

Resident Impact Assessment

Draft Local Plan modifications for consultation

Service Area: Environment and Regeneration

1. What are the intended outcomes of this policy, function etc?

Each Local Planning Authority (LPA) is required to produce a Local Plan setting out the strategic priorities for its area, opportunities for development and clear policies on what will or will not be permitted and where. Islington's current Local Plan includes the Core Strategy (2011), Development Management Policies, Site Allocations and Finsbury Local Plan (all 2013) Development Plan Documents (DPDs). The current Local Plan sets out strategic policies to guide the future development of the borough, together with non-strategic policies that are used to make decisions on planning applications. The Local Plan provides the basis for making decisions on planning applications, and both it and the evidence behind it need to be kept up-to-date to ensure that it can help the Council to better deliver on its objectives including through its Development Management functions. In light of this and informed by an up to date evidence base, new and revised policy approaches in the draft Local Plan have been developed to respond to changing development trends whilst recognising national and regional policy changes where relevant to Islington in order to continue to address the Council's priorities.

The key policy areas are summarised briefly below:

Housing: Delivery of genuinely affordable housing is a key strategic priority. Strategic policy expects 50% of all housing delivered to be affordable. This is to be achieved through a specific on-site target of 45% from developments without public subsidy, alongside policy which strongly encourages the use of public subsidy to help schemes achieve 50% on-site delivery (or more). Incentives including viability review mechanisms will also be used as part of policy to ensure developers try to get subsidy to achieve 50% on-site delivery.

The affordable housing tenure split will remain at 70% social rented and 30% intermediate rent to reflect the fact that maximising social rented housing remains an absolute priority. The tenure split reflects a need to contribute to delivering mixed and balanced communities. London Living Rent, a new form of tenure recently introduced by the Mayor of London will be promoted as the priority for the 30% intermediate tenure, which will provide additional affordable housing supply for those on moderate incomes, including key

workers, who are unable to obtain social housing and cannot afford market housing in the borough.

Islington's housing target, which is set out in the Mayor's draft London Plan, has decreased from 1,264 to 775 homes per annum, reflecting the scarcity of developable land in the borough. There are a number of Council policies designed to resist the development of specialist forms of housing (student accommodation, purpose built private rented sector housing and large-scale HMOs), primarily because these forms of housing take up scarce land supply and/or do not enable effective delivery of genuinely affordable housing. The need to provide housing for older people will be met primarily through conventional housing designed to be adaptable with different levels of care provided in people's homes rather than provision of specialist accommodation such as extra care housing.

Delivering high quality housing is a key priority with minimum standards for internal space, accessibility & inclusivity, floor to ceiling heights, private outdoor space, noise and other amenity considerations. All new housing development will be required to be 'tenure blind', where different tenures are indistinguishable from one another.

Employment: Over the period to 2036, evidence suggests that up to 50,500 extra jobs will need to be accommodated in Islington, most of which will be office based jobs. This requirement equates to 400,000sqm of office floorspace. Delivering this level of floorspace will be very challenging given competing development needs and the lack of land. In order to meet this need as far as possible, employment policies are seeking the maximisation of different types of business space - such as offices, light industrial space and SME space – within specific designated employment sites.

The Central Activities Zone (which is predominantly covered by the Bunhill and Clerkenwell AAP area) is expected to deliver the greatest uplift in office floorspace in the borough. To enable this, additional housing within the Bunhill and Clerkenwell area will not be actively promoted (with some site specific exceptions). Across the rest of the borough, existing employment land will be strongly protected.

Additional Locally Significant Industrial Sites (LSIS) have been designated in order to better protect important remaining small clusters of industrial uses across the borough. The Vale Royal/Brewery Road LSIS, the largest concentration of industrial uses in Islington, has its own spatial strategy to guide development in the area which reflects its particular importance to the local and central London economy. This area is considered suitable for the intensification of industrial uses, to meet the needs of small and medium size businesses.

10% affordable workspace, at peppercorn rent for 20 years, will be required from major development proposals (development of more than 1,000sqm) within various designated employment areas across the borough. On very large proposals in high value areas - such as the south of the borough - affordable workspace could be sought in perpetuity where viable.

Retail: The retail function of the four town centres of Angel, Nag's Head, Archway and Finsbury Park will be supported with a more focused retail core termed the 'primary shopping area', where a minimum level of retail uses will be maintained. The boundaries of these areas have been informed by detailed retail surveys. Outside the retail core a more

flexible approach will be implemented to allow change of use from shops to other town centre uses, for example a restaurant, pending assessment of other considerations including amenity impacts. This more flexible approach is a response to and reflects changes to retail behaviour and the way the retail industry operates, partly driven by the rise in online shopping.

