managed in a sustainable manner without increasing the flood risk to existing buildings or infrastructure in the neighbouring area. This is particularly important in relation to sites that are within a CDA in order to reduce their contribution to flooding in LFRZs.

The vulnerability classification of the development uses proposed by the site allocations, as defined by the in the national Planning Practice Guidance², will be taken into account when considering the flood risk management and mitigation measures required, in order to ensure a site is safe from flood risk for its lifetime. Flood risk management and mitigation measures will be particularly important where the proposed development use is defined as Highly Vulnerable or More Vulnerable, and includes RoFSW High or Medium Risk Areas. It should be noted, however, that very few of the site allocations include proposals for potential development uses defined as Highly Vulnerable or More Vulnerable. In order to ensure that the most vulnerable elements or land uses within a development are located in the lowest risk parts of the site, proposed developments are required to demonstrate a sequential approach to development layout within the development site. These flood management and mitigation measures will be particularly important in relation to the site allocations that include EA RoFSW High or Medium Risk Areas, and sites located within a LFRZ.

In addition to the flood risk management and mitigation measures required by the Local Plan policies, many of the site allocations include proposals for developments incorporating improvements to open space, the public realm and/or landscaping, which will maximise opportunities for flood management and mitigation measures, including SUDS. Such proposals will help to ensure the flood risk to the development is minimised to an acceptable level and are particularly important for sites that contain EA RoFSW High Risk Areas or are located in a LFRZ. The site allocations that include larger redevelopment schemes over 10,000sqm provide extensive opportunities for the incorporation of flood risk management and mitigation measures. In particular, the redevelopment of Andover Estate, Harivist Estate, Holloway Prison, and Moorfields Eye Hospital will include public realm and/or landscaping improvements which will reduce surface water runoff and flood risk on-site, in addition to reducing the contribution of the site to surface water flood risk in the wider area surrounding the site. Large sites over 10,000sqm that do not include a significant level of flood risk on-site but are located in a CDA, such as Archway Campus, will also help to reduce runoff and flood risk in surrounding areas through the development. Furthermore, larger sites will provide greater opportunities to apply a sequential approach to development layout within the site.

Following the application of the sequential test to Islington's 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. Furthermore, the above matrix demonstrates that the flood risk to the majority of the allocated sites is low, and that where sites that do coincide with higher surface water flood risk, this can be successfully managed using appropriate flood risk management and mitigation measures, alongside the sequential approach to site layout.

² Available from: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>

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Appendix 6: Equalities Impact Assessment

Full Council draft EIA June 2019

Equalities Impact Assessment

Islington's Local Plan

May 2019

Final council draft EIA June 2019

Full Council draft //A June 2019

Islington Local Plan
Equalities Impact Assessment

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Preliminary Information

Date of EqIA: May 2019

Reason for undertaking the EqIA: To ensure that, where relevant, all strands of equality have been considered in the development of the Local Plan.

Document title: Islington's Local Plan – Regulation 19 draft June 2019

Author(s) of Local Plan: Islington's Planning Policy Team

Status of the EqIA: This EqIA is the initial draft which will be refined following Regulation 19 consultation in autumn 2019 to reflect any comments received and any further changes made to the Local Plan. Following this consultation, the Local Plan will be submitted for Examination. It will also be important to review this EqIA again in light of any significant changes to the document at Examination by an independent Planning Inspector in Spring 2020.

Purpose of the Local Plan

The council is the key agent responsible for shaping Islington's future. Everything the council does contributes to making Islington fairer, creating a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life. The Local Plan is integral to achieving these aims. It sets out a range of planning policies to steer development in the borough over the next fifteen years – this includes:

-
- spatial policies covering specific areas in the borough;
 - strategic policies which outline the key priorities across a number of policy areas;
 - detailed criteria-based policies, which stem from strategic and spatial requirements and are the main basis on which planning decisions are made; and
 - specific site allocations which provide fine-grain detail on a number of planned and potential development sites across Islington.

The Local Plan provides a clear, bold framework for planning decisions which set out what we expect from development. The Local Plan covers the period 2020 to 2035 ("the plan period"). Islington is a borough with significant constraints, and it is not hyperbole to state that each and every development must make the most of every site

and development opportunity, in order to ensure that opportunities for using increasingly scarce resources, including a lack of developable land, are not wasted. This iteration of Islington's Local Plan is made up of four Development Plan Documents:

- 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.
- Site Allocations – this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
- 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.
- North London Waste Plan – 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.

Figure 1.1: Islington Planning Framework



Further information about the other documents within the local development framework can be found via the council website

<https://www.islington.gov.uk/planning/planning-policy>

We can only succeed by working with key public and private sector partners such as the police, health service, and local universities as well as with local communities. The Local Plan has involved these stakeholders and many others. The involvement does

not stop once the Local Plan is adopted; it is a continuous process, which enables policies to remain effective throughout the lifetime of the plan.

The Local Plan is developed within a complex planning framework which provides it Development Plan status. The Development Plan is the key set of documents which inform decisions on planning applications. In Islington, the Development Plan consists of any locally adopted Development Plan Documents (such as the Local Plan) and the London Plan (the Spatial Development Strategy prepared by the Mayor of London). Any 'made' neighbourhood plans – those which have been successful at examination and referendum – also form part of the Development Plan.

The London Plan is the Spatial Development Strategy for Greater London. It is a strategic plan for London which sets out a policy framework covering a variety of economic, social and environmental issues. It is part of the Development Plan, meaning it must be taken into account in the determination of planning applications. For plan-making, the London Plan provides the strategic, London-wide policy context for all borough Local Development Documents; all such documents including the Local Plan have to be 'in general conformity' with the London Plan.

Planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise. What does and does not constitute a material consideration is determined on a case-by-case basis, as is the weight to be given to any such considerations.

Main stakeholders, likely beneficiaries

Although the document is of a technical nature, the wide ranging policy content means that it has relevance to the following stakeholders:

- Residents – including Tenants and Residents Associations (TRAs)
- Voluntary and community groups
- Neighbourhood forums
- Businesses, developers and landowners (including housing associations)
- Council partner organisations (e.g. CCG)
- Greater London Authority (GLA)
- People who work in and visit the borough

It will also be an important decision making and guidance document within the council for officers across the organisation. It will have particular relevance for officers in Planning and Development (Development Management and Enforcement), Public Realm (Green space), as well as Spatial Planning and Transport (Economic Development Projects and Transport, Inclusive Economy).

Consultation, key facts and findings

The process of developing the Local Plan is reasonably long, and we are now approaching the final stages. Community involvement plays an important role in the policy formulation process and the council has undertaken the following stages:

- 2015 onwards, the Council commenced updates to the evidence base
- The Council consulted on the Local Plan: Scope of the Review document from 28 November 2016 to 27 February 2017. We also undertook a 'Call for Sites' consultation to identify future development sites for a range of uses. This consultation was the first stage in the formal plan production process.
- From 12 February to 26 March 2018, the Council consulted on a Site Allocations Direction of Travel document, which identified over 150 sites where new housing, workspaces, shops, open spaces, or leisure and community facilities could be provided over the next 15 years.
- From 20 November 2018 to 14 January 2019, the council consulted on Regulation 18 drafts of the Local Plan documents: Strategic and Development Management policies, Site Allocations and Bunhill and Clerkenwell Area Action Plan (AAP)

Autumn 2019: Regulation 19 consultation followed by submission to the Planning Inspectorate, with a view to Independent Examination in Spring 2020.

Given the wide ranging nature of the document, and the importance of different policy areas within it, the council has specifically sought to engage different groups with protected characteristics to understand their perspectives.

At the borough-wide level and extensive database of contacts has been established which includes individuals and organisations across the different equalities strands. The council has worked closely with Voluntary Action Islington to communicate with and engage community groups in the borough. A consultation statement with the full details of consultation can be accessed at

www.islington.gov.uk/Localplan

Below is a summary of some of the main pieces of consultation and evidence that have informed this assessment, and which help to set the scene for the equalities issues facing the Local Plan.

Although published in 2011 the Fairness Commission findings are relevant and have been considered as part of policy review and formulation process. Reviews of progress towards implementation of the Fairness Commission findings continue to inform the corporate plan - 'Building a Fairer Islington' 2018-22 and continues to be the vision of the Council.

Planning policy team members were active participants in the Fair Futures initiative – working with young people on a range of issues pertaining to 'Place' and in particular to the public realm. Issues emerging from that work have been fed through into the draft Plan for example issues around overcrowding; the vital importance of public open space and the rights of young people to occupy it.

Planning policy team organised an event for community groups in May 2017 to discuss, in very open terms, the issues and options the Plan might address; the session enabled participants to join free -ranging workshops on housing, open space, social infrastructure and town centres.

Planning policy team approached colleagues in HASS to obtain evidence/intelligence re the experience and prevailing needs of vulnerable older people, disabled people and care leavers. A consensus emerged around the demand for flexible/adaptable homes and for a limited number of specialised, supported housing options.

Planning policy team also obtained information from the local Citizens Advice team on emerging trends in issues presented by our most vulnerable residents; key concerns, overwhelmingly, focused on housing and homelessness, insecure employment, welfare reform and debt.

Planning policy team facilitated an inclusive cycling day with Wheels for Wellbeing and Pedal Power to consider the ways in which non-standard cycles and less confident cyclists may be accommodated and encouraged to use our cycling infrastructure.

Also, in view of the fact that historically different aspects of design have been awarded different priorities and inclusive design sometimes marginalised, planning policy team organised a number of workshops to explore the intersections between those approaches and how one can benefit rather than undermine the other.e.g. sustainable drainage and playable environments, environmental design and public health, green infrastructure and community development. From that work, emerged the integrated design principles and process that underpin the revised Plan – see Local Plan policy: PLAN1.

The planning policy database of consultees also includes a diverse range of broadly representative groups who have been consulted at various stages during the drafting of the Local Plan.

Summarising the Local Plan approach

The Local Plan has significant implications for groups with protected characteristics. It is explicitly intended to have a positive impact on the built environment, and people's quality of life.

By trying to deliver the objectives of the Corporate Plan, the Local Plan vision is 'to make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life'. Although the Local Plan has to deal with difficult issues such as housing affordability an adverse effect is unlikely because the Local Plan attempts to mitigate these difficult issues and, through its policies, make the borough a better and more inclusive place to live, work and study.

Before assessing the impact of the Local Plan, the following sets out a brief summary of the different policy areas within the Local Plan:

a. Policy PLAN1: Site appraisal and design principles and process

To ensure that the vision and objectives of the Local Plan are realised, all development in Islington is expected to, from the very first iteration of the proposal, reflect four key development principles:

- Contextual
- Connected
- Inclusive
- Sustainable

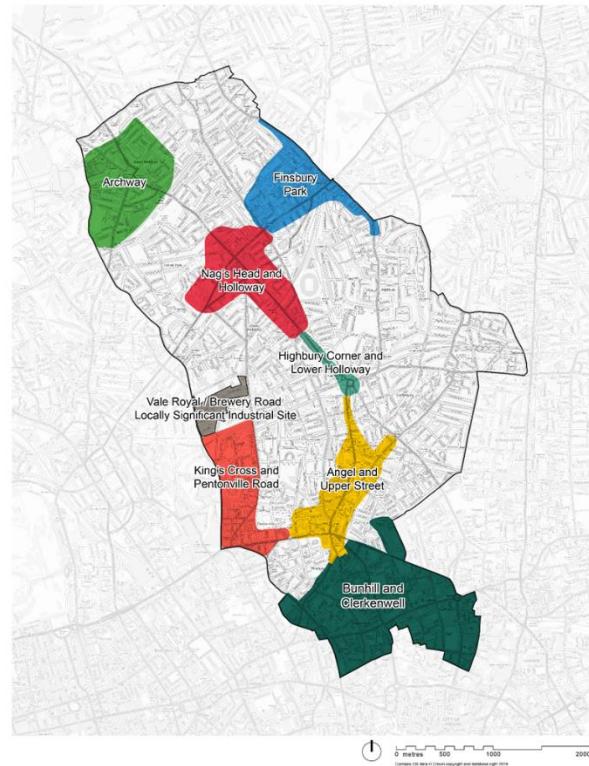
This ensures that, in design terms, access and inclusion are as important as sustainability, urban design and/or conservation. This is a clear benefit to all our communities, including those with protected characteristics.

b. Spatial Policies (policies 1-8): One of the aims of the Local Plan is to set out how we will cater for our growing population and workforce as the pressures on space increase. Although much of the borough is likely to experience some change in the coming years, the Local Plan sets out specific policies for those areas that are likely to experience the most growth/change. These are:

- Bunhill and Clerkenwell
- King's Cross and Pentonville Road

- Vale Royal / Brewery Road Locally Significant Industrial Site
- Angel and Upper Street
- Nag's Head and Holloway
- Finsbury Park
- Archway
- Highbury Corner

Policies for these areas set out what we want to achieve to manage this growth/change and provide for shopping, jobs, leisure and housing. These policies also set out how we want to improve these areas over the next 15 years including making them more accessible and inclusive, where appropriate, such as by improving the roads and public spaces.



- c. Thriving Communities (policies H1 to H12 and SC1 to SC3):** This sets out how Islington will deliver decent and genuinely affordable homes to meet the needs of the community – including setting a target for genuinely affordable housing, and resisting other forms of housing which do not meet this objective. Social and Community Infrastructure policies aim to ensure a wide range of community and social facilities are provided to support community needs. Responding to evidence provided by colleagues in HASS, we have adopted a policy, in line with the London Plan, of providing all new housing to a basic standard of visibility and adaptability, 10% to wheelchair accessible standards and a limited number that are supported by specialist services. We are also acting on intelligence from our allocations team on geographical supply and demand and so building into our policies to respond to those needs more effectively.
- d. Inclusive Economy (policies B1 to B5 and R1 to R12):** This sets out how Islington can create a more inclusive economy including protecting existing and maximising business floorspaces for new jobs, as well as provision of affordable workspaces and encouraging training opportunities. The retail policies support the continued vitality and viability of town centres and the protection and enhancement of the culture and night time economy.
- e. Green Infrastructure (policies G1 to G2)** This sets out how we will preserve and enhance provision of green infrastructure for existing and future communities which will likely have significant positive effects on the health and wellbeing of the population and encourage people to participate in more active travel, sport and recreation in the borough.
- f. Sustainable Design (policies S1 to S10):** This sets out how Islington will help to maximise the positive effects on the environment and avoid negative

environmental impacts through creating high environmental standards for new developments, and through climate change adaptation measures.

- g. **Public Realm and Transport (policies T1 to T5)** This sets out the elements for a coherent and inclusive public realm in order to encourage the role of streets as places. Also sets the movement priorities, parking and cycle parking standards, including particular considerations of the needs of disabled pedestrians, cyclists and drivers.
- h. **Design and Heritage (policies DH1 to DH8):** This looks to support innovative approaches to development capacity whilst limiting adverse impacts on the historic environment and protecting and enhancing the unique character of the borough. Also sets out the approach to building heights... We look to Historic Britain for a lead on how to deliver vibrant contemporary uses within an historic environment; balancing heritage values with social and economic benefits.
- i. **Strategic Infrastructure (policies ST1 to ST4):** This identifies the approach to identifying and delivering infrastructure required to support growth over the plan period.

The above summary highlights the key issues dealt with in the Local Plan. These are supported by Site Allocations and the Bunhill and Clerkenwell AAP. These have both been considered by the EqIA. Sites have been considered altogether.

Methodology

This EqIA takes a three stage approach to assess the main potential impacts of Local Plan policy on groups with 'protected characteristics'. 'Protected characteristics' is the legal term used in the Equality Act 2010 to define the groups against whom discrimination is unlawful under The Equality Act. The nine 'protected characteristics' are:

- Age
- Disability
- Religion and belief
- Gender
- Race
- Sexual orientation,
- Marriage and civil partnership
- Gender reassignment
- Maternity and pregnancy

In Islington the Council is committed to considering socioeconomic equality when making decisions about how it exercises its functions and this factor will also be considered as part of the assessment.

The three stage approach includes the following steps:

- Establish a baseline on the nature and type of groups with protected characteristics which exist within Islington.
- Assess the positive and negative impacts of the local plan policies on these groups
- Identify whether and to what extent there are any significant negative impacts on these groups arising from the plan and its policies, and set out recommendations for mitigation.

The assessment has been undertaken by Local Plan policy sections considering the categories of protected characteristic and highlighting potential impacts. The assessment is set out in table x below. The equalities implications are quite broad. Impacts are considered in terms of positive, neutral or negative impacts and are identified as to whether they are significant with recommendations made for mitigation where necessary.

The following statistics help to set the background to this assessment and have been generally taken from the State of Equalities in Islington Annual Report 2018³ with some supplemental information taken from the IIA Baseline Scoping Report:

Full Council draft IIA June 2019

³ <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/communications/information/adviceandinformation/20172018/20180130stateofequalitiesreport20181.pdf>

General statistics

- The population of Islington is estimated to be 233,200 in 2018. This is an increase of approximately 13% (27,000 people) since 2011.
- It is estimated that the population of Islington will grow by 7% (15,500 people) between 2018 and 2028.
- Islington is the most densely populated local authority area in England and Wales, with 15,524 people per square km. This is almost triple the London average and more than 37 times the national average.
- Islington is the second smallest borough in London covering 14.86 km squared.
- Only 13% of the borough's land is green space, the second lowest proportion of any local authority in the country.
- The 2015 Index of Multiple Deprivation shows that Islington has improved from being the 11th most deprived borough in the country to the 24th most deprived. This development is a result of significant improvements in a number area.

Age: Children and Young People

- 35% of children under the age of 16 live in low income households, as measured by the children living in income deprived households. This is the 3rd highest nationally and an improvement from second in 2010.
- Child poverty is closely linked to unemployment - just over a quarter (35.3%) of Islington children live in households where no one is in employment.
- In 2016/17, 52.9% (7,500) of primary school pupils in Islington's schools are eligible for the deprivation Pupil Premium. The proportion is even higher for secondary school pupils where 69.6% (5,300 pupils) are eligible for the deprivation Pupil Premium.
- 59.4% of Islington children eligible for any form of pupil premium achieved 5 A*-C grades at GCSE (or equivalent) in English and maths, compared with 74.8% of all other children in Islington. Across England, 43.2% of pupil premium children achieved that level, compared with 71.0% of all other children.
- 18.7% of Islington school pupils have some form of Special Educational Needs. This compares to 14.3% across London and 14.4% across England.¹¹
- In Islington, 53% of young people cautioned or sentenced by Youth Offending Teams were from BAME groups; 30% of offenders were of black ethnicity, 17% of offenders were mixed race, 5% of offenders were Asian (1% of offenders identified themselves as 'other' ethnicity. In comparison, 46% of offenders were from White groups.

Age: Older people

- There are around 21,000 people aged 65 and over living in Islington, making up 9% of Islington's resident population. This means the borough has a relatively young population: 12% of the population of London and 18% of England are aged 65 and over.

- There are 7,280 beneficiaries of Pension Credit, a means-tested benefit for older people, in Islington. This represents approximately 38% of pensioners, compared to 23% in London and 15% nationally.
- 53% of single pensioners in private sector housing in Islington are fuel poor, as opposed to 10.4% of all households.
- Older people make up a significant proportion of Islington's social housing households and pensioner households also have a considerably lower income than the rest of the borough. There are also high numbers of affluent older adults in Islington, many of whom choose to self-fund their social care needs.
- 36% of Islington's 60+ population are living in income deprived households. The 4th highest proportion of 60+ persons living in income deprived households relative to all other London Boroughs.
- In Islington, life expectancy at 65 is slightly lower for men than women; with men expected to survive a further 18 years beyond 65, and women expected to survive a further 21 years beyond 65

>insert population pyramid<

Race

- Less than half (48%) of Islington residents are estimated to be "White British" in 2018, compared to 42% in Greater London.
- 32% of residents were in Black and Minority Ethnic (BAME) groups and 20% of residents "Other White" in 2018, compared to 32% and 17%, respectively, in 2011. "Other White" consists of Caucasian people from Europe, America, Africa and Asia and Oceania. White Gypsy and Traveller groups were also included in the "white other" category.
- Children growing up in BAME households in Islington are more likely to be living in poverty in comparison to white children.
- From January 2017 – November 2017, the rate of stop and searches of people of Black ethnicity in Islington was more than three times higher than the rate of stop and searches of people of White ethnicity and twice as high as people of Asian ethnicity.
- Among council staff, the proportion of BAME employees declines as grades increase above Scale 6, with 42.5% at SO1-SO2 coming from BAME groups and only 16% at Chief Officer level.
- 20.5% of the top 5% of earners are from BAME groups, which is an increase on 2013 and is also the highest percentage recorded to date. This is significantly higher than the London Councils' average at 14.9%.
- In Islington schools in 2015/16, the proportion of students of Asian ethnicity achieving A*-C in English and mathematics (78%) was significantly higher than all other ethnicities except for students of Mixed ethnicity (64%). Studies suggest that almost all ethnic minority groups have a higher level of achievement than White British of the same socio-economic status.
- In 2016/17, more than half of the statutorily homeless population in Islington was of a BAME group (56%), compare to 44% of a White ethnicity.
- Population estimates from Islington and London – derived from GLA Mid 2016 housing-led population projections. Population estimates for England – derived from ONS, 2017.

- Historically, the borough has been home to a number of rights based campaigning organisations. eg From 1978 to 1994 the African National Congress (ANC) had their London headquarters on Penton Street, as they worked to oppose the segregationist system in South Africa.

Gender

- The proportions of men and women in the borough are broadly similar: 117,200 men and 115,700 women.
- Men in Islington have the 10th lowest life expectancy out of all London boroughs.
- A man born in Islington can expect to live for 79.5 years on average and a woman 83.4 years on average. These figures are similar to the national average (male life expectancy in England 79.5 years and women 83.1 years).
- Islington has a healthy life expectancy of 60.7 years for men, and 61.6 for women. Both of these are slightly lower than for London (64.1 for males and females) and England (63.4 and 64.1).
- 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.
- In 2016, for the Key Stage 4 measure of achieving A* to C in English and maths GCSEs, Islington girls outperformed Islington boys by 4 percentage points. The equivalent gap for England was 8.8 percentage points. This difference can be explained by the fact that girls in Islington were 2.6 percentage points above girls nationally and Islington boys' performance against this benchmark was 7.4 percentage points above the national.
- There has been a long and sustained increase in domestic violence: the number of reported incidents in Islington has increased by 52% over the past 5 years mirroring the rest of London.
- 73% of female victims were aged between 18 – 44 years, with nearly a third of all victims aged between 25 – 34 years. Women aged 18-44 make up only 54% of the total residential female population.
- There is an over representation of victims from BAME groups compared to the residential population.
- Among council staff, 51% of the top 5% of earners are female. This is a decrease on the 2014/15 percentage, but above the London Councils' average.
- In Islington, men who live in the worst off areas are expected to live 8 fewer years than men living in the best off areas in the borough. Women have fewer inequality in life expectancy (2.7 years) across the social gradient (average life expectancy measured against local deprivation decile between 2013-15). Inequality in life expectancy for men has been rising over the last 5 years, while it has remained stable for women.
- Historically, the borough has been home to a number of rights based campaigning organisations. Clerkenwell Green, as the location of the Marx Memorial library is a focus and gathering point for activists and Holloway Prison, the site where many suffragettes were imprisoned in their pursuit of fairness.

Gender Reassignment /Trans

- An absence of local and national data makes it difficult to gauge the extent of issues currently faced by trans people, and data for this group is often difficult to extract from the wider group of Lesbian, Gay, Bisexual and Transgender (LGBT) within which information is often collected.
- At present, there is no official estimate of the transgender or transsexual (trans) population, either locally or nationally. Existing studies estimate the number of trans people in the UK to be between 65,000 and 300,000.
- 58% of trans people say that waiting times for medical services have negatively affected their mental health.
- In 2015, though, a parliamentary inquiry heard evidence about trans experiences of interacting with the state, including that 46% of non-binary people felt the need to hide their identity as non-binary while accessing NHS services.
- Reported transgender hate crime has remained fairly static in Islington for the last four years with 15 incidents of transgender hate crime reported in Islington between December 2016 and December 2017.
- Trans people are more likely to experience poverty, discrimination, and mental health problems.
- These factors are correlated with a greater use of alcohol and drugs as well as riskier drug using behaviours.

Sexual orientation

- There is a significant dearth of data on the Lesbian, Gay and Bisexual (LGB) population in the borough, requiring the use of proxy datasets to help set policy.
- If Islington replicates the London average for lesbian, gay and bisexual population, there are approximately 5,400 LGB residents in the borough.
- Young LGB and trans people under 26 are more likely to attempt suicide and to self-harm than the rest of the population. Research indicates that this is closely correlated with experiences of bullying by peers, in family settings and in school as well as negative experiences of coming out.
- Research has found that there are two other major mental health issues which disproportionately affect LGB people: alcohol issues in lesbian and bisexual women and body image issues for gay and bisexual men.
- Islington has the 5th highest rate of homophobic hate crime in London.
- In Islington, homophobic hate crime has decreased by 1% in the 12 months to November 2017 compared to the previous 12 months.
- Historically, the borough has been home to a lively LBGT social and political culture..
- Britain's first gay rights demonstration took place in November 1970, when 150 men held a torchlight rally in Highbury Fields against police harassment

Disability

- As of 2017, there was an estimated 30,600 people in Islington reporting disabilities such as mobility, dexterity and memory loss. These figures are based on a surveyed prevalence of 13% in an inner London borough.
- In May 2017, there were 8,710 Disability Living Allowance claimants in Islington.
- National research has demonstrated that disabled jobseekers need to apply for 60% more jobs than their non-disabled counterparts.

- 7.6% of Islington employees have identified as disabled. The percentage has increased significantly from 5.4% in December 2014, which may result from increased activity to encourage staff to report this information.
- The 2011 Census reported that 20,950 dependent children were living in households with adults not in employment and people with a long-term health problem or disability.
- Nationally, the prevalence of disability among people of working age has risen in recent years, from 50.5% economically active in Q2 of 2013 to 54.1% in employment in Q2 of 2017.
- There were 667 hate crimes against disabled people recorded by London police in 2016/17
- Across England and Wales, the number of recorded hate crimes against disabled people increased by 53% from 2015/16 to 2016/17, the greatest percentage increase among any hate crime strand.
- In Islington in 2015, 12,117 people were estimated to be living with moderate or severe hearing impairment, and a further 236 with profound hearing impairment.
- In Islington, an estimated 3,930 people are living with sight loss in 2016 (1.7% of the population). Of these, 470 people are estimated to be living with severe sight loss.
- There are an estimated 17,878 people in Islington living with depression, the highest recorded prevalence of depression in London.
- There are 3,774 people in Islington living with a serious mental illness, the highest prevalence of Serious Mental Illness in London.
- About 1,210 people are diagnosed with dementia in Islington in 2016/17.
- About 10% of students with a Special Educational Need are currently enrolled in special schools in Islington as of January 2017.

Religion and belief / marriages

- 59% of Islington's population reported a religious affiliation in 2015, compared to 63% in 2011.
- In 2014, there were 124 religious marriage ceremonies in Islington, 7% of the total. By comparison, religious ceremonies made up 27% of all marriage ceremonies in England and 17% of all marriages in London.
- Faith hate crime has increased by 4.3% in 2016/17 compared to the previous year. However, the general trend in reported faith hate crime has remained static over the previous 5 years.
- This may be due to the under-reporting of these incidences.
- Of all of the London boroughs, Islington has the sixth highest number of faith hate crimes recorded as taking place within its boundary within the year 2016/17.