Markets and the Camden Passage and Fonthill Road specialist shopping areas will continue to be strongly protected. Residential uses at ground floor level will be resisted in town centres and local shopping areas, due to the potential adverse impact on the retail function of these areas. Existing policy on hot food takeaways and betting shops will be strengthened with additional controls introduced in town centres and local centres. A new policy supporting meanwhile/temporary uses will be introduced.

Culture, night-time economy, hotels and leisure: New cultural quarters have been identified in Angel, parts of Clerkenwell/Farringdon and Archway. The night time economy, which includes a diverse range of uses including music venues, is supported with introduction of 'the agent of change' principle; this will help ensure that existing commercial uses are protected from complaints from new neighbouring residential development. Pubs are provided stronger protection against conversion, based on their social value, heritage merits and/or contribution to night time economy. A stronger protection against development of new hotels is introduced, focusing new hotels only on allocated sites or intensification of existing hotels subject to other constraints, and resisting their development outside these locations.

Design, heritage and tall buildings: Heritage policy has been revised in line with the NPPF, with additional clarity to reflect Islington's rich architectural history whilst also supporting innovation and architectural diversity. A detailed evidence base study of the local Islington character is being produced, to identify a number of character areas across the borough and provide basis for potential further supplementary design guidance for these areas. A policy for basements has been introduced which strengthens the current approach.

The draft Local Plan continues the current approach, which restricts buildings taller than 30 metres throughout the borough other than on specifically identified sites. Detailed evidence has been prepared to identify locations which are potentially suitable for tall buildings, to inform the Local Plan review. A number of potentially suitable sites have been identified in Archway, Finsbury Park, Nag's Head / Lower Holloway, Kings Cross fringe and around Old Street roundabout. Maximum heights have been identified for each site with design considerations set out in site allocations. Any proposals for tall buildings on the sites in question will have to satisfy a rigorous criteria-based policy which considers visual impact, functional impact and environmental impact of the proposal. This includes assessment of impacts on existing local views and strategic views, and daylight and sunlight impacts on properties in the surrounding area.

Sustainability: Delivering a sustainable built environment is crucial for Islington's long term sustainability and prosperity. The following changes to sustainability standards are proposed in the draft plan:

- New Fabric Energy Efficiency Standard for residential development to reduce carbon emissions.
- Retention of the carbon offset charge, based on updated information from the London Plan.

- Updated requirements on drainage to reduce flood risk.
- New separate policy on green roofs and new policy on adaptive design (circular economy).

Health, social and community infrastructure: Uses such as hospitals, doctors' surgeries, nurseries, schools, leisure centres, libraries and community centres are vital for the creation and maintenance of strong, vibrant and healthy communities. These facilities will be strongly protected as they are in the current Local Plan. However, the draft Local Plan allows for recognised public sector bodies to justify loss of facilities through provision of wider estate rationalisation plans, where these plans clearly demonstrate that overall provision within a specified area will not be diminished. An additional requirement to produce a Community Impact Assessment will also ensure that loss of facilities is only acceptable where applicants mitigate/prevent adverse impacts for their users.

Transport: The existing approach to car free development has been maintained.

Open space: Islington has one of the smallest amounts of open space per person in England and its urban and densely populated character means there is great deal of pressure on the borough's existing green spaces to perform multiple functions, and limited opportunity to create large new green spaces. Public open spaces and sites of nature conservation will retain their strong protection. Redevelopment of semi-private amenity spaces such as those on council estates will encourage re-provision in the first instance but a high quality proposal which results in some net loss may be acceptable. Additional policy on green infrastructure includes a requirement for major development to consider an urban greening factor in line with the draft London Plan, ensuring that a minimum level of green space is included as part of a development.

Bunhill and Clerkenwell Area Action Plan (formerly known as the Finsbury Local Plan): The Finsbury area (covering Bunhill and Clerkenwell wards) features a variety of uses often in close proximity to one another; significant competing development pressures; a unique historic character of the built environment and copious heritage assets. The Bunhill and Clerkenwell AAP is a fine-grain policy approach for this area, produced in response to these issues. Changes inside and outside the Bunhill and Clerkenwell AAP area necessitate a review of both the policy approach and related site allocations to ensure they remain up to date. The principal change is policy to prioritise business floorspace and require maximisation of such space across the area, rather than just in the most prominent commercial locations. Additional housing within the Bunhill and Clerkenwell AAP area will not be actively promoted (with some site specific exceptions). Neighbourhood policies, which provide strategic policies for various areas across the Bunhill and Clerkenwell AAP area, will be retained with some amendments to the area boundaries and policies.

Site allocations: Site allocations provide site specific policy for key sites to help to secure specific land uses, meet identified development needs (e.g. for housing and different types of business space) and secure the infrastructure required to support growth. Site allocations bring certainty about what will come forward on different sites. Many existing site allocations from the current Local Plan are proposed to be retained, though some need refinement in light of changed circumstances. There is also a need to identify additional sites for housing, business and other uses. Major new development opportunities likely to come forward during the lifetime of the draft Local Plan include Moorfields Eye Hospital, Holloway Prison and potentially Pentonville Prison.