>insert pie chart<

Full Council draft //A June 2019

Local Plan Equalities Impact Assessment

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Area Spatial Strategies including spatial strategy policies in BCAAP How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>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.</p> <p>One of the specific features of the spatial strategies is that they highlight various the specific minor built environment improvements such as BC3 in the BCAAP which identifies the Old Street roundabout and related public realm improvement work. These sort of works are likely to lead to improvements in terms of access which consider the safety and convenience of everyone including those with mobility, sensory and or cognitive impairments which will be positive for those with disabilities but will also benefit the young and old, women and mothers. SP2 Kings Cross also for example 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 which also benefits protected groups.</p> <p>Policy BC7 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. 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. In particular this will 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. The spatial strategies can also help support facilities suitable for religious groups/BAME groups. Certain BAME groups are more likely to experience poor health than other groups such as Gypsies and Travellers therefore maintaining access to health care facilities is important.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Area Spatial Strategies including spatial strategy policies in BCAAP How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>Policy SP2 for Kings Cross recognises the need to continue to provide important services for local communities along Caledonian Road and also identifies improvements to permeability are also identified with reference to removing barriers a key priority for the whole area. Likewise SP4: Angel and Upper Street SP5 Nag's Head SP6 Finsbury Park and SP7 Archway all recognise the importance of maintain the retail function of the town centre which therefore will be beneficial to all local residents and workers but will particularly help to cater for the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children. Young people like to congregate in town centres and they 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.</p> <p>SP7 Archway should support the commercial function of the area, as well the growing reputation for culture, 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. Locating new cultural uses in accessible locations like Archway promotes access via sustainable modes of transport which will benefit those less able to access such as disabled and older people. Protecting the various cultural spaces such as pubs for example is important for all groups because these provide meeting venues/ night time venues for everybody including groups with protected characteristics such as those with gender reassignment characteristic, or religious or BAME groups. Cultural venues have come under development pressure in recent years with many closing.</p> <p>The spatial strategies for SP1 including BC3, BC4, SP2, SP3, SP4, SP5, SP6 and SP8 all have a positive impact on economic growth promoting the spatial areas as locations for development. This is likely to have a greater beneficial impact on those on low incomes including various groups with protected characteristics as may help address inequalities. BAME groups for example have greater proportion of people who have no qualifications and face barriers to employment as well as disabled people. 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 eg disabled people who traditionally face greater barriers to employment.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	<p>Local Plan section: Area Spatial Strategies including spatial strategy policies in BCAAP</p> <p>How will the policies in this section impact and which groups with protected characteristics will it effect?</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	<p>Local Plan section: Thriving Communities</p> <p>How will the policies in this section impact and which groups with protected characteristics will it effect?</p>
Generally, the housing policies have been mostly identified as likely being particularly positive or having a neutral impact on the groups with protected characteristics.	<p>Policy H3: Genuinely affordable housing expects a minimum of 50% total net additional conventional housing built in the borough to be genuinely affordable and will significantly benefit groups on low incomes who can be made up by certain protected groups. It should be noted that whilst the impact is positive the delivery of affordable housing is constrained by viability and cannot provide for everyone's need including some with protected characteristics.</p> <p>There may be neutral effects on the young people who are more likely to rent and may seek alternative accommodation to conventional rented housing as policy seeks to restrict the provision of purpose built student accommodation, Purpose Built Private Rented and large scale Houses in Multiple Occupation. Such accommodation is generally going to be let at a premium</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Thriving Communities How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>The social and community policies are entirely positive for all groups with protected characteristics.</p> <p>The approach is likely to have a greater beneficial impact on those on low incomes with protected characteristics as the key policies are seeking to address inequalities.</p> <p>Disabled people will directly benefit from more accessible housing and other protected groups will also benefit from access improvements including parents/carers and older people.</p>	<p>compared to traditional private rented accommodation so is considered to have negative socio-economic impacts so when balanced against the policy resistance on supply is considered to create overall neutral effect. On the other hand the EqIA considered the possible positive impact on protected groups from policies H6 and H10 as they may restrict delivery of large scale HMO and purpose built student accommodation thereby potentially increasing conventional housing which would increase the quantity of affordable housing for these groups. Whilst HMO are sometimes considered an affordable form of housing this is a 'traditional' small scale form of HMO as opposed to large scale HMO which are considered expensive. Smaller scale HMO – 'traditional bedsits' can provide affordable accommodation for BAME and other lower income groups who may need to use such accommodation where they cannot access social forms of housing. Overall the restrictive policy approach is considered more likely neutral given the small quantity of this type of accommodation that has actually been delivered and the different impacts on different groups.</p> <p>All BAME groups (with the exception of Indian/Pakistani and White Other households) as well as the young and older, those with disabilities who maybe on lower incomes and are more likely to be housed in social rented housing. The Local Plan aims to maximise the provision of genuinely affordable high quality social housing, as well as increased opportunities for home ownership through intermediate housing with all housing built to high standards. It will therefore provide increased and improved housing opportunities for those living in social housing and on low incomes which will have a positive effect on these protected groups.</p> <p>The Local Plan seeks to maximise affordable housing provision which will help increase the supply of homes with cheaper rents for people who are homeless, in overcrowded homes or on the council housing waiting list. Overcrowding can have severe impacts on mental health due to increased stress. It can be partly reduced by building more homes and building high quality homes. Higher quality homes can also benefit health of all through applying space standards and other standards;</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Thriving Communities How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>There may be a positive impact from policies which resist certain forms of housing including large scale HMO, student accommodation and private rent sector on BAME and other lower income groups as it helps provide more conventional housing which is more affordable.</p> <p>The policy resistance to extra care accommodation will cause a neutral impact on some older people.</p>	<p>ceiling heights, private outdoor space and sufficient natural light. Careful management of the design, layout, materials and locations of residential developments can have a big impact upon health and help to reduce health inequalities.</p> <p>Building accessible and adaptable housing is required in Policy H4: Delivering High Quality Housing and will help to enable disabled people in particular but also older residents and those who develop a disability, illness or injury. Given the prevalence of some form of disability or other identified in the baseline to be 13% achieving the required 10% wheelchair user standard will lead to a positive impact on this group. Policy also seeks 10% of hotel bedrooms, and 10% of student housing in new developments to be wheelchair accessible. This will be particularly beneficial for disabled people, provided that disabled people can access this housing. In addition, the provision of more affordable, flexible and accessible housing will be beneficial for all age groups, but particularly older and young people. Accessible, flexible and inclusive housing will provide more opportunities for younger and older people to stay in the borough in housing which can adapt to their needs when their circumstances change. Pregnant women/mothers of very young children will benefit space standards and storage as well as level access.. from the street and between the home and some private amenity space. In terms of access and the scale of housing schemes delivered in Islington a reasonable proportion of units will come from small scale sites including conversions and changes of use which generally do not have to achieve the same accessibility standards with regards 'Accessible and Adaptable' - Category M4(2) – and 'Wheelchair user dwellings' – Category M4(3). This could be viewed negative in terms of access for disabled people or young and older people. The Local Plan makes clear Islington will seek to secure the greatest degree of 'visibility' and adaptability that is reasonably achievable within an existing structure and this is considered to mitigate the issues as far as is reasonable.</p> <p>Policy H5: Private outdoor space includes a requirement to step-free and level access to the private outdoor space which will benefit various protected groups including, young, old, mothers and disabled groups and help ensure the space is usable. The</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Thriving Communities How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>The impact of policy for gypsy and travellers is considered positive.</p>	<p>EqIA also identified the positive effect on various groups with protected characteristics of ensuring access to communal space is not restricted on the basis of the tenure of residential units as this will improve access overall with new development.</p> <p>Policy H4: Delivering High Quality Housing also addresses noise and noise from neighbours which can be associated with poor mental health. Mitigation measures or layout changes are expected where noise impacts are identified.</p> <p>Policy H7: Meeting the needs of vulnerable older people identifies that their needs will be primarily met through the delivery of conventional housing. Policy recognises the potential local need for affordable extra care which is a positive impact given the baseline evidence that 36% of Islington's 60+ population are living in income deprived households. The impact on some older people who can self-fund is considered neutral. Policy resists extra care except where a need can be demonstrated. A high proportion of older people live in social rented housing therefore ensuring that this housing stock can meet the needs of older people residents, in particular access needs will be important to create a positive impact.</p> <p>Another important aspect within the Local Plan is that to increase access to higher/further education, tackle worklessness and intergenerational deprivation, student accommodation developments are required to provide funding for bursaries for students leaving council care and other Islington students facing hardship.</p> <p>The EqIA considered the possible positive impact on protected groups from policies H6 and H10 as they may restrict delivery of large scale HMO and purpose built student accommodation thereby potentially increasing conventional housing which would increase the quantity of affordable housing for these groups. Whilst HMO are sometimes considered an affordable form of housing this is a 'traditional' small scale form of HMO as opposed to large scale HMO which are considered expensive. Smaller scale HMO – 'traditional bedsits' - do provide affordable accommodation for BAME and other lower income groups who may need to use such accommodation where they cannot access social forms of housing. Despite the overall restrictive</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Thriving Communities How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>policy approach the overall effect is considered more likely neutral given the small quantity of this type of accommodation that has actually been delivered.</p> <p>Gypsy and Travellers are a protected race and policy H12: Gypsies and Travellers aims to provide accommodation where a need is demonstrated. Evidence has identified a need and the Council will seek to identify site(s) to meet that defined need either through the Council's 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. The policy context recognises that the shortage of vacant sites, very high land values and the pressure to meet significant need for conventional housing and business floorspace (amongst other uses) - mean there will be significant challenges to meeting Gypsy and Traveller need. Despite this context the outcome is judged to be positive at this stage.</p> <p>Policy SC1: Social and community infrastructure aims to protect and provide inclusive new social and community infrastructure which 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. In particular this will 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. The Policy can also help support facilities suitable for religious groups/BAME groups. Certain BAME groups are more likely to experience poor health than other groups such as Gypsies and Travellers therefore maintaining access to health care facilities is important. Policy provides for institutional rationalisation of public sector social facilities provided they have considered the needs and views of service users which is considered neutral as it could affect all groups. The policy also expects all new facilities to be inclusive, accessible, flexible, sustainable and which provide design and space standards which meet the needs of intended occupants which will benefit all groups but particularly those disabled, young and old.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Thriving Communities How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>A man born in Islington can expect to live for 79.5 years on average and a woman 83.4 years on average. These figures are similar to the national average (male life expectancy in England 79.5 years and women 83.1 years). However in Islington, men who live in the worst off areas are expected to live 8 fewer years than men living in the best off areas in the borough. Women have fewer inequality in life expectancy (2.7 years) across the social gradient (average life expectancy measured against local deprivation decile between 2013-15). Inequality in life expectancy for men has been rising over the last 5 years, while it has remained stable for women. Providing social infrastructure which benefits both groups is important but will particularly benefit women more than men given life expectancy.</p> <p>In addition the policy specifically identifies that appropriate new social and community infrastructure should provide a Changing Places toilet, suggesting various types of infrastructure where this should be considered which would be positive for disabled people, their families and friends. Provision of accessible toilets can also benefit other groups with protected characteristics such as gender reassigned.</p> <p>The Local Plan policy sets out policy to improve sports provision in the borough through increasing access and use of new schools and community facilities which are not usually accessible to the public. Community Use Agreements would be used to secure this and this would help to increase sport and recreation opportunities and therefore be beneficial to all groups but particularly children and the young.</p> <p>The Local Plan has policies which seek to provide infrastructure to support developments, and for larger developments to carry out health impact assessments, with developers contributing to mitigate any longer term impacts. This will be important to ensure that new housing developments do not have negative impacts on groups with protected characteristics.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	<p>Local Plan section: Thriving Communities</p> <p>How will the policies in this section impact and which groups with protected characteristics will it effect?</p>
	<p>The Local Plan Policy SC2: Play Space aims to protect and provide play space to achieve increased physical activity in recognition that this contributes to healthy growth and development in children and young people, as well as improved psychological wellbeing and social interaction. This will benefit children and young people across the borough.</p>
Does the Local Plan have a positive or negative impact on groups with protected characteristics?	<p>Local Plan section: Inclusive Economy</p> <p>How will the policies in this section impact and which groups with protected characteristics will it effect?</p>
Employment policies are likely to have a positive impact for all groups with protected characteristics no neutral or negative	<p>The Local Plan aims to deliver an inclusive economy. No negative or neutral impacts have been identified. The approach is likely to have a greater beneficial impact on those on low incomes including various groups with protected characteristics as some of the policies are seeking to address inequalities. BAME groups for example have greater proportion of people who have no qualifications and face barriers to employment as well as disabled people. Child poverty is closely linked to unemployment - just over a quarter (35.3%) of Islington children live in households where no one is in employment and</p>

<p>impacts identified with particular positive benefits for those protected groups who may be on low incomes.</p>	<p>children growing up in BAME households in Islington are more likely to be living in poverty in comparison to white children. Providing a range of employment in the borough can help to reduce unemployment and increase opportunities for all protected groups eg disabled people who traditionally face greater barriers to employment.</p>
<p>Retail policies are likely to be a positive impact for all groups with protected characteristics with no neutral or negative impacts identified with particular positive benefits for BAME, religious and older people and parents/carers.</p>	<p>Policies B1 and B2 aim to deliver a range of employment space across the borough including affordable workspace. Policy B2: New Business Floorspace seeks to incorporate business floorspace of the highest inclusive design standards achievable in the context and also to meet the travel and transport needs of those for whom public transport remains inaccessible. This will have positive impacts on the disabled protected group in particular. Policy B3: Existing business floorspace aims to protect existing business space thereby protecting a range of different businesses on sites across the borough including industrial space with new Locally Significant Industrial Sites designated. All of this will help to ensure a range of employment provision for Islington residents, including lower skilled residents.</p>
<p>Cultural policies are likely to be positive for groups with no negative or neutral impacts identified. Protecting cultural facilities will benefit many groups with protected characteristics where it maintains venues where specific events such LGBT occur.</p>	<p>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. Policy B5: Jobs and Training Opportunities aims to support people into work alongside the Councils iWork service which is promoted to developers at the earliest stage.</p> <p>The Local Plan aims to meet employment needs and deliver training opportunities. Not all employment will go to people who currently live in the borough, but training and employment opportunities can be promoted locally eg the Councils iWork service. Policy also aims to set the groundwork for development to contribute to childcare provision through the iWork scheme with potential supplementary guidance where considered. This would be in addition to CIL funded infrastructure and would be beneficial for families, mothers and single parents regardless of gender.</p> <p>National research has demonstrated that disabled jobseekers need to apply for 60% more jobs than their non-disabled counterparts. Job security and simply being in employment can improve health and wellbeing, as well as making it easier to</p>

	<p>pursue a healthy lifestyle, whereas unemployed people experience increased risk of ill health, including mental health problems. Disabled people are seven times more likely to be out of work and twice as likely to have no qualification compared to non-disabled people. Growth in employment opportunities that are easily accessible is important, as are flexible working practices. The Local Plan focuses maximisation of employment in locations most accessible by public transport including town centres (Angel, Nag's Head, Archway, and Finsbury Park), as well as King's Cross and in Bunhill and Clerkenwell.</p> <p>Through the retail policies the Local Plan seeks to encourage a diverse range of shops across the boroughs town centres and local centres, as well as protect local shops. Having accessible shops will be beneficial to all local residents and workers but will particularly help to cater for the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children. Young people like to congregate in town centres and they 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, therefore policies R4: Local Shopping Areas and R5: Dispersed retail and leisure uses are important and provide a positive impact in this respect. In particular Policy R5 provides specific reference and positive impact to all protected groups but specifically those less mobile through the protection of cafés as a meeting place for communities in more residential areas.</p> <p>Policy R7: Markets and specialist shopping areas seeks to maintain and support the local markets which can be a source of affordable fruit and vegetables as well as their vibrancy and range and variety of goods on offer. Having a range of retail provision is likely to be beneficial for people of all financial means but particularly poorer people since it will include shops selling healthy food at affordable prices. In addition, markets and specialist shops can provide specialist food for BAME groups, and religious groups and not just convenience produce but comparison eg Fonthill Road specialises in clothing. Finally markets and specialist shopping areas also tend to employ people on low incomes and BAME groups.</p> <p>The mix of uses in an area can have an impact on health which can affect groups with protected characteristics. For example, a concentration of hot-food takeaways, licensed premises or betting shops can have a negative impact on health for those who frequent them, as well as the noise and anti-social behaviour that can be associated with them which can affect those who live locally. These uses are managed by Policy R8: Location and Concentration of Uses. The policy is of particular</p>
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	<p>relevance and a potential positive impact for children and young people; and it identifies that the level of overweight or obese children in Islington is consistently above both the national and London average. Evidence shows that nearly two thirds of schools in Islington have at least one hot food takeaway within 200m of the school entrance. As part of a comprehensive package of measures to tackle this issue, the council will resist proposals for hot food takeaways within 200 metres of primary and secondary schools which could have a positive benefit for the health of younger people.</p> <p>Policy R10: Culture and night time economy supports the location of new cultural uses in accessible locations; the CAZ or town centres and particularly promotes access via sustainable modes of transport which will benefit those less able to access such as disabled and older people. The policy also seeks to activate the space during daytime hours which will benefit various different groups. Protecting the various cultural spaces such as pubs for example is important for all groups because these provide meeting venues/ night time venues for everybody including groups with protected characteristics such as those with gender reassignment characteristic, or religious or BAME groups. Cultural venues have come under development pressure in recent years with many closing.</p>
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Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Green Infrastructure How will the policies in this section impact and which groups with protected characteristics will it effect?
Likely to be a positive impact for all groups with	The borough intends to take a strategic approach to green infrastructure and will help to ensure these assets are planned, designed, and managed in an integrated way to meet multiple objectives, including: promoting mental and physical health and

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Green Infrastructure How will the policies in this section impact and which groups with protected characteristics will it effect?
protected characteristics in particular disabled groups, older people and the young and children	<p>wellbeing; adapting to the impacts of climate change, including helping to reduce flood risk; improving air and water quality; and encouraging walking and cycling.</p> <p>Maintaining the provision of and access to open space per head of population will be a particular challenge given growth and the context in the borough. Large amounts of new provision will be difficult given the lack of available land and constraints on it for other uses. Given this Local Plan policy is for absolute protection for open space / improvement of existing provision, and to maximise opportunities for further provision.</p> <p>Local Plan Policy G2: Protecting open space intends to protect open space on housing estates whilst allowing redevelopment where re-provision and enhancement of open space. Whilst not formally designated open space the policy recognises the importance of these spaces 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. This is particularly relevant for groups with protected characteristics, in particular young people, given the concentration of such groups living in this housing tenure, and it is considered to have a positive impact given the potential effects are mitigated through the detailed criteria based approach. Where loss of open space on housing estates is permitted redevelopment is intended to improve the quality of space which should enable access improvements which can benefit disabled people, and young and old people too. Any loss has to ensure improvements are made and the space remains both functional and useable.</p> <p>Open space policy G3: New Public Open Space looks to increase access to open space, this should have a benefit for all local residents including all groups with protected characteristics in particular disabled groups, and young and children helping</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Green Infrastructure How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>improve their opportunity for health and wellbeing benefits. BAME groups are also less likely to access open space and the natural environment therefore ensuring space is accessible may also benefit this group.</p> <p>Disabled people in Islington experience significant health inequalities and reduced health outcomes. Communication can be a barrier, as can the opportunity to undertake physical exercise due to inaccessible facilities. Making the environment more inclusive and accessible is vitally important in helping to reduce some of the barriers that affect disabled people.</p> <p>Islington's Streetbook and Inclusive Landscape Design Supplementary Planning Document sets out practical objectives, design considerations and minimum standards to help ensure barriers to the use of public spaces are designed out and flexibility built into any landscape design proposal. This will help achieve parks and a public realm that can be used equally by everyone, taking into account differences in age, gender or disability. A cross reference to this SPD is missing from the Green Infrastructure Section.</p> <p>Local Plan Policy G4: Biodiversity, landscape design and trees requires Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions must submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage – part of this strategy considers the inclusivity of the design which will be beneficial for all local residents including all groups with protected characteristics. The supporting text acknowledges at paragraph 5.24 the social value of SINCs for local communities, and recognises parts of Islington are deficient in terms of access to nature. The policy protects access to SINCs (rather than improve it) by refusing planning permissions for schemes that adversely impact designated SINCs. The approach could seek access improvements where possible although this would</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Green Infrastructure How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>likely not mitigate the areas of deficiency in the borough. Local Plan Policy G1 also seeks to enhance green infrastructure which would include improving access to SINCs.</p> <p>Local Plan Policy G5: Green roofs and vertical greening promote encourages major developments to consider tree planting and food growing opportunities as part of intensive and semi-intensive green roofs where feasible. Local food growing, and amenity value can all be beneficial for mental health and are all promoted within the Local Plan. Temporary use of vacant sites in Islington is encouraged for local community open space. Green infrastructure can also help to tackle poor air quality. For example, plants and trees can intercept pollutants and help to reduce exposure. Age is an important factor in relation to the susceptibility of the health effects of air pollution. Poor air quality can have particular impacts on children and older people and unborn babies.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Sustainable Design How will the policies in this section impact and which groups with protected characteristics will it effect?
Likely to be a positive impact for all groups with protected characteristics in particular the very young and old who are most at risk of the impacts of climate change	<p>It will be important for development to maximise the positive effects on the environment such as reducing the impacts of climate change on everyone. Doing so will especially benefit the most vulnerable including groups; older people, very young and socially isolated, who are likely to be more affected by its impacts such as hotter summers, colder winters and flooding. The Local Plan policies eg S6: Managing heat risk encourages climate change adaptation. Measures that look to address these impacts including managing heat risk, managing surface water run-off and urban greening. The section also sets out policies which look to minimise Islington's greenhouse gas emissions.</p> <p>Local Plan policy S4: Minimising greenhouse gas emissions requires high environmental standards. Of particular relevance is 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. Of course a significant proportion of Islington's buildings are older. It will therefore be important to work with partners and local communities to work with these existing buildings and spaces to improve their environmental credentials and in particular energy efficiency. This is something that is recognised within Local Plan policy 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.</p> <p>Water is likely to become an increasingly scarce resource. Access to sufficient water for the older people, disabled and less mobile is therefore a particular concern. The Local Plan policy S9: Integrated water management and Sustainable drainage encourages an integrated holistic approach to water management across a site which aims to reduce mains water demand and surface water run-off. This can help to reduce the risk of future droughts and subsequent impacts on the vulnerable.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	<p>Local Plan section: Sustainable Design</p> <p>How will the policies in this section impact and which groups with protected characteristics will it effect?</p>
	<p>Policy S7: Improving Air Quality expects development to not cause further harm to air quality or cause a further deterioration and this will benefit those individuals who could be more susceptible to poorer air quality or who are more sensitive to noise. Age is an important factor in relation to the susceptibility of the health effects of air pollution. Poor air quality can have particular impacts on children and older people and unborn babies. This policy and transport policies which encourage more sustainable travel choices and less car use will also help benefit those affected by air pollution.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	<p>Local Plan section: Public Realm and Transport</p> <p>How will the policies in this section impact and which groups with protected characteristics will it effect?</p>
The Public Realm and Transport section is likely to have a broadly positive impact for all groups with protected characteristics with	<p>The Local Plan Policy T2: Sustainable Transport Choices looks to incentivise sustainable forms of transport such as walking and cycling with a design-led approach whilst minimising the impact of non-sustainable transport - reducing the dominance of the vehicle. More sustainable forms of transport will increase physical activity and increased physical activity can have clear benefits for physical and mental health, as well as help to reduce pollution and climate change. The policy approach will also benefit young and old people and recent mothers through improvements to pedestrian crossings/junctions which would improve safety with a consistently designed street environment which is also a positive for older people with street environment</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Public Realm and Transport How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>particular benefits for old and young, disabled groups with regards accessibility.</p> <p>The only potential minor negative impact is on families with young children or the elderly who may need access to parking facilities close to dwellings.</p>	<p>cues to aid navigation. Cycle parking standards included at Local Plan appendix 4 will also provide positive impacts. They will aim to deliver the provision of accessible cycle parking, which will have a positive impact on ambulant disabled cyclists as well as disabled cyclists who use non-standard, adapted cycles and also families using cargo bikes.</p> <p>Encouraging public transport use is important with buses a key form of transport for people aged 65 and over, with 61 per cent saying they use the bus at least once a week. Making public transport more available is crucial for those who cannot drive eg the visually impaired disabled. In addition to the health benefits of encouraging more physical activity the policies will also improve the health of all residents by improving local air quality, and it is considered to be particularly beneficial for those who may be more susceptible to obesity or cardiovascular illness such as the young and the elderly respectively.</p> <p>Making the public transport system more accessible such as step free access to the tube and overground network is important for disabled people as well as the young and old – the Local Plan identifies in policy SP6: Finsbury Park that the Council will work with Transport for London around making the station fit for people and the potential to make it step free. Accessibility improvements in policy T2: Sustainable Transport Choices will benefit disabled cyclists in particular through introduction of standards in the appendix which recognise the difference design needs for facilities for specialist bikes, this will also benefit the young and old too. Finally ensuring public realm improvements are safe is important for various equality groups who may be more likely to be victims of crime than other members of the population such as groups; women, the young and old, religious, BAME disabled, gender reassigned.</p> <p>Policy T4: Public Realm is specific in its reference to ensuring public realm improvements consider the safety and convenience of everyone including those with mobility, sensory and or cognitive impairments which will be positive for those with disabilities</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Public Realm and Transport How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>but will also benefit the young and old, women and mothers. The policy also requires privately owned public spaces to provide management plans to detail how space can be utilised by a range of users, including with those with protected characteristics, which potentially benefits all groups with protected characteristics where new private owned public realm is created. Other policies also benefit safety including retail policy which maintains active frontages in town centres.</p> <p>Policy T2: Sustainable Transport Choices will resist the use of shared space where it incorporates a single surface on the basis that it is unsafe and inappropriate which will be beneficial for those with disability in particular for people with impaired or no vision who can find “shared space” schemes dangerous and difficult to navigate. The approach makes clear that the use of single surface “shared space”, which involves the removal of kerbs, will be resisted. “Shared space” must deliver logical, legible, inclusive and safe environments, informed by a contextual appraisal. Kerbs should be a minimum height of 60mm.</p> <p>Policy T3: Car-free development requires car free development for all development. Wheelchair accessible parking will be provided in accordance with the relevant standards (1 space per wheelchair accessible dwelling), however the remainder will be car free. The wheelchair spaces will be encouraged to be on-street. This will be beneficial for disabled people, particularly those who are unable to take advantage of more active transport modes or public transport and who the car is the only option. Whilst this is beneficial in many aspects for example for improving the health of residents who suffer from respiratory diseases, the policy has been identified as potentially having minor negative impacts on families with young children or the elderly who may need access to parking facilities close to dwellings despite good public transport accessibility. This should be balanced against the benefits of reduced car use improving air pollution too which would be positive for the young and elderly. The temporary use of accessible parking bays for parklets or cycle parking will be supported, encouraging more active travel.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Design and Heritage How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>Likely to be a positive impact for all protected characteristic groups although potential negative conflict between protection of heritage assets and accessibility for disabled groups, the young and mothers with children</p>	<p>Policy DH2: Heritage Assets seeks to preserve the boroughs heritage. There can sometimes be a conflict between conservation of heritage assets and inclusion. There could be potential minor negative impacts on groups with protected characteristics where special architectural qualities or features which must be preserved prohibit the implementation of improved accessibility standards such as ramps or lifts. This could lead to minor negative impacts on less mobile members of the community, such as the elderly or disabled.</p> <p>A restrictive approach is taken to the locations where tall buildings can in principal be sited to ensure that they fit in with the character of the surrounding area. Restricting the amount of high density housing, and ensuring it is well planned, can help to address issues such as accessibility and the adverse effects of noise. The EqIA considers the policy for building heights will have no impact on all groups with protected characteristics. The environmental impact of a tall building is also a consideration where sudden changes in the local microclimate can potentially affect equality groups; the old and young – but if the criteria cannot be satisfied and the impacts are found to be unacceptable then the building will not be permitted. Finally, the safety and consideration of evacuation plans for tall buildings is an important factor in particular for older people who are less mobile and more likely to live alone.</p> <p>Policy DH4: Agent-of-change, noise and vibration will have a positive impact on all groups as it aims to mitigate adverse impacts from noise and vibration. Noise can be associated with poor mental health.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	Local Plan section: Strategic Infrastructure How will the policies in this section impact and which groups with protected characteristics will it effect?
Likely to be a positive impact for all protected characteristic groups as aims to provide the infrastructure necessary for growth	<p>In light of population growth it will be important to provide the necessary infrastructure to meet the needs of existing and future populations. A key piece of work for the Local Plan is the update to the Infrastructure Delivery Plan (IDP). This updates the assessment of the social and physical infrastructure in the borough and will be important in ensuring the needs of all groups with protected characteristics are met. Policy ST1: Infrastructure Planning and Smarter City Approach sets out that the council will work with its partners to meet changing infrastructure needs and requirements over time. The Local Plan recognises the importance of the IDP dataset and will review and update this to support Local Plan in future.</p> <p>Finally Policy ST1 considers how the Council can promote use of technology to help people to live better lives with the policy recognising that this is going beyond the role of planning but that technology can be used to help improve peoples lives.</p>

Full Council draft //A June 2019

Full Council draft //A June 2019

Appendix 7a: Health Impact Assessment Camden & Islington Public Health

Full Council draft HIA June 2019

Health Impact Assessment

Health impact assessment of the Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft, November 2018

January 2019

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Health impact assessment

Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft, November 2018

Introduction

There are stark health inequalities in Islington. For the less affluent in our communities, these inequalities mean poorer physical and mental health, poorer quality of life and an earlier death. As well as the economic impact for individuals, families and society, reducing these inequalities is a matter of fairness and social justice. (Annual Public Health Report, 2013/14). Islington's corporate plan 2018-22, Building a fairer Islington, has a clear vision to make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life. The Local Plan is the spatial expression of the corporate plan.

The National Planning Policy Framework states that Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

There is an important link between how places are planned and developments delivered and the health of the communities who live in them, with scope to address social, health and related poverty issues in spatial planning and to ensure that new development delivers safe, healthy and attractive places for people to live in.