2. Resident Profile

It is not possible to ascertain an exact service user profile as per the table below. The draft Local Plan is a long term plan which has potential impacts on many of the boroughs residents over time. Specific impacts could be determined at planning application stage.

The draft Local Plan will be subject to Integrated Impact Assessment (IIA), a combined approach to environmental, social and economic assessment which will also consider equality impacts. The IIA is considered as part of the approval process for the Local Plan through independent examination by a planning inspector. A draft IIA scoping report, including baseline demographic information, has been produced to support earlier drafts of the Local Plan -

<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/information/adviceandinformation/20182019/20181203integratedimpactassessmentscopingreportislingtonlocalplanreviewnov2018.pdf>

		Affected profile*	Service User profile
		Total: 206,285	Total:
Gender	Female	51%	N/A
	Male	49%	N/A
Age	Under 16	32,825	N/A
	16-24	29,418	N/A
	25-44	87,177	N/A
	45-64	38,669	N/A
	65+	18,036	N/A
Disability	Disabled	16%	N/A
	Non-disabled	84%	N/A
Sexual orientation	LGBT	No data	N/A
	Heterosexual/straight	No data	N/A
Race	BME	52%	N/A
	White	48%	N/A
Religion or belief	Christian	40%	N/A
	Muslim	10%	N/A
	Other	4.5%	N/A
	No religion	30%	N/A
	Religion not stated	17%	N/A

*Census 2011 information

3. Equality impacts

The Equalities Impacts of the draft Local Plan policies were assessed as part of the Integrated Impact Assessment which accompanies the plan. An update to the IIA has been carried out which includes an assessment of the proposed modifications.

With reference to the [guidance](#), please describe what are the equality and socio-economic impacts for residents and what are the opportunities to challenge prejudice or promote understanding?

- Is the change likely to be discriminatory in any way for people with any of the protected characteristics? The draft Local Plan policies, taken together and including proposed modifications, will not be discriminatory for people with any of the protected characteristics.
- Is the proposal likely to have a negative impact on equality of opportunity for people with protected characteristics? Are there any opportunities for advancing equality of opportunity for people with protected characteristics? Overall there are unlikely to be negative impacts for those with protected characteristics in relation to equality of opportunity. The draft Local Plan is underpinned by a vision and objectives which seek to reduce inequalities. The draft Local Plan policies, taken together and including proposed modifications, will help to achieve the vision and objectives.
- Is the proposal likely to have a negative impact on good relations between communities with protected characteristics and the rest of the population in Islington? Are there any opportunities for fostering good relations? The draft Local Plan, including proposed modifications is unlikely to have a negative impact on good relations between communities with protected characteristics and the rest of the population of Islington. The draft Local Plan promotes mixed and balanced communities where people with all protected characteristics can live alongside one another without barriers, and ensures that new development is permeable and not gated. The draft plan objectives aim to tackle inequalities which will assist with building cohesive and resilient local communities.
- Is the proposal a strategic decision where inequalities associated with socio-economic disadvantage can be reduced? The Local Plan, when adopted, will be a strategic decision. This RIA relates to the draft Local Plan and proposed modifications. The draft Local Plan is still required to complete the independent examination process before it can be adopted. As noted above, the intention of the draft Local Plan is to address inequality within the boundaries of national and regional planning policy. For example a key priority of the draft Local plan is the delivery of genuinely affordable housing with a strategic target of 50% of all new housing developed in the borough to be affordable. This is intended to go as far as possible to address the serious affordability issue for housing in the borough, although it is important to note that the ultimate delivery of housing is something that is largely outside the council's control, particularly on private development sites.

4. Safeguarding and Human Rights impacts

a) Safeguarding risks and Human Rights breaches

Please describe any safeguarding risks for children or vulnerable adults AND any potential human rights breaches that may occur as a result of the proposal? Please refer to **section 4.8** of the [guidance](#) for more information.

There are no safeguarding risks for children or vulnerable adults, and there are no potential breaches to human rights related to the draft Local Plan.

If potential safeguarding and human rights risks are identified then please contact equalities@islington.gov.uk to discuss further:

5. Action

How will you respond to the impacts that you have identified in sections 3 and 4, or address any gaps in data or information?

For more information on identifying actions that will limit the negative impact of the policy for protected groups see the [guidance](#).

No negative impacts where raised, as such, no actions are required.

Action	Responsible person or team	Deadline

Please send the completed RIA to equalities@islington.gov.uk and also make it publicly available online along with the relevant policy or service change.

This Resident Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Staff member completing this form:

Signed: Jonathan Gibb

Date: 11/01/2021

Head of Service or higher:

Signed: Sakiba Gurda

Date: 12/01/2021