This recognises that health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity (World Health Organisation). Whilst the spatial planning system cannot impact on the predetermined factors that can affect health: age, gender, hereditary factors, etc., it can influence the wider determinants of health: individual lifestyles, social and community influences, living and working conditions, and socioeconomic, cultural and environmental influences.

Good mental health is as important as good physical health, and is a priority in Islington's Joint Health and Wellbeing Strategy. The design of the built environment is important for people's psychosocial health. Good design encourages greater ownership and community involvement, and can reduce negative effects such as antisocial behaviour and crime/fear of crime, can encourage the use of community facilities.

It is important to bear in mind that poor health outcomes are often driven by multiple and cumulative determinants, for example poor housing conditions and lack of (good) employment can be mutually reinforcing, and lack of open space, fear of crime, and poor air quality can mutually reinforce against social cohesion and physical activity. It is therefore important to consider the individual and communities at the centre of the range of wider determinants.

The Local Plan: Strategic and Development Management Policies - Regulation 18 draft, (November 2018) is referred throughout the health impact assessment as the "draft Local Plan" for brevity.

Summary of recommendations

1. Recommendation: Policy H2D should specifically state that all new and converted conventional residential development should meet the housing tenure priorities in Table 3.2 in addition to house size.
2. Recommendation: That the local plan gives more clarity on what the Council considers "genuinely affordable" in relation to housing.
3. Recommendation: The Local Plan should state that the communal / public spaces around residential developments should encourage residents to interact with the wider world by providing safe, pleasant spaces where people can interact
4. Recommendation: The Local Plan should directly reference the North London Partners Strategic Estates Strategy and the Haringey and Islington Wellbeing Partnership's strategic estates strategy.
5. Recommendation: Where developers include proposals for new, relocated, or loss of primary or secondary health care premises, the Local Plan should require the developer to show evidence of engagement with the NHS Islington Clinical Commissioning Group and the relevant NHS Health Trust (where the premises is owned by an NHS trust), in addition to the service provider or providers. For community pharmacy, developers should be aware of and consult the local Pharmacy Needs Assessment. Dental and ophthalmic services are commissioned by NHS England and developers should engage with NHS England where dental or ophthalmic services are impacted.
6. Recommendation: For clarification the paragraph 3.144 should include post-16 education as social infrastructure.
7. Recommendation: That a policy requiring new business floor space to promote health and wellbeing through good design.
8. Recommendation: That the Local Plan includes childcare facilities as a type of community infrastructure in paragraph 3.144.
9. Recommendation: Paragraph 1.8 of the draft Local Plan should be clear that the National Planning Policy Framework supports local planning policies that consider the health and wellbeing of the population.
10. Recommendation: The draft Local Plan should be clear that the health of Londoners is, to a large extent, determined by the environment in which they live.
11. Recommendation: The draft Local Plan should highlight the inequalities in life expectancy between the most and least deprived areas of Islington in order to encourage a focus on health and wellbeing particularly in the most deprived areas.
12. Recommendation: that major developments are required to submit a health impact screening assessment at pre-application stage.
13. Recommendation: that the draft Local Plan clarifies that health impact assessments

should be proportionate to the size of the development and not limited to access to health services.

Full Council draft //A June 2019

Health Impact Assessment

This Health Impact Assessment of the Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft (November 2018) assesses the draft plan in the context of the wider determinants of health, using a framework described in the London Healthy Urban Development Unit's "Rapid Health Impact Assessment Tool". The assessment tool takes an evidence-based approach to integrating health into urban planning, and takes into account legislation and policy changes both nationally and in London that relate to health and spatial planning.

The Rapid Health Impact Assessment Tool identifies eleven wider determinants of health that are most influenced by spatial planning:

- Housing quality and design
- Access to healthcare services and other social infrastructure
- Access to open space and nature
- Air quality, noise and neighbourhood amenity
- Accessibility and active travel
- Crime reduction and community safety
- Access to healthy food
- Access to work and training
- Social cohesion and lifetime neighbourhoods
- Minimising the use of resources
- Climate change

All policies described in the Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft (November 2018) were cross-analysed against these determinants, taking into account available evidence and best practice from elsewhere, to identify where policies could be strengthened, and the entire plan analysed against the determinants to ensure that the draft Local Plan addresses all of the determinants (gap analysis).

Summary assessment and recommendations

Housing

Houses are more than physical structures providing shelter. They are homes – where we bring up our families, socialise with friends, our own space where we can unwind, keep our possessions safe. Homes are the base from which we access a variety of social, economic and leisure activities. Homes are also at the centre of our communities.

The draft Local Plan has a clear focus on delivering decent, affordable homes for all, and addresses important aspects of housing such as adaptability, space standards, and

sustainability. The draft local plan could be strengthened by adding clarity on tenure mix, the definition of affordability, and how the housing environment can support social interaction.

1. Recommendation: Policy H2D should specifically state that all new and converted conventional residential development should meet the housing tenure priorities in Table 3.2 in addition to house size.
2. Recommendation: That the local plan gives more clarity on what the Council considers "genuinely affordable" in relation to housing.
Recommendation: The Local Plan should state that the communal / public spaces

Access to public services

Public services are essential for health and wellbeing. The draft Local Plan takes a holistic approach to public services, and includes both statutory and voluntary and community services in its definition of social infrastructure. The Draft Local Plan seeks to protect and enhance social infrastructure and supports co-location of services. The draft Local Plan can be strengthened by referencing NHS strategic estates strategies to ensure that the health estate meets demand and new models of care, and is affordable to the NHS. The draft London Plan should require developers to engage with relevant NHS bodies where health premises feature in a development proposal. The draft Local Plan should also be strengthened by clarifying that post- 16 education is included in the definition of social and community infrastructure.

4. Recommendation: The Local Plan should directly reference the North London Partners Strategic Estates Strategy and the Haringey and Islington Wellbeing Partnership's strategic estates strategy.
5. Recommendation: Where developers include proposals for new, relocated, or loss of primary or secondary health care premises, the Local Plan should require the developer to show evidence of engagement with the NHS Islington Clinical Commissioning Group and the relevant NHS Health Trust (where the premises is owned by an NHS trust), in addition to the service provider or providers. For community pharmacy, developers should be aware of and consult the local Pharmacy Needs Assessment. Dental and ophthalmic services are commissioned by NHS England and developers should engage with NHS England where dental or ophthalmic services are impacted.

Opportunities for physical activity

The Chief Medical Officer recommends that adults should aim to be active daily. Over a week, activity should add up to at least 150 minutes of moderate intensity activity in bouts of 10 minutes or more. All children and young people should engage in moderate to vigorous intensity physical activity for at least 60 minutes and up to several hours every day. Much of this, if not all, can be built into our daily activities and it is therefore imperative that the environment supports and encourages this.

The draft Local Plan considers opportunities for physical activity in a number of policies ranging from play space to encouraging walking and cycling, as well as supporting public travel (which inevitably involves some physical activity before and after the journey). The draft Local Plan also considers infrastructure that supports cycling, for example cycle parking and facilities for cyclists in the workplace.

It is important to note that Islington is developing a local Transport Strategy which will respond to and implement policies in the Mayor's Transport Strategy seek to encourage Londoners to attain recommended levels of physical activity through active travel.

There is growing evidence that good design in the workplace not only improves employees' health and wellbeing, but also improves employees' productivity, e.g. Health, Wellbeing & Productivity in Offices. World Green Building Council, 2014.¹

The draft Local Plan should be strengthened by requiring developers to consider workplace health in the design of workplaces.

7. Recommendation: That a policy requiring new business floor space to promote health
~~and wellbeing through good design~~

Air quality, noise and neighbourhood amenity

Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy.

Islington is the most densely populated borough in London. Densely populated areas with heavy traffic experience higher pollution levels than less densely populated areas. A key source of pollution is from road traffic as the A1 runs through the heart of the borough and is commonly used as a thoroughfare to travel through to the city.

All of Islington is within an Air Quality Management Area, which has contributed to Islington consistently achieving EU objectives with the exception of the annual mean objective of 40µg/m³ or less for roadside NO₂ (although there has been a downward trend). However,

¹

https://www.ukgbc.org/sites/default/files/Health%2520Wellbeing%2520and%2520Productivity%2520in%2520Offices%2520-%2520The%2520next%2520chapter%2520for%2520green%2520building%2520Full%2520Report_0.pdf

exposure to levels below EU objectives for air pollution may still be harmful, therefore it is important that strenuous efforts to reduce air pollution continue.

It is also important to note that for the majority of people, the health benefits of physical activity outweigh the disbenefits of air pollution at levels typically observed in Islington.

Recommendation: add text to paragraph 7.4: "For most people, evidence shows that the health benefits of active travel outweigh the disbenefits of poor air quality at levels typically seen in Islington

The draft Local Plan has a range of policies that tackle air pollution, noise and that protect and enhance amenity space.

Access to open space

Urban green and open spaces, such as parks, playgrounds, and residential greenery, can promote mental and physical health by providing psychological relaxation and stress alleviation, stimulating social cohesion, supporting physical activity, and reducing exposure to air pollutants, noise and excessive heat.

The draft Local Plan considers a wide range of open space and natural space in its policies, including accessibility to open and natural spaces. The draft Local Plan links to the All London Green Grid, which is a policy framework to promote the design and delivery of green infrastructure across London and is supplementary planning guidance in the London Plan.

In addition to publicly owned lands, the draft Local Plan also considers privately owned public space, which is likely to contribute to improved health and wellbeing through greater access to amenity.

Accessibility and transport.

Transport is essential for allowing people to access what they need, whether this is education, employment, markets and goods, services, leisure, social interaction, and more. A good transport system supports safe and community-friendly spaces, enables active travel (walking and cycling) and public transport use, is accessible and efficient for everyone, and minimises harmful impacts on the environment.

Islington is extremely well connected in terms of public transport. Many areas of Islington have a PTAL rating of 6a or 6b (the highest possible rating) meaning that the vast majority of the borough has good public transport connectivity and frequency of service.

However, the draft Local Plan recognises that public transport may not serve the needs of people with mobility, sensory or cognitive impairments and recognises that it is vitally important that specific measures are put in place to enable that these users have easy access to the transport network.

The draft Local Plan's policies on transport and accessibility will support the forthcoming local Transport Strategy, which will be the borough's response to the Mayor's Transport Strategy and detail of how the Mayor's transport policies will be implemented locally. The key policies of the Mayor's Transport Strategy – increased active travel and "vision zero" (which aims to eliminate

all deaths and serious injuries on London's transport system) are reflected in the draft Local Plan.

Crime and community safety.

Community safety improves quality of life and wellbeing and fosters stronger communities by reducing crime, anti-social behaviour, alcohol and substance misuse and supply.

The draft Local Plan considers community safety across a range of policies, including active surveillance from buildings, reduced opportunities for crime and antisocial behaviour, and safety from accidents etc.

Access to healthy food

Not only is food essential to our health and survival, it is at the heart of our economy, shapes our environment and helps form our culture and our social lives. It is hardly surprising therefore that there are a wide range of issues about food that impact significantly on our lives: its availability, production, distribution, preparation, consumption and waste generated. (Islington Food Strategy 2010)

The draft Local Plan has a range of policies covering access to healthy food retailers and markets, food growing, and resistance to overconcentration of unhealthy food outlets. The draft Local Plan's commitment to the Healthy Catering Commitment will encourage a healthier offer from food retailers.

Employment and training

One of the important determinants of health inequalities is the availability and nature of employment. Employment matters because having a poor quality job, or no job, can be bad for your health. Good employment has the potential to protect health and contribute to reduced health inequalities.

The draft Local Plan policies provide good opportunities and consider employment for local residents as well as people who come to work in Islington and contribute to the borough's economy. The draft Local Plan also provides for training opportunities associated with development.

It is also important to remove barriers to employment, and one important barrier is the availability of good quality, affordable childcare. It is important therefore that childcare infrastructure is clearly seen as part of the social infrastructure of the borough.

8. Recommendation: That the Local Plan includes childcare facilities as a type of

community infrastructure in paragraph 2.111

Social capital and social cohesion

Social capital is important to health and wellbeing because it comprises the resources that help residents navigate opportunities and overcome barriers to daily life, for example knowledge of

job opportunities or requirements for a chosen career path, providing emotional support, or practical support such as help in attending an appointment. Social cohesion refers to the strength of those relationships and the sense of unity and harmony among members of a community. Together, social capital and social cohesion underpin communities' resilience.

The draft Local Plan provides a range of opportunities to support social interaction, including within housing developments, play provision, town centres, restaurants and cafés, markets, green infrastructure, social infrastructure, etc.

The draft Local Plan has policies to strongly encourage mixed communities, which supports social capital and cohesion.

Resource minimisation

Reducing or minimising waste including disposal, processes for construction as well as encouraging recycling at all levels can improve human health directly and indirectly by minimising environmental impact, such as air pollution.

The draft Local Plan has a range of policies including sustainable design and construction, waste and recycling management, and efficient use of scarce resources including developable land.

Climate change

There is a clear link between climate change and health. The Marmot Independent Review of Health Inequalities in 2010 was clear that local areas should prioritise policies and interventions that 'reduce both health inequalities and mitigate climate change' because of the likelihood that people with the poorest health would be hit hardest by the impacts of climate change.

The draft Local Plan has policies that require sustainable design and construction, flood assessment and mitigation, energy efficiency and cooling, and biodiversity, all of which contribute to the mitigation of climate change.

Other observations

Paragraph 1.8 The National Planning Policy Framework (NPPF). Paragraphs 91 to 101 if the NPPF state how planning policies and decisions should aim to achieve healthy, inclusive and safe places. The environment is a key enabler to improving health and reducing inequalities, and therefore this should be stated specifically in Islington's Local Plan.

9. Recommendation: Paragraph 1.8 of the draft Local Plan should be clear that the National Planning Policy Framework supports local planning policies that consider the

Paragraph 1.9 London Plan Policy GG3 (Creating a healthy city) recognises that the health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space,

climate change and social and community networks can have a greater influence on health than healthcare provision or genetics.

10. Recommendation: The draft Local Plan should be clear that the health of Londoners is, to a large extent, determined by the environment in which they live.

Objective 6: Health and independence. On average, a man born in 2014/16 in Islington can expect to live for 79.5 years, but 18.7 of these will be in ill health. A woman born at the same time can expect to live for 83.4 years, but the last 20.9 of these will be in poor health. An environment that supports healthy lifestyles is key increasing healthy life expectancy.

Recommendation: The draft Local Plan should describe the extent of poor health in later life and take an "Age-friendly Cities" approach to improve the lives and experiences of older people.

The Slope Index of Inequality is a measure of the difference in life expectancy between the most and least deprived sections of the local population. In Islington male life expectancy at birth varies by 8.2 years between the least deprived and most deprived areas; for women life expectancy at birth varies by 3.0 years. This in-area inequality strongly suggests that it is local factors that underlie the difference in life expectancy.

11. Recommendation: The draft Local Plan should highlight the inequalities in life expectancy between the most and least deprived areas of Islington in order to encourage a focus on health and wellbeing particularly in the most deprived areas.

Policy SC3 Health Impact Assessments: The inclusion of policy SC3 Health Impact Assessments is strongly supported. The policy should be strengthened to include a health impact assessment on all planning class uses referred to in the Location and Concentration of Uses Supplementary Planning Document (2016), particularly where such uses are proposed in locations close to sensitive uses. The policy should be further strengthened by requiring all developments that are publically accessible and are expected to have sufficient footfall to assess the feasibility of installing and maintaining a public access defibrillator as part of a health impact assessment.

Recommendation: that health impact assessments are required for planning class uses referred to in the Location and Concentration of Uses Supplementary Planning Document.

The policy should also be strengthened by requiring a screening assessment at pre-application stage for major developments in order for the findings to influence the design at an early stage.

12. Recommendation: that major developments are required to submit a health impact screening assessment at pre-application stage.

In its current guidance on health impact assessments, the Council is mindful that health impact assessments should be reasonable and proportionate, and this should be reflected in the policy or accompanying text.

13. Recommendation: that the draft Local Plan clarifies that health impact assessments should be proportionate to the size of the development and not limited to access to health services.

Conclusions

The draft Local Plan is the spatial expression of Islington's corporate plan 2018-2022, Building a fairer Islington. As such, its policies are focused on reducing inequalities in the borough. This Health Impact Assessment has assessed the draft Local Plan against the wider determinants of health: environmental factors that impact on everybody's health and wellbeing.

Overall, 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 Council's objectives as set out in the corporate plan are clearly reflected in the draft Local Plan and planning policies respond positively to these objectives.

This Health Impact Assessment has made a number of recommendations which aim to strengthen the draft Local Plan and support its objectives further.

Detailed Health Impact Assessment

Housing

Does the Local Plan require Code for Sustainable Homes standards?

Whilst the Code for Sustainable Homes was withdrawn by the Government in 2015, many of the standards passed into the Part M Building Regulations. Islington's Local Plan policy H4A requires new and converted residential development to be built to high quality, and policy H4B requires 90% of residential development to be compliant with the Category M4(2) "Accessible and adaptable" standard and the remaining 0% to be compliant with Category M4(3) "Wheelchair user" standard.

Does the Local Plan address specific housing needs (supported housing, extra care, wheelchair accessibility)?

Policy H1P of the Local Plan states that the Council will support the provision of new supported housing where there is an identified need, and protects existing supported housing. Policies H1L and H7A state that the accommodation needs of older people will be met primarily through conventional housing, which reflects older people's wishes to remain living in their own homes in the community. Parts B-E of policy H7 set out where extra-care housing will be considered and address issues such as proximity to community and commercial facilities and design features, etc.

Does the Local Plan address independent living through adaptations?

Policy H1K requires conventional housing to be designed to meet a variety of needs throughout its lifetime.

Local Plan policy H7 envisages that older people's needs will be met primarily through conventional housing, and policy H4B requires 90% all new and converted residential to be adaptable. Adaptable housing will meet the needs of other groups such as disabled people in addition to older people.

Does the Local Plan address good design and space standards?

Policy H4C-E detail the minimum space standards required for residential development, and policy H5A-E detail the requirements for private outdoor space, which is an important contributor to quality of life.

Does the Local Plan address a range of housing types (social, affordable, intermediate, market)?

Policy H1A states that Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities.

Policy H2D requires that all new and converted conventional residential development should meet the housing size mix priorities set out in table 3.2 in the plan. Table 3.2 sets out the priorities by house size and tenure.

Recommendation: Policy H2D should specifically state that all new and converted conventional residential development should meet the housing tenure priorities in Table 3.2 in addition to house size.

Policy H3A-J sets out a range of requirements for the provision of genuinely affordable housing, although it remains unclear at what level "genuinely affordable" would be considered.

Recommendation: That the local plan gives more clarity on what the Council considers "genuinely affordable" in relation to housing.

Does the Local Plan address energy efficiency?

Policy S1 relates to the Council's policy of sustainable design, including energy efficiency, which is given further detail in policy S1C

Other

Policy H1D states that homes should be designed as a place of retreat and as such should contribute to improving the health and wellbeing (both physical and mental) of residents.

Homes should also serve as a base from which residents can participate in the wider community, whether this is through leisure, education, employment, accessing services or any reason that provides opportunities for social interaction.

Recommendation: The Local Plan should state that the communal / public spaces around residential developments should encourage residents to interact with the wider world by providing safe, pleasant spaces where people can interact.

Access to public services

Have public services' needs, location and accessibility been considered?

Policy SC1 Social and Community infrastructure, sets out the Council's requirements in relation to public services, and in particular section G describes the requirements for spatial and physical accessibility and convenience for new social infrastructure. Section D protects existing social infrastructure.

Has assessment of healthcare demand via use of the HUDU Model been carried out?

The healthcare demand has not been assessed with the HUDU model. However, North London Partners, a partnership of health and care organisations from the five London boroughs of Barnet, Camden, Enfield, Haringey and Islington, has a strategic estates board and strategic estates strategy, which takes into account population projections and housing trajectories in Islington, and interprets this in the context of new and changing models of care and estates needs arising from that analysis.

Recommendation: The Local Plan should directly reference the North London Partners Strategic Estates Strategy and the Haringey and Islington Wellbeing Partnership's strategic estates strategy.

Recommendation: Where developers include proposals for new or relocated primary or secondary health care premises, the Local Plan should require the developer to show evidence of engagement with the NHS Islington Clinical Commissioning Group and the relevant NHS

Health Trust (where the premises is owned by an NHS trust), in addition to the service provider or providers. For community pharmacy, developers should be aware of and consult the local Pharmacy Needs Assessment. Dental and ophthalmic services are commissioned by NHS England and developers should engage with NHS England where dental or ophthalmic services are impacted.

Have health requirements including model of care been assessed in context of the Local Plan?

The Local Plan recognises the importance of health provision and protects existing provision. Both the North London Partners in Health and Care and Haringey and Islington Wellbeing Partnership have strategic estates strategies that reflect new and changing models of care, and these should be directly referenced in the Local Plan.

Recommendation: The Local Plan should directly reference the North London Partners in Health and Care and Haringey and Islington Wellbeing Partnership's strategic estates strategies

Does the Local Plan facilitate multiple building uses for different public services?

Yes, under policy SC1A the Council will support proposals to provide new and/or extended social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment against all relevant Local Plan policies

Are community facilities provided within the Local Plan?

Yes, policies SC1A-H provides for social and community infrastructure, with text in paragraph 3.144 clarifying that social and community infrastructure comprises a wide range of facilities and services, such as hospitals, doctors' surgeries, nurseries, schools, leisure centres and sports facilities, libraries, community centres and recreational and play spaces.

Does the Local Plan contribute to meeting primary, secondary and post 16 education needs?

Yes, policies SC1A-H provides for social and community infrastructure, with text in paragraph 3.144 clarifying that social and community infrastructure includes schools.

London Metropolitan University is recognised in policy SP5I where the draft plan supports increased space for learning.

City University and City and Islington college are not referred to in the draft Local Plan.

Recommendation: For clarification the paragraph 3.144 should include post-16 education as social infrastructure.

Opportunities for physical activity

Does the Local Plan prioritise and encourage walking (e.g. HomeZones, walking plans, wide and safe streets etc.)?

Policy SC2A-D sets out the Council's policies on the retention of and provision of play space.

Policy G3A-D sets out the Council's policies on open space, particularly policy G3Civ which states that public open space should be designed to accommodate and encourage safe physical activity for all, promoting walking, cycling and social interaction.

It should be noted that Islington's forthcoming Transport Strategy will respond to the Mayor of London's Transport Strategy policies which seek to encourage physical activity through increased active travel. Policy T1A of the draft Local Plan states that all development proposals should take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling. Policy T1B states that the design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, must prioritise practical, safe and convenient access and use by sustainable transport modes, namely walking, cycling and public transport.

Does the Local Plan prioritise and encourage cycling (e.g. cycle lanes, secure cycle stands, office shower facilities)?

Policy T1A of the draft Local Plan states that all development proposals should take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, including cycling.

Policy T2E sets out the Council's policies for cycle safety around developments as well as end-of-trip cycle facilities.

It should be noted that Islington's forthcoming Transport Strategy will respond to the Mayor of London's Transport Strategy policies which seek to encourage physical activity through increased active travel, including cycling.

Does the Local Plan ensure that buildings are designed to maximise physical activity (e.g. positioning of stairwells, shower rooms, secure cycle parking)?

Policy B2E sets out the Council's requirements regarding amenity etc., although this does not include maximising physical activity.

There is growing evidence that good design in the workplace not only improves employees' health and wellbeing, but also improves employees' productivity, e.g. Health, Wellbeing & Productivity in Offices. The next chapter for green building. World Green Building Council, 2014.

https://www.ukgbc.org/sites/default/files/Health%2520Wellbeing%2520and%2520Productivity%2520in%2520Offices%2520-%2520The%2520next%2520chapter%2520for%2520green%2520building%2520Full%2520Report_0.pdf

Recommendation: That a policy requiring new business floor space to promote health and wellbeing through good design.

Policy T2E sets out the Council's policies for secure cycle parking.

Does the Local Plan enhance opportunities for play and exercise (e.g. follows Active Design by Sport England for instance)?

Policy SC2A-D sets out the Council's policies on the retention of and provision of play space. Policy G3A-D sets out the Council's policies on open space, particularly policy G3Civ which states that public open space should be designed to accommodate and encourage safe physical activity for all, promoting walking, cycling and social interaction.

Air quality, noise and neighbourhood amenity

Does the Local Plan minimise construction impacts (including dust)?

Policy T5G requires developments to adhere to best practice construction techniques to limit impacts on air quality and reduce noise and vibrations from construction (including non-read moveable machinery), and the transportation of construction waste.

Recommendation: The Council should strengthen policy T5 by requiring construction management plans for all developments. For larger developments the Council should seek S106 funding for the monitoring of construction impacts.

Does the Local Plan minimise air pollution?

Policy S7 of the local plan refers to air quality. Sections of this policy require new developments not to have significant adverse impacts on air quality either individually or cumulatively, or impact adversely on the Borough's air quality limits through exceedances or delays to meeting limits. The policies require developments to avoid reversing improvements made through other air quality initiatives.

Development proposals are required to submit an Air Quality Assessment to meet Air Quality Neutral standards, in line with policies on sustainable design and construction (Policy S2)

Does the Local Plan minimise noise pollution?

Policy 4H (Delivering high quality housing) part J requires all development proposals which include residential units to fully assess noise and vibration impacts on and between dwellings, in line with policy DH5, which takes an "agent of change" approach to noise and vibration, under which potential adverse impacts which may arise due to new development being located close to sensitive uses must be fully prevented via the design/layout of a scheme and/or the incorporation of other appropriate measures to limit the impact.

Does the Local Plan promote good air quality (through for example planting of trees or provision of green/brown roofs etc.)?

Consideration of air quality and other impacts is given within policy G4 (biodiversity, landscape and trees), which includes green/brown roofs as well as green walls and other landscape features.

Does the Local Plan protect and enhance green space?

Green space is protected and enhanced under policy G1 (Green infrastructure), and major developments are required to conduct an Urban Greening Factor assessment in accordance with the methodology in the London Plan. Part F of policy G1 requires development to contribute to the implementation of green infrastructure strategies including the All London Green Grid.

Historic green spaces are protected under policy DH2G, and are identified on the Policies Map.

Does the Local Plan provide high quality amenity space?

Policy G2 (protecting open space) part B states that development within the immediate vicinity of public open space must not impact negatively on the amenity, ecological value and functionality of the space. All impacts must be prevented/mitigated through the design of the scheme.

Under part C of the policy, the Council will protect open space on housing estates. Where development is proposed on open spaces on housing estates, on-site re-provision of the same quantum of space of an improved quality is encouraged. Full loss of open space will be resisted. Proposals which will lead to a net loss but which will re-provide a quantum of on-site open space which is both functional and useable may be acceptable subject to stringent conditions.

Does the Local Plan address open space and natural space deficiency?

Policy G3 (New public open space) requires the provision of new accessible public open space of developments of 200 homes or more.

Access to open space

Does the Local Plan retain and enhance existing open and natural spaces?

The draft Local Plan retains and enhances open and natural spaces through a variety of policies including policies G1 (Green infrastructure) G2 (Protecting open space) and G3 (New public open space).

In areas of deficiency, does the Local Plan provide new open or natural space, or improve access to existing spaces?

The Local Plan recognises that Islington is generally deficient in open and natural spaces. Policy G3 (New public open space) provides for new open spaces across Islington.

Does the Local Plan provide a range of play spaces for children and young people?

Policy C2 (Play spaces) protects existing play space, including the borough's 12 adventure playgrounds, and sets out policy for new play space in developments.

Does the Local Plan provide links between open and natural spaces and the public realm?

Policy G1 part F states that development should contribute to the implementation of green infrastructure strategies including the All London Green Grid.

Policy G2Ciii requires permeability and connectivity within and between spaces to be improved, ensuring that the space remains substantially undeveloped and open, and that accessibility to the general public is improved.

Policy T1 (Enhancing the public realm and sustainable transport) requires all development proposals to take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling

Are the open and natural spaces welcoming and safe and accessible for all?

Objective 3 (Creating a safe and cohesive borough for all) sets the vision for all Islington including open spaces and natural spaces, whilst objective 6 (Health and independence) recognises the positive impact on health of such spaces.

Policy G2Ciii requires permeability and connectivity within and between open and natural spaces to be improved, ensuring that the space remains substantially undeveloped and open, and that accessibility to the general public is improved.

Policy T1 (Enhancing the public realm and sustainable transport) requires all development proposals to take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling, which increases accessibility.

Does the Local Plan set out how new open space will be managed and maintained?

Policy G3 part C requires new public open space to be overlooked, designed and managed to meet diverse and changing needs.

Policy T4 part D states that Privately Owned Public Spaces must provide a detailed management plan which sets out how the space will be used and managed. Management plans must detail how the space can be utilised by a range of users, including with protected characteristics; and how the space contributes to mixed and balanced communities. POPS must operate indistinguishably from public space. Adherence to management plans will be secured through legal agreement.

Accessibility and Transport

Does the Local Plan facilitate streetscape accessibility, legibility and permeability?

The Council has two relevant adopted supplementary planning documents (SPD): Inclusive Landscape Design SPD and Streetbook SPD, which are referenced within the draft Local Plan document. These SPDs form part of the overall Local Plan.

Does the Local Plan consider accessibility for people with mobility problems or disability impairment?

Policy T3 part F provides for accessibility for people with mobility problems or disabilities within an otherwise car free policy.

The draft Local Plan requires 5% of cycle parking spaces to be designated for a disabled 'blue badge' cyclists.

Is the Local Plan easily accessible and well served by public transport?

Islington is extremely well connected in terms of public transport. Many areas of Islington have a Public Transport Accessibility Level (PTAL) rating of 6a or 6b (the highest possible rating) meaning that the vast majority of the borough has good public transport connectivity and frequency of service.

However, the draft Local Plan recognises that public transport may not serve the needs of people with mobility, sensory or cognitive impairments and recognises that it is vitally

important that specific measures are put in place to enable that these users have easy access to the transport network.

Does the Local Plan minimise the need to travel especially by car (e.g. by cutting down trips as result of good access or incorporation of local facilities)?

Policy T1 part B states that the design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, must prioritise practical, safe and convenient access and use by sustainable transport modes, i.e. walking, cycling and public transport. Private vehicle use will be restricted in Islington as far as possible, as it is not sustainable and is a key cause of emissions and congestion.

Does the Local Plan incorporate measures to assist people who are car dependent (e.g. disabled Blue Badge holders etc.)?

Policy T3 part F provides for accessibility for people with mobility problems or disabilities within an otherwise car free policy.

The draft Local Plan requires 5% of cycle parking spaces to be designated for a disabled 'blue badge' cyclists.

Does the Local Plan incorporate traffic calming measures aimed at reducing and minimising road traffic injuries (e.g. use of HomeZones and 30 mph limit)?

Islington was London's first 20 MPH borough, and all borough controlled roads have a 20 MPH speed limit.

It should be noted that Islington's forthcoming Transport Strategy will respond to the Mayor's Vision Zero for road danger as stated in the Mayor's Transport Strategy.

Crime and community safety

Does the Local Plan incorporate effective security and street surveillance?

Policy T4A requires all development proposals to engage positively with the public realm and to ensure that development increases natural surveillance, including through the provision of adequate lighting;

Does the Local Plan incorporate a mix of uses to encourage activity in buildings and public spaces?

The draft Local Plan recognises that much of Islington's areas have mixed use, and has a range of policies throughout the plan, including in its area based policies, where mixed use is acceptable. The draft Local Plan also includes policies on, for example, adequate separation of uses within a mixed use development in order to enhance security.

Has the local community been engaged and consulted with regards to the Local Plan?

The draft Local Plan is subject to community consultation at the time of this HIA, and a Statement of Consultation will be produced.

Access to healthy food

Does the Local Plan facilitate local access to healthy food supply?

Paragraph 4.89 recognises that the protection of A1 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.

The draft Local Plan states that applications for A1, A3 and A5 relevant to food uses will be conditioned to achieve, and operate in compliance with, the Healthy Catering Commitment standard which will help provide easier access to healthier food across the borough.

Policy G4Ciii seeks to incorporate food growing opportunities as part of landscape design strategies.

Does the Local Plan avoid food being monopolised locally by a single provider?

Policy R6 protects existing small shops and resists the amalgamation of individual shop units incorporating A use classes cause unacceptable adverse impacts on the local environment, and this will to protect against monopolisation.

Does the Local Plan avoid contributing towards over concentration of fast food outlets in the local area?

Policy R8 resists overconcentration of a number of uses including fast food outlets, with further detail in an adopted supplementary planning document.

Does the Local Plan provide social enterprise support for local producers or retailers of nutritional and affordable food?

N/A. There is a diverse food offer in Islington.

Does the Local Plan safeguard loss of allotments, good agricultural land, city farms or farmers' markets from development?

The Local Plan includes protection for allotments and markets.

Does the Local Plan incorporate or facilitate access to healthy living centres?

N/A. There are no healthy living centres in Islington.

Employment and training**Does the Local Plan provide access to employment and training opportunities?**

Policy B1 sets out the Council's policies on new affordable business floor space, and states that development in the borough must provide jobs and training opportunities/support. Policy B2 sets out the Council's policies on new business floor space.

Policy B3 protects existing business floor space.

Policy B5 sets out the Council's requirements for jobs and training opportunities arising from development.

Does the Local Plan provide diversity in jobs for local residents?

Under Objective 2, the draft local plan recognises that Islington's economy needs to be inclusive and must work for everyone, working from the bottom up rather than 'trickle down'

from the top, providing new employment opportunities for all sections of the boroughs residents. Area policies set out priorities for employment opportunities in each location, reflecting local area characteristics.

Does the Local Plan provide childcare facilities?

The draft local plan does not make a specific reference to childcare facilities.

High quality early years and childcare provision results in a wide range of benefits to society, including higher levels of maternal employment and lower levels of child poverty. Islington's Childcare Sufficiency Assessment in 2015 noted that Islington had a wide variety and good supply of quality childcare for all ages, but that there were some gaps in provision. The Childcare Sufficiency Assessment did not note that buildings were needed.

Recommendation: That the Local Plan includes childcare facilities as a type of community infrastructure in paragraph 3.144

Does the Local Plan provide opportunities for local businesses?

Policy R1H protects Specialist Shopping Areas, such as the Fonthill Road and Camden Passage.

Policy SP3 protects industrial sites in Vale Royal/Brewery Road, which provides opportunities to local businesses.

Policy B1 provides for a range of affordable business floor space, which will support local businesses, particularly smaller businesses.

Social capital and social cohesion

Does the Local Plan contribute towards opportunities for social interaction?

The draft Local Plan provides a range of opportunities to support social interaction, including within housing developments (policy H4 F states that layout and design should accord strictly with tenure blind principles to maximise opportunities for social interaction); play provision (paragraph 3.155); town centres (paragraph 4.48); restaurants and cafés (paragraph 4.90); markets (paragraph 4.96); Green infrastructure (paragraph 5.1), etc.

Has the Local Plan addressed local inequalities?

The draft Local Plan is the spatial representation of Islington's corporate plan, "Building a fairer Islington" The corporate plan recognises that communities in Islington face deep social challenges, driven by deprivation and inequality. The corporate plan's objectives are shared with the draft Local Plan, and policies within the draft Local Plan respond to those objectives.

Does the Local Plan advance mixed communities by having a mix of tenures and uses?

The draft local plan recognises that the creation and maintenance of mixed and balanced communities will be a key part of ensuring safety and that this depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities.

Policy H1 states that Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities which are economically, environmentally, and socially healthy and resilient. All new housing development should be fully integrated within, and relate positively to, its immediate neighbours and locality.

Throughout the draft Local Plan relevant policies and text support mixed communities, for example ensuring that homes are tenure blind.

Area based policies within the draft Local Plan reflect the unique aspects of various parts of Islington.

Does the Local Plan incorporate community facilities?

Policy SC1A-D set out the Council's requirements for community facilities under social infrastructure, and policy SC2 treats play space as a form of social infrastructure. Housing policies contain appropriate provisions for communal spaces in developments.

Does the Local Plan provide voluntary sector opportunities?

Social and community infrastructure contributes to sustainable communities by providing venues for a wide range of activities and services, including accommodation for Islington's active voluntary and community sector. Under policy SC1A, the council will support proposals to provide new and/or extended social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment against all relevant Local Plan policies

Does the Local Plan avoid community severance (by major roads, large commercial schemes etc.)?

The draft Local Plan recognises how roads etc. contribute to community severance, for example paragraph 2.6 describes the A1 Holloway Road as a heavily trafficked route which creates a major barrier dividing the Town Centre and envisages over the long term removing the gyratory may provide the opportunity to revise the road layout.

All new developments are required to incentivise walking, and policy T2Div in particular requires safe, convenient and continuous routes for pedestrians that follow desire lines and form networks, which helps to ensure that community severance is avoided.

Resource minimisation

Does the Local Plan make best use of existing land?

The draft Local Plan is mindful of the shortage of land for development in the Borough, and has a number of policies in place, for example resisting land-intensive care homes in favour of homes for vulnerable and older people to live in the community, consideration of the optimal use of the former Holloway Prison site, etc.

Does the Local Plan encourage recycling (including building materials)?

Policy H4Cii requires developers to consider how recycling and waste arising from the occupation of the development will be stored, collected and managed. Explanatory text describes how recycling and refuse stores, bins, post boxes and other communal facilities

should be located conveniently within the development, to encourage uptake of recycling, and should be wheelchair accessible.

Through the draft Local Plan the council promotes a circular economy approach to design and construction to keep products and materials in use for as long as possible and to minimise construction waste

Does the Local Plan incorporate sustainable design and construction?

Policy S1A-A sets out the Council's policy on sustainable design and construction, including zero carbon development, energy efficiency, water management/drainage/flood risk, air quality etc.

Policy S10 provides for reducing construction waste.

Are waste management facilities incorporated within the Local Plan?

Waste management falls under the North London Waste Plan - a joint waste plan together with six other boroughs within the North London Waste Authority area. The North London Waste Plan is part of the overall Local Plan suite.

Policy ST2 sets out policy on waste and recycling facilities provided as part of new developments.

Have Environmental Health, Environment Agency or Health Protection Agency been informed about potential hazards related to the Local Plan?

N/A

Climate change

Does the Local Plan incorporate renewable energy?

Policy C2D requires all development proposals must maximise energy efficiency and minimise on-site carbon dioxide emissions in accordance with the energy hierarchy, including the generation, storage and use of renewable energy on-site wherever possible.

Does the Local Plan provide a sustainable approach to transport?

Policy T2 sets out the Council's requirements for sustainable travel, including walking, cycling and public transport., whilst policy T3 requires all developments to be car free (with appropriate provision for those who would otherwise find mobility difficult).

Does the Local Plan maintain or enhance biodiversity?

Policy G4 requires all developments to protect, enhance and contribute to the biodiversity value and of the development site and surrounding area, including protecting and enhancing connectivity between habitats.

Has the Local Plan been flood risk assessed?

Policy S8 details the Council's approach to flood risk minimisation, informed by the Level 1 Strategic Flood Risk Assessment (SFRA), which reviews all sources of flooding in the borough. The policy requires site-specific flood risk assessments to assess the risk of flooding to and from a proposed development in detail, focusing particularly on surface water flooding.

Does the Local Plan incorporate sustainable drainage systems to safely deal with surface runoff?

Under Policy S9E all developments are required to demonstrate that appropriate Sustainable Urban Drainage Systems have been implemented in accordance with the drainage hierarchy to ensure that surface water runoff rates and volumes entering open space are predictable and water at the surface is clean and safe

Policies S2Biii and G4Cv require the incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design.

Other

Paragraph 7.4 includes the sentence "Cycling has significant public health benefits, both strategic – for example, by not exacerbating already poor air quality – and individual – for example, by promoting healthy physical activity."

There is good evidence that The health benefits of cycling and walking outweigh the harm from inhaling air loaded with traffic fumes in all but the world's most polluted cities (e.g. Tainio M. et al. Can air pollution negate the health benefits of cycling and walking? Preventative Medicine 2016;87: 233-236). This is a key public health message that should be included in the Local Plan.

Recommendation: add text to paragraph 7.4: "For most people, evidence shows that the health benefits of active travel outweigh the disbenefits of poor air quality at levels typically seen in Islington.

Appendix 7b: Health Impact Assessment: Council Response

Section/policy/paragraph number (separate line for each comment)	Respondent name	Summary of comments	LBI response
Policy H2: New and existing conventional housing	Camden and Islington Public Health	Policy H2D should specifically state that all new and converted conventional residential development should meet the housing tenure priorities in Table 3.2 in addition to house size.	This is unnecessary; policy H3 Part H covers tenure split requirements.
Policy H3: Genuinely affordable housing	Camden and Islington Public Health	The local plan should give more clarity on what the Council considers "genuinely affordable" in relation to housing.	The council acknowledges that the term 'genuinely affordable housing' is not currently defined (at least explicitly). A definition will be provided in the next iteration of the Local Plan.
Policy H1: Thriving communities, Part D	Camden and Islington Public Health	The Local Plan should state that the communal / public spaces around residential developments should encourage residents to interact with the wider world by providing safe, pleasant spaces where people can interact.	This is unnecessary; there are a range of policies, stemming from the vision and objectives, that encourage mixed and balanced communities (particularly in terms of open spaces), for example H4, H5 and G1
N/A - general comment	Camden and Islington Public Health	The draft Local Plan is the spatial expression of Islington's corporate plan 2018-2022, Building a fairer Islington. As such, its policies are focused on reducing inequalities in the borough. The Camden and Islington Public Health response, which takes the form of a	General support noted. Aspects of the HIA will be used to inform the Integrated Impact Assessment of the Local Plan.

Section/policy/paragraph number (separate line for each comment)	Respondent name	Summary of comments	LBI response
		<p>Health Impact Assessment, has assessed the draft Local Plan against the wider determinants of health: environmental factors that impact on everybody's health and wellbeing.</p> <p>Overall, 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.</p> <p>The Council's objectives as set out in the corporate plan are clearly reflected in the draft Local Plan and planning policies respond positively to these objectives.</p> <p>The response makes 13 recommendations which aim to strengthen the draft Local Plan and support its objectives further; these are addressed separately.</p>	
Policy SC1: Social and Community Infrastructure	Camden and Islington Public Health	<p>The Local Plan should directly reference the North London Partners Strategic Estates Strategy and the Haringey and Islington Wellbeing Partnership's strategic estates strategy.</p>	<p>The Council does not consider including these references is necessary for the Local Plan.</p>
Policy SC1: Social and Community Infrastructure	Camden and Islington Public Health	<p>Where developers include proposals for new, relocated, or loss of primary or secondary health care premises, the Local Plan should require the developer to show evidence of engagement with the NHS Islington Clinical Commissioning Group and the relevant NHS Health Trust (where the premises is owned by an NHS trust), in addition to the service provider or providers. For community pharmacy, developers should be aware of and consult the local Pharmacy Needs Assessment. Dental and ophthalmic services are commissioned by NHS England and developers should engage with NHS</p>	<p>The Council considers that where relevant there may need to be engage with NHS clinical commissioning group where existing social and community facilities which are relevant for future commissioning are being considered for a change of use. Suitable reference will be added in relation to the requirement regarding the undertaking of a Community Impact Assessment.</p>

Section/policy/paragraph number (separate line for each comment)	Respondent name	Summary of comments	LBI response
		England where dental or ophthalmic services are impacted.	
Introduction, paragraph 1.8	Camden and Islington Public Health	Paragraph 1.8 of the draft Local Plan should be clear that the National Planning Policy Framework supports local planning policies that consider the health and wellbeing of the population.	Paragraph 1.8 is setting out the context within which the Local Plan is to consider from a procedural point of view the NPPF therefore it is not necessary to reference in this paragraph the support the NPPF provides to considering health and wellbeing needs of the population.
Policy SC1: Social and Community Infrastructure, paragraph 3.144	Camden and Islington Public Health	For clarification the paragraph 3.144 should include post-16 education as social infrastructure	Amend as requested - up to 18 is now statutory requirement for local authority to meet need.
Policy SC1: Social and Community Infrastructure, paragraph 3.144	Camden and Islington Public Health	That the Local Plan includes childcare facilities as a type of community infrastructure in paragraph 3.144.	The list set out in paragraph 3.144 is not intended to be an exhaustive list of social infrastructure and already includes nurseries; however, an amendment will be made to add reference to childcare facilities such as nurseries. Further definition of social infrastructure will be set out in the glossary.
Vision and objectives, paragraph 1.52	Camden and Islington Public Health	The draft Local Plan should be clear that the health of Londoners is, to a large extent, determined by the environment in which they live.	Whilst the role of planning is important in addressing and improving the environment within people live in it is also important to acknowledge that the choices people make are not always in response to the environment within which they live and are influenced by a wider range of factors.
Vision and objectives, paragraph 1.52	Camden and Islington Public Health	The draft Local Plan should highlight the inequalities in life expectancy between the most and least deprived areas of Islington in order to encourage a focus on health and wellbeing particularly in the most deprived areas.	The Council considers that the detail set out in paragraph 1.54 highlights this issue clearly. Deprivation is spread throughout the borough and development opportunities will not always correspond with deprivation. However from the point of view of equality the opportunity to improve health and wellbeing should be spread throughout the borough irrespective of deprivation.

Section/policy/paragraph number (separate line for each comment)	Respondent name	Summary of comments	LBI response
Policy SC3: Health Impact Assessment	Camden and Islington Public Health	That major developments are required to submit a health impact screening assessment at pre-application stage.	Part A requires HIA as early as possible in development process; we will clarify ST noting that pre-apps should have regard to HIA and we encourage submission of draft screening at pre-app stage.
Policy SC3: Health Impact Assessment, paragraph 1.67	Camden and Islington Public Health	That the draft Local Plan clarifies that health impact assessments should be proportionate to the size of the development and not limited to access to health services.	The supporting text will be amended to clarify this.
Policy B2: New business floorspace	Camden and Islington Public Health	Policy should require new business floor space to promote health and wellbeing through good design.	Health is a fundamental part of the draft plan. It is embedded within the vision and objectives and is a key consideration in a number of policies. It is not considered necessary to include a general reference here.

Full Council draft //A June 2019

Appendix 8: Habitats Regulation Assessment Screening of Islington's Local Plan

Full Council draft LIA June 2019



ISLINGTON

Habitats Regulation Assessment (Habitats Directive 92/43/EEC) screening of Islington's Local Plan

May 2019

Introduction

Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are subject to Habitats Regulations Assessment (HRA). The Directive seeks to provide legal protection of habitats and species that are of European significance. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. European sites are known as the Natura 2000 network:

'The Natura 2000 network provides ecological infrastructure for the protection of sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. These sites which are also referred to as European sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS) (there are no OMS designated at present).'

Article 6.3 of the Habitats Directive states that, *'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives... the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.'*

The HRA is a multi-stage process and planning authorities need to undertake a screening on plans that are likely to have a significant effect on European sites prior to their adoption in order to fulfil the requirements of the Directive in respect of the land use planning system.

The Habitats Regulation Assessment Process⁴

The process is made up of 4 tasks:

- Stage 1: Screening for likely significant effects;
- Stage 2: Appropriate Assessment;
- Stage 3: Assessment of alternative solutions;
- Stage 4: Assessment where no alternative solutions exist and where adverse impact remains

The scope of the work should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. The assessment should be confined to the likely significant effects on the internationally important habitats and species for which the site is classified.

At the screening stage, a plan should be considered 'likely' to have an effect if the council (the 'competent authority') is unable on the basis of objective information to exclude the possibility that it could have significant effects on the European sites, either alone or in combination with other plans or projects. Effect will be 'significant' if it could undermine the site's conservation objectives. The 'test of significance' can generally be interpreted as any negative effects that are not negligible or inconsequential; 'likely' is interpreted as a simple question of whether the plan or project concerned is capable of having an effect. It is recommended that HRA is undertaken in conjunction

⁴ Assessment of plans and projects significantly affecting Natura 2000 sites Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC
http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

with the Sustainability Appraisal (SA) as part of the iterative process, however the two are separate processes with their own legal requirements. The screening would need to be reconsidered prior to adoption depending on any changes made as part of the examination process.

Recent case law set by People Over Wind & Sweetman v. Coillte Teoranta (C-323/17) (and other cases) has ruled that you cannot take into account mitigation intended to reduce significant affects at the screening stage. Mitigation can only be taken account of as part of appropriate assessment, the next stage in the process as otherwise there is the risk that this appropriate assessment stage is circumvented, which is the proper stage to fully consider significant effects. The HRA assessment of Islington Local Plan includes reference to mitigation but this is not intended as specific mitigation to address significant effects on HRA as no significant effects on HRA are identified. Instead mitigation is referenced as example of how the Local Plan policy is reducing any effects no matter how small the effects are on the conservation purposes of the protected sites.

The scope of this report

A screening assessment was undertaken for the Islington Core Strategy in 2011 which did not identify any significant effects. This report has taken that previous report repeating the screening assessment, covering stage 1: likely significant effects, described above. It does the following:

1. Identifies European sites within and outside of the plan area which would be potentially affected, as well as describing the characteristics of these sites, their conservation objectives and other relevant plans or projects.
2. Identifies whether the plan policies are likely to have a significant effect on these European sites ('screening') in order to determine whether the subsequent steps of AA are required. The significance of effects is determined in relation to the specific features and environmental conditions of the protected site and considers the probability of the impact; the duration, frequency and reversibility of the impact. Where effects are considered to be significant, an appropriate assessment of the implications for the site should be undertaken.

The report will focus on the potential impacts of Islington's Local Plan.

Islington in relation to European Sites

There are no Natura 2000/Ramsar sites within the plan area (the London Borough of Islington). However, policies relating to Islington may have an impact on sites within a wider area. The main factor which is likely to cause the plan to have an impact on any Ramsar site is the site's proximity to the plan area. There are not considered to be any other factors which would lead to a particular impact of the plan, which would not be picked up using a proximity indicator. For the purposes of this screening assessment, sites within approximately a 15 km radius of Islington are considered. It is considered that the plan is unlikely to have any measurable effects on sites beyond this due to the absence of reasonable impact pathways. The following sites are within 15km:

- Lee Valley Park Ramsar site and SPA
- Epping Forest SAC
- Richmond Park SAC
- Wimbledon Common SAC

Description of the Lee Valley SPA and Ramsar sites

The Lee Valley SPA is located to the north-east of London, where the valley contains a series of wetlands and reservoirs. The Lee Valley comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. The area is a designated Ramsar site and also a designated SPA. The area also comprises the Sites of Special Scientific Interest (SSSIs) at Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits, and Walthamstow Reservoirs.

SPA status was granted in 2000 because of the site's European ornithological interest. The Lee Valley supports internationally important numbers of wintering gadwall and shoveler and nationally important numbers of several other bird species. The site also contains a range of wetland and valley bottom habitats, both man-made and semi-natural, which support a diverse range of wetland fauna and flora. The site supports the nationally scarce plant species whorled water-milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate (*Micronecta minutissima*) (a water-boatman).

Parts of Lee Valley lie within 3km of Islington

Epping Forest

Epping Forest Special Area of Conservation (SAC) is a 1605 hectare site designated in 2005 in Essex which is predominantly made up of broad-leaved deciduous woodland with dry grassland and steppes and some inland water bodies.

Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss *Zygodon forsteri*. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.

Epping Forest is a large woodland area in which records of stag beetle *Lucanus cervus* are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.

Parts of Epping Forest lie within 6.5km of Islington

Richmond Park

Richmond Park is also a designated SAC, made up of a mix of heath, scrub, maquis and garrigue and phrygrana, broad-leaved deciduous woodland, improved grassland and dry grassland and steppes.

Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.

Parts of Richmond Park lie within 16km of Islington

Wimbledon Common

Wimbledon Common is a designated SAC, made up primarily of a mix of dry grassland/steppes and broad leafed deciduous woodland.

Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy *et al.* 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.

Parts of Wimbledon Common lie within 15km of Islington

Effects of Islington's Local Plan policies

Possible pathways of impact leading to likely significant effects from Islington's Local Plan on the above European sites are considered in this screening assessment below. Assessment of the Local Plan is taken as the whole plan and policies contained in it. Impacts are mainly likely to be due to increased levels of development which result in increased visitor pressure, increased air pollution and impacts on water resources. Increased levels of development are ultimately led by housing targets set by the GLA, and will be influenced and supported by policies within Islington's Local Plan. Other policies, including those aiming to mitigate the impacts of growth, have also been considered in the assessment below.

Table 1: Screening assessment of Islington's Local Plan

Possible impact on European sites	Probability, likely duration, frequency and reversibility of the impact	Significant effect on protected habitats/species?
Impacts of linkages between the sites by water, including water quality issues	Rivers or other water bodies (which are predominantly underground within Islington) primarily run (where they flow) from the borough into the Thames and therefore would not impact on the above European sites. The Regents Canal joins the River Lee just before it flows into the Thames; however this is some way downstream of the Lee Valley Ramsar/SAC sites and thus is not likely to have an impact on them. Impacts on groundwater in Islington itself are likely to be minimal and thus would also be unlikely to have any effect on the European sites, in particular on important species and habitats within them.	N
Increased visitor access	The increased population in Islington which is supported by Local Plan policies may lead to increased visitor numbers at the European sites which would put additional pressure on them and may affect the range of important species and habitats at the sites. However, increases in visitor numbers are considered unlikely to	N

	<p>be significant given the distance of the sites from Islington. Impacts of visitor access could also be controlled or mitigated against to some extent by management practices at the sites.</p> <p>Surveys of users of Epping Forest by City of London Corporation have identified that a large proportion of those accessing the forest live within 2km and visit on a regular daily or weekly basis evidencing it is under most pressure from visits from local residents. Therefore visitors arising from new development from Islington are considered likely to be both few and to visit infrequently therefore are not judged to be significant.</p>	
Light or air pollution	<p>Light pollution increases as a result of increased development in Islington would be unlikely to have any impact on the European sites, particularly given the high levels of light pollution which exist across London currently. Possible impacts on the sites due to deteriorating air quality in Islington would be possible as a result of increased traffic, particularly as air quality is an issue affecting Epping Forest SAC; however, as described below, policies within the Local Plan support an increase in use of more sustainable transport modes and all development is car free so would not encourage increases in traffic. Therefore it is unlikely the protected habitats and species at the sites would be impacted.</p>	N
Spread of pest species	Policies within the Local Plan would be unlikely to have any impact on the spread of pest species.	N
Increased traffic	The European sites may be impacted as a result of poorer air quality in Islington as a result of increased traffic. However the Local Plan support an increase in use of more sustainable transport modes and all development is car free so would not encourage increases in traffic. There would however still be minor increases in traffic associated with development (deliveries, servicing and disabled parking) but it is unlikely that any minor increases in traffic as a result of development would be significant enough to impact on the European sites, and in particular on the important species or habitats at these sites.	N

Flooding	Increased levels of development may increase the chance of surface water flooding in Islington although policy seeks to manage surface water runoff as close to its source as possible. Most of Islington is already covered in hard surface therefore this impact is unlikely to be significant, indeed new development should reduce overall rates of surface water runoff. It is also unlikely that any flooding incident in Islington would impact on any of the protected habitats and species at the European sites.	N
Increased water use from new development contributing to water stress within the region which may have a negative impact on water availability within the sites, for example water levels of the River Lee	The combination of climate change and increased new development is likely to increase water stress in the south east of England. However, the impact of new homes in Islington is likely to be minimal within the wider context, particularly given water efficiency policies within the Local Plan which will require all new homes and other development to be water efficient. Water companies are also planning now to try and minimise the impact any increase in water demand will have on sites of nature importance as well as the wider environment. Policy ensures adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has been engaged as part of the Local Plan process.	N
Increased CO2 emissions from new development may contribute to climate change which may have a negative impact on the sites	It is likely that climate change will have a negative impact on the sites, for example as drought becomes more likely and certain pests and diseases increase. However, the impact of CO2 emissions from Islington as a result of the Local Plan are likely to have a minimal impact on these sites, particularly as the Sustainable Design policies offer strong mitigation for such impacts.	N
Improvement of quantity and quality of accessible open space in the borough	It is possible that policies within Islington's Local Plan which promote improvement to the quantity and quality of accessible open space in the borough may alleviate visitor pressure on the European sites by providing local recreation facilities. This could reduce potential negative impacts on the sites as a result of increased local population and thus increased visitors to the European sites from Islington although the number	N

	of visitors from Islington to these sites is considered minimal and infrequent.	
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In summary, the effect of Islington's Local Plan policies on the European sites is not considered to be 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 contribution of Islington's policies or site allocations to any impacts which could be judged minor, but are already mitigated with strong policies included within the Local Plan for example which support more sustainable transport choices and restrict the use of the car, ensure an integrated approach to water management and limit developments contribution to air pollution and improve local air quality as far as possible.

Integrated Impact Assessment of the Local Plan

An Integrated Impact Assessment incorporating Sustainability Appraisal has been carried out on the Local Plan as part of the iterative process to assessment. As part of this process the range of possible negative environmental impacts the Local Plan may have, many of which are mentioned above, have been assessed and mitigation measures incorporated within the document.

Conclusion

The effects of the Local Plan policies upon the European sites have been assessed as not being significant via the screening report therefore it is not necessary to carry out a full appropriate assessment. However, in order to effectively manage the impacts attributed to the Local Plan policies described above, the Sustainability Appraisal of the Local Plan will continue to evaluate the impacts of any further changes to the document.

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